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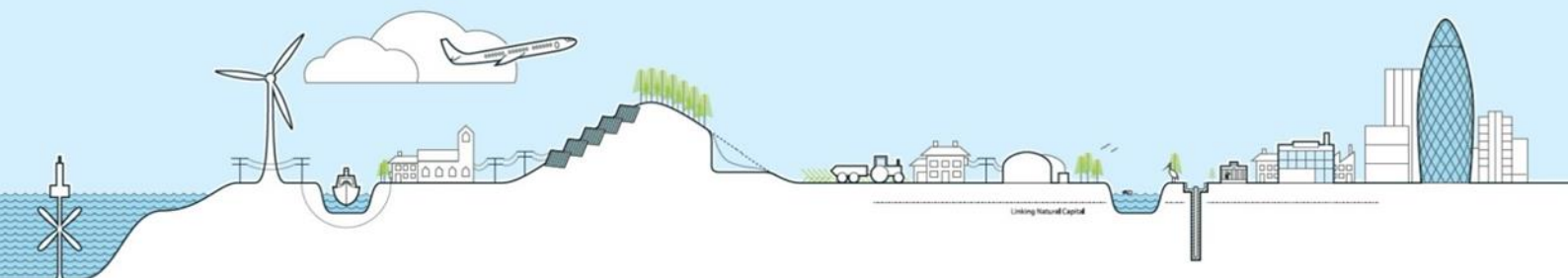
By Liv Rickman at 5:19 pm, Jan 23, 2025

PLANNING, DESIGN & ACCESS STATEMENT

**Redevelopment of the Bishop and Wolf Sewage Pumping
Station, including the construction of an enlarged wastewater
infrastructure building located off Little Porth Road, Hugh
Town, St Mary's, Isles of Scilly, TR21 0JG**

January 2025

Prepared By



Project Quality Control Sheet

Company	Aardvark EM Ltd	Aardvark EM Ltd	Aardvark EM Ltd

Location: SWW Bishop and Wolf sewerage pumping station (SPS) located off Little Porth Road, Hugh Town, St Mary's, Isles of Scilly TR21 0JG

Grid Reference: SV 90241 10502

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Report Number: **2345-R004**

Report Status: FINAL

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1 Introduction

This Planning, Design and Access Statement has been prepared on behalf of South West Water Limited (SWW) in relation to the proposed redevelopment of the Bishop and Wolf Sewage Pumping Station (SPS), including the construction of an enlarged wastewater infrastructure building off Little Porth Road, Hugh Town, St Mary's, Isles of Scilly, TR21 0JG.

Post the enactment of The Isles of Scilly (Application of Water Legislation) Order 2019 (as amended), SWW [the Undertaker] was appointed as Statutory Water and Sewerage Undertaker, under the Water Industry Act 1991 (as amended) [the 1991 Act], for the Isles of Scilly. As such, SWW has a statutory duty under the 1991 Act to provide an effective and economical system for the supply of wholesome drinking water and sewerage services. The Undertaker is progressing the current Isles of Scilly Capital Delivery Programme to comply with this duty by improving the resilience, quality and compliance of the existing water and sewerage infrastructure across the Isles of Scilly.

Additionally, the Undertaker has further duties under Section 3 of the 1991 Act to have due regard and consideration – so far as may be consistent – while conducting its function as the Statutory Undertaker for:

- the conservation and enhancement of the environment;
- the protection and conservation of elements of historical interest;
- and the effect of which proposals could have on the beauty or amenity of an area.

The environmental, historical and tranquil aspects of the Isles of Scilly are considered throughout the design and proposed construction process, so far as possible, while also complying with the Undertaker's central duty to provide and maintain an effective and economical system for the residents of, and visitors to, The Isles.

The proposed development, subject to this application, comprises the construction of an enlarged wastewater infrastructure building, which will replace the existing Bishop and Wolf SPS building. The new building will house new variable-speed pumps and a new screening plant. Full planning permission is sought for the proposed development.

These works are required to improve the resilience and sustainability of the wastewater network on St Mary's in line with regulatory requirements from the Water Industry National Environment Programme (WINEP).

This application should be read alongside the following plans and documents:

Title	Author	Reference
Application Form and Notice certificates	Aardvark EM	Via Planning Portal
Covering Letter	Aardvark EM	R003
Planning Design and Access Statement	Aardvark EM	R004

