COUNCIL OF THE ISLES OF SCILLY

Planning Department
Town Hall, The Parade, St Mary's, Isles of Scilly, TR21 0LW
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1. Case Details

Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 (SI No. 571)
Regulation 6: screening opinion checklist
Screening request under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 SI No. 571

Case Reference	EIA-21-002-SCR BRYHER	Brief Description of the project/development.	To prevent erosion and overtopping risks, repair slipway, prevent flooding and provide long-term storage of defensive materials
Applicant	Adaptive Scilly Coastal Defense works.		
LPA	Council of the Isles of Scilly		
Date Assessed	25th May 2021	Officer:	Lisa Walton
Start Date	25th May 2021	21-day Expiry Date	15th June 2021

2. EIA Details		Yes or No
1	**Is this a Schedule 1 development?**	No
	If YES – EIA development, EIA required, If NO – go to Box 2.	
2	**Is this a Schedule 2 Development?**	Yes
	Which category	10 (M) Coastal work to combat erosion and maritime works capable of altering the coast through the construction, for example, of dykes, moles, jetties and other sea defence works, excluding the maintenance and reconstruction of such works.
a)	**Is it of a description mentioned in column 2 of the table in Schedule 2?**	Yes
	If YES – go to 2(b) and (c); If NO – not Schedule 2 development, no EIA required.	
b)	**Is any part of the site in a 'sensitive area'?**	Yes
	If YES, which area	Within: Isles of Scilly AONB, Conservation Area Close proximity:

		Great Popplestone (Pool of Bryher and Popplestone Bank SSSI and IoS SAC Complex) Great Porth (Rushy Bay and Heathy Hill SSSI, Scheduled Monument of prehistoric field system and Scheduled Monuments: Gig Shed and IoS SAC Complex) Green Bay (Scheduled Monument, prehistoric linear boundary and cairns; Tresco Flats ACA, Io SAC Complex) Stinking Porth (IoS SAC Complex, Gweal Hill ACA and SM of prehistoric field system) Quay (Shipman Head and Shipman Down SSSI)
		(i.e. SSSI, AONB, World Heritage site, SAC, scheduled monument etc)
c)	**Is any applicable threshold or criterion in the table in Schedule 2 exceeded or met in relation to the development?**	All works of this nature trigger the requirement for an EIA.
		If YES to either 2(b) or (c) – Schedule 2 development – go to Box 3. If NO to both 2(b) AND (c) – not Schedule 2 development, no EIA required.
3	**Would the development site/proposal be likely to have significant effects on the environment because of factors such as its nature, size or location?**	Yes
		If YES – EIA development, EIA required. If NO – not EIA development, no EIA required.

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Screening Opinion - reason(s) for decision:

The development falls within Schedule 2 part 10(m).

NOTE: Use the following headings taken from Schedule 3 of the Regs to help define the proposal and its potential for generating significant environmental effects.

Relevant questions as defined in Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017	
1. Characteristics of the Development	
a) the size of the development;	The site area overall spans 13 sites across three of the islands of Scilly for Bryher this is: 7 sites on Bryher: which includes extensive stretches of dune restoration, recharge and replenishment/nourishment, re-alignment of existing rock armour, creation of earth bunding (around freshwater resource), beach recharge, slipway core repair, raising the front edge of a section of bank to create a protective embankment as well as works described as 'rock revetment protection works on the eroded corners of the road and quay.
b) the accumulation with other development;	Having regard to the nature of works, which includes (at Great Popplestone) an option to restore 90m of dunes, including repositioning and maintenance of 50 m3 of in-situ existing 'rock armour', the creation of an earth bund around freshwater well location, to prevent saline intrusion and overtopping. At Great Porth 80 metres of linear of dune nourishment and restoration along with negotiated changes to access and vehicular routes to enable the dune to recover and recess;

	Beach recharge and formalised slipway where core is scoured by waves. 20 metres of restoration of damaged dunes at a low section of dune.
c) the use of natural resources;	Some re-use of local materials: in situ materials would include sand and aggregate, in addition to planting and plant transposing.
d) the production of waste;	Likely to be minimal. Repair and reconstruction of rock armour at Great Porth could reveal inappropriate deposited materials that will need to be disposed of. Currently materials are leaching onto the foreshore
e) pollution and nuisances;	The importation and shifting of materials as part of this project could give rise to emissions from vehicles throughout the operational phase which could impact upon habitats and species, as well as on the resident population and visitor. Additional emissions are generated through the freighting of materials to get them to the islands. Throughout the construction phase such as the rock revetment works at the quay access and raising the edge of the informal pathway at Stinking Porth, depending on weather conditions could generate dust and noise. If any operations take place overnight, the use of external lighting during operations could add to light pollution, sky glow and impacts upon ecology (e.g. bats) if the lighting is not carefully designed and installed and operated correctly.
f) the risk of accidents, having regard in particular to substances or technologies used.	It is noted that some aspects of the project are below MHWS, particularly at the Quay, Great Porth and Great Popplestone where some works will be above mean low water but will be below the mean high water. As with any maritime or coastal development/construction project there is some risk of incidents and accidents, particularly through the use of machinery which shift sand and rock armour. There is a low potential risk of accidents associated with vehicle movements, particularly through the movement of heavy materials from the quay to site.
g) The risks to human health (for example, due to water contamination or air pollution).	The development may give rise to impacts from air quality and contamination land through both the construction and operation of the development. Risks to construction and groundworkers is deemed moderate with a low risk to end users from contamination. A number of project elements are located within or partly within SSSI where there is a potential for adverse effects on these nature conservation sites. These may therefore likely have significant effects on the interest features.

