



**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/24/011/FUL</b>	<b>Date Application Registered:</b>	<b>09 February 2024</b>
<b>Applicant:</b>	<b>Mr Alastair Martin Duchy Of Cornwall 10 Buckingham Gate London SW1E 6LA</b>	<b>Agent:</b>	<b>Mr Nicholas Lowe Llewellyn Harker Lowe Home Barn Gattrell Steway Lane Northend Bath BA1 8EH</b>

**Site address:** Land to South of Pungies Lane, Pungies Lane Telegraph St Mary's Isles of Scilly  
**Proposal:** Construction of 4 no. single storey terraces consisting of 10 no. new dwellings, construction of bin and cycle store, formation of new access and associated landscaping works and drainage works (Major Development)

In pursuance of their powers under the above Act, the Council hereby **PERMIT** the above development subject to the **Section 106 Legal Agreement**, to be carried out in accordance with the following Conditions:

- C1** The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
Reason: In accordance with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).
- C2** The development hereby permitted shall be carried out in accordance with the approved details only including:
- Plan 1 REV A Location Plan, drawing number 4340-01 Dated Jan24
  - Plan 2 REV E Proposed Site Roof Plan, drawing number 4340-10 Dated Dec23
  - Plan 3 REV A Proposed Site Layout, drawing number 4340-11 Dated Dec23
  - Plan 4 REV B Proposed Terrace A, drawing number 4340-20 Dated Jan24
  - Plan 5 REV B Proposed Terrace B, drawing number 4340-21 Dated Jan24
  - Plan 6 REV B Proposed Terrace C, drawing number 4340-22 Dated Jan24
  - Plan 7 REV B Proposed Terrace D, drawing number 4340-23 Dated Jan24
  - Plan 8 REV B Proposed Bin and Cycle Store, drawing number 4340-24 Dated Jan24
  - Plan 9 REV B Proposed Site Sections, drawing number 4340-25 Dated Jan24
  - Heritage Impact Assessment, Johns, C. No 2024/3 Dated 12/02/2024
  - Design and Access Statement, Llewellyn, Harker, Lowe Dated January 2024
  - Preliminary Ecological Assessment, IOS Ecology, Dated 05/02/2024
  - Travel Plan Statement, Jim Holt Ltd, Dated January 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 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order with or without modification), no extensions to the dwellings hereby permitted shall be erected and no additional windows, alterations to the roof or other openings shall be installed within the building without the prior permission, in writing, of the Local Planning Authority.**  
Reason: In the interests of protecting the privacy and amenity of neighbouring properties and ensuring the size of the dwelling is such that it remains available to meet a local need in accordance with Policies LC1 and LC3 of the Isles of Scilly Local Plan (2015 - 2030).
- C4 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (As Amended), (or any order revoking or re-enacting that Order) prior to installation, details of external illumination shall be submitted to and approved, in writing, by the Local Planning Authority. The lighting shall thereafter be installed in accordance with the agreed details.**  
Reason: In the interests of amenity and to protect the Isles of Scilly Dark Skies and wildlife in accordance with SS2, OE2, OE4 of the Isles of Scilly Local Plan 2015-2030.
- C5 The development hereby approved shall be carried out in strict accordance with the recommendations set out in the submitted 'Preliminary Ecological Statement' by IOS Ecology dated 03/02/2024.**  
Reason: To safeguard protected species and their habitats, in accordance with Policy SS2(g) and Policy OE2 of the new Isles of Scilly Local Plan (2015-2030).

**PRIOR TO ABOVE GROUND WORKS: Submission of Boundary Treatments for approval**

- C6 Prior to above ground works, a scheme detailing all boundary treatment dimensions and materials shall be submitted and be approved in writing by the Local Planning Authority. Once approved the development shall be finished in accordance with the agreed details and retained as such thereafter.**  
Reason: To ensure that the character and appearance of this building is sympathetic to this location within the Conservation Area, in accordance with Policy OE7 (5) of the Isles of Scilly Local Plan (2015 - 2030).

**PRIOR TO ABOVE GROUND WORKS: Submission of External Finishes for approval**

- C7 Prior to above ground works, details of, including samples or specifications of all external finishes shall be submitted to and be approved in writing by the Local Planning Authority. Once approved the development shall be finished in the agreed materials and retained as such thereafter. All nails and fittings shall be corrosion resistant.**  
Reason: To ensure that the character and appearance of this building is sympathetic to this location within the Conservation Area, in accordance with Policy OE7 (5) of the Isles of Scilly Local Plan (2015 - 2030).

**PRE-COMMENCEMENT CONDITION: Archaeological Monitoring and Recording**

- C8 A) No development shall take place until a programme of archaeological recording work including a Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of significance and research questions, and:**
- 1. The programme and methodology of site investigation and recording**
  - 2. The programme for post investigation assessment**
  - 3. Provision to be made for analysis of the site investigation and recording**
  - 4. Provision to be made for publication and dissemination of the analysis and records of the site investigation**
  - 5. Provision to be made for archive deposition of the analysis and records of the site investigation**
  - 6. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation**
- B) No development shall take place other than in accordance with the Written Scheme of Investigation approved under condition (A).**
- C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.**
- D) The archaeological recording condition will normally only be discharged when all elements of the WSI including on site works, analysis, report, publication (where applicable) and archive work has been completed, and a final report has been submitted to, and approved by, the Local Planning Authority.**  
Reason: A pre-commencement condition is necessary in this instance due to the need to ensure that a programme and methodology of site investigation and recording of archaeological features is undertaken before physical works commence on site. This is in accordance with the provisions of NPPF (2023) Chapter 16, paragraph 211 and the Isles of Scilly Local Plan policy OE7.

#### **PRE-FIRST OCCUPATION: Biodiversity Enhancement Measures**

**C9** Prior to the first occupation of the development hereby approved, with the exception of the temporary occupation of Terrace A by construction workers, details of measures to promote biodiversity enhancements shall be submitted to and approved in writing by the Local Planning Authority, this shall include details of any bat boxes and/or bird nesting opportunities appropriate to species found on the Isles of Scilly. Appropriate local guidance from the Isles of Scilly Wildlife Trust, for example, should be sought to inform the type, number and positioning of suitable bat and bird boxes. The measures approved shall be installed, prior to the first breeding/nesting season following completion of the development and shall be retained as such thereafter.

Reason: To promote measures to biodiversity and habitat opportunities on the Isles of Scilly and in accordance with the requirements of Policies SS1(d) and SS2(g) of the Isles of Scilly Local Plan (2015-2030).

#### **PRE-COMMENCEMENT CONDITION: Site Waste Management Plan**

**C10** Prior to the commencement of the development, hereby approved, a scheme including details of the sources of all building materials and the means/location of disposal of all waste arising from building works, shall be submitted to and agreed in writing with the Planning Authority. The development shall thereafter proceed in strict accordance with the approved scheme only.

Reason: This is a pre-commencement condition that requires details that were not submitted as part of the application but are required to fully understand the impact upon landscape and management of waste, to be submitted to and agreed in writing by the Local Planning Authority. This is 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.

#### **PRE-COMMENCEMENT CONDITION: Details of External Domestic Waste Storage**

**C11** Prior to the commencement of the development, hereby approved, a scheme shall be submitted to and approved in writing by the Local Planning Authority, to demonstrate areas within each plot for the daily storage of household waste and recycling as well as a presentation area for the weekly collection of waste (communally or plot specific), shall be submitted to and agreed in writing with the Planning Authority. The presentation area(s) for waste and recycling collection shall be well-screened, accessible, secure and vermin proof. The development shall thereafter proceed in strict accordance with the approved scheme only.

Reason: This is a pre-commencement condition that requires details that were not submitted as part of the application but are required to ensure adequate space is available to for the safe and secure storage of household waste and recycling, including being accessible for waste collection vehicles, to be submitted and agreed by the Local Planning Authority. In accordance with the requirements of Policy 1 of the Isles of Scilly Local Plan (2005) and Policy SS2(2) and Policy OE5 of the new Isles of Scilly Local Plan (2015-2030).

#### **PRE-COMMENCEMENT CONDITION: Sustainable Design Measures**

**C12** Prior to the commencement of the development, hereby approved, a detailed scheme indicating the sustainable design measures to be incorporated into the proposal shall be agreed in writing with the Local Planning Authority and should include water conservation and harvesting measures to seek to ensure the development achieves a water consumption standard of 110 litres of water per person per day as well as energy generation/minimisation measures. The sustainable design scheme shall be implemented in strict accordance with the details as agreed prior to the occupation of the development hereby permitted and be retained as approved thereafter.

Reason: This is a pre-commencement condition that requires details that were not submitted as part of the application but are required to ensure the accommodation is as sustainable as possible. In accordance with the requirements of Policy SS2 (2) and Policy OE5 of the Isles of Scilly Local Plan 2015-2030.

#### **PRE-COMMENCEMENT CONDITION: Construction Environmental Management Plan**

**C13** No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:

- The parking of vehicles of site operatives;
- Loading and unloading of plant and materials;
- Storage of plant and materials used in constructing the development;
- Wheel washing facilities;
- Measures to control the emission of dust and dirt during construction;
- A scheme for reducing/re-using/recycling/disposing of waste resulting from demolition and construction works.

On completion of the development any contractors compound, 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.

**Reason: This is a pre-commencement condition that requires details that were not** submitted as part of the application but are required to fully understand the impact upon the Islands natural environment designation and to ensure that the construction of the development is adequately controlled in accordance with Policy SS2 and OE2 of the Isles of Scilly Local Plan (2015-2030).

**C14 No construction plant and/or machinery shall be operated on the premises before 0800 hours on Mondays through to Saturdays nor after 1800 hours. There shall be no works involving construction plant and/or machinery on a Sunday or Public or Bank Holiday.**

Reason: In the interests of protecting the residential amenities of neighbouring properties.

### Further Information

1. **SECTION 106 AGREEMENT:** The planning permission hereby approved is subject of a section 106 agreement to control the occupancy of the dwellings to ensure they contribute towards the housing need of the local community.
2. **STATEMENT OF POSITIVE ENGAGEMENT:** 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.
3. **FIRE SAFETY:** Access and Facilities for the Fire Service as detailed in B5 AD B Volume 2 will be required. You will be required to provide reasonable facilities for the Fire Service. In most circumstances this will mean providing vehicular access for fire appliances. It is important to remember that failure to do so may prevent the applicant from obtaining a completion certificate under the Building Regulations but more importantly, the lives of the occupiers will be put at risk.
4. **DISCHARGE OF CONDITIONS:** In accordance with the Town and Country Planning (fees for Application and Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2017 a fee is payable to discharge any condition(s) on this planning permission. The fee is £116 for each request to discharge condition(s) and is payable for each individual request made to the Local Planning Authority.
5. **BATS:** The Applicant is reminded of the provisions of the Wildlife and Countryside Act 1981 and the E.C. Conservation (Natural Habitats) Regulations Act 1994, the Habitat and Species Regulations 2012 and our Natural and Environment and Rural Communities biodiversity duty. This planning permission does not absolve the applicant from complying with the relevant law protecting species, including obtaining and complying with the terms and conditions of any licences required, as described in part IV B of Circular 06/2005. Care should be taken during the work and if bats are discovered, they should not be handled, work must stop immediately, and a bat warden contacted. Extra care should be taken during the work, especially when alterations are carried out to buildings if fascia boards are removed as roosting bats could be found in these areas. If bats are found to be present during work, they must not be handled. Work must stop immediately and advice sought from licensed bat wardens. Call The Bat Conservation Trust's National Bat Helpline on 0845 1300 228 or Natural England (01872 245045) for advice.
6. **BUILDING CONTROL:** Please ensure that all building works accord with the Building Regulations and that all appropriate approvals are in place for each stage of the build project: [buildingcontrol@cornwall.gov.uk](mailto:buildingcontrol@cornwall.gov.uk)
7. **REGISTERING FOR APPROPRIATE BUSINESS RATES/COUNCIL TAX:** To ensure appropriate contributions, are made to fund services provided by or on behalf of the Council on the Isles of Scilly please ensure you contact the Council's Revenues Department: [revenues@scilly.gov.uk](mailto:revenues@scilly.gov.uk).

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:** 03 October 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 Alastair Martin

## Please sign and complete this certificate.

This is to certify that decision notice: P/24/011/FUL and the accompanying conditions have been read and understood by the applicant: Mr Alastair Martin.

1. **I/we intend to commence the development as approved:** Construction of 4 no. single storey terraces consisting of 10 no. new dwellings, construction of bin and cycle store, formation of new access and associated landscaping works and drainage works (Major Development) at: Land To South Of Pungies Lane Pungies Lane Telegraph 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 please ensure you deal with any pre-slab level, pre-commencement and pre-occupation conditions at the appropriate times. These will require applications to be made for discharging conditions. Please allow up to 8 weeks for the consideration of such applications.

### PRE-FIRST OCCUPATION CONDITION

C9 Prior to the first occupation of the development hereby approved, with the exception of the temporary occupation of Terrace A by construction workers, details of measures to promote biodiversity enhancements

shall be submitted to and approved in writing by the Local Planning Authority, this shall include details of any bat boxes and/or bird nesting opportunities appropriate to species found on the Isles of Scilly. Appropriate local guidance from the Isles of Scilly Wildlife Trust, for example, should be sought to inform the type, number and positioning of suitable bat and bird boxes. The measures approved shall be installed, prior to the first breeding/nesting season following completion of the development and shall be retained as such thereafter.

## **PRIOR TO ABOVE GROUND WORKS CONDITIONS**

- C6 Prior to above ground works, a scheme detailing all boundary treatment dimensions and materials shall be submitted and be approved in writing by the Local Planning Authority. Once approved the development shall be finished in accordance with the agreed details and retained as such thereafter.
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## **PRE-COMMENCEMENT CONDITIONS**

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1. The programme and methodology of site investigation and recording
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  - Storage of plant and materials used in constructing the development;
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# COUNCIL OF THE ISLES OF SCILLY

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-authorized 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/>

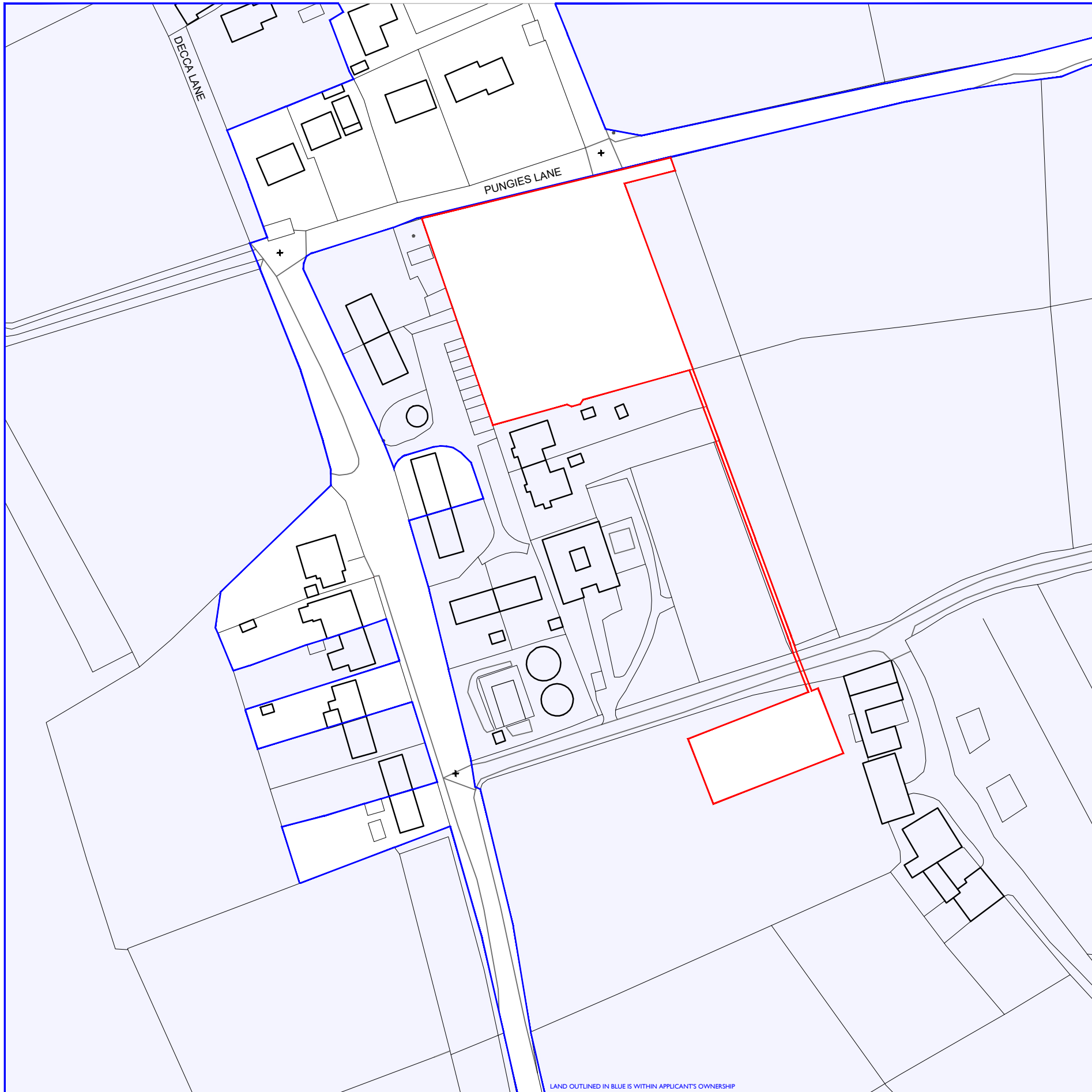
### **Registering/Altering Addresses**

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**

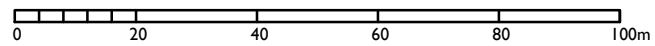
If you require a connection to utilities such as water and sewerage, you will need to contact South West Water on 08000831821. Electricity connections are made by Western Power Distribution who can be contacted on 08456012989.

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.



**APPROVED**  
 By Lisa Walton at 2:31 pm, Oct 03, 2024

Rev.	JW	NL	06.02.24	First Issue
	DR	CH	Date	Notes
PROJECT		TELEGRAPH HOUSING, ST MARY'S		
DRAWING		SITE LOCATION PLAN		
DRAWING No.		4340 - 01		
SCALE		1:1250 @ A3		
DATE:		Jan 24		



**llewellyn  
 harker  
 lowe**



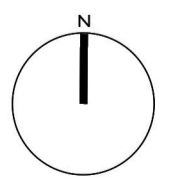
**APPROVED**  
 By Lisa Walton at 2:32 pm, Oct 03, 2024

Rev.	DR.	CH.	Date	Notes
E	JW	NL	05.02.24	Planning
D	JW	NL	01.02.24	Drain Planning
C	JW	NL	29.01.24	Revised Access
B	JW	NL	12.01.24	Parking Updates
A	JW	NL	08.01.24	For Consultation
-	JW	NL	04.12.23	First Issue

PROJECT TELEGRAPH HOUSING,  
 ST MARY'S  
 DRAWING PROPOSED SITE/ROOF PLAN

DRAWING No. 4340 - 10 E.

SCALE 1:200 @ A1 DATE Dec 23



**llewellyn  
 harker  
 lowe**



**APPROVED**  
 By Lisa Walton at 2:34 pm, Oct 03, 2024

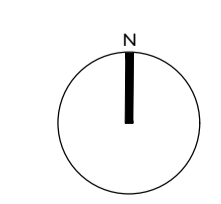
Rev.	DR.	CH.	Date	Notes
E	JW	NL	05.02.24	Planning
D	JW	NL	01.02.24	Draft Planning
C	JW	NL	29.01.24	Revised Access
B	JW	NL	05.01.24	For Consultation
A	JW	NL	12.12.23	Opposn A
-	JW	NL	04.12.23	First Issue

PROJECT TELEGRAPH HOUSING,  
 ST MARY'S

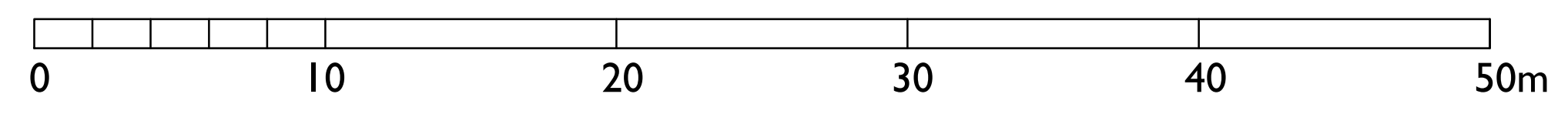
DRAWING PROPOSED SITE LAYOUT

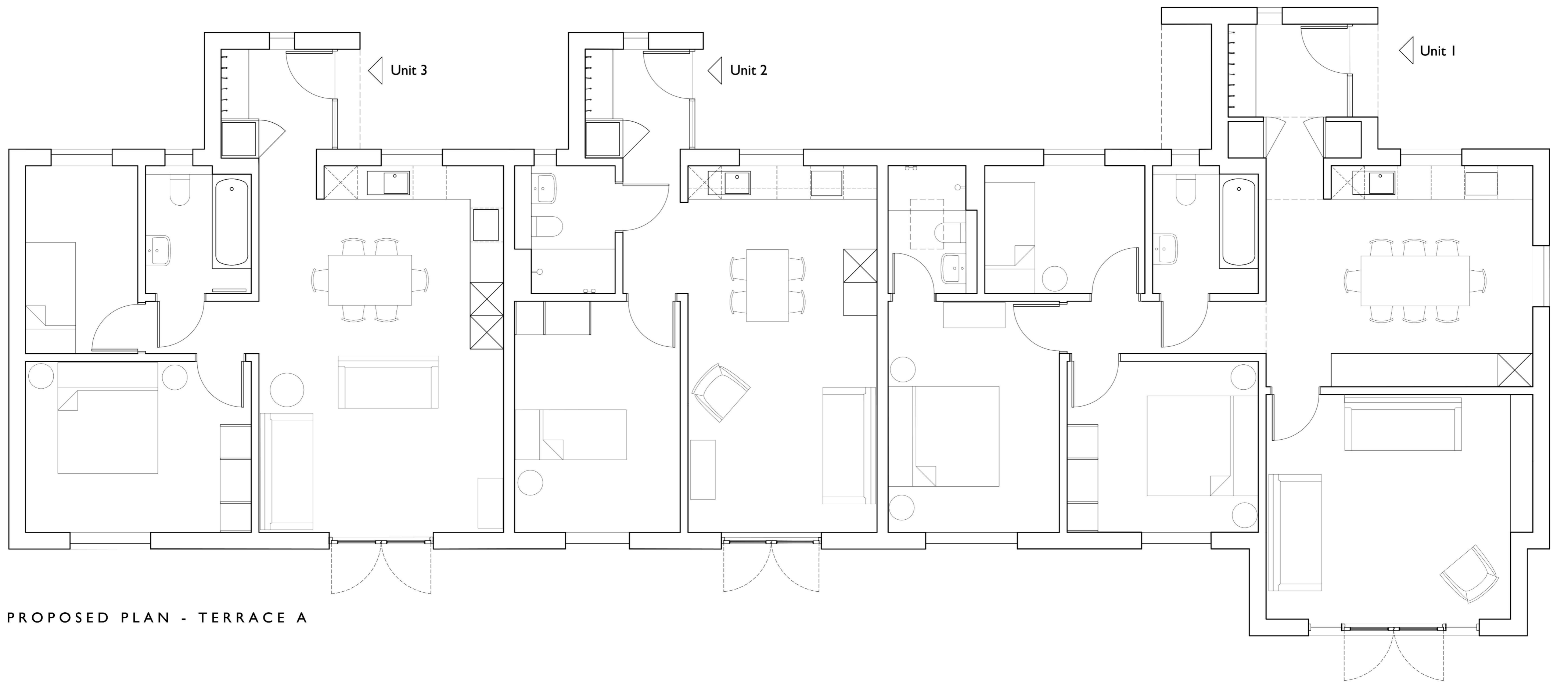
DRAWING No. 4340 - 11 E.

