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Dr Mary Lowth
Bank Cottage, Bryher
Isles of Scilly
TR23 OPR

Ms. Lisa Walton
Chief Planning Officer
Council of the Isles of Scilly
Planning & Development Department
Town Hall, The Parade,
St Mary's, Isles of Scilly,
TR21 OLW

11th May 2023

Dear Ms. Walton

Response to P22/076/FUL; Amendment to the Planning Application for Coastal Defence works at Bryher

I fully support the responses from Amy Langdon and Martin Nicolle. I too wish to register objection to the proposals in this application, because of inadequate provision of information and concerns about the nature/objectives of the proposal design.

Lack of information

I share Bank Cottage, Bryher and the Moorings holiday cottage beside Great Par beach with my sister Alex. Our home and holiday letting will be directly affected by the work. Like Amy, I do not believe enough information has been offered to enable a planning decision:

The proposals still involve unloading a vast amount of rock armour in Great Par then trucking it in huge vehicles along an island without appropriate roads. It is not clear what storing and moving this material means in terms of noise, pedestrian safety and silica dust hazard (the short-term risk of exacerbations to those with respiratory conditions and the long-term risk to everyone of silicosis).

Work is still scheduled to take place during the tourist season. This will strip the West side of Bryher of tourist appeal for that period, yet there has been no consideration of the effect on local businesses who will lose a year's income, nor clarity on whether the Council means to compensate us. I too therefore request that all work be scheduled to take place before April and after September, and that any in-season work is subject to a 9.30-4.30 restriction.

There is insufficient clarity on what the beaches will look like afterwards. We are told the crest of the rock armour on Great Par beach, just below our home, will be 6.5m (over 21 feet) but (as Amy says) it is not clear where this height is measured from. 6.5m is higher than a house. Residential planning applications include visual images so that neighbours understand what to expect. I believe this application would be clearer if such images were provided. Otherwise the Council risks approving devastation of some of the most beautiful beaches in the world without realising this till too late.

Nature of the works

The challenge over timing has given us the opportunity to also question the design, an opportunity we missed earlier. When the plans were first presented to Bryher (November 2021) the proposal had already gone to tender, and by spring 2022 we understood the plan could not be changed without losing the funding. This 'this or nothing' approach, which I believe was driven by funding conditions, made it difficult for individuals to ask whether this was the right option, one of several right options or the wrong option. There now seem reasons to think it is the wrong option:

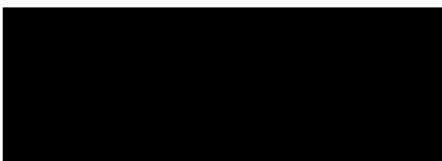
- I first assumed the primary objective of the proposal was to facilitate the recommendations of the 2011 Shoreline Management Plan, SMP2. This (pp48-53) recommends 'hold the line' against wave erosion for Great Porth North and Popplestones till 2055, then 'no active intervention' beyond this, whilst elsewhere on Bryher is NAI throughout. To me, a 21-foot wall of rock armour 10 feet deep seemed excessive to hold the line against erosion in Great Porth for 30 years, but I accepted I must be wrong. However it now appears this may not be the primary objective.
- It seems (from e.g. point 3.2 on the *P-22-076 Habitat Regulations Assessment Bryher - Great Porth North of Great Carn* on the planning portal) that the main objective of the Great Par 'wall' is to defend Great Pool against salinity, a purpose chosen to align with the funding conditions. The 6.5m height is directed at protecting the pool from wave overtopping (also point 3.2). The proposal then relies on the premise that Bryher's freshwater supply depends on the Pool because four of our five boreholes share its watershed. However the Pool is known to be completely independent of the ground water aquifer. The pool is brackish, partially filled from/drained to the sea, whilst the boreholes are not. If the pool does not influence the boreholes then the plan is directed at an unnecessary objective, so that 6.5m may therefore be overkill after all.
- This salination question may now be a moot point since South West Water plan to install seawater desalination on Bryher by September 2024. Unless I have misunderstood what this will achieve then, even if the assumptions about the Great Pool had been correct, the plans follow a primary objective for which an alternative solution is now planned.

I acknowledge this is a late objection to the design, and for that I am truly sorry: however it reflects both the difficulty in raising individual objections when told it was already too late to consider alternatives, and the fact we heard of the desalination plan only this week. I hope the fact that an objection is late doesn't mean the points raised are not considered important.

I also realise that delaying now may reduce funding, but this is not a good reason to press on regardless in the face of unresolved concerns that the proposals will devastate a beautiful coastline without good reason. Bryher deserves better than that - it is not ours, we are only looking after it.

I therefore echo Amy's request that the application be withdrawn for reconsideration. We too want to improve Bryher's sea defences, but only through a plan whose objectives are understood and supported on the island, and that is financially and environmentally affordable.

Best wishes



Mary Lowth