EIA Screening Report	Pell Frischmann	107780-PEF-WW-674-TRP-EN-0001
Air Quality and Construction Dust Risk Assessment	Pell Frischmann	107780-PEF-ZZ-602-TRP-EN-0002
Outline CEMP	Trant Engineering Ltd	n/a
Contaminated Land PRA	Pell Frischmann	107780-PEF-ZZ-602-TRP-GG-6601_P02
Construction Traffic Management Plan	Pell Frischmann	107780-PEF-ZZ-602-TRP-H-0001
Daylighting and Sunlight assessment	Right of Light Consulting	107780-PEF-ZZ-602-TRP-TS-0002
Ecological Impact Assessment	Pell Frischmann	107780-PEF-ZZ-602-TRP-GE-0001
Bat Emergence Survey	Pell Frischmann	107780-PEF-ZZ-602-TRP-GE-0002
Biodiversity Net Gain Assessment	Pell Frischmann	07780-PEF-ZZ-602-TRP-GE-0003
Habitats Regulations Assessment (HRA) Stage 1 Screening Report	Pell Frischmann	107780-PEF-ZZ-674-TRP-EN-0001
Flood Risk Assessment	Pell Frischmann	107780-PEF-ZZ-602-TRP-EN-0004
Heritage Impact Assessment	AC Archaeology	107780-PEF-ZZ-602-TRP-GY-0001
Landscape and Visual Impact Appraisal	IDP Landscape	107780-PEF-ZZ-602-TRP-LA-0002
Operational Noise Assessment	Noise Consultants	107780-PEF-ZZ-602-TRP-GB-0001
Odour Assessment	Air Quality Consultants	107780-PEF-ZZ-602-TRP-EN-0003
Statement of Community Involvement	Copper	n/a
Sustainability Assessment	Pell Frischmann	107780-PEF-XX-602-TRP-EN-0001
Site Waste Management Plan	Pell Frischmann	St Mary's Bishop And Wolf - Swmp

Title	Author	Reference
Location Plan	Pell Frischmann	107780-PEF-WW-602-DDR-T-0001
Existing Site Plan	Pell Frischmann	107780-PEF-WW-602-DDR-T-0002
Existing Block Plans & Elevations	Llewellyn Harker Lowe	4315_02_002A
Proposed Site Plan	Pell Frischmann	107780-PEF-WW-602-DDR-T-0003
Proposed Roof and GF Plan	Llewellyn Harker Lowe	4315_02_006C
Proposed Elevations	Llewellyn Harker Lowe	4315_02_001D
Western Approach	Llewellyn Harker Lowe	4315_02_003B
Eastern Approach	Llewellyn Harker Lowe	4315_02_004A
View from Bishop and Wolf	Llewellyn Harker Lowe	4315_02_005
Schematic Zoning Reference Plan	Pell Frischmann	107780-PEF-WW-602-DDR-T-0005
Temporary Compound Plan	Pell Frischmann	107780-PEF-WW-602-DDR-T-0004

2 Site and Surrounding Area

The site is located off Little Porth Road, Hugh Town, St Mary's, Isles of Scilly, TR21 0JG at Grid Reference: SV 90241 10502 (Easting 090241; Northing 010502). The site falls within the jurisdictional area of the Council of the Isles of Scilly.

The existing SPS is located behind retail, leisure, and residential properties along Garrison Lane, in the middle of Hugh Town, and is accessed from Little Porth Road via a shared access point. Hugh Town is the largest settlement on the Isles of Scilly and is situated on the island of St Mary's, which is the largest and most populous island in the archipelago. Hugh Town is located on a narrow isthmus which joins the peninsula known as the Garrison with the rest of the island.

A Site Location Plan is submitted with the application, Drawing Reference: 107780-PEF-WW-602-DDR-C-0004.

The site currently comprises a small building with a pitched roof. This building measures 3.90m long x 2.96m wide x 4.44m tall. There is also an existing vent stack which measures approximately 8.86m tall. The site is immediately surrounded by properties which includes The Bishop & Wolf Public House.

Drawing references 107780-PEF-WW-602-DDR-C-0008 and 4315_02_002 show the site as existing.

The site is within land designated as 'Existing Town Centre' and 'Existing Settlements' in the Local Plan (Adopted March 2021). The site is also within the Isles of Scilly National Landscape (previously known as Area of Outstanding Natural Beauty (AONB)) and Conservation Area which are designations which cover the whole of the Isles of Scilly.

2.1 Site Constraints

The nearest statutory environmental designations are the Scilly Special Protection Area (SPA) and Isles of Scilly Complex Special Area of Conservation (SAC) which are 80m and 100m south of the site, respectively. In addition, Peninnis Head (St. Mary's) Site of Special Scientific Interest (SSSI) is 650m south-east and Lower Moors (St. Mary's) SSSI is 730m east. There are no trees within proximity of the site.

The application site is located within Flood Zone 3 (High Probability of Flooding). Notwithstanding this, as per Annex 3 of the National Planning Policy Framework, essential utility infrastructure is deemed water compatible and therefore acceptable in areas at risk of flooding.

The Bishop & Wolf Public House is a Grade II Listed Building which is adjacent to the site. The proposed development will slightly encroach into the curtilage of this property. There will be no direct impact upon structures associated with the listed building. There are a further 35 listed buildings within 200m of the site, however none of these are anticipated to be directly impacted by the proposed development. The nearest scheduled monument is 'Post-medieval breastwork, curtain wall and associated defensive structures on the periphery of The Garrison, St Mary's' which is 160m west of the site.

