

# Council of the Isles of Scilly Planning Application

Ref: P/24/088/HH

## Consultation Response

**Date:** 29.11.2024  
**Ref:** P/24/088/HH  
**Site:** 2 Silver Street, Hugh Town, St Mary's, Isles of Scilly  
**Proposal:** Replacement of rear extension window with new door.

You are being consulted on this application as you may wish to make comments before a decision is made. Should you wish to make any comments on this application, please complete the response form below and return to [planning@scilly.gov.uk](mailto:planning@scilly.gov.uk) by the **20<sup>th</sup> December 2024**.

Link to application: <https://scilly.gov.uk/planning-application/planning-application-p24088hh>

I look forward to receiving your comments in due course. If I have not heard back from you by the **20<sup>th</sup> December 2024** then I will assume you have no comments to make.

**Consultee Name:**

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The proposal is to remove the existing window on the east elevation of the property and replace this with a fire door; remove the kitchenette and replace with a sitting room.

The Flood Risk Assessment (FRA) contained within the planning application states that the site is located within Flood Zone 3 – High Flood Risk and all three access doors will have removable flood gates.

It is agreed that 2 Silver Street is located within Flood Zone 3 – High Flood Risk Zone.

Since the application refers to a replacing a window with a door, this would be described as Minor development – “alterations to an existing building which do not increase the size of the building”.

For all development covered by the standing advice for Minor Development, a FRA should include:

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- your site address
- a description of your development
- the estimated flood level for your development, taking into account the impacts of climate change over its lifetime
- details of the finished floor levels
- details of your flood resistance and resilience plans
- any supporting plans and drawings
- any other information the relevant standing advice tells you to include

The estimated flood level is the depth of flooding anticipated on your development site.

The FRA should determine the risk of flooding from all sources and if the major risk of flooding to this site is tidal, the 1 in 200 annual probability event plus an allowance for climate change should be used to describe the likely flood depths to the site. All levels (Proposed Finished Floor Levels and expected flood levels) should be to Ordnance Datum.

The current Flood Risk Assessment identifies the Flood Risk Zone and that a flood gate will be used on all three access doors, but is lacking in detail when considering the Standing Advice above. Please can the FRA be updated to assess what the likely flood depths will be at the property. The depth of water will influence the specification of the flood gate.

Further detail should be provided in relation to the type of flood gate. The information provided in the FRA states flood gates, but should this be a flood barrier ? The details should provide information on the type of flood defence product considering the depth of water, door recess, threshold, wall material and where the gate will be stored. What will be the maintenance for this barrier, who will do the annual maintenance and who will be responsible for erecting the barrier? Would this be the homeowner, or tourists if the property is being let ? Could a tourist with no training be reasonably expected to erect and manage a flood barrier ?

**Name:**

**Date: 06 01 2024**

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## **Additional comments 14 02 2025**

I have reviewed the supplied information provided by the applicant and that the consultant has deemed that a detailed FRA would be disproportionate to the development. This is disagreed. The proposal is to remove an external window and replace this with a 3 point lock UPVC door, which would provide another fire access into the rear courtyard. The new access from the rear extension will be into the rear courtyard to which the property has a right of access over. Even though this door is to

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the rear courtyard and not directly onto Silver Street, Flood water on Silver Street would still flow into the rear courtyard until it finds its own level.

New mapping has been provided by the Environment Agency and it provides the yearly chance of flooding for surface water and rivers and sea for the present day and between year 2040 and 2060. They also now provide the likely flood depths in the area for the same sources and return periods. It would not be too onerous for the consultant to review these maps and update the Council on what the yearly chance of flooding for present day and between 2030 and 2060 as well as the corresponding flood depths for both surface water and rivers and sea.

The points raised in the response are valid. The application states that there will be flood gates provided on all 3 doors, which has been accepted will improve the overall flood resilience for the property. However, there is no detail on the likely flood depths, the specification of these gates, where they will be stored, how and by whom these gates will be erected – this is particularly important if the property is a holiday let and all ongoing future maintenance. If it is found that flood gates are problematic, perhaps other forms of flood resilience could be proposed?

There would need to be a condition so that all approved flood resilience measures remain with the property, with full operation and maintenance instructions if the property is brought to the market to be sold.

**14 02 25**