

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/2019/121056/01-L01
Your ref: P/19/055
Date: 08 November 2019

Dear Ms Walton

**CHANGE OF USE OF PART OF BAY ONE INTO TWO BEDROOM STAFF
ACCOMMODATION.
SIBLEYS FUEL AND MARINE STORAGE 28 - 29 PORTHMELLON INDUSTRIAL
ESTATE PORTH MELLON ST MARY'S ISLES OF SCILLY TR21 0JY**

Thank you for consulting us on this planning application.

Environment Agency Position

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 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. 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
- take the impacts of climate change into account
- fully 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

Recent climate change projections (UKCP18) project that the South West will experience 1.14m of sea level rise by 2115. Current data from the Environment Agency CFB_Extreme_Sea_Levels shapefile (published by the EA from Node ID 2473)) projects coastal inundation up to 3.84mAOD for a 1 in 200 year tidal event. Therefore a 1 in 200 year tidal event in 2115 would result in inundation of the coast up to 5.28mAOD. We would also like to see the inclusion of a 30cm freeboard on top of this. As such, for the development to be safe from flood hazards throughout its lifetime, finished floor levels should be set to a minimum of 5.58mAOD. Alternatively, locating both staff accommodation rooms on the first floor, would ensure that future users of the development will not be placed in danger from flood hazards throughout its lifetime.

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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It is positive to see that occupants will be signed up to the EA flood warning service, however the evacuation plan lacks detail. How will occupants safely evacuate the building and head to the safe refuge site mentioned in the evacuation plan? It is also not clear from the FRA why the Coastguard and Emergency Response Centre is suitable for safe refuge from flooding as it appears to only occupy the ground floor.

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.

Yours sincerely

Mark Williams
Planning Advisor

Direct dial 020 84 746199

Direct fax

Direct e-mail mark.williams@environment-agency.gov.uk