SCALE: 1:200 @ A1 DATE: Dec 23

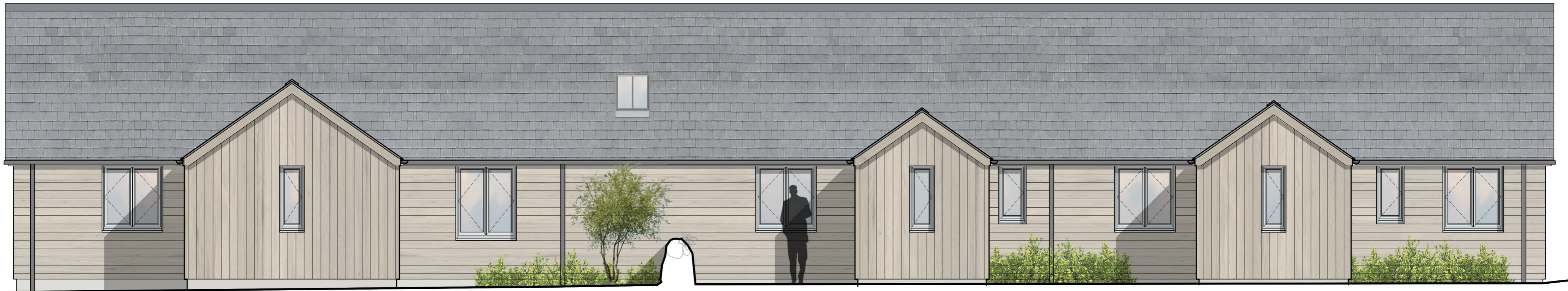


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PROPOSED PLAN - TERRACE A



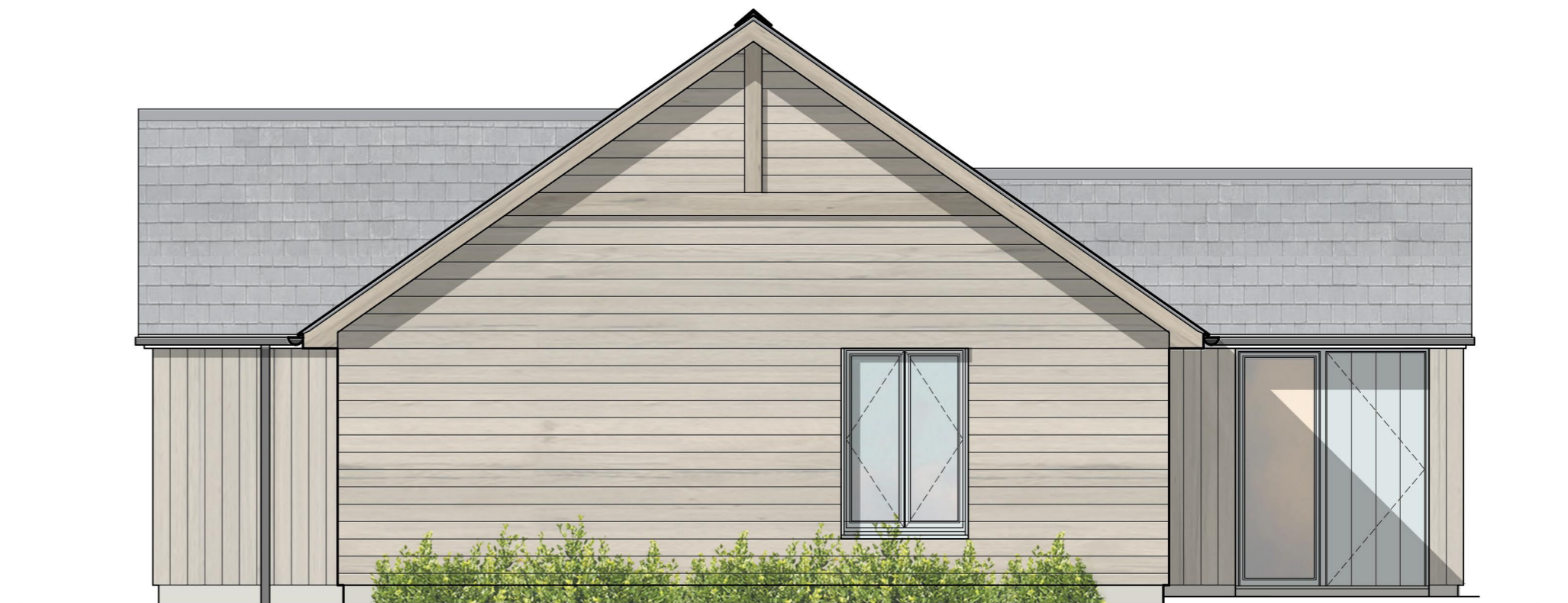
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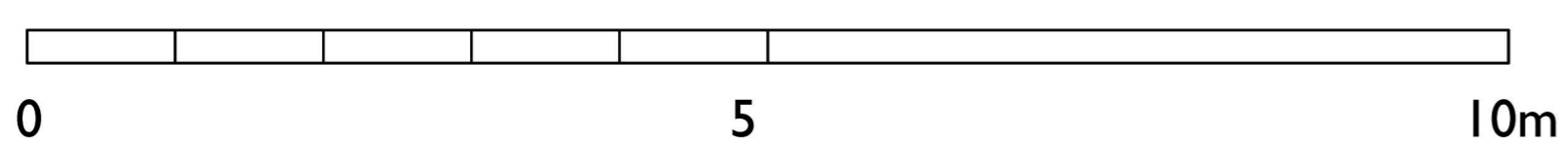
SOUTH ELEVATION



WEST ELEVATION



EAST ELEVATION



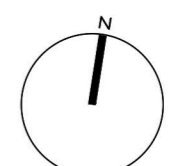
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By Lisa Walton at 2:36 pm, Oct 03, 2024

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A	JW	NL	01.02.24	Draft Planning
-	JW	NL	22.01.24	First Issue
Rev.	DR	CH	Date	Notes

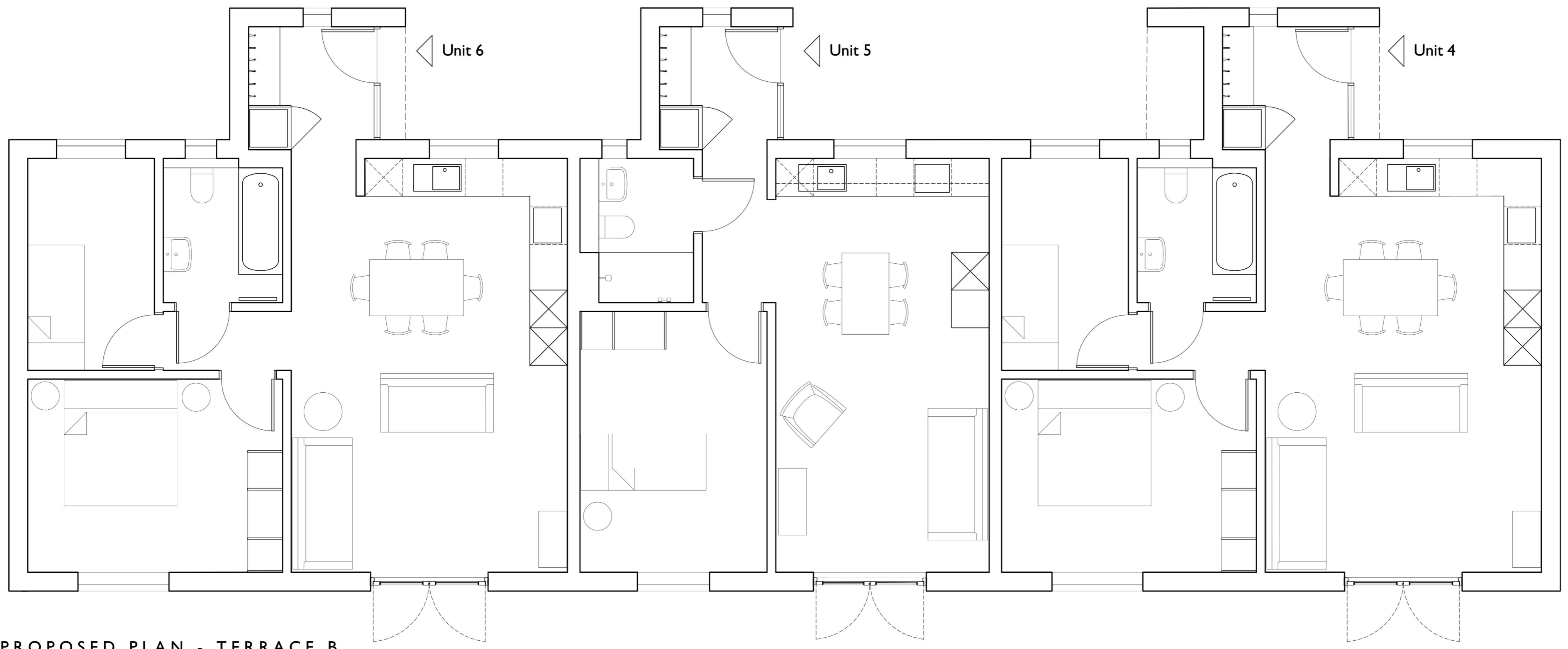
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ST MARY'S  
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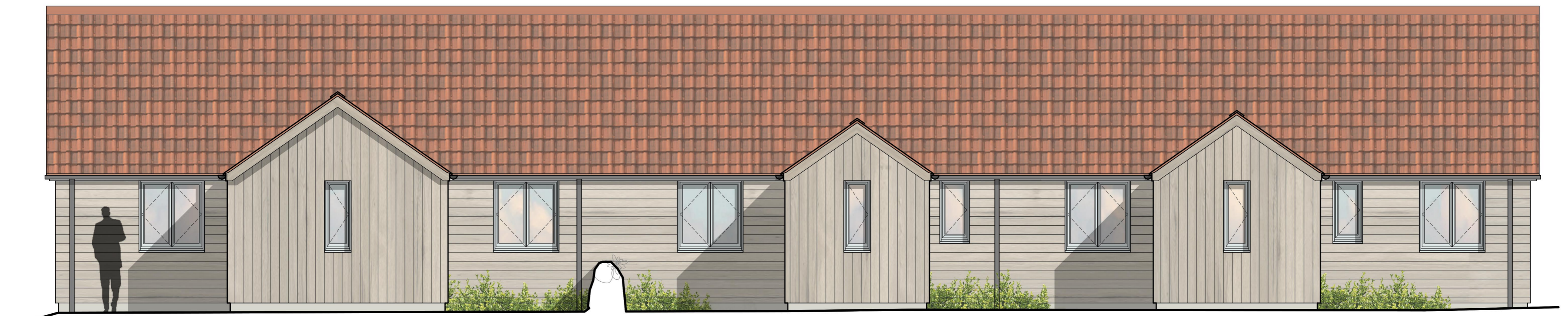
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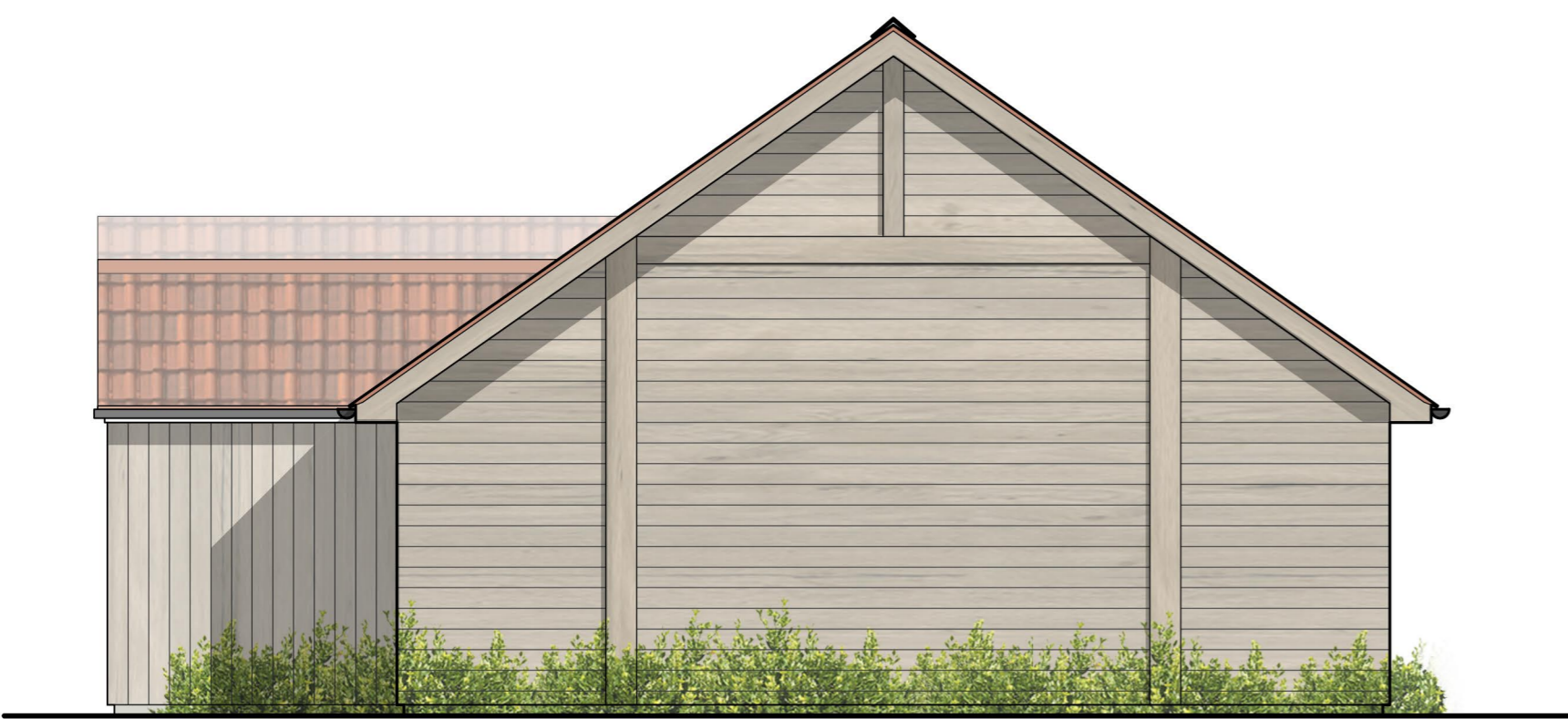
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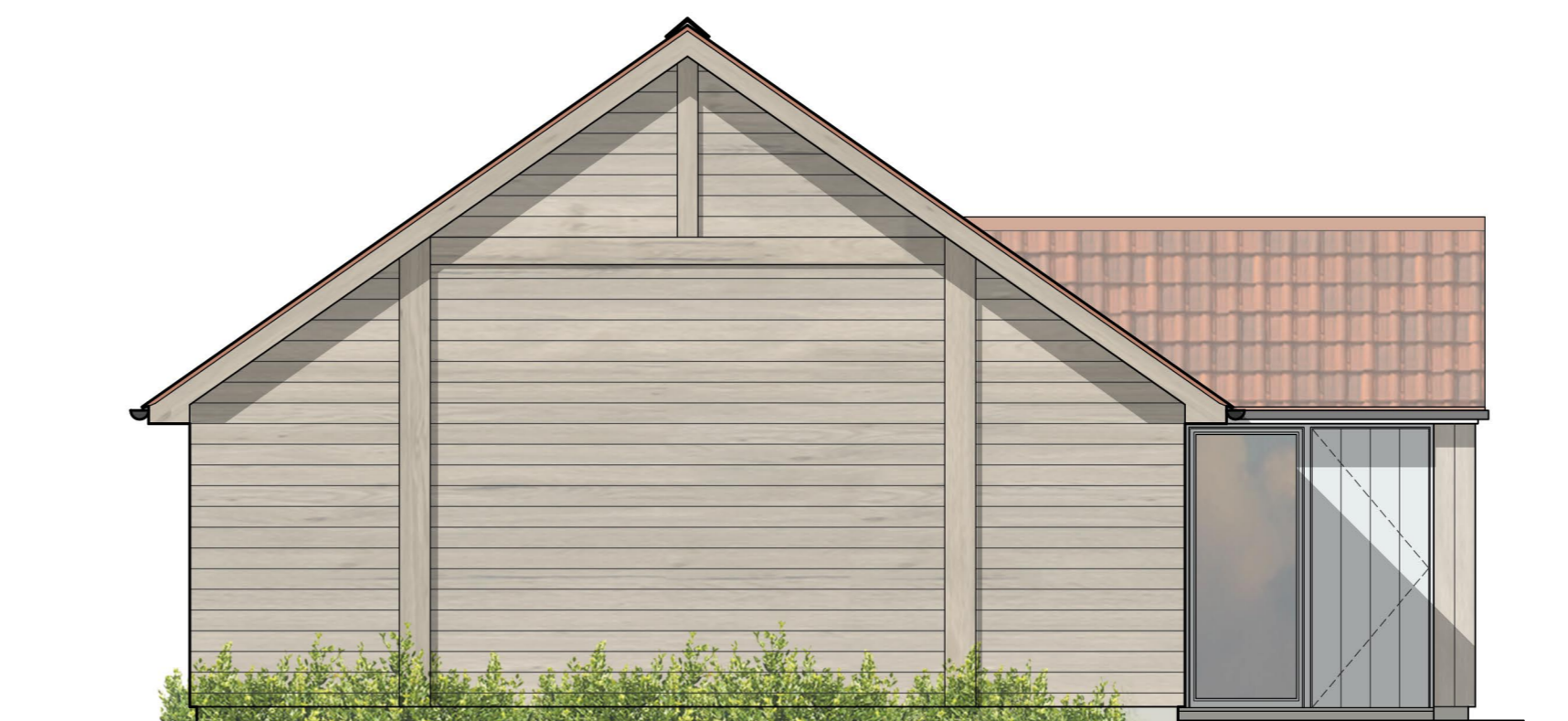
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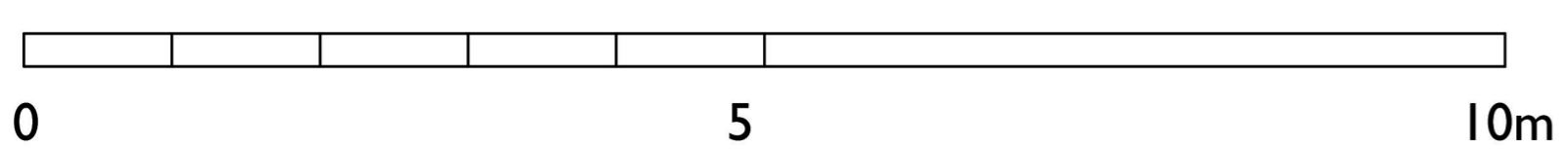
SOUTH ELEVATION



WEST ELEVATION



EAST ELEVATION



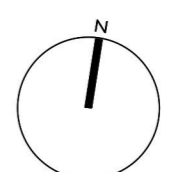
**APPROVED**  
By Lisa Walton at 2:36 pm, Oct 03, 2024

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A	JW	NL	01.02.24	Draft Planning
-	JW	NL	23.01.24	First Issue
Rev.	DR.	CH.	Date	Notes

PROJECT TELEGRAPH HOUSING,  
ST MARY'S  
DRAWING PROPOSED TERRACE B

DRAWING No. 4340 - 21 B.

