

# Council of the Isles of Scilly Planning Application

Ref: P/23/001/COU

## Consultation Response

**Date:** 1 February 2023  
**Ref:** P/23/001/COU  
**Site:** The Chandlery, The Thorofare, Hugh Town, St Mary's, Isles Of Scilly  
**Proposal:** Change of use of first floor to create one bedroom flat including alterations to fenestration and replacement of existing timber windows and doors with UPVC/composite units.

You are being consulted on this application as you may wish to make comments before a decision is made. Should you wish to make any comments on this application, please complete the response form below and return to [planning@scilly.gov.uk](mailto:planning@scilly.gov.uk) by **22<sup>nd</sup> February 2023** or by post to the Planning Department, Town Hall, The Parade, Hugh Town, St Mary's, Isles of Scilly TR21 0LW.

Link to application: <https://scilly.gov.uk/planning-application/planning-application-p23001cou>

I look forward to receiving your comments in due course. If I have not heard back from you by the **22<sup>nd</sup> February 2023** then I will assume you have no comments to make.

**Consultee Name:** Stephen Swabey

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The application is for a change of use of the first floor of the building from commercial to residential. The applicant states that the building is not subject to flood risk (application form) but also notes that a corner of the site appears to be within Flood Zone 3 (the Design and Access Statement).

A portion of the site is within the 1:200 flood extent as mapped by JBA for the Environment Agency in 2019. This is the origin of the Flood Zone 3 designation.

However, the entire site is covered by flooding in the 1:200 year event with future climate change, at 2067 (Figure 1). These assessments use the 2009 UK climate projections, which have been updated more recently (2018).

Since the site is proposed to change uses to residential occupation, which could include residential use in 2067, the impacts of future climate change also should be considered. Since residential buildings on the Isles of Scilly are rebuilt or refurbished only occasionally, it is likely that any change of use and associated renovations may still be in place when the climate changes by 2067.

The applicant suggests existing flood defences in central Hugh Town will prevent flooding impacts on the site. However, these flood defences are demountable (ie, temporary) and should not be relied on

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to reduce flood risk at the site, because they may not be fitted in sufficient time to provide protection against a specific flood.

The proposed change of use will include installing new toilets on the ground floor and first floor, improving the lighting on both floors and installing new windows and doors on the ground floor.

The applicant should consider a range of modifications to the proposal to better cope with the future impacts of coastal flooding on the site and property.

These modifications to the proposal could include:

- 1) Fitting non-return valves to the sewer system/toilets to prevent seawater backing up through the sewer to flood inside the house
- 2) Fitting non-return valves to the stormwater drainage to prevent seawater backing up through the stormwater drains to flood inside the house
- 3) While modifying the electrical systems, lifting all power points, lighting circuits and supply meters above the design future flood level
- 4) Ensuring all minor piercings of the building envelope are either above design future flood level or waterproofed
- 5) Ensuring that proposed window and door units can withstand static water pressure from the design future flood level outside the building, without failing by breaking or allowing water to seep through the units. The alternative to this 'waterproofing' of the window and door systems could be to fit flood defence systems to each opening which is below the design future flood level to provide defence against flooding at the design level.



**Figure 1:** Modelled coastal flood extents at 1:200 return period today (purple line) and in 2067 (blue line) with climate change using UK climate projections (2009)

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The applicant also could consider using waterproof sealants on the outside of the building to retard the ingress of seawater through the building fabric during design future flood events.

The applicant has identified that the proposed first floor double doors could offer a means of escape from the building during flooding. However, this is unlikely to be feasible except with a ladder. It is acceptable to use the first floor of the building to 'shelter in place' from coastal flooding, since the flooding will subside as the tide falls following a flooding event.

However, the emergency services may wish to avoid a scenario where building occupants are trapped at first floor level by coastal flooding and then require assistance. It may be more appropriate to require an evacuation plan is provided for the event of imminent coastal flooding. This may require a conversation with the emergency services to ascertain their views.

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**Name:** Stephen Swabey

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