



MEMBERS of the ISLES of SCILLY PLANNING COMMITTEE;

STATEMENT Re P/18/051; KARMA GROUP Ref: 13639; 13th June, 2018.

We wish to make it quite clear from the outset that as committed St Martin's Islanders our primary concern is to nourish and protect our family, together with the sensitive development of all our individual businesses that underpin the sustainability of the way of life that we have chosen, so we have no objection to measured and appropriate business development in Scilly and more specifically, on St Martin's.

We generally applaud and encourage forward thinking development proposals in Scilly as they contribute to and crucially support the Transport, Retail, Accommodation and Food Providers together with the Islands' General Infrastructure without which Scilly's lifeblood would cease.

However, this Planning Application is in total contrast to our island 'forward thinking attitude' and it should be noted by Members that this particular APPLICANT is an international predatory timeshare based company with it would appear over the last four years, little or no regard for a serious ongoing relationship with either their personnel, customers or the community within which they operate and more importantly, no demonstrative long term commitment to the island community of St Martin's.

Most of Karma St Martin's excessive personnel escapades in recent years are totally unacceptable. They are not only hugely embarrassing to many islanders but reputationally damaging to our community and potentially detrimental to our businesses, suggesting that any additional Karma development would further adversely affect our way of life.

This island has a hard won reputation based on decades of heartfelt personal care for our annual visitors, resulting in lifelong friendships and even wedding bells! .

It is not helpful to have to try and explain to your family, your friends or your visitors that support your way of life, that there is an unwelcome police presence just down the road.

This APPLICANT appears to be intent on assiduously pursuing Asset Profit with only a token input (a small donation to the cricket club) as a sop to our local community in an effort to elicit our support to help achieve their short term operational financial aspirations, which anecdotally has resulted in substantial accumulated losses from inception.

An additional SIX letting units with only minimal building cost would create a much needed boost to the APPLICANT's gross income, thus increasing their asset value at disposal hence this Planning Application - but at what cost to our island community of St Martin's?

Planning Guidelines are quite clear; ALL requested information MUST be made available for PUBLIC scrutiny PRIOR to the start of a consultation period and until ALL the requested information is produced in FULL by the applicant and properly CHECKED, the Planning Authority CANNOT re/institute a proper and legal consultation period.

It is also quite clear that this APPLICANT's STRATEGY in response to numerous requests for clarity from our Local Planning Authority relating to the serious outstanding issues outlined below, is to utilise an OMP - an Operational Management Plan which is effectively 'Planning Avoidance' wrapped up in a 'Planning Condition' which in this case has actually been drafted by the APPLICANT!!!, thus AVOIDING the need to EXPLAIN the UNEXPLAINABLE until such time as the application is determined, after which it will be too late as unfortunately the Local Planning Authority have neither the manpower nor the finance to PROPERLY oversee any of the proposed conditions which currently are ill-defined, either pre or post the development.

We would respectfully request that Members re-read the initial response email from the Local Planning Authority to the APPLICANT dated 31.10.2017 in which David Wyborn, Head of Planning for Exmoor Park Authority, commissioned to assist the IOS Planning Authority stated;

"In conclusion, even if the principle of this type of accommodation was to be deemed acceptable, I am NOT persuaded that the location is satisfactory in policy terms given the elevated nature of the landform of Tinkler's Hill that slopes down to the rear of the Karma hotel and the access road, and the archeological significance of the area. I believe that a group of Glamping tents would harm the landscape character of the area and the setting of a designated heritage asset on Tinkler's Hill thereby, failing Policy 1 and Policy 2 of the Local Plan and it would introduce a domestic element to an area that is largely semi-natural in form and appearance".

We agree with the above statement and totally REJECT the APPLICANT's assertion that the Three Dimensions of Sustainable Development as outlined in the National Policy Planning Framework issued in 2012 (NPPF) have been discharged for the following reasons.

#### 1. INAPPROPRIATE LOCATION AND DEVELOPMENT

The NPPF direction in respect of the above and notated as 'AN ECONOMIC ROLE' states that 'sufficient land of the right type is available in the right places, to support growth and development'.

