

Our Ref: 13639

12 October 2018

Lisa Walton
Planning & Development Department
Town Hall
The Parade
St Mary's
Isles of Scilly
TR21 0LW

Dear Lisa,

Re: - P/18/051/FUL Land at Karma St Martin's, Lower Town, St Martin's, Isles Of Scilly

Thank you for your recent correspondence in respect of the aforementioned planning application at the Karma Hotel, St Martin's. This letter accompanies revised details addressing the various matters raised and provides details of the action taken to resolve the principal areas of concern at this time, discussed hereafter, namely through the following documents:

- 01 – Topographical Survey (Prime Surveys)
- 18014.102 rev C – Tent Location Plan
- 18014.103 rev C – Illustrative Section
- 18014.104 – Illustrative Section
- Standard Bathroom Details
- Landscape and Visual Impact Appraisal V2 (MHP)

Fire risk

While not materially relevant as a planning consideration per se, it is clearly in the applicant's best interests to avert a situation whereby planning permission is obtained only for the consented layout to conflict subsequently with impending site licence restrictions relating to fire safety, requiring further amendments (e.g. by S73 application). In this respect, your colleagues' proactive approach is welcomed, and you will see that we have revised the site layout accordingly, achieving at least 6m between tents and typically more.

We would ask you to note that, in working to the minimum 6m separation distance scheduled, we have had regard to the specific circumstances of the case. These include that no visitor vehicles will be allowed on site, and none at all overnight, and also that all cooking and heating facilities are pre-installed and regularly inspected and maintained by staff.

Thus, the camping facilities will not be at the mercy of any extraneous factors and/or visitors' 'creative' solutions to cooking/heating that may increase the risk of fire to the levels typical of a normal campsite. It is the applicant's intention that the tents would be fitted individually with smoke and carbon monoxide detectors. As such, we consider 6m to be ample.

Taking account of these changes, which include the relocation of one of the units and slight adjustment of three others, the submitted LVIA has been updated and confirms that the scale of change relative to that anticipated by the original Assessment would be negligible. Although the impact on immediate visual receptors would be increased, the amended proposals will not have any unacceptable wider landscape and/or visual impact.

Land levels/platform height

In tandem with the amendments to layout to take account of the above, we have also undertaken a comprehensive topographical survey of the application site, details of which are attached. This has informed the finer revised siting of the units, in order that these may be positioned on the flattest ground practicable. Again, common sense would suggest it is in nobody's interest to be creating platforms with a dangerous drop to one or more sides.

The outcome of this exercise is reflected in the accompanying indicative section drawings; you will see that a drop of no greater than 1200mm across the units has been identified owing to the site topography and choice of individual siting. The implementation of the development to ensure that this is not exceeded could be secured by a planning condition made binding across the entire site/development.

It should be noted that the unit from which the above figure is derived – Tent 6 – is sited at the lowest part of the site close to its western boundary. This area is already enclosed to a large extent by existing vegetation and water storage tanks, preventing any wider views of the 'built-up' platform section. Platforms over 360mm high will be equipped with a simple timber railing.

We would recommend that a suitable planning condition could be worded as follows:

"The development hereby approved shall be constructed and maintained at all times thereafter such that no part of any platform deck shall exceed a height of 1200mm above

ground level at any point, as shown on drawing 18014.103 rev C, and at least one platform deck corner shall not exceed ground level by more than 300mm.

REASON: In the interests of landscape protection.”

Thus, the appreciable height of the development would remain strictly controlled and the legitimacy of the findings of the LVIA (as updated) would remain intact.

Bathroom pods

Per your request, the attachments include details of the integral bathroom pods situated upon the overall deck structures. As can be seen, the units are simple, modest and subordinate to the individual tents; they are finished in natural materials that will be left to weather and are contiguous with the platform structures. An example photograph is included below.



Above: typical tent and bathroom pod example.

The services for these pods are completely integral to each unit; a 175L fresh water tank feeds the fixtures, which discharge to an integral 175L grey water container. Foul waste is to be contained to the WC units for later disposal via septic tank at the hotel complex. As previously confirmed with your EHO, these are then replenished/disposed of using the hotel's existing facilities during changeover periods.

For completeness, the limited electricity needs of the units will be met by individual small solar units mounted either on the deck surface or sides of the bathroom pod and linked to battery supplies, which are again integral to each unit, to ensure the units remain 100% 'off-grid'.

