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Our ref: DC/2022/122983/01-L01

Your ref: P/22/076/FUL

Date: 18 January 2023

Dear Liv Rickman

APPLICATION FOR THE INSTALLATION OF A 75M LONG GEOBAG CORE ADDED TO EXISTING COBBLE EMBANKMENT AND TIED WITH GEOTEXTILE AT GREEN BAY BOATHOUSE, CONSTRUCTION OF A 40M LONG ROCK REVETMENT AT KITCHEN PORTH A 55M LONG REVETMENT AT STINKING PORTH, A 90M LONG ROCK REVETMENT TO THE NORTH AND SOUTH OF THE BEACH ACCESS RAMP AT GREAT PORTH (NORTH), A 100M LONG ROCK REVETMENT AT POPPLESTONE AND THE RECOVERY OF ROCK ARMOUR FROM NORTH POPPLESTONE. (EIA DEVELOPMENT) (MAJOR DEVELOPMENT) CHURCH QUAY, NORRAD, BRYHER, ISLES OF SCILLY

Environment Agency Position

We object to the proposed scheme as the proposals are likely to impact on priority habitats. We recommend a change in the designs for the reasons set out below.

Impacts on designated habitats will be addressed by Natural England.

We are satisfied with the proposals with regard to flood risk.

We note that the proposals may be contrary to SMP policy and provide further advice below.

Reasons

For Great Porth North

The general arrangement layout (Drawing DKR6499-210-D111) and typical section (Drawing DK6499-210-D320) shows the toe of the rock armour being set only a minimal depth below existing beach level. With a total height of rock armour of 1.6m, and with the toe extending seaward beyond the MHWS, this structure will cause increased beach erosion and beach lowering in normal wave conditions that will result in undermining of

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the defence. The reduced wave overtopping will increase this draw down in larger storms.

An alternative approach would be to set back the rock armour to the edge of the road. This would provide at least 9m width, which would take the defences outside of the HAT beach zone. This would allow for the beach recession that the SMP suggested could be 35m over the next 100 years, and so would increase the resilience and design life of the structure, whilst reducing the impacts on the adjacent beach and dune.

For Great Porth- Par South

Impacts on SSSI will be addressed by Natural England.

We advise whilst the toe of the rock armour is to be set a minimum of 0.6m below beach level, this still leaves up to 1.0m of rock armour face at the toe exposed between the MHWS and HAT zone. The introduction of a hard reflective face within the intertidal zone will lead to beach draw down during storms. Given the reduced overtopping in extreme storms, drawdown will be further increased in those conditions. This threatens to undermine the structure and reduce its design life.

Stinking Porth

This proposal would result in net loss of priority dune habitat.

In order to provide increased protection to Great Pool from tidal inundation, a smaller structure set back from the dune ridge should be feasible. At its closest there is some 9m between the dune face and the SSSI boundary. This suggests that a much smaller structure set back landward of the dune ridge is feasible that would maintain current inundation rates to Great Pool without direct impacts on the beach and dune system.

Great Popplestones

It is not clear, why rock armour along the landward side of the existing wall is not considered, as this would not be prone to undermining that the current proposal is (given that the toe is a single line of large boulders placed at beach level within the breaker zone).

Kitchen Porth

With a design of rock armour placed at beach level within the wave breaker zone would suggest that the design would be at risk of undermining and failure.

North Green Bay

The proposal is remote from the shoreline, and appears to be designed as a coastal flood defence structure rather than a coast protection structure.

This does appear to be replacing natural dune habitat, although we have no records on the condition of this habitat and whether it is dominated by terrestrial species. In the latter case, the proposal would only act to squeeze such priority habitats in response to rising sea levels.

SMP Policy

The proposed works at Bryher appear to run contrary to SMP2 policy

For Great Porth North

SMP policy is No Active Intervention (NAI) from 2025. Given the likely construction time, and the increased rate of climate change that has occurred since publication of SMP, this policy period is the principal guidance for coast protection that should apply. Whilst the SMP did acknowledge the need to maintain or upgrade existing defences prior to this, this explicitly referred '*only to the rock armour defence currently in place along the most northerly part of the shoreline*'.

The existing rock armour extends to the beach only for the northwest half of the area of proposed works. To the east of this, current rock armour is located only in the dune face above the high tide shingle. The proposed works extend rock armour seaward of the current defences, and may be considered an advance the line.

The works at Great Porth North therefore appear contrary to SMP policy.

For Great Porth- Par South

Great Porth was considered in the SMP within a single policy unit, the Hold the Line (HTL) till 2025 explicitly referred '*only to the rock armour defence currently in place along the most northerly part of the shoreline*' that lies in Great Porth North. The proposed works in the south of the Bay are therefore contrary to the SMP policy. Impacts on SSSI will be addressed by Natural England.

Stinking Porth

The SMP policy is NAI. Introduction of coast protection here is therefore contrary to the SMP policy and would result in net loss of priority dune habitat.

Great Popplestones

SMP policy is No Active Intervention (NAI) from 2025. Given the likely construction time, and the increased rate of climate change that has occurred since publication of SMP, this policy period is the principal guidance for coast protection that should apply. Whilst the SMP did acknowledge the need to hold the line till in the area fronting Great Pool till 2025, this was to inform if no active intervention was the correct long term aim. The proposal therefore appears at odds with the SMP unless information has been gathered suggesting NAI is not appropriate in the longer term.

Kitchen Porth

The SMP policy is no active intervention. The proposed rock armour seaward of the existing ridge line and informal rock armour is therefore contrary to the SMP, and may constitute advance the line.

North Green Bay

The SMP policy is no active intervention.

The proposal is remote from the shoreline, and appears to be designed as a coastal flood defence structure rather than a coast protection structure. As such, this may fall outside of the consideration of the SMP policy.

Flood Risk

There are no flood risk objections

The proposals are in line with some of the Policy Intent Area (PIA) of "Hold the Line" till 2025 set out within the Shoreline Management Plan till 2025. Therefore, the proposals are required in order to reduce the risk of erosion and inundation of the Great Pool. However, the PIA's covering the proposal sites have revised policies for the next epoch of 2025 up to 2150 of "No Active Intervention". The details submitted for this proposal make clear that it has been designed with a lifetime of 25years only and therefore consideration needs to be made on how the aspirations of the SMP will continue beyond the 25 years of this scheme.

Overcoming our objection

We would be happy to discuss the proposals and provide further advice relating to the

comments above.

Yours sincerely

Mark Williams
Planning Advisor

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