A. There are sound, weather related reasons why for thousands of years no development whether temporary or permanent has taken place to the north east of Lower Town behind the natural topographic line that encompasses and protects this amphitheatrical hamlet, with one exception - to inter their dead.

B. Those of us on St Martin 's who have lived here for decades can attest to the ferocity of the unpredictable, savagely fierce weather that can arise at this proposed location from the prevailing north and west, throughout the visitor season from March to October.

C. This proposed extremely exposed, canvas-based development is particularly vulnerable to high winds and with little or no natural protection places the safety and wellbeing of its trusting, transient and increasingly valuable Scilly visitors at an unacceptable risk.

D. The fifty odd years of camping experience that the current and previous patrons of the successful southerly dune and hedge protected, sea level, northerly, easterly and westerly hill protected, award winning St Martin's Campsite will attest to this assertion.

E. Should Members be minded to approve this application, we believe that it would set a very dangerous planning precedent, relative to the potential development of the entire West/North/East coast curvature of St Martin's from Porth Seal to Great Bay and possibly as far as the Daymark, which thus far has not only been successfully preserved and propitiously managed, but enjoyed for its pristine and unblemished appearance by generations of visitors and islanders for both agricultural and recreational use.

F. If Members were minded to approve this application we would also draw your attention to the extent of the hotel's lease which extends from the proposed development site, down to the cliff at Goat's Hole and east several hundred metres forming a large, sloping triangle of uninterrupted sea view potential for precedent set, further similar development.

## 2. INAPPROPRIATE SEWAGE AND GREY WATER DISPOSAL

The NPPF direction in respect of the above and notated as “AN ENVIRONMENTAL ROLE’ states that it should ‘protect and enhance our natural environment’.

The Local Planning Authority have admitted within this planning application that they are AWARE of existing problems with the current hotel sewage disposal system.

The manufacturer of this decades old hotel sewage disposal system has been contacted by the APPLICANT for comment, however their response was merely to provide some vague loading details that bear no relevance to the current operational loading and is therefore, meaningless.

The solution to resolve this crucial planning issue is for the Planning Authority to immediately instruct the APPLICANT to commission the manufacturer of their current sewage disposal system to undertake a full physical survey, the findings of which MUST be published for public scrutiny PRIOR to the determination of this application.

A. The application states that the projected AVERAGE length of stay for each of the additional SIX Glamping units will be between 2 and 3 days.

B. We are utterly astounded that this planning proposal seriously suggests that every TWO to THREE days the hotel staff would be instructed to PHYSICALLY disconnect SIX Sewage tanks plus SIX Grey Water tanks, TWICE or THREE times per week throughout the season, trundle them down the hill, hopefully avoiding the visitors on the main track to and from the northerly cliff walk, to a site located within the curtilage of the hotel where the grey water tanks would be emptied into an 'open' drain and the sewage tanks emptied DIRECTLY into the existing hotel effluent disposal system.

C. It is very difficult to understand how the Karma management intend to motivate their personnel to carry out this daily, raw sewage disposal function which after emptying will presumably also require flushing through and disinfecting, which raises further questions as to how and where these procedures are to be carried out and more importantly, how they intend to protect their personnel from potential infection. Needless to say there is nothing in this application that addresses these issues.

D. To put this additional sewage load into context, assuming an additional 24 persons per night times 6 tents times say 215 nights, approximates to an additional 31,000 'bed' nights. To complete the calculation this number must then be multiplied by the number of visits to the toilet undertaken by an individual within a 24 hour period.

E. The recently released information relating to the proposed toilet specification states that it is powered by ELECTRICITY. There is no mention in the planning application of a direct electricity connection and no clarification that solar power is the source to enable this proposed facility.

Nor is there any proposed provision for power storage, to supplement other power sources.

F. It is of concern that the toilet specification provided online does not allow access to the operational details of this product. However from the minimal details supplied it would appear that 15.9 litres of fresh water will service an average of 56 flushes, which equates to between a quarter and a third of a litre per flush....??

