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By Liv Rickman at 4:55 pm, Feb 06, 2023

Liv Rickman
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/2023/123054/01-L01
Your ref: P/22/085/COU

Date: 06 February 2023

Dear . Rickman

CHANGE OF USE OF PART GROUND AND FIRST FLOOR COMMERCIAL SPACE WITH SECOND FLOOR EXTENSION TO CREATE TWO RESIDENTIAL UNITS (RETAINING EXISTING GROUND FLOOR STREET FRONTAGE COMMERCIAL AREA) INCLUDING PARTIAL DEMOLITION OF REAR PART OF BUILDING. THE ISLES OF SCILLY STEAMSHIP COMPANY, HUGH STREET, HUGH TOWN, ST MARY'S, ISLES OF SCILLY, TR21 0LJ

Thank you for consulting us on this planning application.

Environment Agency Position

There is an objection as the proposal does not meet with the requirements of paragraph 167 of the NPPF.

The site is identified in Flood Zone 3 and introduces new dwellings into an area predicted (as stated within the submitted FRA) up to a depth of 1.79m during the future 1 in 200 year (0.5% AEP) event. The LPA will need to be satisfied that they consider the site has met their policy SS7 Flood Avoidance

Reason

We would comment on the FRA as follows

- The FRA has addressed the likely depth of flooding during a future 1 in 200 year event with Climate Change but has failed to address the increased frequency during lesser events due to climate change. With flooding to the depth predicted and on a more frequent basis there is a greater probability of significant damage to the building. Very robust flood resistant and resilient measures would need to be adopted to allow the building to be quickly brought back into use without significant refurbishment, as required by the NPPF
- No assessment has been provided on the current level, location or condition of any flood defences. The Council may also wish to consider that the SMP policy for this zone is Hold the Line to 2023 but from 2105 the policy changes to Managed Retreat
- The proposal relies on future inhabitants of the site receiving a flood warning and evacuating the site prior to a flood event, to allow them to be safe, both now and even more so in the future. We believe that therefore to provide the councils

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

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emergency planners with an idea of whether they feel an event of this magnitude can be managed for the lifetime of the development a full and comprehensive Flood Warning and Evacuation Plan should be submitted prior to determination and fully signed off by the council's emergency planners. Our greatest concerns are with the ground floor residential development which provides no safe refuge.

- The disposal of surface water from the site has not been addressed with the FRA and seems to wholly rely on an unspecified existing SW drainage system. It is unclear if there is tide locking of this system or the potential for water to syphon back through the system. Climate change and increased rainfall should be taken into account.

Overcoming our objection

The applicant should submit a revised FRA that addresses the points raised above.

Yours sincerely

Mark Williams
Planning Advisor

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