

Ms Lisa Walton  
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/2018/119775/01-L01  
**Your ref:** P/18/031/FUL  
**Date:** 06 June 2018

Dear Ms Walton,

**REVISED SCHEME FOR REDEVELOPMENT OF TREGARTHENS HOTEL INCLUDING (1) ERECTION OF A PAIR OF SEMI-DETACHED DWELLINGS FOR RESTRICTED HOLIDAY LETTING (USE CLASS C3) INCLUDING ASSOCIATED LANDSCAPING. (2) ALTERATIONS TO EXTERNAL FACADE OF HOTEL LOUNGE AND HOTEL BEDROOMS INCLUDING REPLACEMENT WINDOWS/DOORS, FORMATION OF NEW WINDOWS AND REMOVAL OF EXISTING CHIMNEY. (3) FORMATION OF A NEW PEDESTRIAN OPENING IN THE EXISTING WALL ADJACENT TO GARRISON HILL. (4) FORMATION OF EXTERNAL SEATING AREAS AND NEW BALUSTRADES TO HOTEL ROOMS AND HOTEL LOUNGE. (5) INSTALLATION OF GROUND SOURCE HEAT PUMP/LOOP, BREAK TANK FOR FOUL SEWAGE. (6) REPLACEMENT FLAGPOLE. (7) DOWNLIGHTS ON EXISTING LETTERING ON FRONT OF MAIN HOTEL BLOCK. (8) DOWNLIGHTS AND NEW EXTERNAL LETTERING ON REAR OF MAIN HOTEL BLOCK. (9) ADDITIONAL EXTERNAL LIGHTING TO WALL ON GARRISON HILL (HOTEL SIDE). TREGARTHEN'S HOTEL, GARRISON HILL, HUGH TOWN, ST MARY'S, TR21 0PP**

Thank you for consulting us on this planning application.

### **Environment Agency position**

We object to the proposed development on the grounds that insufficient information has been submitted to demonstrate that the proposed development will be safe from flooding over its lifetime. The application should not be determined until further evidence has been submitted to show that the risk of tidal flooding has been satisfactorily addressed.

The reasons for this position are set out below.

### **Reason-Flood risk**

The development site is adjacent to the Mermaid Wall sea defences which are known to be subject to frequent overtopping by waves during storm events. Flood risk mapping currently being prepared for St Mary's indicates that the area referred to as 'derelict kitchen gardens', and which is earmarked for the construction of residential

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'cottage' dwellings, is likely to be subject to flooding from the sea along its northern half during extreme storm events, this includes the car parking area and the existing 'Hendra' cottage.

The primary risk is from wave overtopping and wind driven spray resulting in the area becoming hazardous for pedestrians during extreme storm events due to the 1) Velocity and volume of wind-driven spray and 2) Projectiles and debris propelled by the overtopping waves.

It also needs to be considered that wave overtopping events are likely to become more severe and more frequent over time, due to the effects of climate change and sea level rise.

The submitted Planning & Design Statement does not reference flood risk from the sea. It should be acknowledged that currently no published flood risk zones exist for the Isles of Scilly and therefore the oversight may be due to this technicality. However, wave overtopping in the vicinity of the Mermaid Wall is well documented and the applicant needs to acknowledge this issue of flood risk from the sea during extreme storm events and provide evidence as to how it has been considered. This includes in terms of safety and wellbeing of any guests, or staff who might be exposed to those conditions whilst staying or working in or around the proposed new garden cottages. Details of current sea defences and access arrangements associated with that part of the hotel grounds will also need to be considered.

### **Overcoming our objection**

Further documentation needs to be submitted that demonstrates that:

a) The risk is acknowledged and all aspects of it are discussed in the Planning and Design Statement.

b) Design documentation identifies how the cottages and associated drainage systems would cope with, and be resilient to, the effects of such wave overtopping/flooding, including allowance for wave overtopping becoming more severe and more frequent over time, due to the effects of climate change and sea level rise.

Production of the described evidence will not in itself result in the removal of an objection.

Please contact us again if you require any further advice.

Yours sincerely

**Harriet Fuller**  
**Planning Advisor**

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cc Jackson Planning Ltd