H. It should also be noted that the current application gives no indication of any additional or improved sewage disposal proposals.

I. The applicant's current sewage disposal system, which anecdotally has been at over capacity for a number of years, is located right on the western seafront to the north side of their public lawn with an outflow for treated water direct into Tean Sound.

J. The only current vehicular access to this sewage disposal facility is from the proposed site to the road leading to the hotel quay, and then entails weaving its way across the hotel lawn between the tables, chairs and sun loungers used for drink, food service and guest/visitor relaxation. Given the restriction of hospitality service turnaround times, it would appear that this disposal proposal could prove somewhat disruptive and with the wind in the wrong direction, quite unpleasant.

K. This application states that a detachable Portaloo style toilet facility will be attached to each unit. Generally with such systems, chemicals are added to mitigate the immediate, negative olfactory experience of a lack of standard flushing which, as is proposed when added to the hotel's main sewage disposal system may well result in the inhibition of the essential bacteriological breakdown of the solids resulting in an even less efficient effluent disposal system than is currently in existence, with the potential for inappropriate and possible illegal outflow into Tean Sound.

### 3. INAPPROPRIATE AND UNNECESSARY, INCREASED ROAD TRAFFIC

The NPPF direction in respect of the above notated as 'A SOCIAL ROLE' states that it should 'support strong and healthy communities'.

A. It is quite clear that this proposal is aimed; Firstly at the family market, Secondly at the retired market and Thirdly, at the timeshare market whether through the applicant's own timeshare owners or through RCI, a worldwide timeshare exchange company to which Karma Resorts are members where timeshare owners can exchange their weeks in Bali for example, for a week at Karma St Martin's.

B. So it is fair to assume that if Members are minded to approve this development it will for all intents (apologies!) and purposes, be incorporated into the applicant's normal hotel offering which currently has up to THREE hotel vehicles meeting every tripper boat embarking or disembarking Karma customers or Karma staff.

C. To put this into context NO St Martin's self catering owner or the previous hotel operators have EVER met EVERY tripper boat throughout their visitors' stay with a vehicle because our guests ENJOY the fresh air and the EXERCISE provided by the walk to and from the quays, as indeed they do on all the other islands and furthermore, our self catering visitors constantly complain of having to 'jump into the hedge' in order to avoid the endless convoy of speeding hotel vehicles.

D. Most islanders and visitors find this unnecessary 'hotel vehicle convoy' from one end of the island to the other extremely irritating and intrusive, and if this proposal is approved by Members it will increase an already unacceptable level of hotel traffic by between 20% and 30%.

E. The APPLICANT misleadingly states that the customers for this potential development will "walk" from their rented, canvas based accommodation via existing paths around the island.

The reality is that with three vehicles at their beck and call, the additional trips caused by this proposed development will add massively to the traffic from Higher Town to Lower Town at a time when locals and visitors have frankly had more than enough, ergo, this proposal does NOT support our 'strong, vibrant and healthy community'.

#### 4. INAPPROPRIATE SITE ACCESS, HEALTH AND SAFETY CONCERNS

A. The access track from the back of the hotel up to the proposed site is extremely steep and with rock strewn deep ruts caused by centuries of runoff from the heath, vehicular access is currently limited to four wheel drive and agricultural vehicles.

Pedestrian access to the site can best be described as HAZARDOUS to say the very least and given the potential customer base previously outlined, this track is positively dangerous.

C. There is no mention in the application of an upgrade to this access track, indeed the application is 'LESS THAN ECONOMICAL WITH THE TRUTH' in describing the track as an 'existing gravel track', on which the APPLICANT proposes to use a quad to service this facility.

There are no suggested provisions for pavements, drainage, safety lighting or handrails, which as a basic minimum would be required to satisfy basic Health and Safety requirements for pedestrian access to this proposed development, which in turn would then spoil this area.

D. In the event of an emergency medical evacuation or a fire outbreak, the current state of the track is wholly inadequate and from an operational standpoint, staff access to carry out the daily service requirements for SIX tents is frankly a major Health and Safety Personnel Issue.