2. The environmental sensitivity of geographical areas likely to be affected by development must be considered having regard, in particular, to:	
a) the existing land use;	The land is currently undeveloped land comprising dune and coastal access areas. None of the sites are identified as containing the best or most versatile agricultural land: Great Popplestone (Pool of Bryher and Popplestone Bank SSSI) Great Porth (Rushy Bay and Heathy Hill SSSI, Scheduled Monument of prehistoric field system) Green Bay (Scheduled Monument, prehistoric linear boundary and cairns; Tresco Flats ACA) Stinking Porth (IoS SAC Complex, Gweal Hill ACA and SM of prehistoric field system) Kitchen Porth and Quay (Shipman Head and Shipman Down SSSI) IoS SAC Complex and SPA
b) the relative abundance, quality and regenerative capacity of natural resources in the area;	In this context 'natural resources' has been taken to mean those resources which exist naturally and can be used to attribute or derive value, including biodiversity interests and the natural landscape. Due to the locations, the impact of the works, if care is taken to avoid non-native invasive species on any due reinstatement elements, would be very unlikely to have a significant impact. The development has the potential to have a positive impact upon ecology. Given the existing land uses there is some potential to enhance habitats and the importance of these to the marine environment particularly in relation to the wider SAC/SPA whilst protecting the terrestrial environment more widely: Pool of Bryher and Popplestone Bank SSSI: Rushy Bay and Heathy Hill SSSI: Shipman Head and Shipman Down SSSI: Outside the site there is a high abundance of high quality natural resources, both coastal at countryside of both designated international importance and local nature reserves.

c) the absorption capacity of the natural environment, paying particular attention to the following areas:				
I. **Wetlands;**	No	-	-	-
II. **Coastal zones;**	Yes	Heritage Coast, AONB, SSSIs: • Pool of Bryher and Popplestone Bank SSSI • Rushy Bay and Heathy Hill SSSI • Shipman Head and Shipman Down SSSI	Pool of Bryher and Popplestone Bank SSSI: 100% in favourable condition. This site is located on the west side of the island of Bryher on the north-west margins of the Isles of Scilly archipelago. Great Pool is the only true brackish lagoon within Scilly being separated from the sea by only a narrow highly mobile storm beach backed by a small dune system. The shallow water in Great Pool supports a dense growth of Beaked Tasselweed Ruppia maritima and Sea-milkwort Glaux maritima. Saltmarsh Rush Junus gerardii is abundant around the margins of the pool with Lesser Sea-spurrey Spergularia marina and Red Goosefoot Chenopodium rubrum in the adjacent turf. Little Pool, a small pond to the north, is less brackish and supports abundant Lesser Marshwort Apium inundatum and Brackish Water-crowfoot Ranunculus baudotii in the open water with Intermediate Water Starwort Callitriche intermedia, Lesser Spearwort Ranunculus flammula and Marsh Pennywort Hydrocotyle vulgaris around the margins. Rushy Bay and Heathy Hill SSSI: 100% in favourable condition. Rushy Bay and	Given the scale and location of the project, combined with the predicted short duration of the construction phase, it is unlikely that significant volumes of contaminated sediment would be released into the environment and have a significant impact on human health or that of surrounding flora and fauna.

			Heathy Hill are located on the south side of the island of Bryher on the north eastern margins of the Isles of Scilly archipelago. The site comprises a low exposed granite hill, only rising to some 10 metres above sea level, backed by a small sand dune and dune grassland system overlying a storm boulder beach. The site supports a number of nationally rare plant species. The areas of dune grassland between Rushy Bay and Great Porth are particularly important for the occurrence of the very rare Dwarf Pansy Viola kitaibeliana, a plant which grows on Scilly and nowhere else in Great Britain. The species rich dune grassland has abundant Sand Sedge Carex arenaria, Sheep's Sorrel Rumex acetosella, Buck's-horn Plantain Plantago coronopus, Sea Stork's-bill Erodium maritimum, Red Fescue Festuca rubra and Thrift Armeria maritima. The nationally scarce Sea Spurge Euphorbia paralias, Portland Spurge E. portlandica and Western Clover Trifolium occidentale also occur here. Sea Beet Beta maritima is more abundant on the edges of the dune grassland where it merges into low dunes dominated by Marram Ammophila arenaria with Sea-holly Eryngium maritimum. In addition Sea Kale Crambe maritima grows on the	