2.2 Planning History

The site in question has no known planning history. However, the Bishop & Wolf has the following planning history:

- **P/24/034/COU** - Proposed internal & external alterations, partially retrospective, to grade II listed building including change of use of redundant bar area at first floor level to provide increased staff accommodation/managers flats & associated works to internal and external trade areas. Revised scheme of withdrawn application P/23/027/COU (Listed Building). (Decision Pending)

This application proposes no external alterations or extensions which would conflict with the proposals outlined in this pre-application advice request.

2.3 Pre-Application Advice

A pre-application advice request for the proposed scheme was submitted to the Council of the Isles of Scilly on 22nd April 2024 and a response was received from Lisa Walton MRTPI (Chief Planning Officer) on 2nd May 2024 (reference PA-24/038).

The advice received explains that the principle / need for the development would be supported by policies in the Local Plan and specifically the heritage policies would support the development as the new building (specifically it's appearance) would make significant improvements to the back land of the pub.

The advice also outlines that supporting surveys would be required to assess odour, noise, sunlight, flooding and ecology impacts and the necessary mitigation provided.

Useful feedback was also provided to explain where further details would be required in terms of materials, power consumption, operational activity and design.

The pre-application advice provided has been taken into consideration and the technical reports and design justifications requested are provided as part of this application.

2.4 Environmental Impact Assessment Screening Opinion

A formal request for an Environmental Impact Assessment (EIA) Screening Opinion is made as part of this application for the proposed works. An EIA Screening Report has been submitted with the application to aide the local planning authority in this exercise.

The submitted EIA Screening Assessment has been undertaken due to the proximity to 'sensitive areas' as defined by the EIA regulations. The proposed scheme falls below the 1000sqm threshold under 'Column 1, 11 Other projects (c) Waste-water treatment plants' in Schedule 2 of the EIA Regulations. The proposed scheme is located within one 'sensitive area,' as defined by the EIA Regulations, the Isles of Scilly National Landscape (AONB), however it is noted that this is an archipelago-wide designation.

It is considered unlikely that construction or operation of the proposed scheme would lead to significant adverse effects on the surrounding landscape and environmental receptors.

It is also acknowledged that the proposed scheme will deliver benefits, such as improving the resilience of the wastewater system (including reduction of waste products entering the marine environment). Nearby residents and sensitive receptors will benefit from the replacement of the existing infrastructure with modern and improved plant, with features such as improved noise attenuation and odour control.

Additionally, a CEMP will be produced prior to commencing works (an outline CEMP is submitted with the application). The CEMP will be a commitment from the Principal Contractor to ensure good practice

techniques are implemented during construction to reduce the potential for adverse impacts to all relevant receptors. Control measures for nuisances such as noise and vibration, dust and emissions, pollution and contamination events, and disturbances to ecology and the water environment will be managed by requirements in the CEMP.

Based on the above, the Undertaker is seeking written confirmation from the Isles of Scilly Council that an EIA is not required.

3 The Development Proposal

The proposed scheme consists of the construction of an enlarged wastewater infrastructure building, which will replace the existing Bishop and Wolf SPS building. The new building will house new variable-speed pumps and a new screening plant. The screening plant will remove objects such as rags, paper, plastics, and metals to prevent damage and clogging of downstream equipment, piping, and appurtenances as well as ensuring they do not enter the marine environment. These screenings will be removed from site and disposed of at the on-island municipal waste facility.

The proposed scheme layout is shown in drawing 107780-PEF-WW-602-DDR-C-0005.

The plant will operate intermittently as required on a 24/7 basis, operation could occur at any time as per the current operational conditions.

The proposed scheme will improve the resilience of the wastewater system, bringing benefit to all residents and visitors to St Mary's. Residents in close proximity will further benefit from the replacement of the existing infrastructure with modern plant, incorporating improved noise attenuation and odour control facilities.

The replacement pumps will be sized to ensure the conditions of the Atlantic CSO permit are met. Screens will be fitted with 3mm mesh with the Screens designed to a a 30 l/s flow rate.

3.1 Proposed Building – Design, Scale

The proposal will involve the construction of a single vernacular small-scale industrial building.

It is designed to accommodate essential infrastructure equipment necessary for the maintenance and upgrade of the wastewater infrastructure. The internal layout of the equipment has been carefully designed to optimise the use of the space and the building proposed is the minimum size required to accommodate the required processes.

The new pumping station and screening building will have a dual-pitched roof and measure approximately 12.0m long x 6.3m wide x 4.9m tall. Due to the increase in footprint of the building, a small section of the Bishop & Wolf Pub's outside space will be required.

The scale of the building is appropriate to the context, has been designed to be in keeping with the local area and is much lower in height than the predominantly two-storey buildings surrounding the plot.