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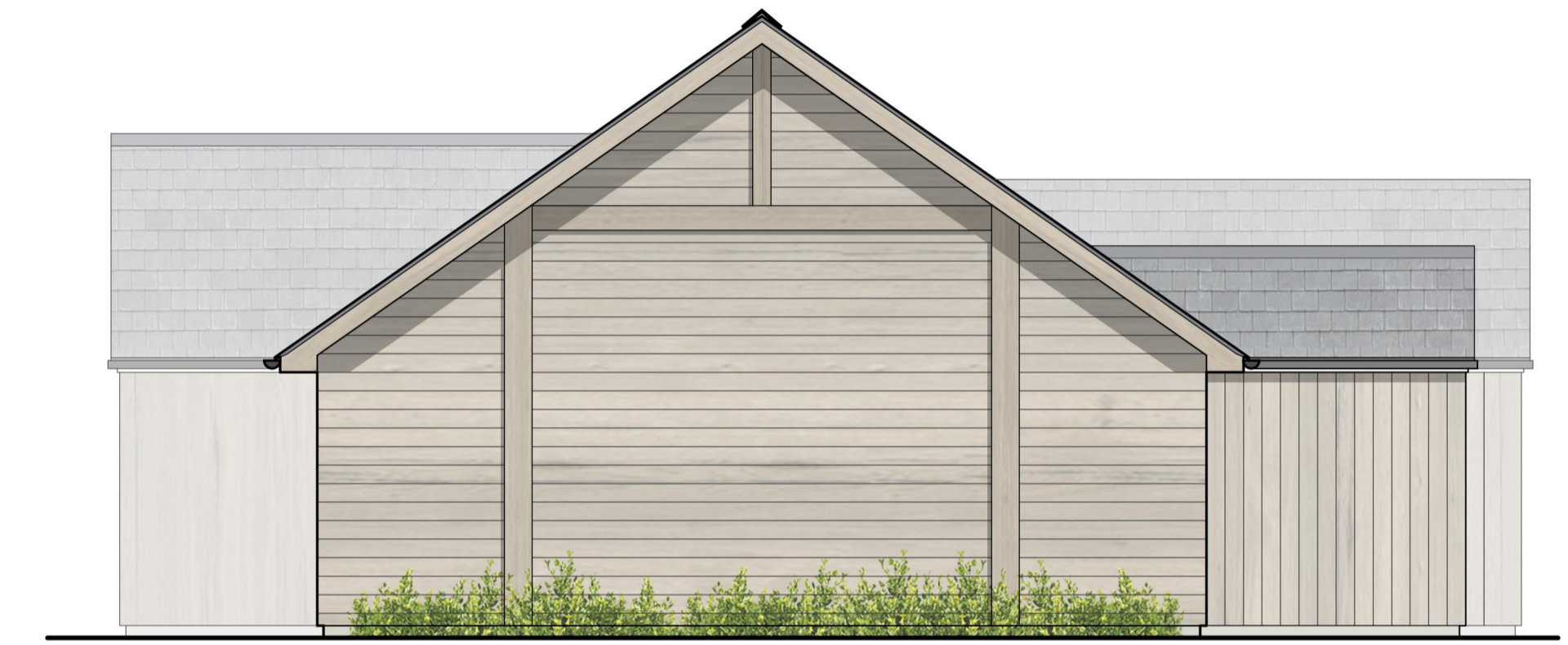
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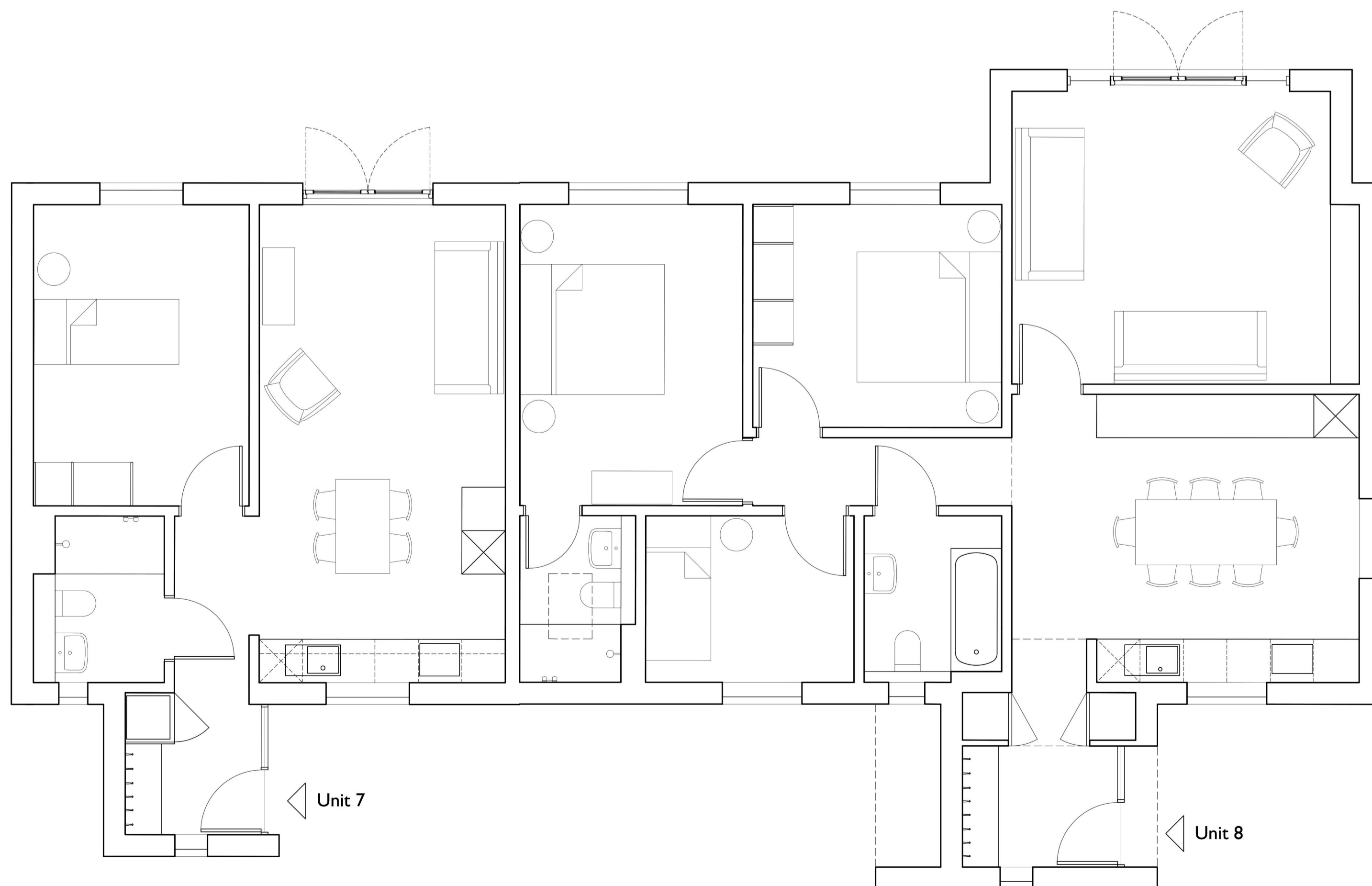
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NORTH ELEVATION

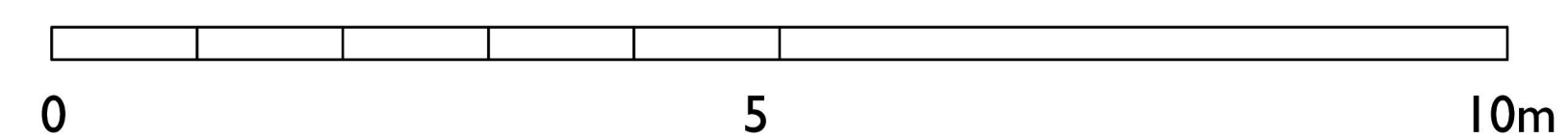


WEST ELEVATION



PROPOSED PLAN - TERRACE C

**APPROVED**  
By Lisa Walton at 4:51 pm, Oct 03, 2024

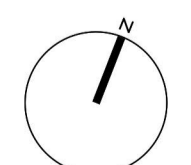


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A	JW	NL	20.01.24	Draft Planning
-	JW	NL	22.01.24	First Issue
Rev.	DR.	CH.	Date	Notes

PROJECT TELEGRAPH HOUSING,  
ST MARY'S  
DRAWING PROPOSED TERRACE C

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DATE: Jan' 24

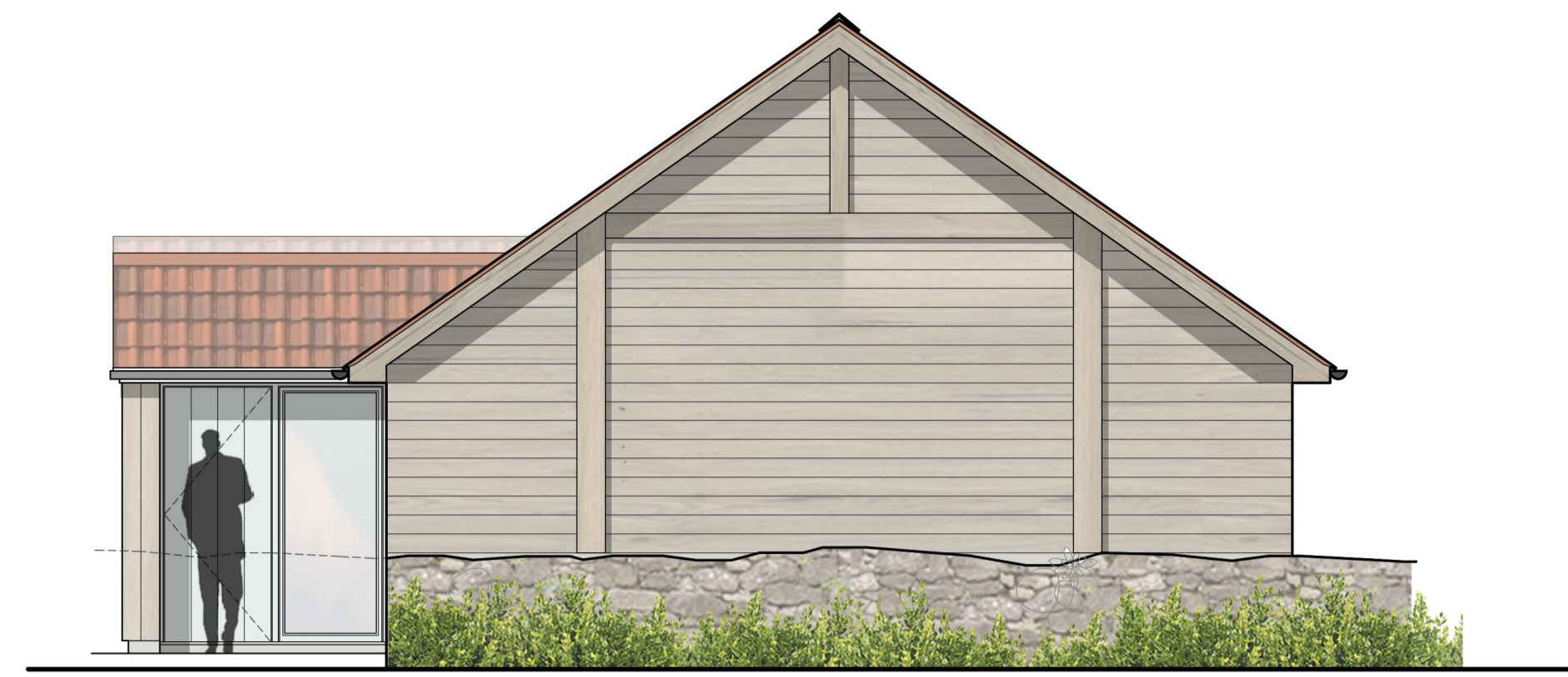


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SOUTH ELEVATION



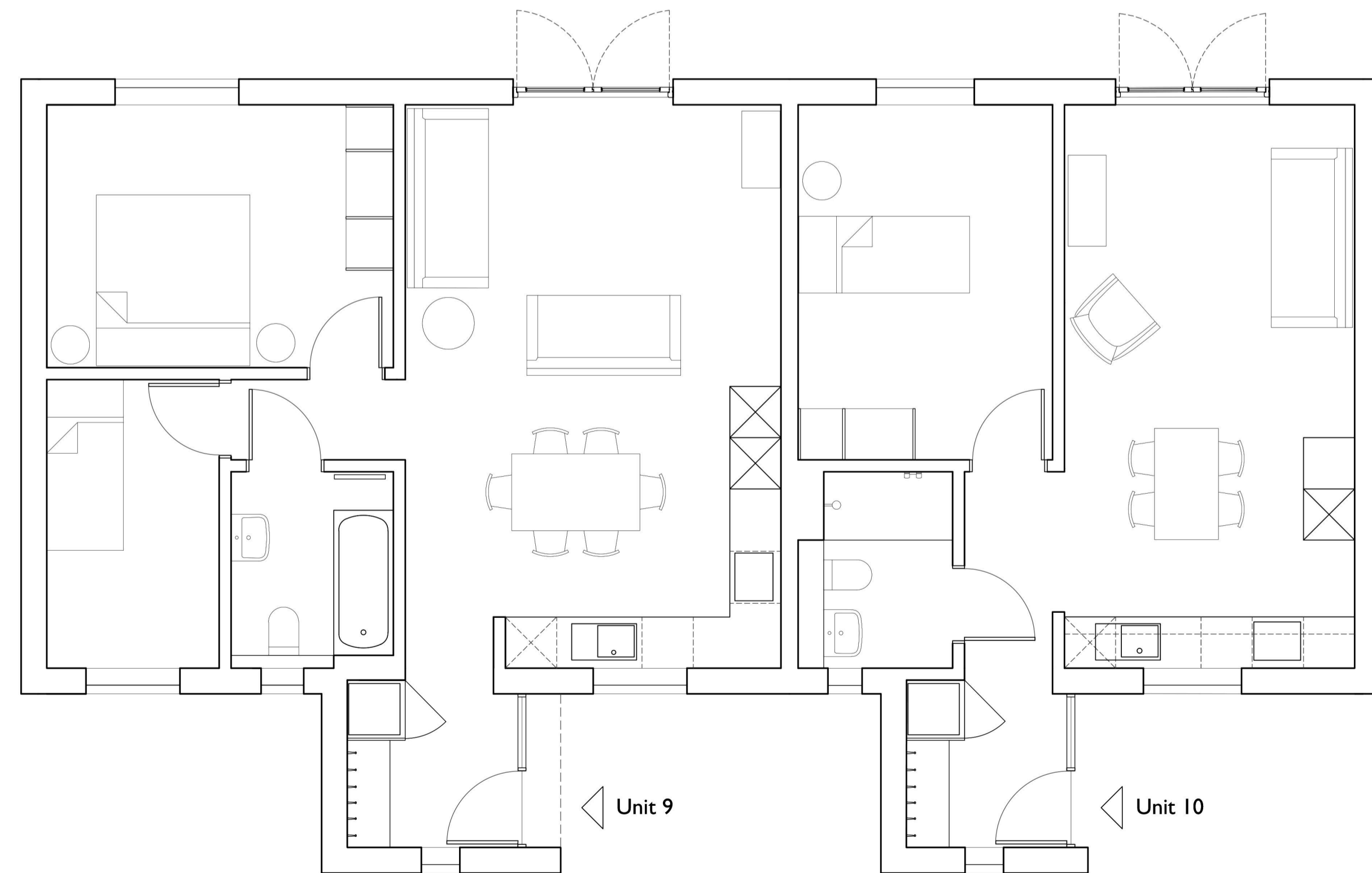
EAST ELEVATION



NORTH ELEVATION

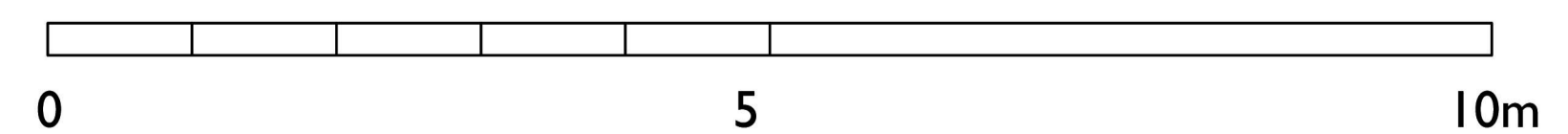


WEST ELEVATION



PROPOSED PLAN - TERRACE D

**APPROVED**  
By Lisa Walton at 4:52 pm, Oct 03, 2024



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A	JW	NL	20.01.24	Draft Planning
-	JW	NL	22.01.24	First Issue
Rev.	DR.	CH.	Date	Notes

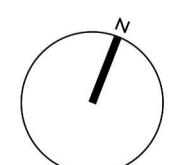
PROJECT TELEGRAPH HOUSING,  
ST MARY'S

DRAWING PROPOSED TERRACE D

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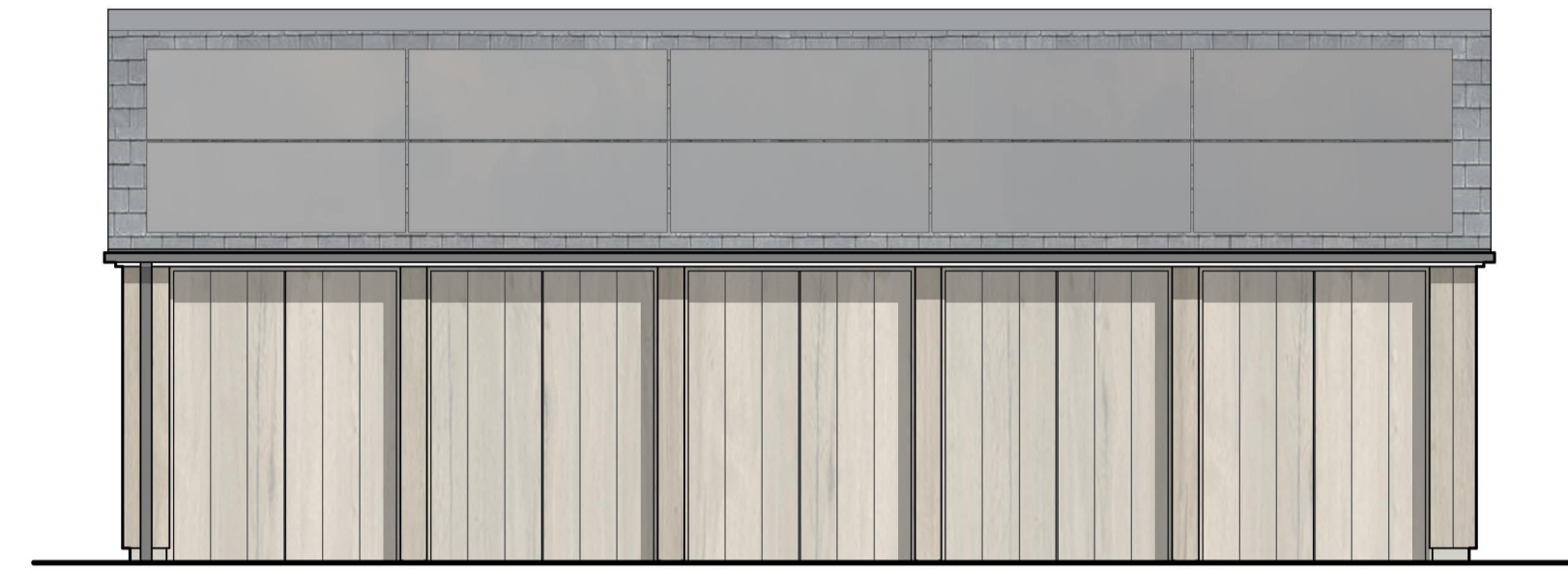
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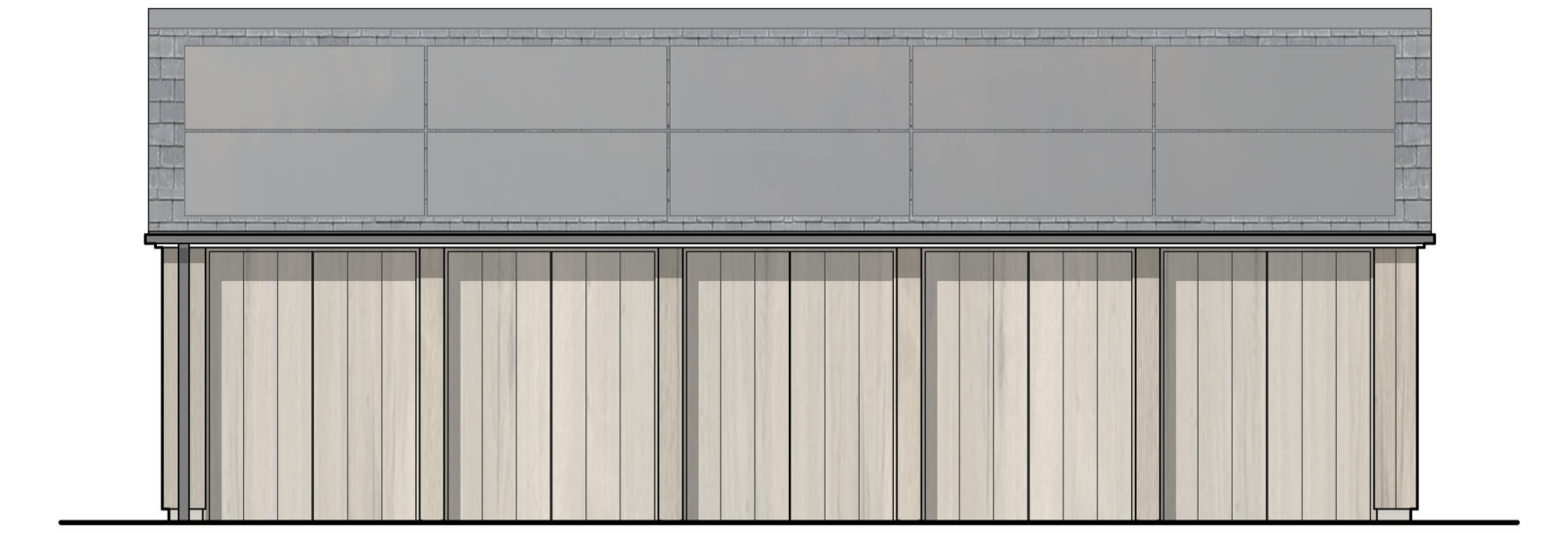
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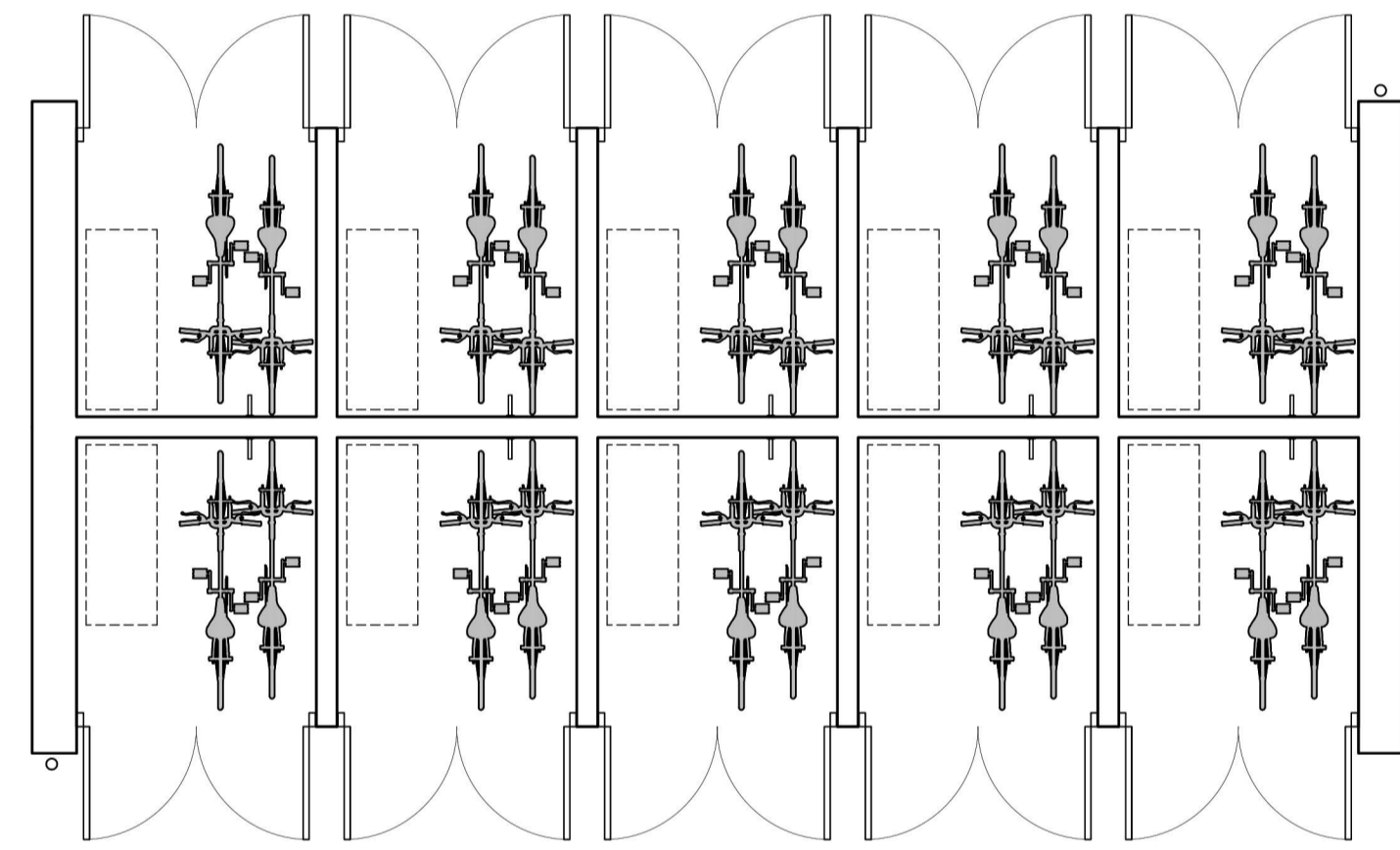
WEST ELEVATION