			boulder and cobble strandline at the back of Stony Porth. The Shipman Head and Shipman Down SSSI is largely (87.7%) in a favourable condition, with 12.23% in an unfavourable but recovering condition. Shipman Head forms the north end of the island of Bryher on the north-western margins of the Isles of Scilly archipelago. From Shipman Head a ridge runs south towards the low plateau of Shipman Down. Hercynian granite underlies the site forming mainly shallow podzolic soils. These soils and the extreme maritime exposure have led to the development of 'waved' maritime heathland containing some rare lichen species. Hell Bay, between Shipman Head and Shipman Down, exhibits an important fossil shore platform with associated raised-beach deposits. Pleistocene glacial outwash gravels with abundant erratic pebbles outcrop cover much of the site.	
III. **Mountain and forest areas;**	No			
IV. **Nature reserves and parks;**	No			
V. **Areas classified or protected under Member states' legislation; areas designated by**	Yes	(a) Isles of Scilly Special Protection Area (SPA): • A014(B) Hydrobates pelagicus: European	Isles of Scilly Complex SAC and Isles of Scilly SPA have known pressures/threats from invasive species, fisheries impact,	The use of in situ materials and transposing of plants will limit the introduction of invasive species and likely. Given the scale and location of the project, combined with the

Member States pursuant to Council Directive 79/409/EEC on the conservation of Wild Birds (a) and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (b);		storm-petrel Seabird assemblage • A183(B) Larus fuscus: Lesser black-backed gull (b) Isles of Scilly Complex Special Area of Conservation (SAC): • H1110 Sandbanks which are slightly covered by sea water all the time • H1140 Mudflats and sandflats not covered by seawater at low tide • H1170 Reefs • S1364 Halichoerus grypus: Grey seal • S1441 Rumex rupestris: Shore dock	habitat fragmentation, public disturbance to wildlife and habitats and water pollution.	predicted short duration of the construction phase, it is unlikely that significant volumes of contaminated sediment would be released into the environment and have a significant impact on human health or that of surrounding flora and fauna. Sufficient information, however, will be required on the potential impacts of this proposal on these designated sites.
I. **Area in which the environmental quality standards laid down in Community legislation have already been exceeded;**	No	-	-	-
I. **Densely populated areas;**	No	Population of St Agnes around 85 (2011 census)	-	-
II. **Landscapes of historical, cultural or archaeological significance;**	Yes	Designated heritage assets: Conservation Area	SMs (1015649) Gig Shed is identified in the SW Heritage at Risk 2020 and will be vulnerable to the proposal which includes restoration of a section low dune on Great	Given the scale, nature and location of the project, there is potential for works to give rise to some impacts on designated heritage assets,

		Scheduled Monuments: (SM 1014987) Prehistoric field system and post-medieval quay in Great Porth; (SM 1016173) Gig shed on the north coast of Great Porth Listed Building: Archaeological Constraint Areas: **Undesignated heritage:** there is a high potential at this work location for the presence of undesignated buried archaeological remains, in addition the presence of the Scheduled Monuments. These undesignated remains may extend from the shoreline across the inter-tidal zone and into the marine environment.	Porth, in addition to rising sea levels and any ground disturbance around the site, **SM 1016173** Gig shed on the north coast of Great Porth - this monument appears to lie directly within an area of proposed works. This gig shed on the north coast of Great Porth survives reasonably well; despite the loss of its roof, substantial parts of its walling will survive beneath the wind-blown deposits within and around it. The gig shed shows clearly its form, manner of construction, and those aspects of its siting and orientation essential for its function. Its visible features are complemented by the known identity of the gig it housed and by the detailed historical records of several actions undertaken by that and other gigs working out of Great Porth. Its proximity to the `Golden Eagle' gig shed and to the surviving pilot lookout on Timmy's Hill produces a rare grouping of the surviving elements from this former key activity both in the islands' economy and the nation's maritime trade. This monument is afforded additional significance by the presence of two other, undesignated gig shed sites to its south, both of which also appear to lie directly within an area of proposed works. **SM 1014987** Prehistoric field system and	particularly the gig shed and the pre-historic field system both on the west coast at Great Porth; the project does also have the potential to impact on buried archaeological remains. Further assessment should be prepared by the applicant to understand and evidence the potential impacts on heritage assets. Any excavation of the Gig shed, which lies within the proposed area of dune renourishment and restoration, will need to be monitored in accordance with a written scheme of investigation and recorded.

