

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/2025/124770/01-L01  
**Your ref:** P/25/016/COU  
**Date:** 11 April 2025

Dear Sir/Madam

**TEMPORARY CHANGE OF USE OF LAND TO SITE TEMPORARY  
CONTAINERISED ACCOMMODATION (2 X SNOOZEPODS) FOR A PERIOD OF UP  
TO 3 YEARS IN RELATION TO BRYHER BOATYARD.  
BRYHER BOATYARD, NORRAD, BRYHER, TR21 0PR**

**Environment Agency position**

This site is subject to high flood risk. In the absence of an acceptable Flood Risk Assessment (FRA) we object to this application and recommend that planning permission is refused.

**Reasons**

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- consider how people will be kept safe from the identified flood hazards
- consider how a range of flooding events (including extreme events) will affect people and property. A site-specific Flood Risk Assessment must evidence that the development will be suitable safe and resilient against the impacts of a 1 in 200 year tidal flood event (climate change and sea level rise amplifications are not required due to the short timeframe of permission sought).
- consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- consider the requirement for flood risk mitigation measures to address flood risk for the lifetime of the development.

Because the Flood Risk Assessment has not sufficiently detailed the modelled flood levels, the development may propose inadequate:

- Flood defences
- Raised finished floor levels
- Resistance and resilience measures
- Safe access and egress routes

### **Overcoming our objection**

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised FRA submitted and we will respond within 21 days of receiving it.

We would recommend that the applicant contact the Environment Agency and request a Product 4 Information Package, which may contain modelled flood data for this site, via the following email address: [DCISEnquiries@environment-agency.gov.uk](mailto:DCISEnquiries@environment-agency.gov.uk).

Yours faithfully

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**Planning Advisor**

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