

Liv Rickman  
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/2024/124402/01-L01  
**Your ref:** P/24/057/FUL  
**Date:** 14 October 2024

Dear Liv Rickman

## **REPLACEMENT OF BIRD HIDE. HIGHER MOORS NATURE TRAIL, PORTH HELLICK, ST MARY'S, ISLES OF SCILLY**

### **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. This development proposal is situated within Flood Zone 3, and insufficient site-specific information has been provided to determine the safety of this planning application.

### **Flood Risk**

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist.

The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA does not:

- 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. We require more site-specific information, including proposed finished floor levels (measured in metres above ordnance datum), and flood level data. This information is required to ensure that the proposed finished site levels (and any mitigation measures proposed) will make the property suitably safe for its lifetime against a 1-in-100-year flood event ( 52% climate change amplifications).
- 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.
- take the impacts of climate change into account

There is no assessment of the impact of climate change using appropriate climate change allowances [52% amplification]. Flood risk mitigation measures to address flood

risk for the lifetime of the development may be inadequate because the flood risks posed to the site have not appropriately assessed. Until the flood risk has been suitably assessed, we cannot determine the safety of the development. Consequently, the development design may propose inadequate raised finished floor levels, resistance and resilience measures, and safe access and egress routes

### **Overcoming our objection**

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. We would recommend that the applicant contact the Environment Agency to request a Product 4 information dataset for any flood modelling data held that is relevant to this site.

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

**Mr Mark Williams**  
**Planning Advisor**