SOUTH ELEVATION

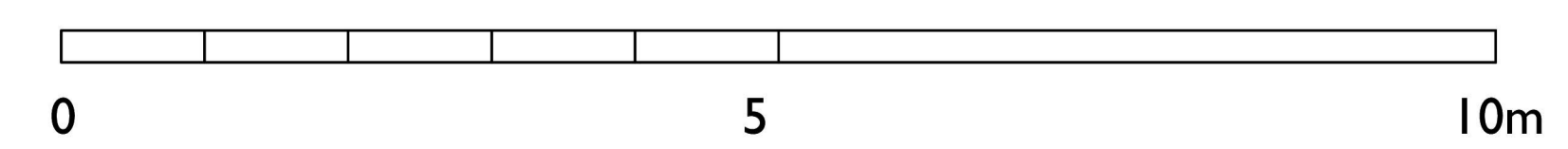


EAST ELEVATION



PROPOSED PLAN - BIN AND CYCLE STORE

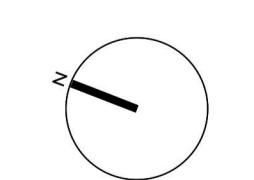
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By Lisa Walton at 4:53 pm, Oct 03, 2024



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A	JW	NL	30.01.24	Draft Planning
-	JW	NL	23.01.24	First Issue
Rev.	DR.	CH.	Date	Notes

PROJECT TELEGRAPH HOUSING,  
ST MARY'S  
DRAWING PROPOSED BIN & CYCLE  
STORE  
DRAWING No. 4340 - 24 B.

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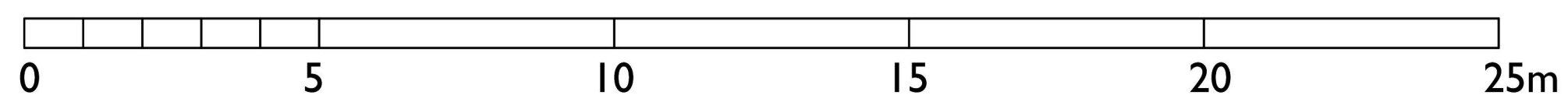
SITE SECTION A  
SOUTH ELEVATION



SITE SECTION B  
NORTH ELEVATION



SITE SECTION C  
STREET ELEVATION



**APPROVED**  
By Lisa Walton at 4:54 pm, Oct 03, 2024

Rev.	DR.	CH.	Date	Notes
B	JW	NL	05.02.24	Planning
A	JW	NL	30.01.24	Draft Planning
-	JW	NL	29.01.24	First Issue

PROJECT TELEGRAPH HOUSING,  
ST MARY'S  
DRAWING PROPOSED SITE SECTIONS

DRAWING No. 4340 - 25 B.

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**APPROVED**

By Lisa Walton at 4:57 pm, Oct 03, 2024

**RECEIVED**

By Liv Rickman at 5:02 pm, Feb 08, 2024

# TELEGRAPH HOUSING, ST MARY'S

## DESIGN, ACCESS & PLANNING STATEMENT

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Appendix I - Schedule of Areas

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Application Site (Google Maps 2024)

# I. INTRODUCTION

This document has been prepared in support of an application for the construction of a new residential development to provide essential worker accommodation on St Mary's, Isles of Scilly. The development would consist of 2no. 3 bedroom dwellings, 4no. 2 bedroom dwellings, and 4no. 1 bedroom dwellings. They are arranged across 4 single storey terraces, on an infill plot at 'Telegraph,' a hilltop site that is the highest point on St Mary's and in the Isles of Scilly.

The Council of the Isles of Scilly announced a housing crisis in January 2022 due to the number of households at imminent risk of homelessness and the lack of homes for local need and essential workers, with the consequential risks to essential services and the islands' economy.

Council housing projects are targeting affordable housing; this scheme aims to support the intermediate market sector for households that may not fulfil eligibility criteria for affordable housing but still need to reside full time on the islands and to provide essential services.

In accordance with the policy set out in the local plan, this development provides good quality accommodation for a mix of household sizes. They are attractive, well designed and spacious, located in a ideal location, close to the existing community. They have been designed to be as sustainable as possible, through the use of natural low carbon materials, reduction in energy use, and renewable energy generation.

The proposed works form part of the Duchy of Cornwall's ongoing investment on the Isles of Scilly. Invariably investment on St Mary's has an indirect economic benefit to other islands, with transport services, employment, and service industries benefiting across the archipelago.



Proposed Site Plan

## 2. SITE AND CONTEXT

The application site is situated in the north-west of the island and the highest point on the Isles of Scilly. It is currently an agricultural plot, located to the east of the Grade 2 Listed 'Coastguard's Lookout Tower', also known as Telegraph Tower. The tower, constructed around 1814, was built as a signal tower station for the Admiralty, before being taken over by the Coastguard.

The area surrounding the tower is largely residential (it is enclosed by development on three sides). To the north, the proposed site is bordered by Pungies Lane, with residential development beyond. Similarly, the site is surrounded by housing to the west and south, with agricultural land to the east of the plot. The existing housing is all of similar character; a mixture of single and one and a half storey housing, with rendered walls and slate roofs, typical of the island character.

To the east a small copse of tree planting shelters the site from weather and distant views.

The site has a gentle sloping incline from west to east.

As a consequence of the upland plateau site location, and the surrounding existing development & tree planting, the site is of low visual prominence and generally obscured from distant views.

Although the site is not currently allocated for housing, it was previously an allocated plot, and is a natural infill site suitable for residential development. It is well integrated into the existing settlement, and lies outside the flood risk zone.



View of site from Pungies Lane



View of site from Pungies Lane



### 3. PROPOSALS

#### Form

It is proposed that 10no. new houses would be constructed across four short single-storey terraces. The proposed buildings take their form from the traditional vernacular on St Mary's and the wider Isles. The terraces would be single storey and linear, with dual pitched roofs, reflecting the pattern of development in the surrounding settlement. They would be arranged in two rows of two terraces, arranged around a communal green.

Various architectural devices have been employed to add variation and character to the development. Siting would be staggered slightly and the size and layout of units would vary, to avoid the appearance of a continuous linear development. Features borrowed from the traditional Scilly vernacular including storm porches of assorted sizes and varied fenestration which would punctuate the elevations.

#### Scale

The height of the development is restricted by the line-of-site communications array that links to St Martins from the adjacent comms tower. In response to this, and in keeping with the character of the surrounding properties, the development would be low slung and single storey in scale.

The units are 5m high at the ridge and 2.2m at the eaves. Consequently the proposals would be of low prominence and appropriate in scale within the context of the surrounding settlement.

Ridge heights on the proposed terraces would range from approximately +54.1 to +54.6m. This is comparable to the ridge heights at the adjacent cottages.

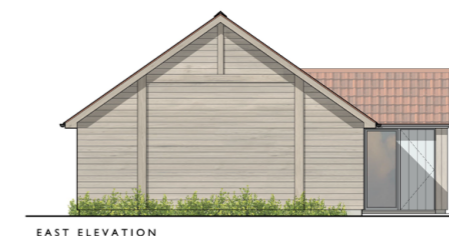
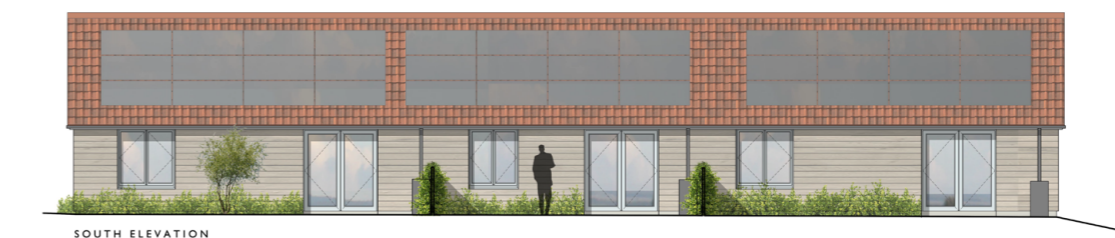
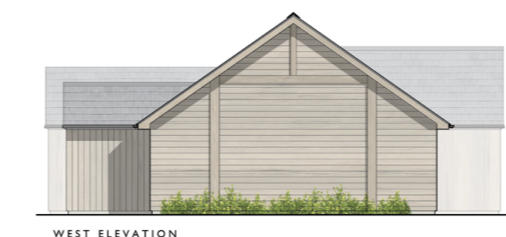
#### Use/Layout

The proposal would include:

- 4no. 1 bed units
- 4no. 2 bed units
- 2no. 3 bed units

A mix of dwelling types would be provided to create a balance of household sizes and meet local needs.

Each unit would have a private entrance, a porch with plenty of storage and space to remove and store wet clothes. To the rear each dwelling would have access to a private garden. All units would be arranged with living spaces facing the gardens for privacy, and to



Terrace A and B Proposed Elevations

make the most of the natural light and access to outside space.

A shared parking area, including electric vehicle charging points and visitor parking would be located to the east of the terraces. A bicycle and bin store adjacent to the parking area would provide each unit with a dedicated storage area. This also acts to shelter the communal green from the parking area. External storage is important for island life and to prevent detritus from accumulating in external spaces; this would be supplemented by the provision of bases for sheds in the gardens of the larger units, these would be carefully positioned to be of low visual prominence from outside the site (particularly where adjacent to the road).

### Materials

The buildings would take their material palette from the existing vernacular, continuing an architectural language that can be seen across the islands. This style employs local natural materials and traditional details. The buildings would be clad in a mixture of horizontal and vertical cedar boarding, left untreated and allowed to silver naturally.

Roofs would be covered with a mixture of natural slate and clay tile roofing to provide variation across the development and to reflect the Island vernacular. Solar PVs are included on the south facing roof pitches and integrated into the roof surfaces to minimise their visual prominence.

Similar proposals for worker accommodation have previously been consented and implemented at 'Palace Gardens' on Tresco. These dwellings can be seen to have successfully integrated with the texture and grain of the Island landscape.

### Landscape

Landscaping has been designed to be simple and in keeping with the local character.

The boundary with the roadside is currently demarked with a Cornish hedge. In order to provide access and achieve visibility splays, a section of this will need to be removed. This will be reinstated in a slightly set-back position to provide the necessary splay. The hedge would also be extended into the site as a landscape motif, to enclose the parking area and provide separation between cars and housing.

The central green would be planted with native grasses and wildflowers, it would be slightly raised to discourage 'corner cutting' that damages planting, and create some privacy between opposing properties.

Boundaries between plots would be hedging planted around a post and wire fence (which would quickly be subsumed by the hedge). Additional hedge planting and greening to the site perimeter would increase biodiversity and provide enhanced screening along the development boundaries.

Several trees would be strategically placed on the site. Relatively low growing wind-resistant native species would be selected for this purpose.



Terrace C and D Proposed Plans and Elevations

## 4. PLANNING CONTEXT

This proposal has been prepared within the context of a policy framework set out in both primary legislation and national and local planning policy. A summary of this framework is set out below.

### Primary Legislation

#### **The Planning (Listed Buildings and Conservation Area) Act 1990**

The application site is situated within a Conservation Area and as such there is a requirement that the proposed development preserves or enhances the character or appearance of the area.

#### **The Countryside and Rights of Way Act 2000**

St Mary's, along with the whole of the Isles of Scilly is designated as a National Landscape (Area of Outstanding Natural Beauty). In considering proposals located within National Landscapes, there is a consequential requirement for Local Authorities to have regard to the purpose of conserving and enhancing the natural beauty of the area.

#### **The Conservation of Habitats and Species Regulations**

There is a duty for the Local Authority to assess the impact of proposed development on any European Protected Species.

#### **National Planning Policy Framework, (NPPF)**

This important policy document outlines the Government's overarching planning policies and details of how they expect these to be applied by Local Planning Authorities. The NPPF makes clear that there is a presumption in favour of development and confirms that the starting point for decision making is the statutory Development Plan. Local Planning policy is expected to conform with the requirements of the NPPF.

#### **Isles of Scilly Local Plan 2015-2030**

The Isles of Scilly Local Plan sets out a spatial strategy for the next 15 years and provides a vision for the islands, along with key objectives. The plan seeks to strike a balance between protecting and enhancing the high quality environment, whilst ensuring the islands communities and economy to grow sustainably.

Due to the lack of suitable housing, particularly for 'essential need workers', and the growth in holiday accommodation and second home ownership, the population of St Mary's, and the wider islands are in decline, as working-age individuals and households have left the islands, locally exacerbating the national trend of an ageing population.

In line with this, the Council is keen to stem the recent trend of population decline, as this, along with reducing the average age of the islands' population is essential to the economic and social sustainability of the Isles of Scilly.

In particular, the plan seeks to create a balanced local housing market that provides housing

choice and meets the existing and future local housing needs, in order to enable economic prosperity.

These proposals respond directly to the need to improve housing provision on St Mary's, in accordance with the Local Plan policy.

**Policy LC1** – *'Isles of Scilly Housing Strategy to 2030'* makes clear that all new homes must *"contribute towards the creation of a sustainable, balanced and inclusive island community by making a positive contribution to addressing the local housing needs of present and future generations."*

This development is in alignment with policy LC1, and has been developed to complement other housing provision sites already underway on St Mary's. The proposals have been developed to meet current local need which is considered to be smaller sized intermediate and market rental homes. Provision of accommodation for essential workers ensures the preservation of island services and contributes towards the creation of a sustainable, balanced and inclusive island community which is the goal of this policy.

**Policy LC3** – *'Balanced Housing Stock'* sets out that all new residential development must contribute towards the creation of sustainable, balanced and inclusive island communities by *"ensuring an appropriate mix of dwelling types, number of bedrooms and tenures, taking account of what is in demand at the time, imbalances in the housing stock, and viability and market considerations."*

The policy also makes clear that new houses should meet the minimum space standards, and be accessible in accordance with part M of the building regulations.

The proposals meet these criteria, a mix of small – medium sized dwellings is proposed. The site location and proposals have been selected and developed specifically for essential workers and long term residents, particularly through a focus on efficient construction (terraces), practical layouts, and the creation of a small community around a central green.

The proposals meet the minimum space standards and comply with part M.

**Policy LC7** – *'Windfall Housing'* demonstrates that housing will be permitted outside of allocated housing sites where they are within or adjacent to existing settlements (such as the Telegraph/MacFarland's Down area) and where they meet a local housing need in accordance with planning policy.

This site is considered to comply with these requirements.

**Policy WCI** – *'General Employment Policy'* makes clear that development proposals that strengthen, enhance and diversify the islands' economy will be supported where they are appropriately designed, scaled and located, in accordance with other policies in the Local Plan.

This development aims to address a shortage of suitable housing for local need and 'essential workers', who need to live full-time on the island in order to provide essential services, thereby supporting the economic and social sustainability of the islands.

**Policy SS1** – '*Principles of Sustainable Development*' records the requirement that 'any new development must make a positive contribution to social, economic and environmental sustainability on the islands, by, inter alia:

- *conserving and enhancing the outstanding natural, built and historic environment;*
- *locating, designing and constructing development where it makes a positive contribution to reducing the islands' carbon footprint and consumption of natural resources;*
- *improving accessibility and creating a network of safe and well-connected routes by integrating measures that encourage and promote walking, cycling and electric vehicles as part of any new development wherever opportunities allow;*
- *promoting cohesive and resilient communities on each island; and*
- *generating and sustaining economic activity.'*

The proposals address this policy in the following manner:

- The site has been selected to minimise the impact of development on the island landscape. Ecology and archaeological assessments have been undertaken to ensure the natural and historic environments are not adversely impacted by the proposals.
- The development is designed to have a low carbon footprint in construction and in use (please refer to the energy strategy outlined later in this document).
- The proposals include cycle storage, several electric car charging points and a Go-EV car share location.
- Provision of essential workers is key to sustaining island services, communities and the local economy. The design of the proposals encourages community interaction with a shared central green and bike storage facilities.

**Policy SS2** – '*Sustainable Quality Design and Place-Making*' makes clear that new development will only be permitted where it is of high-quality design and respects the character, identity and local distinctiveness of the area, and is of an appropriate scale, density, layout, height, mass and materials.

The proposals address this policy in the following manner:

- Materials have been carefully chosen to reflect the existing vernacular, and continue an architectural language which can be seen across the Islands.
- The scale and form and character of the proposed dwellings has been designed to be appropriate to the character and identity of the area.
- The proposals have been designed to be of low prominence within the context of the surrounding settlement.

The policies within the Local Plan also provide a range of policies designed to protect the landscape character (Policy OE1) as well as the natural (Policy OE2) and historic environment (Policy OE3).

The proposals contained within this application have been prepared to respond to the

specific requirements of the Isles of Scilly Local Plan policies.

### **Isles of Scilly Design Guide 2007**

The Isles of Scilly Design Guide is a Supplementary Planning Document (SPD) that forms part of the local Development Plan. This states that "*It is important that the nature of the surrounding area is understood and reflected in any development proposal. Without this awareness it is likely that a development will be unsympathetic*".

Through their design, materials, character and scale, these proposals are considered to comply with these requirements. A similar proposal has previously been consented and implemented at 'Palace Gardens' on Tresco, which can be seen to have sympathetically reflected the character and nature of the Islands.

## 5. OUTLINE IMPACT STATEMENTS

### Landscape Character

The plot lies within the Isles of Scilly National Landscape (formerly AONB) & Conservation Area, which covers St Mary's in its entirety.

The site is defined as 'Pasture Fields' on the Landscape Character Map within the Draft Isles of Scilly Conservation Area Character Statement, but is located immediately adjacent to the area defined as 'Settlement'. This is considered an acceptable location for a windfall housing development under Isles of Scilly Local Plan Policy LC7.

The proposed site has been identified as an appropriate location for this form of development on St Mary's, due to the following characteristics:

- An infill plot located within an existing settlement area, and the proposed scale, design and layout of the development would sit well in the landscape and with existing development.
- Part of an existing settlement with access to services and transport. This will be supplemented with sustainable transport options including electric vehicle charging and bicycle storage.
- Sheltered plot with low visual prominence, an upland plateau position well shielded by adjacent buildings and planting.
- Not proximate to sensitive historic sites, archaeological constraint areas, flood risk zones or ecological sites.

The proposals have been developed with due consideration of the Conservation Area and National Landscape Setting. The design of the proposed buildings responds to the characteristics and historic context of the area, the relationship with existing proximate buildings, and the landscape character.

The form, scale, massing and character of the proposed buildings would continue established existing development patterns in this area; short staggered linear terraces. The proposed terraces would be single storey, with ridge heights that are comparable to surrounding buildings. The site is bounded by existing buildings or vegetation on all sides, and are clearly set within the established development boundary. The development site is currently shielded by an established hedgerow perimeter and existing buildings. Existing vegetation would be retained wherever possible.

From Pungies Lane to the north, the development would be screened by a low level planted granite Cornish Hedge. The garden spaces in the northern terraces facing the road would remain open in character, and largely free from domestic paraphernalia to minimise the visual impact on the landscape character of the area.

The material palette has been selected to be muted and suitable for this particular plot, intended to blend with the natural environment. In particular, this includes the use of untreated timber cladding and natural slate and clay tile roofs.