			post-medieval quay in Great Porth - this monument appears to be directly within or very close to an area of proposed works. The field system in Great Porth survives reasonably well, clearly displaying the character of the prehistoric land division. Its extensive survival well into the inter-tidal zone confirms its long term stability against a considerable period of submergence. This sector of the field system complements that at higher levels which survives with the prehistoric settlement on Heathy Hill, providing an unusually complete view of prehistoric land allotment across the altitude range into now-submerged levels. This field system is one of very few inter-tidal survivals on Scilly situated on a shore facing out from the core of the archipelago. As a result of these factors this monument is of particular importance for Scilly's contribution to the study of land-use responses to island environments during the prehistoric period. The wider contemporary context of this monument and its relationship to prehistoric funerary and ritual activity is demonstrated by the field systems and cairn cemeteries on Samson Hill and Gweal Hill. The association of the abandoned post-medieval quay in this monument with the kelp pit on Heathy Hill illustrates the main visible surviving	

			elements of kelp-burning, a formerly major economic activity in the islands' economy.	

3. The potential significant effects of development must be considered in relation to criteria set out under paragraphs 1 and 2 above, and having regard in particular to:	
a) The extent of the impact (geographical areas and size of the affected population);	The landscape and visual impacts would be experienced by those living nearby and to a lesser extent from some longer distance views. It is considered that the development would not generate a significant impact with respect to landscape and visual impact in relation to the Regulations as the site would be seen within the context of the coastal environment of the island of Bryher.
b) The nature of the impact;	Impacts likely to be mainly visual from the changes to the dunes, storage of materials, installation of additional rock armour. Creation of bunding at Great Popplestone has the potential to be visually intrusive but there are no details of height. Impacts upon the protected species and habitat can be assessed as part of the planning application. Wider impacts upon the European Designated sites has not been assessed under the Habitat Regulations and mitigation. The at risk heritage asset (Gig Shed) has the potential to be completely lost through the reinstatement of the rock revetment works and will require archaeological monitoring when works proceed.
c) The trans-frontier/transboundary nature of the impact;	The works fall above both mean high water spring but with some aspects below. No works are proposed below the MLWS but impacts from the terrestrial and into the marine environments could arise through materials being washed down the beach, either during periods of high rainfall or through high tides.
d) The magnitude and complexity of the impact;	The intensity of the impact is likely to be relatively limited in complexity and magnitude
e) The probability of the impact;	High
f) The expected onset, duration, frequency and reversibility of the impact;	Gradual onset as works progress around the coast of Bryher once works commence. Duration would be limited and frequency would be a one-off to secure the coastline and protect fresh water, seawall stability, roads and slipway. The works would not be reversible.

g) The cumulation of the impact with the impact of other existing and/or approved development;	Having regard to other developments it is considered that the proposal would give rise to significant in-combination impacts.
h) The possibility of effectively reducing the impact.	The schedule of proposed works includes a number of options which will have varying degrees of effectiveness in terms of achieving long term aims. It is considered that the main effective way of reducing the visual impact of the works would be for them to not take place and allow the coastline to naturally change. This is not a viable option. There are alternatives to the types of materials, particularly the types of materials used in the rock revetment protection works on Quay Beach. In relation to historic environment impacts then an archaeological impact assessment will need to be undertaken at an early stage in the planning process to enable informed advice to be provided on this scheme by Historic England and Cornwall Council's Archaeology Service. The archaeological assessment should take a particular (though not exclusive) focus on the potential for buried prehistoric land surfaces, inter-tidal remains and peat deposits which may contain early prehistoric archaeological remains and preserved palaeo-environmental evidence. General comment - proposed aggregates store at Broward Point. We note reference to this potential site in correspondence but are unable to locate it on Bryher from the limited information available. We would wish to understand its exact location given the high density of Scheduled Monuments upon the island. Any excavation of the Gig shed, which lies within the proposed area of dune renourishment and restoration, will need to be monitored in accordance with a written scheme of investigation and recorded. A shadow habitat regulations assessment for each proposal and in terms of the in combination impacts with other developments will need to consider the impact upon protected species.

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Conclusions – According to EIA Regulations Schedule 3		
Q1	**Is it a major development which is of more than local importance?**	**N/A**
Q2	**Does it affect a particularly environmentally sensitive or vulnerable location?**	**Yes**
Q3	**Does it have unusually complex and potentially hazardous environmental effects?**	**Yes**
Conclusion **Having regard to the characteristics, scale and potential impacts of the development, the proposal would likely give rise to significant effects that would amount to EIA development. The decision is based on the information known at the time and selection criteria for screening Schedule 2 development (Schedule 3) and the indicative thresholds and paragraphs 017, 018, 023 and 027 of Planning Practice Guidance.**		
Environmental Impact Assessment		**Required**