

Mrs. Amy Langdon
Castle Bryher
Bryher
Isles of Scilly
TR23 OPR

Ms. Lisa Walton
Chief Planning Officer
Council of the Isles of Scilly
Planning & Development Department
Town Hall
The Parade
St Mary's
Isles of Scilly
TR21 0LW

4th May 2023

Dear Ms. Walton

Formal Response to P22/076/FUL; Amendment to the Planning Application for Coastal Defence works at Bryher

I agree with other comments that I have seen in various recent email threads, that the amended planning application still seems woefully devoid of pertinent information, so I cannot see how planning permission for the proposed Bryher sea defences can be given until further details are confirmed. (I note that it has now been confirmed that the Bryher application will not be going to Full Council at the end of May 2023, but I consider the following comments to still be relevant).

It is clear that feedback and further discussion with Historic England, in particular, is needed before plans for the sea defences at Great Par can even be finalised, given the position on the bank of the Gig Shed Historic Monument. There are no plans to show the proposed new position of the slip way access on to the beach, away from the gig shed remains; and it is concerning that the rock armour could extend 4.1m seawards from the existing bank across the beach. It is also not very clear from where the proposed height of 6.5m is measured, making the visual impact on that area of Great Par very hard to envisage, but certainly all this would have a huge impact on the appearance of the whole of that side of the bay. Currently our guests in Glenhope can enjoy sea views from the garden, and I fear that if these plans are approved they may just be looking at a massive bank of rock armour in future.

I am very concerned about the continued omission of vital details that the most affected neighbouring tourism businesses need, despite being promised detailed method statements at our last meeting with Project Director Stephen Swabey and TMS Ltd (at Hell Bay Hotel on 29th March 2023). The amended timeline indicates that material deliveries to the island will still be through the main tourism season on Bryher, from April – August 2024, and however we look at it, will be hugely detrimental to the tourism businesses closest to Great Par (Hell Bay Hotel, 2 units of self-catering accommodation at Glenhope, and 1 unit of self-catering accommodation at Bank Cottage). I take exception to the statement on page 10 of Addendum Volume 1 of the Environmental Statement that *“Further engagement has also been undertaken with the residents of Bryher & St Agnes to discuss the*

potential opportunity for material delivery across the summer period, which was been (sic) accepted.”
Not on Bryher, it hasn't!

Also stated in Addendum Volume 1, the impact on tourism is considered to be 'not significant' with 'very small changes in tourist numbers'. I would like to ask on what or whose judgement this is based? I agree the tourist numbers are small compared to other areas of the UK, however 3 businesses very close to Great Par could lose significant income (in my case, about 90% of my annual income, if all guests cancel). It is not good business practice to offer our accommodation without giving guests full details of what might be happening during their holidays, before they pay a deposit (hence my continued requests for detailed information on the project, well in advance – the vast majority of guests pay us a deposit in November for the following year), and I fully expect that most would not be keen to visit if they could potentially be subjected to rock armour deliveries and 30 tonne vehicles driving past the cottages for 6 days out of their 7 day stay. I will be seeking legal advice with regards to our rights for compensation should it come to that – if the changes in tourist numbers are considered to be so small, then perhaps compensation is something the Council should consider?

Addendum Volume 1 still states that deliveries will be made to each bay where work is being carried out 'where possible' – but we have already been told that all deliveries will have to come in to Great Par, so this should now be made clear in all documents - for 6 days a week (the addendum states 138 days during the 153 day period of April - August) during the peak tourist season! Addendum Volume 2 of the Environmental Statement also states that there will be 19 loads of delivery in total. Based on a 350 tonne barge, this must be incorrect information, as 19 loads of 350 tonnes equals 6,650 tonnes. We have been told that there could be as much as 17,000 tonnes of rock armour being delivered, which would be closer to 50 loads of delivery!

Like the Hell Bay Hotel, we are also very concerned as to where exactly the storage of all this rock armour is likely to be prior to construction, plus the usage of 30 tonne vehicles moving it during the busy tourist season. I have stated many times that these vehicles will be too big for the island (and I do appreciate that smaller vehicles will mean more trips!). All this would be hugely disruptive to our guests who expect to enjoy a peaceful holiday on Bryher. Deliveries and storage **must** be further away from the tourism businesses closest to Great Par, and decibel information for deliveries, movements of rock and vehicles plus construction must be provided. (NB in Addendum Volume 2, pages 13 & 14 of the Outline Construction Environmental Management Plan (pages 41 & 42 / 621) Section CE2 states "*Noise impacts will be minimised by adherence to measures described in BS 5228, to reduce noise impacts from construction by 5dB to 15dB*" – a quick Google indicates that 15dB is the level of a whisper, is this an error?!). I would also like to ask why, if deliveries and storage were originally proposed for February – April 2023, can this not be the case for 2024? This would be much less disruptive to the main tourism season. Like the Hell Bay Hotel, our tourism season runs from mid-March (sometimes earlier) to the very end of October, so, if Councillors were minded to approve all this, we would ask for a planning condition that any deliveries, work and movements of machinery that might happen during this time should be limited to between 9.30am and 4.30pm, with no night time, early morning or evening work to be permitted. If 30 tonne dumper trucks must be used, they should only be used from November – February.

If all rock armour is delivered into Great Par, there is no way that these vehicles will be able to get the rock armour over to Kitchen Par – the largest vehicle that could safely navigate any of the Bryher roads would be a 6 tonne dumper, although this would still leave no space for any pedestrians to pass safely. It would be far more prudent to deliver the rock armour needed for Kitchen Par directly

there, or failing that, Bar would be the closest appropriate point, keeping the road transport needed to a minimum.

More incorrect information in Addendum Volume 2 is that on page 154 / 621 it states *“There is a need to increase defences at Great Porth (Great Par) North of Great Carn to protect the island’s water supply (Great Pool) from seawater inundation...”* - the Pool is not the island’s water supply and already fills from and drains directly into Great Par via the leat, therefore sea water already regularly enters and exits the Pool daily.

In summary, I am very concerned by all the vagaries of this planning application and believe that planning for the Bryher sea defences should be withdrawn in order that we can go back to the drawing board with the consultants and design team, also working closely with South West Water as it seems obvious to me that they should be involved, particularly with the clearing of the leat from the water meadows to Popplestones to protect the island’s water supply. The research that Cllr Andy Frazer carried out regarding the drainage ditches around Great Par and across Hillside Farm should be used – in my opinion it is essential that these are all re-instated; and more protection should be given to the properties ‘Old School House’ and ‘Carn Leigh’ on the headland between Great Par and Stinking Par. As others have commented, this whole project still feels like money is being spent without any consideration being given to the impact of the very nature, seascape and landscape of the island. I would also like to ask how appropriate it is that the Council of the Isles of Scilly can give itself planning permission for its own grant funded project? It doesn’t seem quite right to me!

Again, I want to be clear that I am not opposed to improving Bryher’s sea defences, but feel sure there are better ways than throwing thousands of tonnes of rock armour at it!

Regards,

Amy Langdon