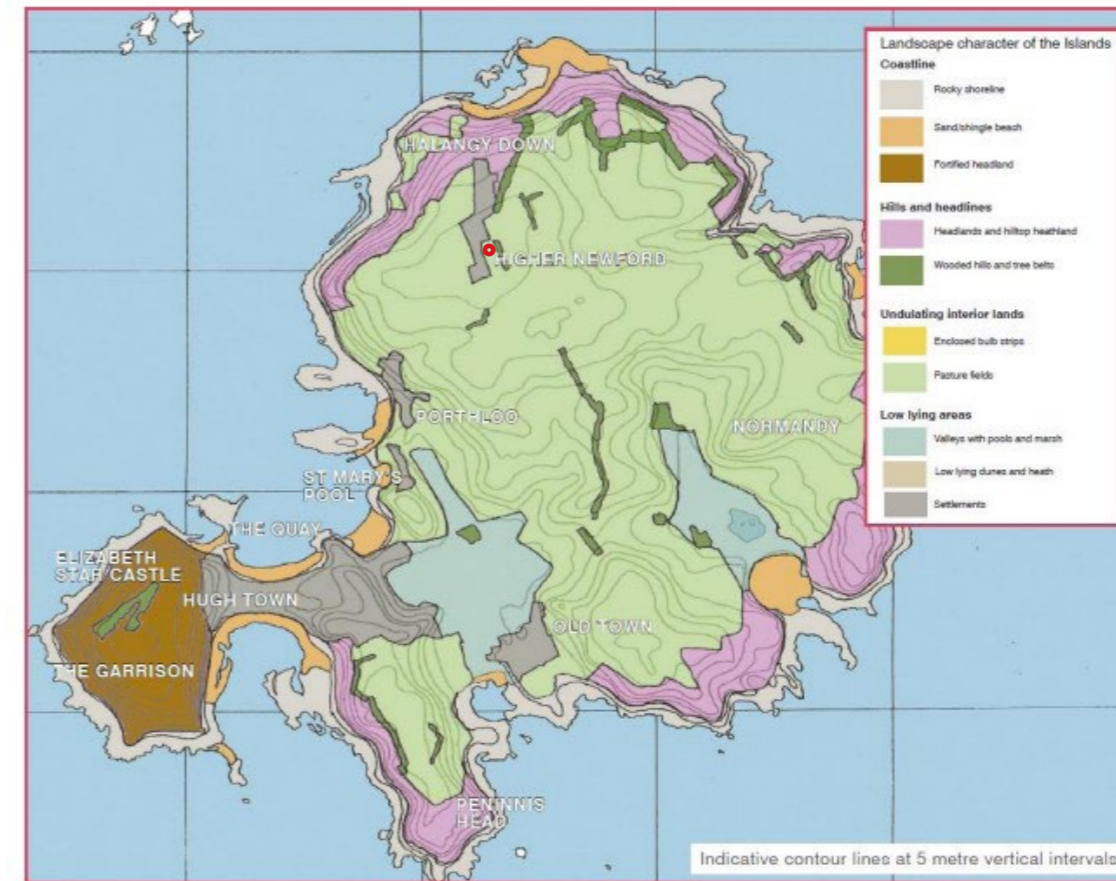


Figure 16 Landscape character on St Marys

Landscape Character Map Extract from the Draft Isles of Scilly Conservation Area Character Statement. The site is identified as 'Pasture Fields' (green shaded), but is immediately adjacent to a 'Settlement' (grey).

### Heritage

The proposed development is relatively proximate to the Grade 2 Listed Telegraph Tower. This tower is already surrounded by directly adjacent existing low-rise residential development on all sides. The proposed development would continue this and is not considered to have an impact on the significance of the listed building.

The proposed traditional forms and natural materials would mitigate the impact of the proposals and respond to the traditional buildings and vernacular on the island.

Any granite boundary walling disrupted by the development to achieve visibility splays would be replaced like-for-like and extended.

The proposals are therefore considered to be the type of sustainable development for which the NPPF establishes a strong presumption and it would align with relevant national and local policy.

### Trees

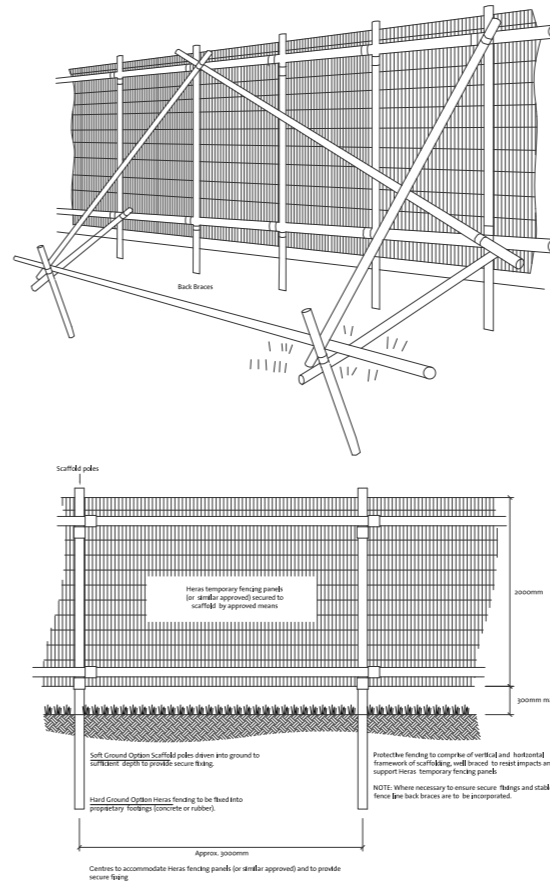
There are no works to existing trees proposed as part of this application, and works in close proximity to any trees are limited.

No construction materials would be stored within the Root Protection Area of any trees and heavy plant would also be excluded. Care would be taken during excavations to avoid any damage to roots greater than 25mm in diameter. If any light traffic was required to cross the RPA, temporary ground protection measures would be installed.

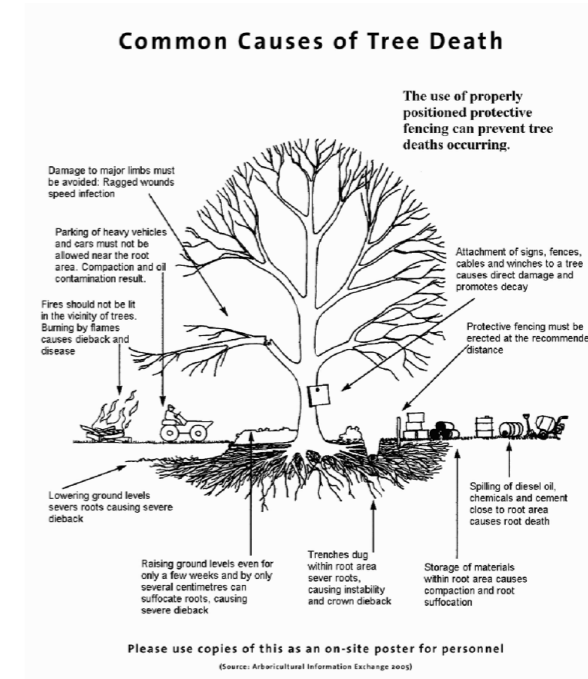
Prior to commencement on site, tree protection fencing would be installed in accordance with BS5837 along the eastern site boundary as shown, in order to protect the trees in the shelterbelt during construction. No works would take place in the protected area.



Line of Tree Protection Fencing highlighted in red



Example tree protection measures which will be implemented on site



## 6. CONSULTATION FEEDBACK

A public consultation was held on the 11th January 2024, at a venue local to the application site. 40 letters were sent out to adjacent local residents and stakeholders.

Over 2 sessions, 35 people attended the consultation to view preliminary proposals for the site and provide comments on the proposed plans. The majority of the immediate neighbouring households were represented during the process.

Below is a summary of the comments received and how these have been addressed:

### Design and Principle of Development

*“Excellent quality & design/good car park. Solar panels great. Support this plan”*

*“Like the design & eco features - solar panels etc. Appreciate you have considered surplus water & main sewerage facilities.”*

*“[Like] the style/mix of the houses”*

*“Love the idea and location”*

In general, the principle of development was received positively at the public consultation.

### Access and Parking

*“Very pleased to see this sort of development and on this site. Slight concern about the road access directly opposite McF entrance creating a cross road”*

*“Lorries, taxis, visiting friends parking spots, turning space”*

*“Stop vehicles backing out onto main road, also stop parking at junction along main road”*

*“GO-EV car on site (would help McFarlands Down too)”*

Following the consultation and advice from transport and highways consultant, the proposed access has been staggered from the opposite junction in order to prevent the formation of a crossroad and improve road safety.

The layout of the parking area has been adjusted to provide additional visitor parking, and additional turning/drop off space within the site.

A Go-EV car share charging station is proposed on the site.

A proposed pedestrian access into the development at the western end of the site has been removed due to feedback from adjoining neighbours. Alternatively, a gate for emergency

service access only has also been introduced. This will be kept locked and will not be for general use.

### Environment, Sustainability and Drainage

*“Concern of water run-off into McFarlands Down, which already gets far too much rain water down the road”*

*“Batteries for solar in every house, would be very solar efficient then”*

*“1. BNG: Where and how will requirements be met 2. How tie in with DoC carbon net zero policy + will there be battery storage (PVs)”*

It is proposed that the parking area would be constructed with permeable surfacing, to mitigate any rainwater run off from the development.. A channel drain will be installed across the site entrance to ensure any surface water is intercepted before leaving the site.

Alongside PV arrays, battery storage will be provided in order to increase the energy resilience and sustainability of the development.

Boundaries between plots would be hedging planted around a post and wire fence (that will quickly be subsumed by the hedge. Additional hedge planting will increase biodiversity and provide screening along the development boundaries. A Biodiversity Net Gain proposal will be included as part of this application.



Photographs from public consultation on 11th January 2024

## 7. SUSTAINABILITY ASSESSMENT

### Context

The underlying principle behind the scheme is economic, social and environmental sustainability. Improvements are made through clean energy, with reductions in emissions, and reduced reliance on carbon fuels, in line with Council policy.

### Social

The proposals would meet a critical requirement for 'essential need' worker housing and housing for permanent island families, who are currently unable to find suitable accommodation on St Mary's and are therefore being forced to leave the Islands. Providing more high quality housing for people that don't meet the criteria for affordable housing is essential to develop sustainable communities on the Island, and will help to stem the decline in population, attracting younger workers and households in order to slow the trend of an ageing population. It may also provide opportunities for households to downsize and free-up existing housing for larger households.

### Economic

Addressing the shortage of accommodation for key workers on the island will ensure that the provision of essential services including schools, health and social care facilities, shops, land management and emergency services is maintained, which is critical for the economic sustainability for St Mary's and the Isles of Scilly as a whole.

The retention of essential services not only benefits islanders, but also supports the tourism industry which is essential an part of the Islands' economy.

Inevitably, investment on St Mary's would have an indirect economic benefit to other islands, with transport services, employment of local people, and service industries across the islands benefiting.

### Environmental

The proposals would employ lightweight construction methods and materials. The detailed design would be developed to minimise energy use and the building's carbon footprint, both in the construction works and in ongoing use. The following energy strategy outlines this approach in detail.

Landscape proposals take the opportunity to enhance the ecological value of the site with additional and more diverse habitats.

### Embodied Energy In Construction

A considerable proportion of a building's carbon footprint is attributable to the manufacturing and transportation of building materials. To minimise this the buildings would be constructed with a timber frame and with timber cladding; which are low embodied energy, carbon sequestering materials when sourced from sustainable forestry.

Highly insulated prefabricated timber cassette panels would be manufactured on the mainland and shipped over to reduce wastage and construction time on site.

The building's exterior would be clad in long lasting materials, and installed with robust detailing, capable of withstanding the marine environment. Improved life span ensures a better return on the energy expended in construction.

Natural materials would be used wherever possible, including slate roofing and timber cedar cladding. The specification would be developed with reference to the BRE Green Guide to Specification to evaluate the environmental credentials of the materials procured in construction.

Each dwelling will be provided with a separate bin store for the storage and collection of recyclable waste.

### Heat Loss and Energy Use

The proposals would take a 'fabric first' approach to energy reduction, seeking to minimise consumption from the outset through the use of passive design principles. These would include optimising orientation and massing, as well as ensuring the use of high-performance building fabric.

The east-west orientation of the buildings and glazing on the south side maximises solar gain, reducing the heatload requirements. South facing windows are protected by overhanging eaves, this arrangement allows passive thermal gain in the winter when the sun is low in the morning and throughout the day, thereby providing additional warmth for the building interior and reducing the overall heat load of the house. Conversely, less of the high summer sun penetrates the building, avoiding the risk of overheating.

Good levels of glazing for the living areas will reduce the need for artificial light. The arrangement of opening windows on both sides of the dwelling allows natural cross ventilation which in the summer will help maintain even, comfortable temperatures.

The prefabricated timber framed building envelope can achieve excellent levels of insulation, with minimal thermal bridging. Off-site manufacturing ensures precision construction, with improved air tightness and thermal performance beyond building regulations standards.

U-value performance of typical building fabric elements would be as follows:

Element	B Reg.s Min.	Proposed
Walls	0.26 W/(m <sup>2</sup> K)	0.16 W/(m <sup>2</sup> K)
Roof	0.16 W/(m <sup>2</sup> K)	0.15 W/(m <sup>2</sup> K)
Floor	0.18 W/(m <sup>2</sup> K)	0.16 W/(m <sup>2</sup> K)

High performance standards would dramatically reduce the energy required to heat the property.

The use of new double glazed windows would: improve air tightness; improve thermal performance; increase the amount of natural light entering the property; and reduce the energy demand from space heating and artificial lighting as a consequence.

Arranging the dwellings in terraces would reduce the external envelope and consequent heat loss.



## 8. ACCESS AND TRANSPORT

### Renewable Energy Sources

A Solar PV array would be installed onto the south facing roof pitches of each terrace as part of the development. Battery storage would be provided in each unit in order to store any excess power generated. This would increase the energy resilience of the development, and reduce any energy demand from the local grid.

Solar PV's would also be provided on the bin/cycle store, which would be used to power the communal electric car charging points in the parking area.

Lighting can add significantly to the electrical loads. All internal and external lighting will use low energy lamps and bulbs. External lighting will also be controlled by appropriate timing and daylight sensor devices to minimise energy consumption.

### Water and Sewage

A package treatment plant system with associated drainage field would be installed to collect and treat sewage effluent from the development.

Each dwelling would be provided with a water butt for rainwater collection, and a communal harvesting tank for emergency use would also be provided. Any excess surface water will be discharged into soakaways.

All hard surfacing would be permeable to minimise rainwater run-off from the site. The proposed dwellings would be designed to minimise water usage. Low water use appliances would be specified where possible, including dual-flush toilets and aerating nozzles throughout.

Excess surface water will be discharged into soakaways.

A new access to the site would be formed from Pungies Lane to the north of the plot. This would lead to a communal parking area, with 10 allocated car parking spaces for the dwellings, alongside 4 extra visitor parking spaces.

In addition, the provision of a Go-EV electric car share charging station on the site will tie into an existing community venture which has been successful in encouraging car sharing and electric car use on the Islands.

The provision of this, alongside an additional 3 electric car charging points which cover the allocated parking spaces would encourage sustainable transportation, in accordance with the Isles of Scilly Local Plan strategic aims and policies. In particular, this would comply with Aim 6 *“Reduce the environmental and social impacts of transport by reducing the need to travel by petrol and diesel cars through the siting and design of new development and encouraging sustainable travel options, including the use of car sharing and electric vehicles”* and policies SS1, SS5, SS8 and SS10.

Occupants of the dwellings would be encouraged to use sustainable transportation methods wherever possible. Sufficient bicycle storage for each resident would be provided, in order to promote cycling on the island.

Options for additional pedestrian access routes are being investigated alongside neighbouring occupiers.

More detail on the access and transport provision for the development is included within the enclosed transport statement.

Sufficient space would be provided for fire appliance access to the site in accordance with Part B of the Building Regulations.

Internally the buildings would be designed and constructed to comply with Part M of the Building Regulations as a minimum standard. Provision of ground floor bedrooms and living spaces, level access throughout, generous circulation spaces and glazing allowing views out for seated occupants would ensure that the units could be occupied by all.

## 9. PHASING

It is proposed that the construction process would be phased, in order to allow sufficient contractor accommodation on the island to construct the remainder of the development. 'Terrace A' would be completed first, and would then be occupied temporarily by the contractors constructing the remaining terraces. Upon completion of the development, this terrace would revert to its intended use as essential accommodation to meet the Island's housing needs.

The applicant kindly requests that any pre-occupation planning conditions are worded so as to avoid precluding the use of these units as temporary contractors' accommodation.



Terrace A (highlighted in red) to be completed in phase I of construction

## 10. CONCLUSION

The proposed 10 new dwellings would address the critical shortage of housing on St Mary's. This application aims to provide housing for 'essential need' workers and permanent island residents that may not fulfil eligibility criteria for affordable housing but still need to reside full time on the islands to provide essential services underpinning the economy. In line with local policy, the development would provide new housing to support the creation of a sustainable, balanced and inclusive island community.

This is essential to support the long-term social and economic sustainability of St Mary's, which is integral to the economic prosperity of the island group as a whole; its contribution sustains many other local services including transport, employment and service industries across the archipelago.

The form, scale, character and materiality of the proposed buildings are designed to be appropriate to the character and setting of the conservation area, compatible with the vernacular character that has developed across the archipelago



Proposed Site Sections

## APPENDIX I - SCHEDULE OF AREAS

	No. of bedrooms	No. of Bed spaces	Minimum Space Standard (m2)	GIA (m <sup>2</sup> ) Incl bike storage
<b>Terrace A</b>				
Unit 1	3	5	86	92.1
Unit 2	1	1	37	50.0
Unit 3	2	3	61	64.0
				<b>206.1</b>
<b>Terrace B</b>				
Unit 4	2	3	61	64.0
Unit 5	1	1	37	50.0
Unit 6	2	3	61	64.0
				<b>178.0</b>
<b>Terrace C</b>				
Unit 7	1	1	37	50.0
Unit 8	3	5	86	92.1
				<b>142.1</b>
<b>Terrace D</b>				
Unit 9	2	3	61	64.0
Unit 10	1	1	37	50.0
				<b>114</b>
<b>Total</b>				<b>640.2</b>

**RECEIVED**

*By A King at 3:31 pm, Feb 12, 2024*

**APPROVED**

*By Lisa Walton at 4:55 pm, Oct 03, 2024*



# Land to the south of Pungies Lane St Mary's, Isles of Scilly

## HERITAGE IMPACT ASSESSMENT

Charlie Johns | Report No 2024/3 | 12 February 2024

<i>Land to the South of Pungies Lane</i>	
St Mary's, Isles of Scilly	
Heritage Impact Assessment	
Client	Duchy of Cornwall
Author	Charlie Johns
Status	Final
Date	12 February 2024

## **Acknowledgements**

The study was commissioned by Nathan Dean, Head of Building (Rural) for the Duchy of Cornwall. Licensed copies of Ordnance Survey mapping were provided by Will Partridge of the Cornwall & Scilly Historic Environment Record. Thanks to Katharine Sawyer for permission to reproduce photographs of the Pungies Lane cup-marked stone and the Telegraph Tower and Clive Sibley for the photograph of the Long Rock standing stone.

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 Coastguard's Lookout Tower viewed from the site (photo: Nathan Dean).*

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## 1 Summary

This Heritage Impact Assessment has been commissioned by the Duchy of Cornwall to support a planning application for a housing development on land to the south of Pungies Lane, St Mary's, Isles of Scilly.

The site is close to the junction of Pungies Lane with Telegraph Road (NGR SV 91295 12096). To the north, south and west of the field are modern houses and other buildings. To the east is a shelter belt of trees and agricultural land.

The assessment is focused on the proposed development plot – 'the site' – but also identifies heritage assets within a wider 0.5km buffer around the site and considers potential impacts upon these assets – 'the study area'.

There are no recorded designated or undesignated heritage assets within the site. There are four Scheduled Monuments, one Listed Building and 21 undesignated heritage assets within the wider study area.

The assessment concludes that the proposed development will not have any physical (direct) impact on these heritage assets and will not have any visual, or other non-direct impacts, on the Scheduled Monuments and the undesignated heritage assets or their settings.

There will be a visual impact on the setting of the Grade II Listed Coastguard Lookout Tower (NHLE 1141182), which is located 25m west of the site. However, the setting of the tower is already compromised by the miscellaneous 20<sup>th</sup> century development around it, so the visual impact of the proposed development on the tower is assessed as Neutral.

There have been numerous finds of prehistoric flint artefacts and cist burials within the 0.5km radius study area, although none are recorded in the site. Therefore, the archeological potential of the site is assessed as Uncertain, but possibly Moderate. The impact of the development on any buried archaeological resource would be irreversible and archaeological monitoring of initial groundworks on the site and for the foul drainage soakaway in a field to the south should be considered.

The roadside hedge of the site may be protected under the Hedgerow Regulations 1997. Any plans to remove the hedgerow, or a section of it, if required for site access and visibility splay, will need to be discussed with the Local Planning Authority first to make sure it is legal to do so. Appropriate mitigation might be a photographic record and archaeological recording of sections through the hedge.



Figure 1 Location of the site on St Mary's, the 0.5km-radius study area is outlined in red.

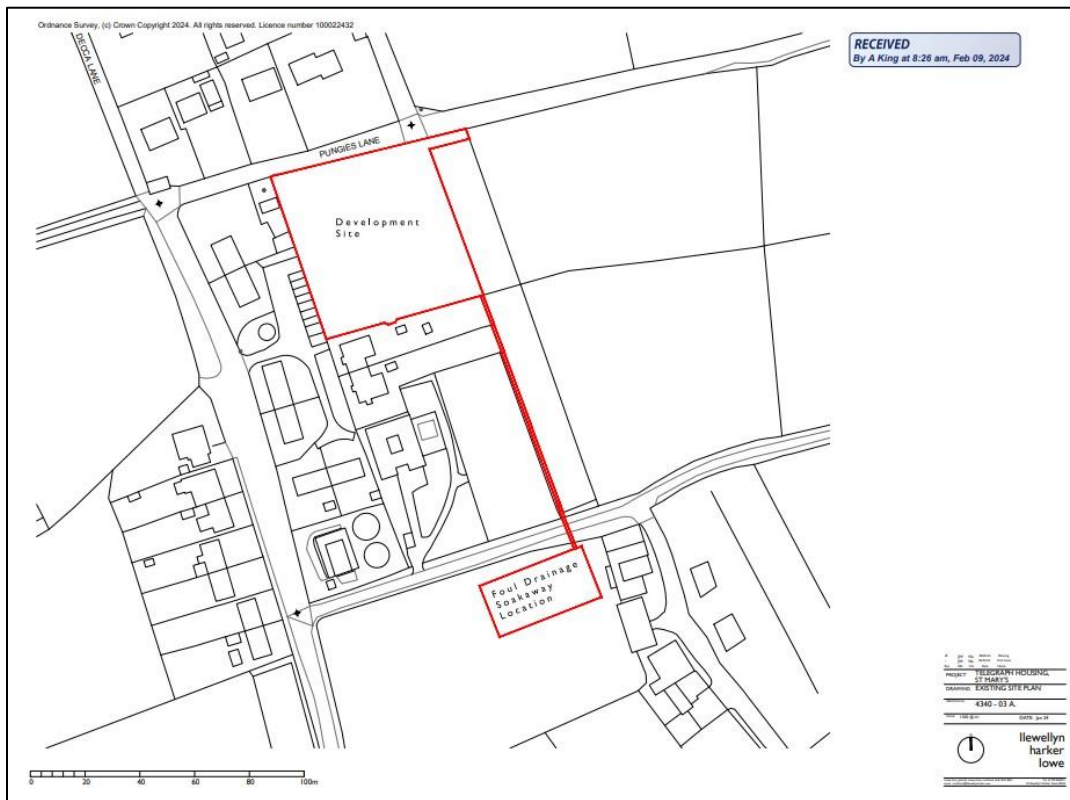


Figure 2 Map showing the site and the foul drainage soakaway location outlined in red.

