

RECEIVED

By Liv Rickman at 4:50 pm, Sep 15, 2022

Ms Lisa Walton
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/2022/122747/01-L01
Your ref: P/22/048/FUL
Date: 15 September 2022

Dear Ms Walton

**ERECTION OF A STAFF DWELLING WITH ASSOCIATED LANDSCAPING AT ST MARTIN'S VINEYARD (RE-SUBMISSION OF PLANNING PERMISSION P/19/060/FUL).
ST MARTIN'S VINEYARD AND WINERY, HIGHER TOWN, ST MARTIN'S, ISLES OF SCILLY, TR25 0QL**

Thank you for consulting us on this planning application.

Environment Agency Position

Given the extant planning permission and current 30 year permission (Duchy of Cornwall), we believe that a Time Limited Planning permission and a 'flood resilience condition' would be an acceptable way forward to remove our objection.

We would like a 10 year time limited permission, when the flood risks and climate change could be reviewed in line with the guidance at the time. This would have to be via an appropriate Flood Risk Assessment, that properly assesses the wave overtopping risk, climate change guidance and the state of the sand dunes/foreshores. We would not accept a 30 year time limited permission, given that by 2052 the flood risk and climate change guidance is likely to have changed significantly.

The latest flood risk modelling, which considers tidal water levels, wave action, climate change and the Dune System, shows the area at risk during a range of storms. The exact position of the proposed buildings is not shown at risk until the 2% AEP (1 in 50) Storm so there is an element of forewarning (by the land to the south and west flooding) available.

We would strongly advise the following is conditioned by the Council:-

- the FFL of the building is set at least 300mm (600mm is recommended) above the surrounding land levels;
- that water resilience materials are used in the design/construction;
- a simple flood evacuation plan is prepared (based on weather warnings and local

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

Cont/d..

observations – we do not currently provide a flood warning service for the Islands);

- The proposed building includes a mezzanine level, which is essential to act as a safe refuge, if the flood water surrounds the building.

Additional Comments on the applicant's Email on flood risk issues:-

The email tries to argue that the actual risks are very low, and wouldn't happen in the lifespan of the development. The risks need to be set out in line with the planning and technical guidance, and they come out as 'high risk', and must be considered appropriately. There is a 2% chance in any year that the site could flood. This risk will increase every year as sea level rise and increased storminess is happening now, and not just in the future. A current 2% chance storm (1 in 50) will become an approximate 50% chance (1 in 2) storm by the year 2052.

Sand Dunes

The Sand Dunes appear to have been included in the flood risk/hazard mapping, as they are a 'natural defence' and thus recorded in the underlying lidar (3D land map). The detail flood outlines appear to follow the sand dunes and the underlying topography.

Sand Dunes can disappear after a couple of storms, and this has been recorded in many location in DCIS. Where dunes remain, they do offer a level of protection/reduce flood risk & frequency. Climate change will make the likelihood of damage more frequent, and hence greatly increase any future repair costs. The cost of repair could be well into £100ks. There is no guarantee that the Sand Dunes will always be repaired or replaced, so cannot be fully relied upon.

Type of Building

- A mobile building for residential usage (Caravans, mobile homes and park homes intended for permanent residential use) are in the Highly Vulnerable category and should not be in an area at risk.
- Lifetime of development - 100yr for residential development is the national standard, unless there is a good reason to deviate (between LPA and EA). The Duchy's 30 year period could be used as the 'design life' to consider the flood risk over for this linked workers accommodation.

Yours sincerely

Mr Mark Williams
Planning Advisor

Direct dial 020 84 746199

Direct fax

Direct e-mail spdc@environment-agency.gov.uk