



Project Management



Planning Consultants



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Disabled Access
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Planning, Design & Access Statement

Karma Hotel
Lower Town
St Martins

Prepared on Behalf of: Karma Group

Ref: 13639

Date: 13 June 2018

Contents

1.	INTRODUCTION	1
	Executive Summary	1
2.	SITE AND SURROUNDINGS	2
3.	DEVELOPMENT PROPOSAL	3
4.	PLANNING HISTORY	5
5.	PLANNING POLICY CONTEXT	6
	National Planning Policy Framework	6
	The Development Plan	7
	Other Material Consideration	8
6.	PLANNING CONSIDERATIONS	9
	Principle of Development	9
	Economic Impact	10
	Landscape	11
	Conservation.....	13
	Ecology	16
	Amenity	16
	Design & Access Statement.....	17
7.	SUMMARY AND CONCLUSIONS	19
	Appendix A	1

1. INTRODUCTION

- 1.1 This Planning Statement is submitted in support of the full planning application seeking permission for the stationing of six glamping tents on a seasonal basis on land at Karma Hotel, St Martin's.
- 1.2 This Statement sets out the main planning considerations and justifications for the scheme. In support of the application, this Statement demonstrates that the proposed scheme is acceptable in principle and expands upon issues relating to the principle of development; economic impacts; landscape; conservation; ecology and amenity.

Executive Summary

- 1.3 This Statement will explore relevant Development Plan and national planning policies as relevant to development proposed, together with other material planning considerations, which indicate in this instance that the proposed development is acceptable in planning terms.
- 1.4 The Statement also incorporates the Design and Access Statement in respect of the proposed development.
- 1.5 This Statement is to be read in association with the following plans/documents:
- 18014.101 – Site Location and Ownership Plan
- 18014.001 – Site Plan
- Landscape and Visual Impact Assessment (LVIA) – MHP Design Ltd

2. SITE AND SURROUNDINGS

- 2.1 The application site amounts to some 0.11ha of heathland comprising a modest elevated portion of the total landholding owned in association with the Karma Hotel, St Martins. Occupying a prominent location on the seafront overlooking Tean, the Karma Hotel is a well-known and successful enterprise, and a principal provider of employment and visitor accommodation on the island.
- 2.2 Historically the site, situated on a rising form known locally as Tinkler's Hill, has been used for the stationing of utility structures associated with the hotel, including the storage of water drawn from an underground well. Accordingly, a row of such containers flank the western site boundary, which is otherwise heavily treed so as to largely screen views between the coast and upland areas.



Fig.1: Site location

- 2.3 Currently, the hotel provides 27 letting rooms and 3 suites, as well as an on-site restaurant and hotel bar. Access is obtained via the sweeping lane running inland to the northeast and eastward to smaller accommodation and the Seven Stones Pub nearby.
- 2.4 St Martin's is part of the designated Isles of Scilly Area of Outstanding Natural Beauty (AONB) and a Conservation Area, within which the application site falls.

3. DEVELOPMENT PROPOSAL

- 3.1 The application seeks planning permission for the stationing of six glamping tents on a seasonal basis, in order to broaden the hotel's accommodation offer.
- 3.2 The tents are to be positioned in a curved row along the lower, western portion of the site, minimising their total envelope while enabling practical installation/disassembly and adequate amenity for their occupiers.
- 3.3 Informed by the comments raised in the officer's pre-application response, the tents' proposed exterior colour is to be 'Brunswick Green', selected from the available options below. This, it is considered, will integrate any elements exposed to wider views comfortably into the surrounding vegetation.