3.2 Access

The existing SPS is located behind retail, leisure, and residential properties along Garrison Lane, in the middle of Hugh Town, and is accessed from Little Porth Road via a shared access point. The site consists of concrete hardstanding and the existing site. A wall separates the existing Bishop and Wolf pumping station from the Bishop and Wolf pub beer garden.

There will be a single hardwood timber door and a metal roller door on the southern elevation to provide access with a second single hardwood timber door access on the western elevation. The single door will grant access into the control room and the roller door into the plant room. There will be PIR lights above the doors for safety when accessing the building in dark hours. The facility will not

be permanently manned, and access is only required for operational purposes and associated maintenance.

The existing access allows one van to reverse in and pull out of the yard to the east of the existing SPS. This provision would be maintained within the new proposal. There is also on street parking adjacent to the site, and this is used by operational vehicles on an ad-hoc basis.

3.3 Scheme Construction

Construction is expected to commence in early to mid-2025. The site is anticipated to be operational early 2026.

The approved construction working hours will be agreed with the Local Planning Authority prior to the start of construction. A small team of workers will be on site each day.

Shift patterns may be staggered to improve the workforce's efficiency and reduce peak demand on local infrastructure. This approach will also reduce pressure on accommodation facilities.

No construction plant and / or machinery will be operated before 0800 hours or after 1800 hours on Mondays through to Saturdays.

There will be no works involving construction plant and / or machinery on Sunday or Public or Bank Holiday.

The proposed scheme will consist of a locally erected steel framed building using standard type materials.

The existing pumping station building will be demolished. Ground impacts would be primarily foundation construction, breaking out existing concrete paths.

Methods of construction will consist of the excavation to formation level of the building footprint and installation of a reinforced concrete foundation pad. The steel framed building will be erected in sections on this pad. The steel frame will be part block walls and timber/render cladded with the addition of acoustic insulation.

Excavation and removal of the existing concrete hard standing area will be completed. Raft foundation works will be constructed. A 350mm depth is anticipated

Due to the constraints with shipping and access to site prefabricated items will be limited and consist of prefabricated steelwork and cladding, this also applies to process equipment. Process equipment will be broken down to manageable sized items and built up on site.

Construction will be covered through a 20kva power supply, through two Site 10kva transformers. LED Task Lighting will be required within the site boundary between 16:00 – 18:00 during winter working.

It is proposed that's Parson's Green will be used as a construction storage compound and lay-down area. Parsons Green comprises a 250m² triangular piece of amenity grassland located along Little Port Road, approximately 50m to the west of the Bishop and Wolf Pumping Station.

It is expected that Parson's Green will be used for the storage of materials and equipment during the construction phase only. It is expected that topsoil will be stripped from Parsons Green and a compacted stone base will be installed. It is expected that the compacted stone aggregate will be separated from the underlying sub-soil using a geomembrane. This will allow the stone aggregate to be recovered during the decommissioning of the compound and will allow the site to be reinstated to amenity grassland.

During construction it is expected the perimeter of the temporary compound will be secured using Heras type fencing. It is possible that some task lighting may be required to allow for safe working during hours of darkness in winter months.

3.4 Construction Traffic

The redline boundary includes an approximate 162m length of Carriageway extending from 14 Silver Street, along Little Porth up to 10 Parsons Field. The redline boundary has been produced to incorporate all land necessary to carry out the proposed development this including the land required for access to the site from the public highway, visibility splays, car parking associated with construction site workers and those local areas it is expected will require temporary parking suspensions put in place during the construction sites operational hours.

The development site will be accessed via Silver Street to the north and Porthcressa View to the south. Standard type delivery vehicles and small plant will be utilised during construction. During peak construction periods it is anticipated there will be no more than five deliveries per day. During other periods there will be no more than two deliveries per day. Construction materials will be delivered to site with the use of standard type delivery vehicles due to constraints of the islands roads.

3.5 Biodiversity Net Gain (BNG) / Landscaping

A BNG assessment has been completed and submitted with the application to quantify the baseline value and overall effect of the proposed scheme on biodiversity within the site. The BNG assessment has followed industry best practice methodologies and legislation using the Statutory Biodiversity Metric and the UKHab Habitat Map produced as part of the EclA. The Statutory Biodiversity Metric is a tool that can be used to calculate the biodiversity impact of development projects in England. It is used to ensure that development projects achieve a net gain in biodiversity, meaning that they leave the environment in a better state than they found it.

The proposed scheme can achieve an excess of 10% BNG in area habitat units within the site through the reinstatement of modified grassland at Parsons Green with either modified grassland (good condition) or other neutral grassland (moderate condition).

Based on retention of the hedgerow alone, the proposed scheme cannot achieve the 10% BNG in linear hedgerow units. To achieve the required 10% for linear hedgerow units, options for additional planting have been outlined. Plant species mixes are recommended to reflect the unique flora of the Isles of Scilly and provide additional and improved habitats for pollinators.