## 2 Introduction

### 2.1 PROJECT BACKGROUND

In November 2023, Charlie Johns, Heritage Specialist, was commissioned by Nathan Dean, Head of Building (Rural) for the Duchy of Cornwall to carry out a Heritage Impact Assessment (HIA) to support a planning application for a proposed housing development on land south of Pungies Lane, St Mary's, Isles of Scilly, TR21 0JD.

### 2.2 AIMS

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

- The resource of identified heritage assets, both designated and non-designated, within the study area that are 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 study area.
- Appropriate measures for mitigating impacts upon the heritage assets and resource within the study area.

### 2.3 METHODOLOGY

#### 2.3.1 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).
- 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).

### 2.3.2 Scope

This HIA is focused on potential heritage assets identified within the proposed development plot, hereafter referred to as 'the site' (Figure 2). The HIA also identifies relevant heritage assets within a wider 0.5km buffer around the site and considers potential impacts upon the assets within this wider area, hereafter referred to as the 'study area' (Figure 4).

### 2.3.3 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).

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.
- Publicly accessible LiDAR data.
- Early maps, records, and photographs (see Section 8.1).
- Published histories and 'grey literature' (see Section 8.2).

### 2.2.4 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'.

### 2.2.5 Settings

In evaluating aspects of the settings of heritage assets the assessment followed Historic England's guidance on the subject (2017).

### 2.2.6 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 Nathan Dean for use in this report.

## 2.6 AUTHOR

The author of this report is Charlie Johns BA (Hons), MCIfA (No. 381). Formerly a Senior Archaeologist with Cornwall Archaeological Unit, Charlie was the Unit's archaeologist for 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).

### 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.

Pungies Lane is located towards the north-west coast of the island. The site is a field, currently down to pasture, situated to the south of the western end of the lane close to the junction with Telegraph Road (NGR SV 91295 12096). The field is flat, an aerial photograph of 2019 shows it was ploughed at that time. To the north, south and west of the field are modern houses and other buildings. To the east is a shelter belt of trees and agricultural land.

The proposed foul drainage soakaway for the development is in a field to the south of the site (Figure 1).

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 Historic Resource

### 4.1 HISTORIC LANDSCAPE CHARACTER

The study area is characterised as 'Farmland: late post-medieval enclosures (C19)' in the Isles of Scilly Historic Landscape Assessment (Figure 3; Land Use Consultants 1996).

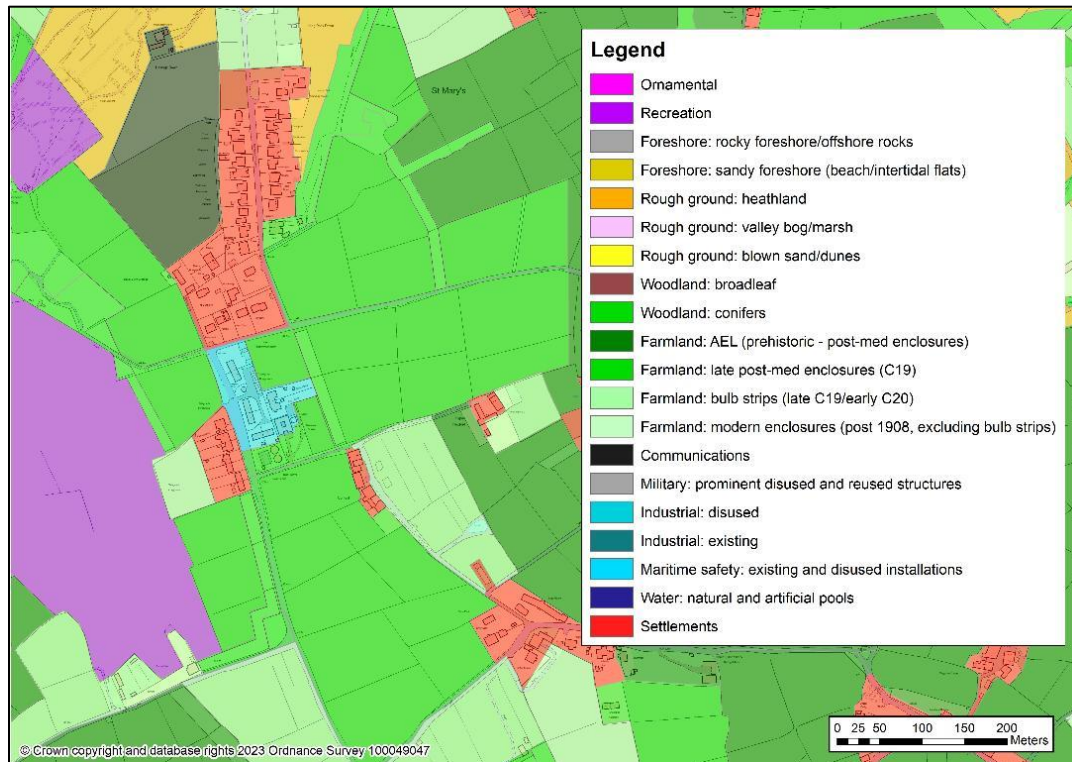


Figure 3 Map showing the Historic Landscape Character of the site.

### 4.2 DESIGNATIONS

#### 4.2.1 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 consulted on a Draft Conservation Area Character Statement for the Isles of Scilly as a Supplementary Planning Document.

#### 4.2.2 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.

#### 4.2.3 Archaeological Constraint Areas (ACAs)

The Isles of Scilly Archaeological Constraint Maps were compiled during February and March 1995 by Cornwall Archaeological Unit (CAU) with funding from English Heritage and the Council of the Isles of Scilly. The maps were drawn to indicate the location of recorded archaeological and historic sites and structures in order to make an initial assessment of the impact of any proposed development on these remains, and if necessary, archaeological consultation carried out prior to any planning decision being made. 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 is 20m east of the Telegraph Hill ACA, approximately 200m south of the Pendrathen /Long Rock Down ACA, 300m north west of the Lower Newford ACA, 400m north of the Content Farm ACA and 4440m north east of the Porthloo Road ACA.



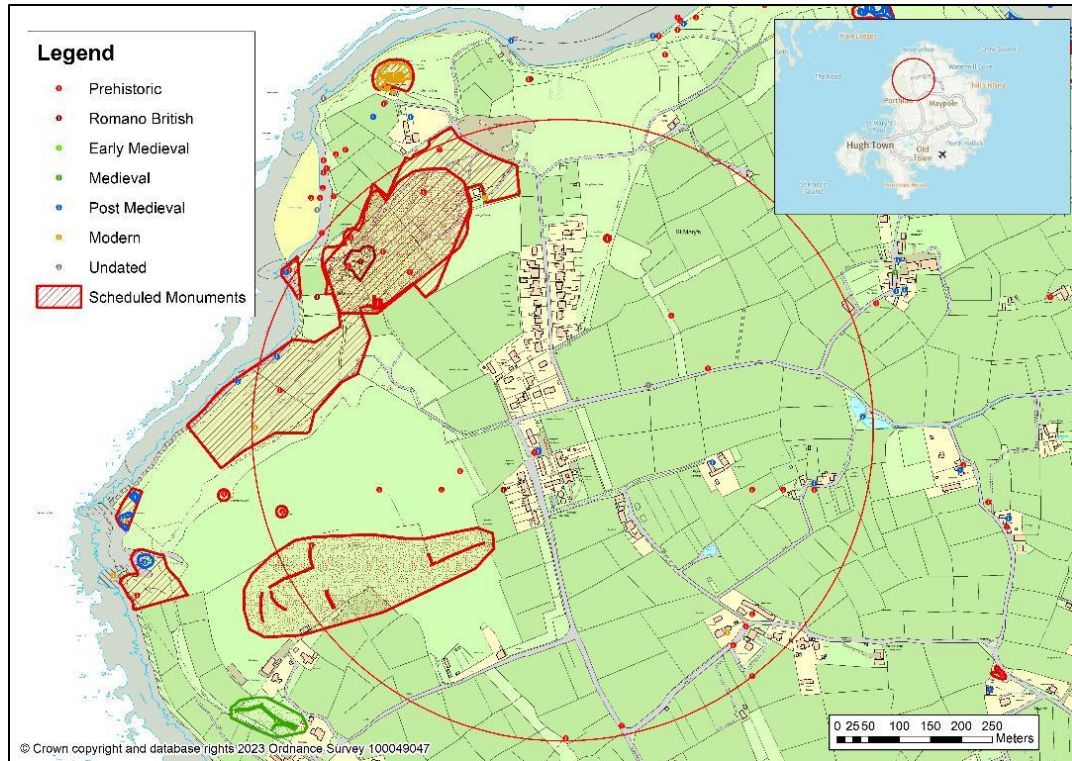


Figure 4 Map showing heritage assets within the study area.

#### 4.2.4 Scheduled Monuments (Figure 4)

There are no Scheduled Monuments within the site but there are four Scheduled Monuments within the wider study area:

- The Long Rock prehistoric standing stone on Long Rock Down, St Mary's (NHLE 1013276) located 200m NNE of the site (Figure 6); and
- Entrance graves, standing stones, field systems, settlements and post-medieval breastwork, kelp pit and stone pits on Halangy and Carn Morval Downs, St Mary's (NHLE 013273), located approximately 280m north west of the site).
- Prehistoric settlement, Romano-British cist cemetery and Civil War battery in northern Toll's Porth, St Mary's (NHLE 1015664), located approximately 500m north west of the study area.
- Platform cairn on Carn Morval Down, 235m north of Isles of Scilly Golf Course Club House, St Mary's (NHLE 1010172), located approximately 500m south west of the site.

#### 4.2.5 Listed Buildings (Figure 4)

There are no Listed Buildings within the site but there is one Listed Building within the study area:

- Coastguard Lookout Tower, Telegraph Road (NHLE 1141182), located 25m west of the south-eastern edge of the site.

#### 4.3 UNDESIGNATED HERITAGE ASSETS (FIGURE 4)

There are no undesignated heritage assets recorded within the site but the HER records 21 undesignated heritage assets within the wider study area:



Figure 5 The undated cup-marked stone incorporated in the drystone hedge on the south side of Pungies Lane, (MCO58413 (photo: Katharine Sawyer).

- A Neolithic or Bronze Age standing stone (MCO31547) is shown on Graeme Spence's 1792 chart in a field where the Telegraph Tower now stands (Figure 5).
- A possible Neolithic or Bronze Age standing stone (MCO31175). A square stone pillar, 1.5m high, situated in the corner of a field called 'Pungies', approximately 250m north east of the site. It was recorded in the late 18<sup>th</sup> century but has not been identified by more recent fieldworkers.
- An undated cup-marked stone is incorporated in the drystone hedge on the south side of Pungies Lane, 155m east of the site (MCO58413; Figure 5). The visible part of the stone measures 0.9m wide and 0.6m high. It has presumably been re-used from elsewhere.
- A prehistoric cup-marked stone is incorporated in the drystone hedge on the north side of Pungies Lane 255m east of the site (MCO5705).

- Prehistoric flint implements were found at Newford Farm, 325m south east of the site (MCO 30876).
- A Bronze Age cist was recorded in the 1750s by William Borlase at Lower Newford, in which was found an urn containing human bones (MCO30807).
- Borlase also recorded The probable remains of a prehistoric field system, recorded at Lower Newford (MCO30808).
- The possible site of a Bronze age cist is recorded at Town Lane, approximately 425m south east of the site (MCO31672).
- A cist, 0.9m long by 0.6m wide, at Town Lane possibly now beneath the metalled road surface, approximately 430m south east of the site (MCO31671).
- A prehistoric lithic scatter found at the junction between High Lane and Town Lane, approximately 425m south east of the site (MCO30646).
- Prehistoric flint thumb scrapers, cores, re-touched flakes and a blade found at High Lane, approximately 500m south east of the site (MCO30647).
- A Bronze Age cist found at Content Farm in 1939, 0.6m long by 0.4m wide by 0.3m deep, approximately 490m south of the site (MCO30443).
- Eight worked flints were found at Content Farm, approximately 500m south of the site (MCO30444). These include a barbed and tanged arrowhead, a small scraper and a re-touched blade of plano-convex knife type. Paul Ashbee (1974, 129) notes that flint working is common in the neighbouring fields. In 1965 a flint arrowhead, two scrapers and another worked flint from Content Farm were given to the Isles of Scilly Museum.
- A Bronze Age cist containing a child burial found on Carn Morval Down at the end of the 19<sup>th</sup> century, approximately 175m south west of the site (MCO30239).
- Prehistoric flint implements recovered from Klondike field on Telegraph Hill in 1967, approximately 200m south west of the site (MCO30755).
- A Bronze Age cist and a flint scraper recorded in 1927 (MCO31044 and MCO31045) – should be in the cliff at Pendrathen so incorrectly plotted by the HER.
- A prehistoric field system visible on air photographs as cropmarks across the golf course south of Carn Morval Downs, approximately 450m south west of the site (MCO41969).
- A Denarius coin of the Emperor Hadrian found approximately 125m south west of the site (MCO31549). At the same location two saddle querns from the debris of a stone wall near Telegraph Hill (MCO31546).
- A possible inland fortification or barracks known as 'New Fort' recorded at in the terrier of the 1652 Parliamentary Survey (MCO30806).
- A post-medieval cobbled floor was uncovered during gardening works at Higher Newford about 0.30m below the current ground surface. It has since been re-buried (MCO 63371).

- Two extant post-medieval retting ponds originally dug to hold water for washing flax, 380m east of the site (MCO30128).
- The Site of a World War Two Ground Controlled Interception Station at RAF Newford, approximately 425m south east of the site (MCO74971).

#### 4.4 CHRONOLOGICAL SUMMARY

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

In the Early Bronze Age (c2000–1500 BC) the site and wider study area would have been within a 'ceremonial landscape' which included the entrance graves at Bant's Carn and Halangy Down, the Long Rock standing stone, the Newhouse standing stone at Telegraph (see Figure 5) and the possible standing stones at Bant's Carn and Pungies.

The Long Rock standing stone has survived well with no recorded disturbance from its present location. A concentration of flint artefacts recorded near this stone provides evidence for this site having formed a focus for prehistoric activity. The relatively close grouping of standing stones known on this part of the island is also unusual, while the wider relationship between the monument, its topographical setting and the settlements and field systems on the slopes of Halangy Down demonstrates the organisation and development of ritual and settlement activity among prehistoric and Romano-British communities.



*Figure 6 The Long Rock standing stone (NHLE 1013276) (photo: Clive Sibley).*

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



Figure 7 Detail from Graeme Spence's 1792 Survey showing the location of the site, the Newhouse standing stone and the settlement of Newford (UKHO, Taunton).

#### *Newford*

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

A map of 1792 by Graeme Spence, a maritime surveyor for the Royal Navy, shows that this area of heathland was known at this time 'Newford Down' (Figure 7). The map also shows the prehistoric 'Newhouse standing stone' at Telegraph. The process of post-medieval enclosure had already begun to the east of the site at Newford Farm.

Newford was the main settlement in the area at this time. It was recorded in the 1652 Parliamentary Survey as 'Newfort ten: a faire dwelling house with large outhouses, gardens, orchards within closes and common adjacent, all lying under the New Fort' (Pounds 1984, 143-4). William Borlase (1756, 11) described it as 'a farm of Mr. Smith's, on which he has made considerable improvements', although after Mr Smith's death the land was divided among several tenants (Troutbeck c1794, 101).

### *The Coastguard's Lookout Tower*

The Grade II Listed Coastguard Lookout Tower, probably better known as the Telegraph Tower, was built as semaphore signal station of 1814, with early-20<sup>th</sup> century telegraph house added to the roof. The following description is extracted from the List Description.



*Figure 8 Postcard of the Telegraph Tower in c1898.*

The tower is circular in plan, stands four storeys (12m) high and is built of coursed, shaped, granite blocks. There are four four/four-pane sash windows with sills to each face and gabled wooden porch. One of the ground-floor window openings is sealed in granite, and probably marks a former door opening. To the right of the opening, a downpipe with hopper is attached below parapet level. The granite surrounds of the window openings show signs of disturbance, and some heads are scored vertically to give the appearance of decorative, flat arches. The upper floors are slightly set back from the projecting ground floor. There are string courses beneath the parapet surrounding a flat roof on which the early-20<sup>th</sup> century timber telegraph house stands (Goodwin 1993).

The tower is located on the highest point of St Mary's, at 49m above sea level on the site of the Newhouse standing stone (Figure 7). The stone is mentioned by Troutbeck (c1794). His account also identified the ruins of a watch house on the site, and a lookout is marked on Christian Lilly's map of c1715. Following the breakdown of the Peace of Amiens (1802), hostilities between Britain and France resumed. Prior to this, signal posts had been constructed along the English coast

to alert naval squadrons and ports to the route of an invading French force. In 1804 it was agreed that a further signal post should be built on the Isles of Scilly in response to attacks on merchant ships by French privateers. A signal house was built on the island of St Martin's, and unlike the mainland examples which were constructed of timber and canvas, was built of local granite to resist the ill-effects of the exposed location (Goodwin 1993).

In May 1812 Lieutenant General Vigoureux, military governor of Scilly, asked for a new signal tower station to be built on Newford Down, St Mary's. After a series of delays, the tower was erected by Messrs Hambledon by 1814. The officer in charge of the station was a Lieutenant Trinder, who appears to have been unhappy with his posting and consequently complained constantly about the condition of the building, the quality of his staff and the usefulness of the station. The result was that further works were carried out to the tower. However, in December 1816, after only two years in operation, it was closed down. The building reverted to the custody of the landowner - the Duke of Leeds. In 1831 the site was taken over by the Coastguard as a subsidiary to the main station situated on the Garrison (Goodwin 1993).

In 1898 Guglielmo Marconi is said to have heard wireless signals at this tower transmitted from Porthcurno in west Cornwall, 30 miles away (Figure 6). The tower now serves as the Coastguard headquarters and weather reporting station (Madden 1996, 41; Johns and Ratcliffe 2003, 40).

In 1903 a wireless mast and receiving office were built nearby, and in 1908 a telegraph house was erected on the tower's roof by the contractor, Arthur Carkeep. The Newford Down semaphore station became known as Telegraph Tower, and the wider site was developed into a modern radio transmitting and communications site by the late-20<sup>th</sup> century. The tower appeared to stand empty in 2010.

#### *1880 to the present day*

The Telegraph Tower (Coastguard station) is shown on the c1880 Ordnance Survey map but there are no other buildings around it, the nearest being at Content Farm, approximately 0.5km to the south (Figure 9). The map shows that Pungies Lane had been extended to form a right-angled junction with Telegraph Road. The site is now an enclosed field. The roadside field boundary is a Cornish hedge, a stone-faced earth bank, which appears to date from the mid-19<sup>th</sup> century. The level of the field is 0.3 – 0.5m higher than the road so the hedge may be a retaining structure. It is about 1.2m high on the road side with quite large stones at the base.

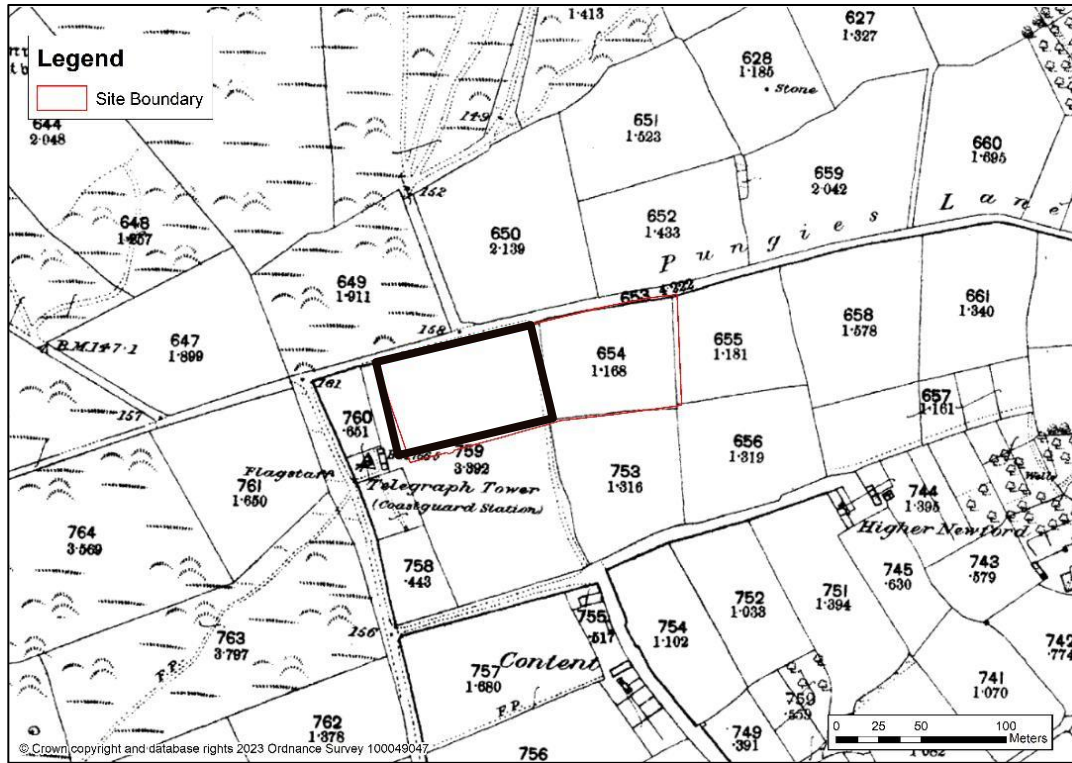


Figure 9 Detail from the c1880 OS map, the site outlined in black.