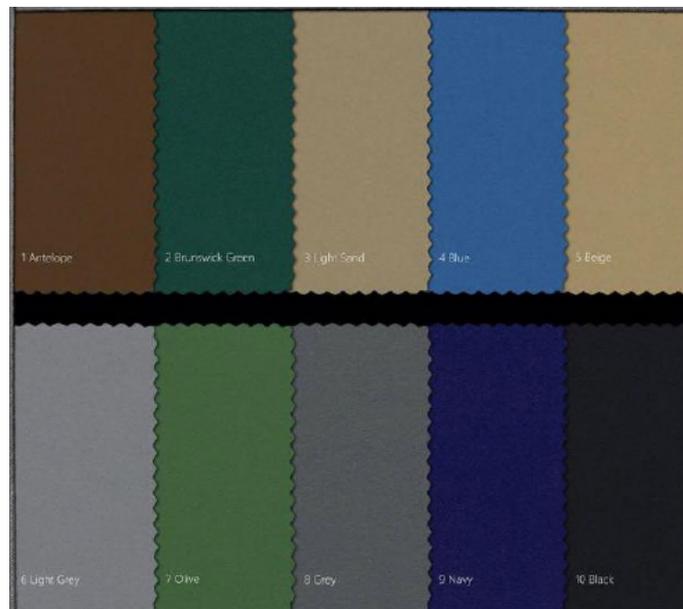


Fig.2: Available tent colours, selected colour top row, second from left

- 3.4 Each tent is to measure approximately 24m² in footprint and will be no more than 3m in height. The tents themselves are mounted on a bespoke timber platform that is simply placed on the ground, obviating any need for intrusive earth operations. There is also no additional requirement for services – above or below ground – to be laid, as these are incorporated with the deck platform. This means the works are entirely reversible, as would be anticipated to take place over the winter months.

- 3.5 The layout has been refined through the undertaking of an LVIA (which accompanies this application) in order to minimise the tents' prominence while also avoiding the various permissive footpaths that traverse the site. It also gives precedence to areas of the site where planting has been eroded by previous structures and storage.
- 3.6 The site enclosure is to remain bounded by the existing strong vegetation buffer on its western edge, reinforced wherever necessary, while views from the East will be limited due to the site topography. Visitor parking is to be incorporated with that of the existing hotel, this being ample, and therefore no additional requirement will arise in this respect.

4. PLANNING HISTORY

- 4.1 There is no planning history directly relevant to the site in question however application P/18/013 (Refurbishment, repair and partial conversion of existing building to create self-contained holiday accommodation at Packing Shed & Glasshouse, Lower Town, St Martins) is of particular relevance in this instance.
- 4.2 This development, granted permission on 9 May 2018, sought to convert and refurbish ageing buildings close to the current application site to provide self-contained holiday accommodation. While of course utilising existing buildings rather than creating new structures, the proposals nonetheless required visible intervention within the landscape.
- 4.3 Moreover, the Lower Town proposals provided a diversified form of holiday accommodation with a reliance on self-catering facilities as opposed to the inclusive offer of the Karma Hotel or the basic camping provision at the nearby St Martin's campsite. The scheme demonstrated the economic value of low-impact tourism on the island.
- 4.4 The current proposal continues this theme, and the following discussion will demonstrate that the scheme meets the three dimensions of sustainable development together with satisfying the relevant policies of the development plan.

5. PLANNING POLICY CONTEXT

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning decisions should be made in accordance with the Development Plan, unless material considerations indicate otherwise.

5.2 Paragraph 214 of the National Planning Policy Framework advises that for 12 months from the day of its publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with the Framework. Following this 12-month period and in other cases, Paragraph 215 advises that due weight should be given to relevant policies in existing Plans given their consistency with the Framework.

National Planning Policy Framework

5.3 The National Planning Policy Framework (The Framework) was published on 27th March 2012. The Framework sets out the Government's economic, environmental and social planning policies for England and details how these are expected to be applied. It is, in itself, a material consideration in planning decisions.

5.4 At the heart of The Framework is a presumption in favour of sustainable development. For decision taking, this means "approving development proposals that accord with the Development Plan without delay" and where the Development Plan is absent, silent, or relevant policies are out-of-date, granting permission unless "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted".

5.5 The Framework defines the three dimensions of sustainable development as:

An Economic Role: Contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation;

A Social Role: Supporting strong, vibrant and healthy communities;

An Environmental Role: Contributing to protecting and enhancing our natural, built and historic environment.