The Statutory Metric identifies that these can be met for the proposed scheme.

Construction is expected to commence in early 2025. The site is anticipated to be operational in 2026. Therefore, a zero-year delay multiplier has been applied in the metric.

3.6 Embedded Mitigation

The Principal Contractor will be responsible for implementing a Construction Environmental Management Plan (CEMP) throughout construction, to be approved prior to commencement. This will be updated as a live document during construction as and when required. This will ensure activities are completed in line with good practice guidance and relevant legislation to minimise impacts.

The following topics will be outlined within the CEMP:

- General construction information;
- Roles and responsibilities;
- Environmental management requirements including measures for managing the following environmental aspects;
- Dust and emissions to reduce impacts to air quality;
- Noise, vibration and light to reduce disturbance to human and environmental receptors;
- Hazardous materials to avoid pollution events to watercourses and groundwaters; and
- Maintaining high standards of biosecurity to include measures to prevent the spread of Invasive Non Native Species (INNS).

4 Planning Policy

Planning policy relating to the application site is formed through:

- Local Planning Policy
- National Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The development Plan material to the proposal consists of:

- Isles of Scilly Local Plan Including Minerals and Waste 2015 to 2030 (Adopted March 2021)

In addition to the Development Plan, applications should also have regard to the National Planning Policy Framework (NPPF 2024) and National Planning Practice Guidance, which are material considerations in any determination.

4.1 Isles of Scilly Local Plan Including Minerals and Waste 2015 to 2030 (Adopted March 2021)

The Local Plan is the statutory development plan for the Isles of Scilly and forms the basis for decisions on land use planning. The Local Plan sets out a vision, objectives and a planning strategy for development.

It includes the following policies on the type and scale of development that will be supported through criteria-based assessment on a range of planning issues which will be used to determine planning applications.

- Policy SS1 Principles of Sustainable Development
- Policy SS2 Sustainable Quality Design and Place-Making
- Policy SS5 Physical Infrastructure
- Policy SS7 Flood Avoidance and Coastal Erosion
- Policy OE1 Protecting and enhancing the landscape and seascape
- Policy OE2 Biodiversity and Geodiversity
- Policy OE3 Managing Pollution
- Policy OE4 Protecting Scilly's Dark Skies
- Policy OE5 Managing Waste
- Policy OE7 Development affecting Heritage

4.2 National Planning Policy Framework (2024)

National policy is set out in the NPPF which was updated in December 2024. This framework seeks to ensure sustainable forms of development and good design, alongside the protection and enhancement of the environment.

Paragraph 8 states the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. The first of these is an economic objective, to help build a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and co-ordinating the provision of infrastructure.

Paragraph 11 states there should be a presumption in favour of sustainable development. Local plans should positively seek opportunities to meet the development needs of their area and development proposals which accord with and up-to-date development plan should be approved without delay. Where there are no relevant development plan policies, or the policies are out-of-date, permission should be granted unless policies in the Framework that protect areas or assets of particular importance prove a clear reason for refusing the proposed development, or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Paragraph 12 states where a planning application conflicts with an up-to-date development plan Local Planning Authorities may take decisions that depart from an up-to-date development plan where material considerations in a particular case indicate that the plan should not be followed.

Paragraph 20 states strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- b. infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk, coastal change management and the provision of minerals and energy (including heat).

Paragraph 25 states authorities should collaborate to identify the relevant strategic matters which they need to address in their plans and should engage with infrastructure providers.

Paragraph 26 states effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary.

Paragraph 29 outlines non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include the provision of infrastructure.

Paragraph 85 states planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt.

Paragraph 86 states planning policies should

- d. seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.

Paragraph 116 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe taking into account all reasonable future scenarios.

Paragraph 124 states planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 162 confirms plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts.

4.3 National Planning Practice Guidance (NPPG) - Water supply, wastewater and water quality (July 2019)

The NPPG provides guidance on water supply, wastewater and water quality. It states that adequate water and wastewater infrastructure is needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.

5 Planning Appraisal

The proposed scheme has been assessed against the planning policy framework outlined above and a planning appraisal undertaken.

5.1 Principles of Sustainable Development

The proposed scheme will improve the resilience of the wastewater system, bringing benefit to all residents and visitors to St Mary's. Residents in close proximity will further benefit from the replacement of the existing infrastructure with modern plant, incorporating improved noise attenuation and odour control facilities.

The proposal is therefore considered compliant with relevant national and local planning policies in delivering social, economic and environmental benefits of sustainability

5.2 Sustainable Quality Design and Place-Making

The applicant has appointed an architect, Llewlyn Harker Lowe, who are experienced in designing buildings on the Isles of Scilly. The design of the building is proposed to reflect the existing vernacular architecture of the island.

- The eastern end will feature white render with a high-level window, creating a more domestic character that complements the rear wing of the Bishop & Wolf public house building.
- The western end will be cedar timber-clad which will be left to weather naturally to a silver finish, creating a 'gig shed' aesthetic suitable for the back land site.
- The roof would be covered with natural slate.