It is also important to note that this development complements, rather than exacerbates, Karma's acknowledged need to re-strategize how it collects, stores and uses fresh water.

Access

It is confirmed that vehicle parking will be contained entirely within the hotel's existing facilities located at the western end of the island. Guests will then be expected to walk up to the glamping tents and use these as a basecamp to explore the island on foot during the course of their stay.

Amenity

Responding to the very limited number of objections received from local residents, it is firstly entirely understandable that there may be some reticence about the prospect of increasing the island's tourist offer through the proposed development. However, the proposed six units are inherently low-impact in terms of visual intrusion, physical presence and associated activity, as demonstrated by the submitted material. As the network of informal public footpaths is a well-established feature of this location, the potential for any additional overlooking is negligible.

Accordingly, notwithstanding any pre-existing concerns locally in respect of the operation of the Karma St Martin's complex and associated vehicle movements and activity, the proposals, taken on their individual merits, will not adversely impact on the amenity enjoyed by others to any significant extent. As confirmed by some of the representations, tourism is a significant and long-established feature of the island and the proposals simply respond to the changing expectations of visitors and the need to diversify in an increasingly competitive market. In short, the proposals offer a considered and sustainable means of enhancing non-residents' access to the natural beauty of St Martin's, rather than detracting from it.

Landscaping

As can be seen on the accompanying revised layout plan, the units are to be equipped where necessary with modest pathway links to the existing network of informal footpaths crossing the site. These new pathways would not be raised and will simply be surfaced in chipped bark per the middle photo adjacent to the layout plan – effectively as an extension to the existing permissive footways.

There is no additional hard or soft landscaping proposed, being that the scheme seeks to retain the 'wild' heathland feel so far as possible; not least because this is a critical part of the location's wider appeal. Over winter, the tents/pods are to be disassembled and stored elsewhere to protect them from the elements. This will both ensure that there is no visible fabric on site when vegetation offers least screening and ensure the units are not allowed to look

'scruffy' as a result of exposure. We anticipate the visitor season running from early March to end October, coinciding with the main tourism draw of the island.

The accompanying section/elevation details indicate the short-range visual impression of the development in situ. For wider-range views, however, reference should instead be made to the updated LVIA accompanying this submission.

The below photographs indicate the relationship between the access way to the immediate rear of the hotel (which is in private ownership) and the application site; as can be seen, the steep gradient of the intervening land is also heavily vegetated and therefore inter-visibility with the proposed development is effectively precluded. Accordingly, there is little value in preparing drawings of the site as viewed from these areas.



Archaeology

The comments of the Cornwall Archaeological Unit dated 13 July 2018 are duly noted. At the time of writing, it has not been confirmed that the comments' author is aware that Paragraph 6.20 of the Planning Statement refers to the archipelago as a whole (rather than the application site specifically). Although this is a concern, it is our intention to commission further study to reconfirm that no buried or above-ground archaeology will be affected by the proposals, if this is considered necessary.

However, due to the time and expense involved in such an exercise, we would in the first instance seek agreement that – in the light of the above information and accompanying revised plans – the proposals are acceptable in all other respects and will be supported by Officers subject to a positive recommendation from archaeological consultees. With this reassurance, we will then promptly undertake the requisite assessment and report the findings to you.

Consultation

I have confirmed previously, having liaised with the Karma Hotel manager, that the application site notice was received by the hotel and displayed promptly at the hotel itself (I was not entirely sure that this was the case at the time). As such, we are satisfied that the statutory consultation process has been followed from the time originally anticipated.

It is our view that the changes now proposed are not so great in scope as to warrant the re-starting of the statutory 21-day consultation process and I hope you will agree that these can be considered more efficiently through targeted engagement with relevant subject matter experts on a reduced-turnaround consultation exercise.

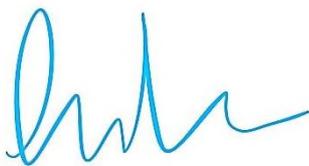
Conclusions

Briefly, this letter and the accompanying details demonstrate the applicant's commitment to working proactively and positively to resolve identified issues with the proposals, while your supportive approach is likewise welcomed.

As such, it is hoped that we are now significantly closer to a positive determination of the application however if I can provide any further information or clarification then please do not hesitate to contact me. I look forward to hearing from you in due course.

Yours sincerely

For and on behalf of Evans Jones Ltd



Chris Marsh
Senior Planning Consultant
Tel. 01242 531431
E-mail: chris.marsh@evansjones.co.uk