- 5.6 Furthermore, the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking. Local Planning Authorities should approach decision taking in a positive way to foster the delivery of sustainable development. Furthermore, they should look for solutions rather than problems.
- 5.7 Section 3 of The Framework encourages enterprise in rural areas in pursuit of a balanced and vibrant countryside. The Isles of Scilly are unmistakably 'rural' and, being separated by water from the nearest truly 'urban' areas, the need to achieve an appropriate mixture of land uses is of heightened importance here.
- 5.8 Section 7 of The Framework provides context to design within planning. Paragraph 56 states "The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."
- 5.9 Section 11 of The Framework sets out the main considerations in respect of the natural environment, including protected landscapes and ecology. It recognises designated landscapes for their inherent value together with the need for their sensitive management. It also recognises the importance of intrinsically dark landscapes.
- 5.10 Section 12 of The Framework establishes the process for decision-making where development concerns designated and non-designated heritage assets, including Conservation Areas. It places explicit value on 'significance', requiring that this is firstly identified before the likely effect(s) of proposals on a heritage asset is assessed. It also requires that any harm is quantified and balanced against the public benefits arising from development.

The Development Plan

- 5.11 The Development Plan policy context for the site and surrounding area is provided by The Isles of Scilly Local Plan 2020, adopted November 2005, of which the following policies are relevant:

Policy 1 – Environmental Protection

Policy 2 – Sustainable Development

Policy 4 – Economic Development

5.12 There is no made or emerging Neighbourhood Plan for the area.

Other Material Consideration

5.13 The National Planning Practice Guidance advises on the consideration and determination of planning applications, including the balancing of considerations in decision-making.

5.14 The emerging Local Plan is intended to provide a planning strategy for the period 2015-2030 and provides an opportunity to bring policies in line with the Framework and planning practice guidance. Consultation upon the draft Local Plan has recently closed and following any necessary amendments the Plan will subsequently move forward to submission draft, main modifications and ultimately examination before an appointed Inspector.

5.15 At the time of writing this application statement, policies within the emerging plan have not moved forward to a stage where they carry significant weight in the consideration of current applications or appeals, however. Adoption is not expected until mid-2019 at the very earliest.

5.16 Section 72(1) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 provides the legal backdrop against which applications for planning permission within Conservation Areas are to be considered.

5.17 The Isles of Scilly Area of Outstanding Natural Beauty Management Plan 2015 – 2030 is also a material consideration, identifying the characteristics that make the islands' landscapes special and the strategy for their conservation.

6. PLANNING CONSIDERATIONS

6.1 Having regard for the proposed development; the sites planning history; the relevant planning policy context; and all other material issues; the main planning considerations for the determination of this application relate to the principle of development; economic impacts; landscape; conservation; ecology and amenity.

Principle of Development

6.2 The development is principally an economic one, providing a diversified offer on the part of the hotel, providing a limited degree of additional employment and encouraging a wider mix of tourists to visit the island. Policy 4 offers support to promote employment and economic activity by providing opportunities for businesses to support viable communities. A proposal based on the existing economic base of tourism, agriculture and fishing as well as the distinctiveness of the islands will be supported in the following cases:-

a) Where such development contributes to the further diversification and essential modernisation of the islands economy.

In this case the proposed glamping facilities respond to a recognised growth sector in tourism both nationally and internationally, making use of an existing key tourism facility to diversify and modernise the local tourism offer while contributing to the islands' economy.

b) Where it demonstrably improves the quality of existing tourist accommodation.....

This is quite clearly the case. The provider of the glamping tents relies on a first-rate, luxury product coupled with extremely high-quality natural and built settings to set them apart from other glamping operators. The proposals will compliment Karma's existing offer, as well as local holiday let units and the nearby campsite, by offering high-spec but truly alternative accommodation.

- 6.3 Paragraph 36 of the adopted Plan confirms that the emphasis within the tourism industry is on improving the availability of high quality accommodation and raising the value of the tourism product. This proposal will contribute towards the provision of high quality accommodation while diversifying overall consumer choice.
- 6.4 Having regard to the National Framework, bullet point 3 of Paragraph 28 confirms that authorities should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors and which respect the character of the countryside. They should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres.
- 6.5 For the reasons set out above, it is clear that the proposals are supported by local and national policy in terms of the principle of the additional, diversified tourism facilities proposed. The direct impacts of the scheme are explored hereafter.