A new vent stack will be installed at a similar height to the existing, however will pass through the new buildings roof, rather than being a stand-alone structure next to the building. There will also be ventilation louvres on the northern and southern elevations.

A low granite masonry wall will be built along the western elevation to replace the existing wall which is in poor condition. A new timber gate and fence will be installed at the eastern elevation to secure the rear yard of the Bishop and Wolf pub. No further boundary treatment is required as the building itself will be secure.

A Site Waste Management Plan has been submitted with the application (see below).

The proposal is therefore considered compliant with relevant national and local planning policies in delivering high-quality design and will contribute to the islands' distinctiveness and social, economic and environmental elements of sustainability.

5.3 Physical Infrastructure

The proposed scheme will replace the existing Bishop and Wolf SPS building. The new building will house new variable-speed pumps and a new screening plant. The screening plant will remove objects such as rags, paper, plastics, and metals to prevent damage and clogging of downstream equipment,

pipings, and appurtenances as well as ensuring they do not enter the marine environment. These screenings will be removed from site and disposed of at the on-island municipal waste facility.

The proposal is therefore considered compliant with relevant national and local planning policies in making a positive contribution to the sustainability of the Islands.

5.4 Flood Avoidance and Coastal Erosion

A Flood Risk Assessment (FRA) has been submitted with the application.

The NPPF provides the planning framework on which the FRA has been based. The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary, the development should be made safe and not increase flood risk elsewhere.

The proposal is classified as 'Water compatible'. 'Water compatible' assets are appropriate developments in Flood Zones 1, 2 or 3, as such an Exception Test is not required for the site.

The development area is entirely within Flood Zone 3. The proposed development will refurbish and replace the existing sewage pumping station; therefore a more suitable location is not viable. Based on the above the Sequential Test is deemed to have passed.

All critical infrastructure be relocated above 4.49mAOD which is based on the defended scenario for 1% AEP with climate change allowance. The building has been designed to be able to flood during flood events, with the Structural Slab Level (SSL) will be set at 4.00mAOD. The MCC unit is proposed to sit on a mountain frame set at 4.60mAOD, providing over 100mm freeboard above the defended water scenario with climate change. In a severe flood event, the Pumping Station and Screening Plant would be allowed to flood unrestricted.

The building is not staffed and would continue to operate under flood conditions.

The proposed development will not increase the impermeable area of the site, as the proposed development will remain as hardstanding, therefore surface water runoff from the site will be unaffected post development. The existing surface water management for the site allows surface water to run from the roof of the existing sewage pumping station and into the existing wet well through gullies. Surface water around the site is also directing into the existing wet well through gullies and overland flow. Post development surface water runoff will be allowed to discharge in the same way as the current arrangement.

The proposal is therefore considered compliant with relevant national and local planning policies relating to flood risk.

5.5 Protecting and enhancing the landscape and seascape

A Landscape and Visual Impact Appraisal (LVIA) has been submitted with the application.

In terms of townscape character, the main effects will be experienced to the Site, and some direct but very small effects on the townscape character from Porthcressa View. At construction stage there will be notable effects to the area of amenity grass at Parson's Green where the compound will be located. There will be a perceptible change to the townscape character that will be negative but temporary in nature.

From a visual impact perspective, the proposed development of a larger wastewater infrastructure building would have a very limited effect on the receptors passing by the Site and those experiencing the beach front and local amenities. There would be no effect on the users of The Parade or Hugh Street due to the intervening buildings. Residential dwellings that surround the Site and the construction compound would experience a slight adverse effect to their visual amenity.

Therefore, the proposal can be accommodated without undue effects on townscape character or visual amenity.

The proposal is therefore considered compliant with relevant national and local planning policies relating to landscape and visual effects.

5.6 Biodiversity and Geodiversity

An Ecological Impact Assessment has been submitted with the application.

Seven statutory and one non-statutory designated sites of importance to nature conservation have been identified within 2km of the site. St Mary's Island is directly surrounded by the Isles of Scilly Complex Special Area of Conservation (SAC), as well as the Isles of Scilly SPA. There are no SACs designated for bats within 30km of the site. Sites of Special Scientific Interest (SSSI) are present throughout St Mary's Island. With regards to the development activities listed for the location, the proposed site can be considered to require consultation with Natural England.

The overall conclusion of the HRA Stage 1 Screening (submitted with the application) is that the proposed scheme will not lead to likely significant effects upon any qualifying features (habitats or species) of the Isles of Scilly Complex SAC or Isles of Scilly SPA. Best practice construction methods should be outlined within the scheme Construction Environmental Management Plan (CEMP).

