

Mr Andrew King  
Council of the Isles of Scilly  
Planning & Development Department  
Old Wesleyan Chapel Garrison Lane  
St Mary's  
Isles of Scilly  
TR21 0JD

**Our ref:** DC/2020/121505/01-L01  
**Your ref:** P/20/044/FUL  
**Date:** 13 July 2020

Dear Mr King

**RESUBMISSION OF PLANNING APPLICATION P/19/044/FUL FOR THE ERECTION OF A THREE STOREY, TWO BEDROOM DWELLINGHOUSE WITHIN THE CURTILAGE OF A GRADE II LISTED BUILDING. (LISTED BUILDING). PARK VIEW, THE PARADE, ST MARY'S, ISLES OF SCILLY.**

Thank you for the recent consultation with regards to the above proposed development.

**Environment Agency Position**

As this development poses an unacceptable risk to life and property from flooding, we object to this application and recommend that planning permission is refused.

**Reason**

The site lies within Flood Zone 3, which is land defined by the planning practice guidance as having a high probability of flooding. Notwithstanding the mitigation measures proposed, the risk to life and property, within the development, from tidal inundation would be unacceptable if the development were to be permitted. As demonstrated by The Isles of Scilly Coastal Model 2019, the site is at risk of tidal flooding and will experience internal flooding of up to 2.52m in depth for a 1 in 200 event with the High Climate Change scenario (UKCP18). Although the proposal has indicated that living quarters will be raised a safe distance above the design flood level, part of the proposed ground floor contains potentially habitable areas that pose as a potential risk to life throughout the life of the development.

**Overcoming our objection**

The ground floor should be re-designed so that it is not enclosed and allows the free passage of water through it, thereby maintaining the existing flow paths for water and ensuring that all enclosed residential space is raised to 300mm above the design flood level (1 in 200 tidal event) the High climate change allowance (6.18 0.3 = 6.48m). In addition to this, appropriate mitigation and resilience measures (Such as those outlined in the FRA, Section 7 – Flood Risk Management Measures) should be

Environment Agency  
Sir John Moore House, Victoria Square, Cornwall, Bodmin, PL31 1EB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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implemented to reduce damages incurred by flooding and restrict the ingress of water. These mitigation measures should include, but are not limited to:

- Bringing down electrical services from ceiling, towards sockets.
- Non-return valves to be fitted on sewers to prevent back flow.
- Residents sign up to receive flood warnings from the Environment Agency.

To overcome our objection, the applicant should submit evidence to demonstrate that the proposal will not pose a risk to life and property as highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA and we'll respond within 21 days of receiving it.

Yours sincerely

**Shaun Pritchard**  
**Sustainable Places Technical Specialist**