Economic Impact

- 6.6 Mindful of the Officer's concerns expressed in the pre-application letter attached at Appendix A, it would of course be remiss of the applicant not to have considered the viability and economic benefits of the proposed development. Should the officer require the reassurance of a summary business case, this can be provided on request on a confidential basis.
- 6.7 Glamping in general is a sector of the tourism market that continues to experience rapid growth, and in which the prospective tent provider in this instance is a market leader. Market analysts Mintel assert that the value of the camping and caravanning industry as a whole is expected to rise to £3.2billion by 2020¹, owing significantly to the growth in demand and availability of glamping.

¹ <https://www.glampingbusiness.com/2017/01/06/glamping-popular-ever-uk/>

6.8 In the present climate, with the future ease and low cost of travel to Europe now uncertain, travellers are increasingly looking to holiday in Britain, seeing camping and glamping as an opportunity to visit new places domestically. The applicant has recognised an opportunity to appeal to this growing interest area.

6.9 By their very nature, providing accommodation only and with no facility to spend money on site, the proposals offer significant gains to the local economy. Visitors to this reasonably high-value accommodation are therefore likely to choose from existing services and transport across St Martins and the inhabited islands of St Mary's and Tresco beyond in particular, ensuring spend is not focused on a single business but distributed to the local economy in a more sustainable manner.

Landscape

6.10 Policy 1 requires, *inter alia*, that proposals for new development;

(a) Conserve or enhance the natural beauty, wildlife and cultural heritage of the Area of Outstanding Natural Beauty and protect the unspoilt character and good appearance of the Heritage Coast;

This statement, together with the supporting LVIA, will demonstrate that the proposals comply with this criterion.

6.11 Paragraph 23 further clarifies that the objective of the policy is in part that *proposals are in character with the islands*. In this instance, St Martin's is characterised by its distinctive mixture of coastal and inland landscapes, long-reaching views and fragmented built development. The island already has limited camping facilities at the St Martin's site, and this has developed to become part of the island's makeup. It is submitted therefore that existing characteristics would be protected by the development, with the limited visible portions of the tents not conflicting with the reasonable expectations of an observer in this high-quality landscape.

- 6.12 As demonstrated through the accompanying LVIA, the existing vegetation cover already provides a substantial barrier in terms of inter-visibility between the upper part of Tinkler's Hill and the seafront, and this would continue to provide almost complete screening of the tents as perceived from surrounding public viewpoints. Opportunities to reinforce planting where necessary can be seized where available, and a landscaping scheme (if required) could be secured by planning condition.
- 6.13 Notwithstanding, it is noteworthy that when vegetation cover would be at its lowest, i.e. over the Winter months, the tents would not be present at the site, enabling increased views across the landscape to be appreciated in their unaltered form. The removal of equipment out of season will also allow for its proper maintenance, ensuring it returns to the site in peak condition.
- 6.14 It is of course also relevant to note that by co-locating additional vehicle parking with the hotel's existing provision, the paraphernalia of private vehicles typically associated with campsites will be averted in this instance. This opportunity makes the selected location a prime candidate for this type of development and, critically, places control over the appearance of the facility in practice squarely in the hands of the applicant and the Local Planning Authority.
- 6.15 Turning to the content of the AONB Management Plan, it is recognised that tourism facilities form an essential revenue scheme and basis for the enjoyment of the AONB by those not resident on the islands. It states:
- “There are significant opportunities for tourism providers, organisations and businesses in Scilly to make more of Scilly's exceptional environment by providing a unique visitor experience. This could be developed, for example, through sustainable tourism initiatives such as wildlife kayaking tours and food foraging walks. A local green-tourism-provider accreditation scheme could be another example to fulfil this potential opportunity...”*

