

Planning Department
Council of the Isles of Scilly
Town Hall
The parade
St. Mary's
Isles of Scilly
TR21 0LW

Our ref: DC/2017/119416/01-L01

Your ref: P/17/081/FUL

Date: 31 October 2017

Dear Sir/Madam

CHANGE OF USE AND ALTERATIONS TO PROVIDE TWO SELF-CONTAINED STAFF UNITS 28-29 PORTHMELLON INDUSTRIAL ESTATE, PORTH MELLON, ST MARY'S, ISLES OF SCILLY, TR21 0JY

Thank you for consulting us on the above proposal.

Environment Agency position

In the absence of a flood risk assessment (FRA), we object to this application and recommend refusal of planning permission until a satisfactory FRA has been submitted.

Reasons

The application site lies within an area considered to be at risk of flooding over the lifetime of development. The National Planning Policy Framework (NPPF) requires applicants for planning permission to submit an FRA when development is proposed in areas of flood risk.

An FRA is vital if the local planning authority is to make informed planning decisions. In the absence of an FRA, the flood risk resulting from the proposed development are unknown. The absence of an FRA is therefore sufficient reason in itself for a refusal of planning permission.

Advice to LPA – flood risk

In the absence of published flood risk mapping for Scilly, we base our advice on anecdotal evidence, council advice and strategic assessments, such as the Shoreline Management Plan 2(SMP2). The SMP 2 maps show this area to be vulnerable to

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Sir John Moore House, Victoria Square, Bodmin, Cornwall, PL31 1EB.
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www.gov.uk/environment-agency

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inundation due to coastal flooding in the long-term future under extreme event scenarios. The application site lies within the flood extent for the 1:200 year flood event, plus 100 years of sea level rise, to represent the envisaged coastal flood risk to the area in 2105. This is a still water projection and therefore doesn't account for wave run-up and over-topping, which would exacerbate the risk.

Sea flooding due to breach of coastal defences, tide locking and surface water run-off are all potential sources of flood risk. Whilst the building itself occupies an area towards the outer edge of the perceived zone of risk, it is possible that more substantial risks relate to access and egress to the industrial estate itself.

This application proposes two ground floor residential units (which, on our understanding would be occupied year-round) in an otherwise primarily light industrial area. This would increase the flood risk vulnerability from 'less' to 'more' vulnerable. Occupants of single storey/ground floor only residential units are generally considered to be at a greater risk than occupants of units with upper floors who will benefit from safe refuge during a flood event if they have not been able to evacuate in advance.

Overcoming our objection

The applicant can overcome our objection by undertaking an FRA which demonstrates that the development is safe without increasing risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

The FRA needs to assess flood risk to the building and access over the lifetime of development for a 1000yr coastal storm event.

The FRA needs to demonstrate that flood resilience measures have been considered at the design stage. Additionally, the application should detail how the safety of potential residents has been considered in relation to flood risk, particularly in relation to the provision of alternative safe egress routes should the main access point to the industrial estate be impacted by flood water. It should also be demonstrated how safety information would be conveyed to potential residents. This is felt to be relevant, as the application itself has noted that residents of the units would be non-islanders and therefore likely to be less familiar with the local geography and terrain, which could potentially increase their exposure to risk during a sudden or unforeseen flooding event.

Further advice on FRAs can be viewed at:

<https://www.gov.uk/planning-applications-assessing-flood-risk>

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation.

Yours faithfully

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cc Sibley's Fuel & Marine Services

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