The Habitat Baseline of the site consists of concrete hardstanding with small amounts of ruderal plant species and bramble present within the cracks of concrete and the boundary wall; however, these formed less than 10% of the site, and the existing Bishop and Wolf pumping station building. An amenity area of grassland at Parsons Green was present adjacent to residential properties and the road, with three small sections of non-native hedgerow present which separate the grassland from the adjacent road.

No priority habitats were identified within the site boundary. The nearest sections of priority habitat, lowland heathland, are located 60m southwest, and 195m southeast of the site. Features were observed on the east and southeast sides of the existing building which could offer some roosting opportunities for bats, in particular crevice dwelling species. Emergence surveys identified no bats emerging from the SPS and therefore roosting bats are considered absent.

No nesting birds were identified within the site. Potential nesting habitat was identified within the eaves of the existing building, within a small area of overhanging bramble in the northeast corner of the SPS yard, and within the pittosporum hedgerow. Habitats suitable for the Scilly shrew and hedgehog to use as resting places were absent from the Site, however due to the nearby residential gardens they may be present for foraging or commuting. No invasive species were recorded within the site.

The habitats within the site are of negligible value. No priority habitats are present within the site or in proximity to the construction or operational impacts of the proposed scheme. Therefore, the potential for likely significant effects on the habitats are neutral and no additional mitigation would be required.

Habitats present on site were suitable for nesting birds, and therefore construction works during the summer months could lead to the destruction of active nests. Specific legislation protecting nesting birds will be followed. The potential for likely significant effects on other species were scoped out of the EclA.

A bat emergence survey has also been undertaken and is submitted with the application. No bats were observed emerging from the existing building or the boundary wall by the field surveyor or during the analysis of video footage. Very little bat activity was recorded during the summer survey with only three calls from nearby foraging common pipistrelle recorded during the survey.

A separate Biodiversity Net Gain (BNG) Assessment (submitted with the application) has been completed and provides recommendations to achieve 10% Statutory BNG.

The proposal is therefore considered compliant with relevant national and local planning policies relating to Biodiversity.

5.7 Managing Pollution

The applicant has undertaken assessments relating to managing pollution arising from the proposed scheme.

5.7.1 Noise

An operational noise assessment has been submitted with the application to assess how local amenity could be affected.

The closest and most exposed receptors are dwellings and holiday accommodation, which have a range of sensitivities to operational noise from the proposed scheme. The main sources of existing noise at receptors closest to the proposed scheme is intermittent plant within the Bishop and Wolf SWWL asset, birdsong, wind and waves.

As full details of the operational plant and equipment are unknown at this stage, the results of a baseline sound survey have been used to recommend cumulative Environmental Sound Criteria (ESC) for new plant and equipment at the closest and most affected receptors, and by reference to noise policy, and relevant standards and guidance, including the assessment procedure set out BS4142:2014.

Given proximities to noise generating elements of the proposed scheme plant and equipment, its location, building construction, and any atmosphere terminations (including louvers) or openings in the building envelope will need to be carefully considered to avoid giving rise to a significant adverse impact on health and quality of life in relation to noise.

Provided that operational noise levels can be adequately controlled, the proposed scheme would comply with paragraph 187 and 198 of the NPPF and comply with Policy OE3 of The Isles of Scilly Local Plan (2015-2030).

The need to ensure that noise from the proposed scheme is controlled to an acceptable level can be secured by a suitably worded planning condition, if necessary and example of which is presented below.

The rating level of operational noise generated from the proposed installation under normal operating conditions, determined in accordance with BS 4142:2014, shall not exceed 38dB LA, 1hr and 37dB

LAr, 15m during the daytime (07:00 – 23:00) and night-time (23:00 – 07:00) periods respectively, measured as a free-field equivalent level at the nearest existing noise sensitive residential receptors.

5.7.2 Light

The Right of Light Assessment and Daylight/ Sunlight report is submitted with the application to assess how local amenity could be affected.

The results demonstrate that the proposed development will have a relatively low impact on the light receivable by its neighbouring properties. Non-compliance with the BRE recommendations is limited to the daylight tests in respect of the bedroom served by window 16 at the Bishop and Wolf Inn. In our opinion, taking into account the overall high level of compliance with the BRE recommendations, and the mitigating factors set out in section 4 of the assessment, the proposed development is acceptable in terms of daylight and sunlight.

5.7.3 Ground and Soils

A contaminated land assessment has been submitted with the application.

The assessment highlights potential radon risks, based on the findings of the land contamination preliminary risk assessment. Whilst the mapping indicates that no radon protection measures are required for most of the site due to its intermediate radon probability classification, further investigation will be undertaken to confirm the nature of the superficial deposits below the proposed building. This information and the nature of any embedded ventilation within the new structure will inform the exact requirements relating to radon protection measures, along with liaison with the local planning authority.

Construction of the redeveloped pumping station is likely to require excavation of existing natural soils that may be destined for onsite re-use or off-site disposal. In order to comply with current waste legislation or to demonstrate that materials which are designed to be retained on site are suitable for use, specific geochemical soil analysis should be undertaken as part of the site investigation.