- 6.16 The proposals are purposefully and diligently low-impact in nature, making use of sustainable materials, renewable technologies and outdoor-led philosophy to encourage environmentally-responsible tourism. The facility places an emphasis on the enjoyment of the natural environment; walking, foraging, stargazing and other outdoor pursuits that make best use of the island's unique qualities against a pattern of visitor numbers that the Management Plan notes has been declining in recent years.
- 6.17 Paragraph 115 of the Framework ascribes great weight to the conservation of landscape and scenic beauty in AONBs. Accordingly, it is unlikely that development causing significant harm to either should be considered acceptable. In this instance, however, there would be no such harm arising from this inherently low-impact development. As discussed in the accompanying LVIA, the scheme's impact on the wider landscape would be extremely limited and measures including changes to the tents' colour will further allow the development to blend into its surroundings.
- 6.18 Both the Management Plan and Paragraph 123 of the Framework place an emphasis on the protection of intrinsically dark skies and it is the intention of the applicant to ensure that the scheme uses illumination responsibly in order to conserve this enviable quality of the island. It is therefore suggested that securing a final scheme of lighting could be subject of a planning condition.
- 6.19 For the reasons set out above, and the conclusions set out in the accompanying LVIA, the proposal represents appropriate development in the AONB and special landscape in which it is located.

Conservation

- 6.20 There are no listed buildings identified within or near the application site area however the archipelago as a whole is subject of a Conservation Area designation. As confirmed by the pre-application advice, it is also the known site of scattered archaeological remains including the prehistoric cairn cemetery and field system monument situated close by to the northeast at Tinkler's Hill.

- 6.21 The Conservation Area Character Statement SPD indicates through its Landscape Character Assessment that the application site lies within the 'Headlands and hilltop heathland' character area, albeit very much at the meeting point of the main expanse and built development at Lower Town. Without defined enclosures, it follows that development should be led primarily by the topography and natural vegetation in such areas.
- 6.22 In this respect, the LVIA confirms that the development's siting has been well chosen, following an existing vegetated barrier and the natural contours of the hillside. This will also provide ease of accessibility and shelter from the elements to future occupants of the accommodation, so is advantageous.
- 6.23 Significant views and vistas identified in the Isles of Scilly Design Guide are from Knackyboy Carn, from The Plains looking north, from Churchtown Farm, Higher Town Quay and Chapel Down, sketched below:

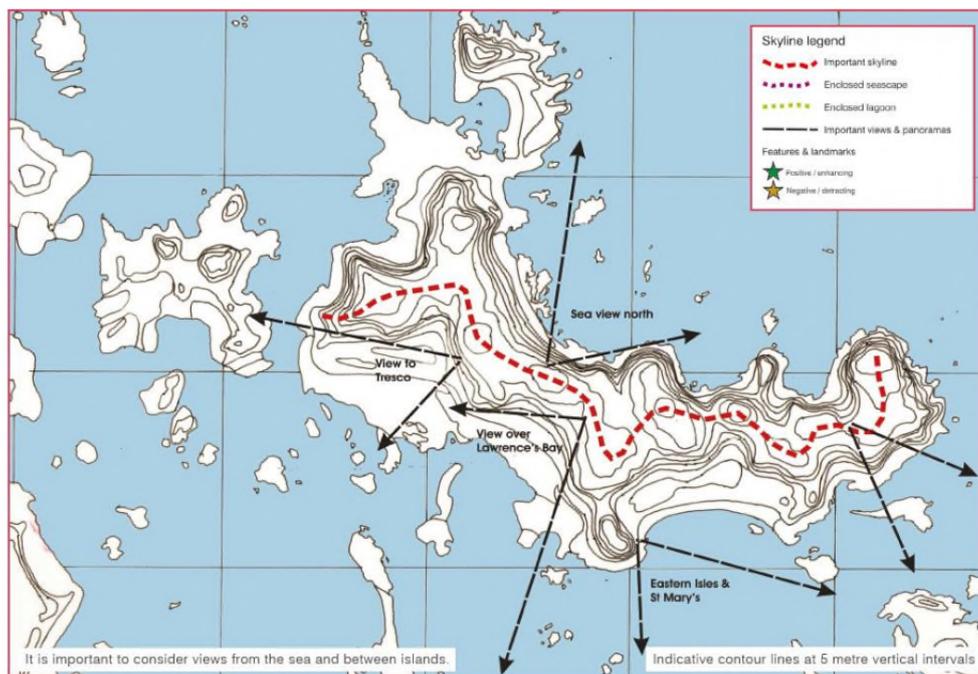


Fig.3: Important views (Isles of Scilly Design Guide, 2006)