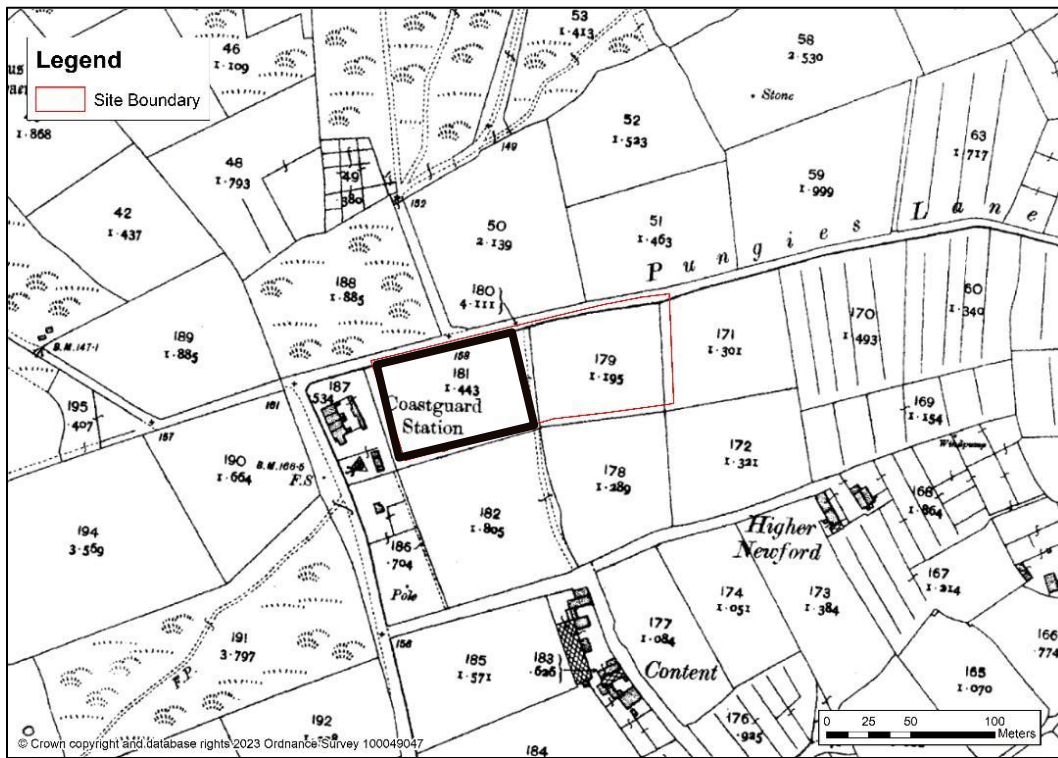


Figure 10 Detail from the c1907 OS map, the site is outlined in black.



The tower is shown on the Ordnance Survey Map of c1907 (Figure 10), along with a group of other buildings marked Coastguard Station to the north. The tower is shown as circular on plan, set within a triangular boundary, and an indistinct marking on the south-west corner. To the south of the station is a small rectangular structure, possibly a mast.

Most of the development around the Telegraph Tower dates to the mid- and late-20th century, including a new row of garages between the tower and the site (Figure 11), the linear development of McFarland's Down to the north and Telegraph Bungalows to the south west. There is a new telecommunications mast to the north and a Repeater Station (telecommunications) with mast and what looks like sewage treatment works to the south.



*Figure 11 The Grade II Listed Coastguard Lookout Tower today, note the row of garages behind the tower (photo: Katharine Sawyer).*

## 5 Assessment of Significance

### 5.1 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).

#### 5.1.1 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.

#### 5.1.2 Setting

The NPPF defines setting of a heritage asset as: 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

Historic England (2017) has published good practice advice on the setting of heritage assets which provides guidance on setting and development management, including assessment of the implications of development proposals on the setting and significance of designated heritage assets.

#### 5.1.3 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.

## 5.2 STATEMENT OF SIGNIFICANCE

### 5.2.1 Evidential value

There are no recorded heritage assets within the site and examination of LiDAR coverage of the site does not indicate any potential archaeological features. However, there have been numerous finds of prehistoric flint artefacts and cist burials within the 0.5km radius study area. Therefore, the evidential value of the site is assessed as of **Uncertain but possibly Moderate Significance**. Any cist burials or finds or features that might be revealed which are with associated the Bronze Age ceremonial landscape are potentially of National Importance, any other features or finds are likely to be of Local Importance.

### 5.2.2 Historical value

The site illustrates the ongoing enclosure of heathland in the post-medieval period and is associated with the historic settlement of Newford Farm.

The roadside hedge of the site may be **Protected** because it appears to meet the following criteria of The Hedgerow Regulations 1997:

- Length – it is more than 20m long.
- Location – it is on land used for agriculture.
- Importance – it appears to be more than 30 years old and part of a field system that existed before 1845 (as shown on Graeme Spence's 1972 map – Figure 5) and is therefore deemed as Important.

The other field boundaries appear to have been modified during the 20<sup>th</sup> century. The historical value of the site is assessed as of **Moderate Significance**.

### 5.2.3 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 modern development in the vicinity, including bungalows, a row of garages, transmitter masts and a sewage treatment plant. Therefore, the aesthetic value of the site is assessed as of **Moderate Significance**.

### 5.2.4 Communal value

There are no obvious connections with recent social history or current art connections. Therefore, the communal value of the site is assessed as of **Low Significance**.

## 6 Assessment of Potential Impacts

### 6.1 DETAILS OF THE PROPOSED DEVELOPMENT

The proposal is for a housing development on the site. No further details were available at the time of writing this report.

### 6.2 SUMMARY OF POTENTIAL IMPACTS

#### 6.2.1 Physical (Direct) Impacts

The main impact of the proposed housing development is a direct impact on any buried archaeological remains located on the site – although the archaeological potential is uncertain but possibly moderate. The impact of the development on any buried archaeological resource would be irreversible. Excavations for the foul drainage soakaway in the field to the south would have similar direct impacts.

There may also be direct impacts on the protected roadside hedgerow, if required for site access and visibility splay. Any proposal to remove the hedgerow, or a section of it, will need to be discussed with the Local Planning Authority (LPA) first to make sure it is legal to do so and plans relating to the hedgerow will need to be provided.

There will be no direct impacts on any of the other designated or undesignated heritage assets identified in this assessment.

#### 6.2.2 Visual and Other Non-Direct Impacts

The assessment concludes that the proposed development will have no visual or other non-direct impacts on the scheduled monuments or undesignated heritage assets in the study area, or on their setting.

The proposed development will have a visual impact on the setting of the Coastguard's Lookout Tower. The tower is designated at Grade II for the following principal reasons:

- Architectural: An interesting example of a pre-1840 semaphore signal station.
- Rarity: This is an early example of its type
- Intactness: The station remains largely unaltered externally.

However, the setting of the Coastguard Lookout Tower has already been compromised by the miscellaneous modern development around it such as a row of garages, bungalows, transmitter masts and a sewage treatment plant (Figures 11, 12 and 13). The visual impact of the proposed development on the Coastguard Lookout Tower is therefore assessed as **Neutral**.



*Figure 12 The northern boundary of the site showing development around the Coastguard's Lookout Tower (photo: Nathan Dean).*



*Figure 13 The back of the row of garages between the site and the Coastguard's Lookout Tower (photo: Nathan Dean).*

## 7 Concluding remarks

Because of the numerous finds of prehistoric flint artefacts and cist burials within the 0.5km radius study area, archaeological recording during initial groundworks on the site and for the foul drainage soakaway should be considered. This might take the form of a controlled soil strip or a watching brief.

A controlled soil strip (or strip, map, and sample – SMS) is where the archaeologist controls the machining and strips the overburden on the site, records any archaeology features and implements an appropriate sampling strategy.

A watching brief involves the archaeological monitoring of groundworks as they proceed. Time should be allowed for the archaeologist to carry out excavation, recording (at an appropriate level which may include description, photography, or drawing in plan or section), the recovery of any artefacts or samples, and the identification of any further investigation needed.

The archaeological should be carried out according to a Written Scheme of Investigation (WSI) approved by the Local Planning Authority.

If it is necessary to cut through the roadside hedgerow for access or visibility splay, appropriate mitigation might be a photographic record and archaeological recording of sections through the hedge.

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### 8.3 WEBSITES

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



*Charlie Johns*  
*Heritage Specialist*

*'Sunset', Trewennack, Helston, Cornwall*  
*TR13 0PL*

(01326) 572024  
[bradpeverill@aol.com](mailto:bradpeverill@aol.com)

**APPROVED**

*By Lisa Walton at 4:58 pm, Oct 03, 2024*

**RECEIVED**

*By Liv Rickman at 5:04 pm, Feb 08, 2024*

## PRELIMINARY ECOLOGICAL ASSESSMENT

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### LAND AT TELEGRAPH, ST MARY'S, ISLES OF SCILLY



*Client: Duchy of Cornwall*

*Our reference: 22-11-1*

*Planning reference: Report produced in advance of submission*

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

*Author: James Faulconbridge BSc (Hons), MRes, MCIEEM*

*Contact: ios.ecology@gmail.com*

# Executive Summary

## Overview

The Land at Telegraph, St Mary's was subject to a Preliminary Ecological Assessment (PEA) and Preliminary Bat Roost Assessment (PRA) in December 2023 / January 2024.

This report outlines the results of the PEA as well as recommendations and proposed mitigation measures arising from the ecological baseline.

## Proposals

The proposed works involve the construction of residential dwellings along with associated landscaping, utilities and infrastructure within an existing pasture field. A soakaway will be created in a separate field to the south with a pipe route connecting with the development site – these areas will be subject to temporary impacts only.

## Ecological Assessment

The proposals would result in the removal of the majority of the pasture field within which the dwellings are to be constructed. The soakaway field and intervening pipe route would be subject to short-term disturbance for the installation of soakaways.

A boundary wall is situated along the northern boundary. It would be removed and recontoured as part of the works. The remainder of the boundary features would be largely unaffected aside from a minor removal from the western boundary wall to provide access.

The proposals have the potential to impact upon nesting birds and rabbits associated with boundary features and the offsite evergreen shelter belt. An offsite garage which lies immediately on the western boundary of the site has the potential to support roosting bats which, whilst not directly impacted by the proposed works, have the potential to be disturbed during construction and occupation phases of the project if present. There is also a low risk of bats finding transient or occasional roosting opportunities within the northern boundary wall.

## Recommendations

Recommendations provided in this EA report will ensure that impacts to protected species are avoided and a Biodiversity Net Gain is secured. These measures include:

- Measures to protect nesting birds including timing of works;
- Measures to protect bats and other species during works to the northern boundary feature;
- Measures to protect retained habitats including boundary and onsite features;
- A methodology to dismantle the existing wall and restore to a Cornish Hedge along the northern boundary;
- Measures to ensure that rabbits are not killed, injured or entombed;
- A further bat survey on the offsite garage building and development of measures necessary to ensure that any roost identified is protected and retained;
- Design of external lighting to minimise light-spill on retained habitats to provide dark corridors and continued suitability of foraging resources for bats and invertebrates;
- An assessment of Biodiversity Net Gain to demonstrate how a net gain will be achieved;

- Development of a Landscaping Plan to detail habitat creation and management measures which would secure the BNG in the long-term;
- Installation of bird and bat boxes within the final development;
- Measures to restore the habitats temporarily impacted by the installation of the soakaway;
- Measures to control or minimise the risk of non-native invasive species spreading within our outside of the site.

### Report Status

This EA report represents a comprehensive baseline to support a Planning Application with regards to ecological receptors.

There are however additional documents which should either be submitted alongside the report or conditioned in any permission granted in order to secure the mitigation and enhancement measures. These include:

- A **Construction Ecological Management Plan (CEMP)**;
- A **Bat Survey Report** with regards to the offsite garage building on the northern boundary;
- A **Lighting Plan** showing details of proposed external lighting;
- A **Biodiversity Net Gain** assessment demonstrating how 10% minimum gain will be achieved;
- A **Landscaping Plan** detailing habitat creation and management measures which would secure the BNG in the long-term;
- **Habitat Enhancement Plans** showing the specification and location of bird and bat boxes within the final development.

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# 1. Introduction

## 1.1. Project Overview

The development site under consideration is a horse-grazed pasture field near Telegraph, St Mary's in the Isles of Scilly. The temporary works to construct a soakaway involve further areas of grassland and scrub to the south.

The proposals relate to the construction of new housing and associated utilities and landscaping along with a soakaway.

The proposed works considered in this assessment were identified in the plan "Llewelyn Parker Lowe: 4340 - 13" provided by the client.



**Map 01** – Site location indicated by the red circle. The field where the new development will be constructed is indicated. Reproduced in accordance with Google's Fair Use Policy.

## 2. Site Location and Description

### 2.1. Site Location

The development site comprises a grassland field near Telegraph, St Mary's, Isles of Scilly. The National Grid Reference for the centre of the site is SV 91313 12099 (see Map 1).

### 2.2. Site Description

The development site is approximately 0.35 hectares (ha) in size and is dominated by a horse-grazed pasture fields with stone wall boundaries. The redline enclosing the soakaway occupies a further 0.7ha of fields containing grassland and scrub along with intervening boundary features to the south.

### 2.3. Local Landscape Setting

The site is set on the boundary between existing conurbations comprising Telegraph to the west and MacFarland's Down to the north. MacFarland's Down is a small linear development of detached dwellings - each of the properties are set within their own mature gardens consisting of a mixture of lawn and flower borders which are bounded by hedgerows that contain the occasional mature tree.

The landscape to the west, beyond the dwellings, comprises a small block of cultivated fields used for growing flowers which are linked to a small shelterbelt by mature hedgerows of Pittosporum. This shelterbelt forms part of the north-eastern boundary of the local golf course, a large, exposed expanse of very short grassland and heathland with minimal trees or shrubs to provide cover. Beyond these cultivated fields to the north are open headlands, consisting of a mosaic of coastal grassland, heathland and scrub which are grazed for conservation purposes.

Due south and to the south-east, the landscape is dominated by a mosaic of small, enclosed fields used for growing flowers. This contiguous patchwork of small fields, hedgerows and linear shelterbelts extends for at least 2km, reaching as far south as two wetland SSSIs.

East of the site are pasture and cultivated fields bounded by hedgerows. This habitat extends north-eastwards to the large pine shelterbelt at Trenoweth. To the east the small fields and lanes are bounded by hedgerows or mature trees. This habitat continues south-eastwards for at least 2km.





**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 five 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 450m to the north-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 450m to the north-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.
- **Higher Moors and Porth Hellick Pool SSSI** – Situated 950m south of the proposed development lies Higher Moors SSSI – a topogenous mire designated for several rare and notable plant species including bog pimperl, star sedge and marsh St John’s-wort.

- **Watermill Cove SSSI** – Situated 950m to the east is designated for predominantly geological rather than ecological interest - its cliff exposures of Quaternary sediments, that show the sequence of changes in the climate and environment during the Quaternary period.
- **Porthloo SSSI** – Situated 700m to the west is designated for its geology, particularly for its Quaternary sediments in the cliffs that show changes in the climates and environments of the Quaternary period in Scilly.

## 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.

A full records centre search was not undertaken for other ecological groups, as it was not considered necessary given the limited scale of impacts and the nature of the on-site and surrounding habitats.

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 Ecological Assessment 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 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 14<sup>th</sup> December 2023 with additional survey of the proposed soakaway site undertaken on 26<sup>th</sup> January 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 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. Habitats

The habitats described 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.

#### 4.1.1. Development Field

The development site is situated to the north and is dominated by a semi-improved grassland field used for horse grazing at the time of survey.

The sward is grass dominated with species including perennial rye (*Lolium perenne*), red fescue (*Festuca rubra*), common bent (*Agrostis capillaris*) and couch (*Elymus repens*) with a lower frequency of cock’s foot (*Dactylis glomerata*) and Yorkshire fog (*Holcus lanatus*).

Herbaceous species include corn spurrey (*Spergula arvensis*), ribwort plantain (*Plantago lanceolata*), common vetch (*Vicia sativa*), creeping buttercup (*Ranunculus repens*), cats-ear (*Hypochaeris radicata*), clover (*Trifolium sp.*), and ivy-leaved speedwell (*Veronica hederaceae*). Yarrow (*Achillium millifolium*) and sheep’s sorrel (*Rumex acetosella*) are occasional around the peripheries whilst broadleaf dock (*Rumex obtusifolius*) occurs where there is greater disturbance from trampling.

The field has rows of daffodils (*Narcissus sp.*) indicating a historic use for bulb farming. This would indicate that the grassland sward has not been a continuous presence but is likely to have been ploughed and agriculturally managed for bulb planting in the past before reversion to pasture.

#### 4.1.2. Shelterbelt

An offsite shelter belt lies to the east of the development site. The shelterbelt is predominantly karo (*Pittosporum crassifolium*) and lodgepole pine (*Pinus contorta*) with occasional coprosma (*Coprosma repens*). The shrubs are to 5-6m in height with some pine trees reaching 8-10m.

The understory is very dense and dark due to the evergreen shrubs, with abundant deadwood and brash from pruning. There is vegetation at the edges where light penetrates – here can be found typical woodland edge species common in the locality such as red campion (*Silene dioica*), cow parsley (*Anthriscus sylvatica*) and foxglove (*Digitalis purpurea*) along with bramble (*Rubus fruticosus*) and honeysuckle (*Lonicera periclymenum*). Occasional gorse (*Ulex europeae*) shrubs are also recorded along with species from the adjacent grassland fields.

#### 4.1.3. Cornish Hedge / Stone Wall

The site is bounded on the northern, southern and western edges by stone walls or Cornish Hedges with intermediate characters in places.

The boundary feature along the northern periphery of the field, fronting onto Pungies Lane, develops a characteristic Cornish Hedge construction to the east, but is a stone wall on the site boundary. Regardless, it supports abundant mosses, lichens, polypody ferns (*Polypodium agg.*) and navelwort (*Umbilicus rupestris*). In places, there is honeysuckle and bramble along with ivy (*Hedera helix*) growing over. Occasional non-native species such as coprosma are present, along with abundant three-cornered leek (*Allium triquetrum*).

On the southern side of this field, the stone wall is unmanaged and overgrown with bramble and grasses both through and within. The flora is similar to the pasture field though with more ruderal and woodland edge species, including foxglove and red campion, as well as further invasive species such as montbretia (*Crocsmia x crocosmiiflora*) and variegated Italian arum (*Arum italicum*) as well as bracken (*Pteridium aquifolium*) and nettle (*Urtica dioica*). There is a mature offsite karo hedge along the majority of this wall.

The western boundary is a generally well-pointed stone wall. Non-native species growing within cracks in the pointing include Escallonia (*Escallonia rubra*), houseleek (*Aeonium sp.*) and agapanthus (*Agapanthus africanus*) with three-cornered leek, alexanders (*Smyrniolum olusatrum*) and nasturtium (*Tropaeolum majus*). Mosses, lichens and ferns are well-represented.



#### 4.1.4. Non-native Hedgerow

There are recently planted karo hedges along the northern boundary with establishing specimens to 1.5-2m in height. The understory is largely drawn from the species found in the wall to the north with alexanders, bramble, three-cornered leek and cleavers (*Galium aparine*).

#### 4.1.5. Soakaway Field

The soakaway field lies to the south of the main development field. It is heavily grazed by horses such that the sward is a consistent low height throughout, aside from areas around food and water provision where the ground is poached by excessive trampling.

The botanical species list is constrained by the season and by the heavily grazed nature of the sward, but included common bent, red fescue, cock's foot and Yorkshire fog along with ribwort plantain, cat's ear, white clover, daisy (*Bellis perennis*), creeping buttercup (*Ranunculus repens*) and bird's foot trefoil (*Lotus corniculatus*). The sward is variable in relative composition, with some areas heavily grass dominated indicating historical improvement, whilst others show a greater abundance of herbaceous species.

Some areas appear to be impacted by the grazing density and subsequent damage to the sward, with nutrient rich patches supporting broadleaf dock, common nettle and charlock (*Sinapis arvensis*) occurring particularly towards the western boundary. The edges closest to the boundary are often shadier and support red campion and arum lily (*Arum maculatum*).

In the north-eastern corner of the site is an area of scrub. This area is dominated by dense mounds of bramble with gorse and occasional self-set karo.

The northern boundary of the field is marked by a Cornish Hedge has shrubs including gorse growing through and within; however it has been cut back almost to the stones at the time of survey. Other shrubby species may be present.

The feature supports a typical range of bryophytes, polypody ferns and navelwort along with honeysuckle, bramble and ivy. Non-native species including three-cornered leek and alexanders are frequent within the stones.

#### 4.1.6. Soakaway Route

The land between the development site to the north, and the soakaway site to the south, is dominated by an unmanaged grassland with abundant mounds of bramble developing within the sward.

The sward itself is dominated by grasses including cock's foot, Yorkshire fog and bent grass along with herbaceous species such as lesser celandine (*Ranunculus ficaria*), wild carrot, creeping buttercup, germander speedwell (*Veronica*

*chamaedrys*), hogweed, ribwort plantain and yarrow. Three-cornered leek can also be found in the sward.

A minor area of land was outside of the accessed land but was visible from the boundary – these are two back gardens which appear to have the same grassland sward though with varying degrees of management. There are karo hedges bounding the gardens as well as a Cornish palm (*Cordyline australis*) within this grassland.



**Photo 01** – Showing the northern stone boundary wall to the west of the site.



**Photo 02** – Showing the northern stone boundary wall offsite to the east where it takes on the character of a Cornish Hedge.



