

Mr Andrew King
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/2021/122243/01-L01
Your ref: P/21/050/FUL
Date: 21 September 2021

Dear Mr King

**CONSTRUCTION OF A ROCK ARMOUR REVETMENT IN THE SOUTH WEST CORNER OF PORTH MELLON BEACH. FORMALISING PEDESTRIAN BEACH ACCESS TRACK. (EIA DEVELOPMENT/MAJOR DEVELOPMENT).
NOTE: THE ENVIRONMENTAL STATEMENT FOR THIS APPLICATION IS A COMBINED DOCUMENT WITH PLANNING APPLICATIONS P/21/049/FUL & P/21/051/FUL AND CAN BE FOUND IN THE DOCUMENT LIST FOR P/21/049/FUL.
PORTHMELLON BEACH, TELEGRAPH ROAD, PORTH MELLON, ST MARY'S, ISLES OF SCILLY**

Environment Agency Position

We have no objections to the proposed works.

Reason

Although the Isles of Scilly have not yet adopted formal flood zones whilst the council review the Environment Agency's latest model outputs, the proposed works would be situated in flood zone 3 and be impacted by waves on a relatively regular basis. However, it is recognized that as coast protection works the proposal is clearly water compatible and is therefore unlikely to be vulnerable to flooding.

Technically the proposal is incompatible with the Shoreline Management Plan policy of Managed Realignment which comes into force for Porth Mellon in 2025 and therefore the construction of new defences should be discouraged. Managing flood risk sustainably into the future will require realigning assets landward and this could include the work proposed herein prior to the end of its design life. With this in mind, we acknowledge that the proposed rock revetment is more adaptable than some other hard engineering defences.

Advice

The proposed structures have the potential to impact on Isles of Scilly Complex Special Area of Conservation (SAC), the Isles of Scilly Special Protection Area (SPA), Peninnis to Dry Ledge Marine Conservation Zone (MCZ) and Porthloo SSSI and Higher Moors and Porth Hellick Pool SSSI. We note that Natural England are the lead authority for these protected areas and are satisfied that if the proposed works are carried out in strict accordance with the information provided by the applicant there is not likely to be

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an adverse effect on the interest features or hinder conservation objectives of the designated sites.

We recommend that the mitigation measures set out in Section 5.5 of the Environmental Statement are included in the Construction Environmental Management Plan (CEMP) and this document should be provided to and signed off by Natural England prior to any construction taking place.

We support Natural England's request to attach planning conditions for the planting of the restored sand dunes with native species and the works are timed between January and March 2022 to protect breeding birds.

There is no mention of any biodiversity enhancements as part of the proposal. The proposed works would need to achieve a biodiversity net gain to be in line with the Government's 25 Year Environment Plan, the NERC Act 2006 (section 40 & 41), the NPPF (paragraphs 170 & 175) and the Environment Bill (schedule 15).

Yours sincerely

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