#### 4. INAPPROPRIATE FIRE RISK, HEALTH AND SAFETY CONCERNS

A. We have just experienced the driest summer in decades and the prognosis for further periods of severe drought are well documented.

The risk and subsequent utter devastation that a fire could wreak at this end of St Martin's, or even worse throughout our entire island when the ground and surrounding vegetation is tinder dry, is extreme.

B. This Planning proposal misleadingly suggests that the site is fire safe. It is surrounded by differing heights of highly inflammable pittosporum, aged gorse and decades of ground detritus which, coupled with the proposed introduction of an additional SIX (or more with BBQ's) sources of ignition plus transient guests who have no understanding of the flammable risk, exponentially creates a fire fighting nightmare.

C. A simple discarded cigarette or a BBQ left improperly extinguished after a 'pleasant' relaxed evening is all that it would take for the prevailing winds to drive the conflagration in the direction of Lower Town, probably at night and devastate our homes and our livelihoods.

D. The inaccessible, steep slope from the proposed site via the Carn directly behind Lower Town properties would make fire fighting difficult and extremely dangerous and while our firefighters are well trained, there is a limit to their immediate resources and even with backup from the other islands the risk of a serious incident with the potential for loss of life cannot be ignored.

E. We can find no mention in this application of fire detection measures connected to a 24 hour response from the hotel, nor can we find mention of automatic fire suppressant proposals which given the extraneous location and extreme flammability of this canvas, wood based proposal, we would have thought was absolutely essential.

F. The Cornwall Fire and Rescue response to this application clearly states that there are certain standard physical requirements in terms of an access road (construction, width, lighting, hydrants etc.) to the proposed site and as far as we have been able to determine, these have not been incorporated into or indeed responded to by the APPLICANT, presumably because they have determined that these units are not 'buildings'.

G. Subsequent to their advice we were informed that physical wooden pods were to be added to these units which in our view makes them a 'building', whether temporary or not, and even if this was not the case, common sense and corporate responsibility should dictate that adequate fire detection and a fire fighting capability be properly incorporated into this scheme.

Members, we would respectfully refer you to the standard requirements detailed in the Fire Authority Response and if you are minded to approve this application, we would request that a condition is imposed to ensure that the Fire Authority requirements and recommendations are fully implemented in respect of access from the hotel to the proposed site.



## 5. INAPPROPRIATE LIGHT AND NOISE POLLUTION

A. The potential light pollution from this inappropriate site in relation to the St Martin's 'Dark Skies' designation, coupled with the embryonic forward thinking St Martin's Cosmos project is at total odds with this application and against current ISLAND FORWARD THINKING that supports growth and success through innovation, without harming our island home.

B. Additional Evening/Late Night noise pollution will undoubtedly increase if Members are minded to approve this development. There has been a substantial increase in late night noise and disturbance emanating from the hotel and its service buildings over the last four years, due in part to a lack of management oversight, which has negatively affected St Martin's families along with their loyal and supportive self catering visitors who like us, value the peace and quiet on this island that we all call home.

## 6. AND FINALLY, IN SUPPORT OF OUR OPENING STATEMENT THAT MEASURED AND APPROPRIATE BUSINESS DEVELOPMENT COULD BE SUPPORTED BY ISLANDERS;

We wish to bring to Members' attention that the hotel has an expired, previously approved planning approval within the curtilage of their existing hotel building for an additional 6/8 units of accommodation located to the north and west of their lawn.

If Karma Resorts wish to expand their existing stock of accommodation then why not develop this previously approved area, subject of course to resolving the aforementioned incursive island issues.

The need to even comment on this application could so easily have been obviated had the APPLICANT simply invited concerned islanders to the hotel to view their plans and then openly and honestly discussed the ramifications of their proposals to our island life, as opposed to their clandestine and somewhat dismissive approach.

MEMBERS; We thank you for your consideration of our genuine, heartfelt concerns.

Keith and Dawn Bradford, Lower Town, St Martin's.