**Photo 03** – Showing the pasture field



**Photo 04** – Showing the overgrown hedge with dense brambles on the southern boundary of the pasture field



**Photo 05** – Showing the western boundary wall with the offsite garage behind.



**Photo 06** – Showing the shelterbelt viewed from the east.



**Photo 07** – Showing the dense, dark understorey of the shelterbelt



**Photo 08** – Showing the tussocky grassland field with bramble mounds through which the soakaway route passes.



**Photo 09** – Showing the back gardens through which the soakaway route passes.



**Photo 10** – Showing the horse-grazed soakaway field with the scrub visible beside the boundary.

## 4.2. Bats

### 4.2.1. 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.

A common pipistrelle roost was recorded within McFarland's Down in 2014 in a garage approximately 110m to the north of the site, with further transient/day roosts recorded associated with properties over 500m away to the east.

#### 4.2.2. PRA Results (Trees)

The only trees which could be impacted by the works are those in the offsite shelterbelt. These trees do not appear to be of an age or condition to support roosting bats based on the visibility available – this includes all aspects of the trunks which face directly onto the site. However the potential for individual pine trees within the interior to support roosting opportunities cannot be ruled out due to the density of the evergreen shrub vegetation.

No other trees suitable for use by roosting bats were noted.

#### 4.2.3. PRA Results (Buildings)

There are no buildings within the site itself.

There is an offsite garage on the western boundary, the rear of which faces directly onto the site. The garage was not comprehensively surveyed due to access restrictions; however the western aspect has a fascia board which has gaps beneath in places. This has the potential to support roosting bats and could be indirectly impacted by the proposals due to its proximity to the site.



**Photo 11** – Showing the garage immediately offsite adjacent to the stone wall on the western boundary. The gaps beneath the fascia are indicated.



**Photo 12** – Showing a closeup of the fascia board with a gap indicated.

#### 4.2.4. PRA Results (Walls)

There are limited examples of bats roosting in drystone walls and Cornish hedges 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 drystone walls onsite do provide occasional niches which are of a size and shape to provide Potential Roosting Features (PRF). These are too widespread to individually describe but are present throughout the features.

#### 4.2.5. 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 grassland fields and the offsite shelterbelt are likely to be used by common pipistrelle which favour 'edge' habitat.

The field boundaries and developing karo hedges, and especially the shelterbelt, are likely to be used by commuting bats to navigate between roosts and foraging habitat in the wider landscape.

### 4.3. Birds

#### 4.3.1. Nesting Habitat

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

- Trees and shrubs associated with the non-native shelter-belt, including bramble and other climbers and scrub at the margins;
- The under-grazed margins of the grassland field, found beyond the electric fence;
- The stone walls and Cornish Hedge;
- The rough grassland, bramble scrub, shrubs and hedges on the soakaway route;
- The scrub in the corner of the soakaway field.

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

#### 4.3.2. Foraging Habitat

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

### 4.4. Other Ecological Receptors

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

- The boundaries of the non-native shelter-belt;
- The stone walls and Cornish Hedge;
- The soakaway route and soakaway field.

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

## 5. Evaluation

### 5.1. Proposals

The proposed works were identified in the plan “Llewelyn Parker Lowe: 4340 – 13” provided by the client.

These include the construction of new homes with associated hard and soft landscaping, access and utilities. There will be temporary disturbance to land within the soakaway route and soakaway field to install the drainage infrastructure – the habitats will be restored following the completion of the works. The proposals do not indicate an impact to the shelterbelt aside from a reduction in the overhanging canopy facing the site.

### 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.

The proposals would represent a small increase in the residential population of the island, but the distance to the designated sites and the relatively small proportional increase in access in relation to the recreational pressure from tourists during the summer would be negligible.

#### 5.2.2. Habitats

The proposals would lead to the long-term, irreversible loss of the pasture field through conversion to residential and associated landscaping use. Whilst fragments of the pasture grassland will be retained and enhanced, the majority will be lost.

The offsite shelter belt would be retained provided measures are put in place to protect the features during the construction process. Reduction in the overhanging canopy on the site side would represent standard management of a feature such as this. In the long-term, there is the potential for increased disturbance of this feature through proximity of residents, lighting and pets.

The perimeter walls would be largely retained with a minor removal of a section of the western boundary to permit access. There would however be a significant remodelling of the northern boundary wall/Cornish hedge to facilitate access and provide appropriate visibility splays. There is the potential for this to be restored fully and enhanced in the long-term through recreation of the original feature; however in the short term this would lead to significant disturbance of the species associated with the feature. The change of use of the overall site may result in changes to the management of boundaries to the new residential field. The karo hedge along the wall is likely to be removed in places to permit the re-

modelling of the boundary feature – this non-native species is over-represented within the islands and could be replaced with a more appropriate species.

The habitats within the soakaway route and soakaway field will be subject to short-term removal though the habitats will be restored following the completion of works. No long-term impacts are predicted.

### 5.2.3. Bats

The PRA surveys did not identify any onsite buildings or trees which would provide suitable roosting opportunities for bats.

The survey did identify an adjacent offsite roosting opportunity associated with the garage unit. If this building is used as a roost, the proposed development would have the potential to cause disturbance to the roost during the construction and operational phase if the roost were not taken into account and appropriate measures put in place. This disturbance could arise through noise, resident/contractor presence, inappropriate lighting and obstruction to flight lines/drop zones.

The boundary walls are considered to have a very low 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 wall would not rise to the level which would justify further surveys given the low likelihood of use. However the remodelling of the northern boundary wall could result in killing/injuring of bats present within the wall in the unlikely event of their presence, and this more serious impact would justify the recommendation of measures to control risk.

The proposals would retain the offsite shelter belt and field boundaries – this would ensure that commuting routes, flight lines and the higher value foraging habitats would be retained. The minor reduction in suitable foraging habitat arising from the conversion of grassland to residential use is likely to be relatively minor given the scale of impact within the wider foraging context.

Inappropriate lighting of the boundaries and shelter belt have the potential to negatively impact the suitability of these features for use by foraging or commuting bats.

### 5.2.4. Birds

The site provides various suitable habitats for use by common nesting bird species, primarily associated with the shelter belt and the boundary features including ungrazed margins.

If works affect these features during the breeding season, they would result in the short-term disturbance, damage or destruction of nests and the potential killing of adults or chicks/eggs if measures are not taken to avoid this.

In the long term, based on the plans provided, it is likely that the new structures and garden vegetation would offer an increase in the availability of nesting habitat, though additional habitat boxes can be installed to secure this and offer a net enhancement.

There would be a short-term reduction in the availability of suitable foraging habitat for nesting birds during the construction phase, but this is likely to be of low significance. In the long term, the new homes and gardens are likely to result in similar or potentially enhanced foraging resources for local bird populations.

#### 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

#### 6.1.1. Overview

The ecological baseline presented in this report is considered to be sufficient to assess the impact of the proposals upon ecological receptors, with the exception of the potential for roosting bats to make use of the adjacent offsite building.

The presence, or otherwise, of protected species is a material consideration in the context of planning; however in this instance, the only potential is for disturbance during construction or post-development interference impacts such as lighting. This can be addressed through appropriate lighting; landscaping; or a Construction Ecological Management Plan (CEMP) which are all within the scope of Planning Conditions to secure without requirement for modification of the overall proposals.

#### 6.1.2. Bat Emergence Survey

It is recommended that two dusk emergence surveys are carried out on the southern aspect of the offsite garage building during the main bat activity season, in line with the specifications set out in the relevant Best Practice Guidance<sup>8</sup>.

It is recommended that a Planning Condition is attached to any permission granted which requires the submission of the results of the survey to the Planning Authority. Recommendations for landscaping, lighting or CEMP should be clearly identified in this report and details submitted either alongside or within the appropriate document to ensure that any roosts and associated bat populations are protected during construction and occupation of the site.

### 6.2. Timing of Works

#### 6.2.1. Nesting Birds

The onsite vegetation including both the development and soakaway sites 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>9</sup>.

The most reliable means of ensuring nesting birds are not impacted by the works is for clearance and development works affecting relevant areas to be conducted outside the bird breeding season of March to September inclusive. Development

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<sup>8</sup> Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition). The Bat Conservation Trust, London

<sup>9</sup> HMSO (1981). *Wildlife and Countryside Act 1981 (as amended)*. HMSO, London.

works can be undertaken outside of the breeding season without constraints relating to breeding birds.

If works affecting nesting sites are undertaken outside of the nesting season to a stage where the nesting habitat is removed, then breeding birds will find alternative offsite nesting opportunities. In this way, works begun during the winter can proceed into the spring/summer with a minimal risk of causing disturbance or damage.

If works are scheduled to commence during the breeding season, a nesting bird survey would need to be carried out by a suitably qualified person prior to commencement. 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.

Measures to protect retained habitats which might support nesting birds should be built into the CEMP. This may include barriers where required, and signs identifying areas where contractors should avoid. This should be advised by the ecologist, as required.

#### 6.2.2. Bats

The works affecting the northern boundary feature should be undertaken outside of the main active season. The evidence available indicates that roosts within drystone walls and similar features are more typically summer roosts; therefore targeting works between November and March would be advisable.

This would broadly coincide with the recommended timeframe for nesting birds and would permit the wall to be taken down at an optimal time to avoid or minimise the risk to both species.

### 6.3. Lighting

The external lighting for the new development should aim to minimise the use of lighting to the extent compatible with public 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.

The retained onsite and offsite features, as well as new areas of landscaping, should remain as dark habitats and corridors wherever possible to ensure that the habitats are suitable for bats and invertebrates which are sensitive to light pollution.

#### **6.4. Cornish Hedge**

The northern boundary feature has the character of a Cornish Hedge offsite to the east, but the stretch which runs along the proposed development area is a drystone wall.

The removal of sections of the wall to re-contour the boundary feature would allow this to be restored to a Cornish Hedge which would provide an elevated ecological resource along with a more locally appropriate boundary feature.

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 hedge. This should also allow stones with abundant mosses and lichens to be set aside and restored to the exterior of the new wall to facilitate the restoration of an ecologically functional feature.

A Method Statement for the dismantling of the existing feature and its subsequent restoration in line with best practice<sup>10</sup> 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.

#### **6.5. Biodiversity Net gain**

The project should secure a Biodiversity Net Gain through appropriate landscaping and habitat creation. This is to ensure compliance with Local Plan policy OE2. This should be measured using the Biodiversity Metric published by DEFRA.

Landscaping should be designed in conjunction with ecological input in order to ensure that the proposals will result in deliverable, long-term habitat creation appropriate to the site and the local landscape setting.

The plan to secure Biodiversity Net Gain should be submitted alongside the application, or conditioned in any approval granted at the discretion of the Planning Authority.

#### **6.6. Landscaping**

The landscaping design for the scheme should focus on species native and endemic to the Isles of Scilly. This involves a restricted range of tree and shrub species compared with the diversity found in mainland UK.

The establishing karo hedge along the northern boundary should be removed and replaced with native hedgerow species which would provide a significantly enhanced ecological function compared with the non-native windbreak species.

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<sup>10</sup> <http://www.cornishhedges.co.uk/PDF/lookafter.pdf>

Where practicable, grassland areas should be retained within the site in order to allow the existing native sward to persist post-development. Where this cannot be achieved, for example where areas are irreparably damaged by storage works, the restoration of a native and endemic sward should be targeted. This could be achieved by spreading a green hay from a local or onsite sward over the ground to be restored. Generic seed mixes should be avoided in favour of endemic, locally sourced species.

A selection of trees should be planted within the new development – the species chosen should have due regard to the species native or established on the islands as well as the degree of exposure to wind and winter storms which will be associated with the location. Fruit trees including Scillonian varieties (such as Scilly Pearl) or south-western varieties (such as Cornish Aromatic, Cornish Pine or Devonshire Quarrendon) would provide a resource for wildlife as well as food for new residents and could also be considered.

The following tree and shrub species are either native to the islands, or have been introduced elsewhere in the past eg. the Lower Moors Extension managed by the Wildlife Trust, such that they would not be a novel presence.

**Table 02.** Recommended species for a residential development

<b>Species</b>	<b>Growth Form</b>
Silver birch	Small tree
Crab apple	Small tree
Rowan	Small tree
Hawthorn	Shrub
Holly	Shrub
Hazel	Shrub
Wild privet	Shrub

Where practicable, a pond could be developed to provide an aquatic resource for wildlife – this could be considered in conjunction with swales or SUDS systems to manage runoff and water.

## **6.7. Soakaway Restoration**

The land to be impacted by the installation of the soakaway field and pipe route should be restored to it's previous condition following the completion of works. This could involved removal of turf to be set-aside and restored in the case of short-term works; however where this is not practicable, restoration to grassland should be achieved by natural regeneration where possible.

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

## 6.8. Habitat Boxes

Habitat boxes can be installed within the new development. These could include either stand-alone or integral bat boxes and bird nesting habitat within the new buildings.

Where stand-alone boxes are selected, these should be fixed following the manufacturer's recommendations and using the fixings provided. Care must be taken to ensure that the boxes are secure and stable in high wind conditions.

### 6.8.1. Bird boxes

A minimum of **5 bird boxes** should be installed, with more included where appropriate. The locations would need to have due regard to public hygiene or public nuisance concerns, for example avoiding locations where droppings could impact upon residents.

The precise specification for enhancement should be developed in order to maximise the ecological provision whilst avoiding any material impact upon the aesthetics or character of the new buildings. The species targeted should be those which are confirmed to breed on the island and are present within the more developed location of the site. Suitable options are outlined below:

- Swallow nest boxes could be incorporated in eaves or gables – these should be in a location with a good 'fly in' for parents provisioning the nest and in a location with minimal risk of disturbance;
- House sparrows nest communally and nest boxes could accommodate this, either through the installation of a single purpose-built nest box comprising several individual chambers with separate entrances, or the installation of 3+ nest boxes in close proximity.
- Nest boxes suitable for hole-dwelling species such as blue tits, or open-fronted boxes for species such as blackbird and robin also have a good likelihood of occupation if they were positioned close to the shelterbelt.

Any boxes should be either integrated into the construction design, or mounted securely at a height of at least 3m above the ground in areas without high levels of public presence which could cause disturbance.

There are many examples of integrated box designs to minimise the aesthetic impact and these could be considered where appropriate. A valuable resource is 'Designing for biodiversity: A technical guide for new and existing buildings'<sup>11</sup> – this is published by the Bat Conservation Trust (BCT) in conjunction with RIBA and covers habitat box provision specifications for both bats and birds.

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<sup>11</sup> 'Designing for biodiversity: A technical guide for new and existing buildings' (RIBA Publishing 2013, 2nd edition)

It is recommended that proposals for the installation or integration of bird nesting boxes are either submitted as part of the application, or conditioned in any approval granted at the discretion of the Planning Authority.

#### 6.8.2. Bat boxes

A total of **4 bat boxes** should be integrated into the new buildings, with more included where appropriate. The locations would need to have due regard to resident nuisance concerns, for example avoiding locations where droppings could accumulate on window ledges. They would also need to be sited facing onto boundary or other vegetated features to maximise the chance of occupation.

The boxes selected should be suitable for use by common pipistrelle bats – the dominant species found on St Mary’s.

It is recommended that integral boxes are used which fit discreetly within the construction of the buildings and would not represent an obtrusive presence.

It is important that the boxes are not lit by external lights such as security lights.

It is recommended that proposals for the installation or integration of bat roosting boxes are either submitted as part of the application, or conditioned in any approval granted at the discretion of the Planning Authority.

#### 6.9. Rabbits

Rabbits are covered under the Wild Mammals Act 1996<sup>12</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 rabbit burrows which would be directly or indirectly impacted by the proposals. If the burrows are active, they 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>12</sup> HMSO (1996) Wild Mammals (Protection) Act 1996. HMSO, London.

## 6.10. Invasive Species

Under the Wildlife and Countryside Act, 1981<sup>13</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 ubiquitous across the islands and its low-level presence on the site is commonplace. Montbretia is an easily identifiable invasive species which is present on the site as a small number of readily identifiable plants which could be easily removed and destroyed as part of the project.

It is incumbent on a landowner to ensure that any actions of land management or development do not result in the plant being spread either within the existing site or elsewhere. Working practices during demolition and construction should be designed to ensure this.

## 6.11. Survey Validity and Update

The surveys were completed in December 2023 / January 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 PEA assessment can be considered valid for a period of 12 months after the survey was completed, until January 2025.

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

## 6.12. Application Documents or Planning Conditions

It is recommended that the following documentation should be submitted alongside the application or incorporated into appropriate Planning Conditions if the LPA are minded to approve the application:

- **A Construction Ecological Management Plan (CEMP)** which includes:
  - Measures to protect nesting birds including timing of works;
  - Measures to protect bats and other species during works to the northern boundary feature;
  - Measures to protect retained habitats including boundary and offsite features;
  - A methodology to dismantle the stone wall and restore to a Cornish Hedge along the northern boundary;

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<sup>13</sup> HMSO (1981, as amended). Wildlife and Countryside Act 1981. HMSO, London.

- Measures to address or minimise the risk of spreading invasive non-native species including Montbretia and three-cornered leek;
- A methodology to restore the habitats temporarily impacted by the installation of the soakaway;
- Measures to ensure that rabbits are not killed, injured or entombed.
- A requirement for submission of **bat survey results** with regards to the offsite garage building and recommended measures to ensure that any roost identified is protected and retained during construction and occupation of the site;
- A **Lighting Plan** showing details of proposed external lighting which would minimise light-spill on retained habitats to provide dark corridors and continued suitability of foraging resources for bats;
- An assessment of **Biodiversity Net Gain** demonstrating how a net gain will be achieved;
- A **Landscaping Plan** detailing habitat creation and management measures which would secure the BNG in the long-term;
- **Habitat Enhancement Plans** showing the specification and location of bird and bat boxes within the final development.



## 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.

**RECEIVED**

*By Liv Rickman at 5:01 pm, Feb 08, 2024*

**APPROVED**

*By Lisa Walton at 5:01 pm, Oct 03, 2024*

# Jim Holt Ltd

## Travel Plan Statement

Telegraph Housing, St Mary's, Isles of Scilly

Residential development on land to the south of Pungies Lane

On behalf of Duchy of Cornwall

January 2024

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## Introduction

This Travel Plan Statement has been provided in relation to a proposal for 10 No. residential dwellings on land to the south of Pungies Lane, St Mary's, Isles of Scilly. The proposed development is located within a residential area with existing development to the north, south and west.

The image below demonstrates the site location:



*Site location*

This Travel Plan Statement has been prepared with reference to the Isles of Scilly Local Plan 2015 - 2030.

## What is a Travel Plan Statement?

A Travel Plan Statement is a simple form of travel plan for smaller developments which focusses on sustainable modes and can be used where a full travel plan is not required. It should set out the existing conditions within and near to a development and promote sustainable travel.

Department for Transport guidance Good Practice Guidelines: Delivering Travel Plans through the Planning Process, Department for Transport (DfT, April 2009), identifies the role travel plans have in securing the provision of sustainable travel choices both to new developments and extensions to existing sites, whatever their use.

“Travel plans can be a key tool in achieving national, regional and local objectives to manage the demand for movement and improve accessibility for everyone”.

The Travel Plan Statement should help minimise the amount of car travel to and from the area. This will bring benefits to those living in the area as well as the wider local community and environment.

## Existing Transport Conditions

This section provides a review of the existing local highway network and the existing access arrangements for all modes of travel.

## Site Location and Description

The development proposal is located on land to the south of Pungies Lane, St Mary's, Isles of Scilly. It is bounded on its southern and western sides by residential development with the proposed vehicular access served from Pungies Lane.

Pungies Lane is not one of the main primary roads running through St Mary's, it is more a secondary route providing a connection to residential areas from the primary road network. Whilst subject to the National Speed Limit, the actual speed of traffic is significantly lower which makes it accessible to all modes of travel.

## Pedestrian and Cycle Access

Manual for Streets (MfS) states that "walking offers the greatest potential to replace short car trips, particularly those under 2km." It is also widely considered that cycling has the potential to substitute for short car trips, particularly those under 5km.

Hugh Town is the most likely destination with all the services and facilities on offer, including employment, eating establishments, and shops.

Hugh Town is located comfortably within 2km from the development proposal. It can be accessed using less trafficked roads and paths without needing to utilise the primary road network, and is therefore within acceptable walking distance. In addition, for recreational purposes there is a golf club, walks and beaches all within easy walking and cycling distance located even closer to the development proposal.

In terms of cycling, the whole of St Mary's would be within acceptable cycle distance using the local highway network.

## Public Transport Access

A community bus service runs every day from the third Sunday in May until the first Sunday in September. The community bus offers a regular scheduled service around St. Marys. The nearest bus stop in relation to the development site is at McFarlands Down.

## Telegraph Housing

This bus stop is very well served by the community bus operator with regular bus services around St Mary's. These bus services operate throughout the day and would support resident journeys as demonstrated in Table 1 below:

Service/Operator	Route	Frequency		
		Mon - Fri	Sat	Sun
Community Bus	Circular Route around St Mary's	7 services (09:24 - 17:34)	5 services (09:24 – 17:34)	5 services (09:24 – 17:34)

Table 1 – Bus timetable information

## Car Share Access

There is an existing community car share scheme operating on St Mary's which offers electric vehicles for hire to residents and local businesses. Following a simple registration process, a vehicle can be booked for the date, time and location required. There are several locations from where a vehicle can be picked up, the nearest currently being approximately 50m from the development site.



## Objectives

The objectives of the Travel Plan Statement are to minimise the number of single occupancy car trips associated with residents travelling to and from their home. The detailed objectives are as follows:

- Achieve a high level of sustainable travel awareness for residents;
- Maximise accessibility by sustainable modes of travel by facilitating walking, cycling and public transport trips and reduce single occupancy car use.

The table below provides the list of objectives and how they will be achieved by the development.

Objectives	Development
Achieve High Awareness	This Travel Plan Statement will be provided to residents, giving details on the sustainable travel options available
Maximise travel by sustainable modes and reduce single occupancy car use	<p>Promote walking, cycling and public transport to residents;</p> <p>Provide cycle parking in shared cycle store. Each dwelling will be provided with a base to allow for a shed where a bicycle could be safely stored;</p> <p>Encourage resident car sharing wherever possible by providing a new location within the development for the community car share scheme;</p> <p>Provide electric vehicle charging points within the development;</p> <p>Provides details of sustainable travel information (as detailed in this Travel Plan Statement);</p> <p>Inform residents of the public transport alternatives available.</p>

Table 2 - Objectives