Based on the available evidence and the continued use as a sewage pumping station, the potential risks from geochemical contamination in soils, as determined by the preliminary risk assessment, are considered to be low therefore specific site investigation and assessment relating to these risks is not required.

5.7.4 Odour

An odour assessment has been submitted with the application to assess how local amenity could be affected.

The odour risk assessment has identified a potential for slight adverse odour effects at sensitive receptor locations resulting from the operation of the screening plant. In accordance with IAQM guidance, this is considered not significant.

The proposal is therefore considered compliant with relevant national and local planning policies relating to managing pollution.

5.8 Protecting Scilly's Dark Skies

The proposed development only includes external lighting that are essential for safety, security. These are positioned above doors and will be downward facing with appropriate shrouds.

The proposal is therefore considered compliant with relevant national and local planning policies relating to protecting dark skies.

5.9 Managing Waste

A site waste management plan (SWMP) is submitted with the planning application to demonstrate best practice will be adopted in addressing waste management solutions and aligning with the waste hierarchy.

Demolition arisings are anticipated to include a combination of concrete, brickwork, timber, roof slate, glass and cabling. The waste from demolition is likely to be reused / recycled, this may be offsite.

Excavation waste arisings will be generated from the proposed scheme. The waste management actions will consider and identify onsite or offsite reuse or recycling opportunities for these materials.

It is currently anticipated that the largest waste volumes will be from construction activities. The largest contributors will be concrete and steel. Therefore, the SWMP activities will identify suitable reuse or recycling opportunities for the materials and must be dealt with in compliance with the waste hierarchy.

The Contractor will be responsible for SWMP activities pre-construction, during construction, post construction and decommissioning including capturing all relevant documentation that is legally required (e.g., for Duty of Care) and the additional requirement as specified in the Clients Sustainability Design Guide.

The proposal is therefore considered compliant with relevant national and local planning policies relating to waste management.

5.10 Development affecting Heritage

A Historic Environmental Impact Assessment is submitted with the application.

The proposed site is located to the rear of the Grade II Listed Bishop and Wolf Public House. The site will extend out slightly to the east and will necessitate the removal of a stone boundary wall of probable mid-20th century date currently separating the existing pumping station site from a rear yard area to the south of the pub.

The proposed temporary construction compound is situated within an Archaeological Constraint Area, and has a high archaeological potential based on nearby evidence for prehistoric and Romano-British settlement and cist burials and a lack of previous development within the identified area. Appropriate mitigation could be achieved via a programme of archaeological monitoring and recording during topsoil stripping for the proposed compound.

Although the proposed site is not located within an Archaeological Constraint Area, there is some archaeological potential within the vicinity of the site based in part on the nearby findings at Parsons Green. There is also some potential for post-medieval or earlier structures, features or surfaces associated with the development of Hugh Town to be present, although modern disturbance caused by the construction of the existing pumping station is likely to have removed any archaeology within

the footprint of the building and wet well, but some small areas may not have been previously impacted, and archaeological features may be present below-ground that could be impacted by the scheme.

Overall, based on the limited nature of the proposed scheme, the small area it covers and the uncertain survival of any potential features, a programme of archaeological monitoring and recording during relevant groundworks appears to be an appropriate means of archaeological mitigation.

The proposed scheme would result in a direct impact to a small part of the Isles of Scilly Conservation Area, but this change would be neutral and would result in no impact to the overall significance of this asset. It has also been determined that the proposed scheme would result in no impact to the significance of the Bishop and Wolf Public House via change to part of its wider setting.

The proposal is therefore considered compliant with relevant national and local planning policies relating to heritage matters.

6 Conclusion

The proposed development, subject to this application, comprises the construction of an enlarged wastewater infrastructure building, which will replace the existing Bishop and Wolf SPS building. The new building will house new variable-speed pumps and a new screening plant. Full planning permission is sought for the proposed development.

These works are required to improve the resilience and sustainability of the wastewater network on St Mary's in line with regulatory requirements from the Water Industry National Environment Programme (WINEP).

As with the NPPF, the local development plan places emphasis on the principles of sustainable development being central to the planning system and putting economic, social and environmental roles at the fore. The economic role of sustainable development of contributing to building a strong, responsive, and competitive economy, by ensuring that sufficient land of the right type is available in the right places to support growth and innovation, including infrastructure provision.

The main impacts in the immediate environment will be localised and temporary in nature during the construction period when appropriate conditions and implantation of a CEMP can control localised effects, times of work and traffic management to minimise local disruption. Furthermore, once operational the proposed development would not result in any unacceptable or significant adverse impacts in terms of landscape, flood risk, heritage, amenity, highway or biodiversity matters.

This Statement confirms that the proposed development is consistent with current planning policy at a national and local level and there are no other material planning considerations such that consent should not be withheld. This site is therefore considered appropriate for the development proposed and consent should be granted for this essential infrastructure.