- 6.24 As can be seen, the critical receptor in terms of the historic character of the Conservation Area in this instance is the view toward Teän from the hilltop, in which the application site is viewed obliquely. It follows that, provided the development can be kept at a scale and prominence that does not unduly impede this view, there should be no discernible loss of this element of the asset's significance.
- 6.25 The list entry for the Tinkler's Hill monument confirms that most of its widespread form is now obscured by intervening soil build-up, with only limited exposures intermittently evidencing its existence. Lying on the western side of the elevated heathland, the application site does not bear any hallmarks of the field system nor contain any funerary remains, suggesting that any such features extending to this point are well buried.
- 6.26 The proposed tent platforms, of course, do not require any insertion or other works to the ground, and are simply placed upon the surface from which they are removed when required. As such, the development will not materially impact on any archaeological features of interest. Of course, should any evidence of remains be unexpectedly encountered upon preparing the site, clearing vegetation or similar, works can be temporarily ceased in order that these can be properly investigated and recorded by competent professionals. In this matter also, therefore, significance will be preserved.
- 6.27 Having examined the proposed development against the relevant policies for the protection of designated and non-designated heritage assets, including Policy 1(b) and (c) and the content of Section 12 of the Framework, when having regard to the neutral landscape impact associated with the scheme it has been demonstrated that no harm will arise in heritage terms.
- 6.28 Applying the relevant tests of Framework Paragraph 134, however, were any to be identified, however, this would undoubtedly fall at the lower end of 'less than substantial' and, when balanced against the support in principle and local economic terms for such development, nonetheless acceptable on balance.

Ecology

- 6.29 The site does not fall within a designated SAC, SPA or RAMSAR site in ecological terms however it is nonetheless of some limited interest in its own right as a small component of the hilltop heathland habitat extending through the central part of St Martin's. It is of course already well-used in relation to the permissive footpaths that run through, and therefore not undisturbed in terms of human impact on any resident species.
- 6.30 There are no known species on site that are not abundant, adaptable and resilient to change at the magnitude proposed. The development is characteristically low impact, with physical ground cover limited essentially to the supporting stands of the timber platforms. Boundary vegetation that may offer some foraging potential has been maintained and the proposal seeks to preserve the intrinsically dark character of the site at night. The site will of course revert to its 'natural' state over the off-season months.
- 6.31 Accordingly, it is considered that there is no conflict arising in respect of Policy 1 (d) and/or (e), with national policy contained at Section 11 of the Framework or with national or international legislation. If, however, proportionate and reasonable measures are considered necessary to ensure as a precaution that the development is as ecologically-sensitive as possible, these can be discussed prior to determination and/or secured by condition.

Amenity

- 6.32 Careful consideration has been given to the relationship between land uses in terms of amenity; that being the amenity of permanent residents, other visitors to the island and those staying at the proposed development. There is no Local Plan policy that deals directly with amenity in relation to developments of this type and therefore consideration turns to the content of the Framework.
- 6.33 Paragraph 17 (pt 4) of the Framework promotes "*a good standard of amenity for all existing and future occupants of land and buildings*" as a core principle of new development, making clear that this applies to all and not simply existing residents.

- 6.34 In this instance, the proposal has been purposefully sited to give good access to local services and recreation while maintaining a respectful distance from existing receptors. It is well-screened to avoid undue loss of privacy or outlook, and certainly too small-scale to incur any loss of light.
- 6.35 The development is characteristically low-impact, being self-reliant for all basic amenities and unsuited to larger groups of visitors. Thus, the development will not give rise to significant disturbance by way of noise, which may be a concern in the case of certain types of tourism development. As mentioned, vehicle movements will be incorporated with those of the Karma Hotel, precluding any additional disturbance arising from these at the site.
- 6.36 Although a minor point, it is nonetheless relevant to note the high standard of amenity afforded to future occupants of the accommodation through the incorporation of creature comforts such as proper bedding, stoves and showers. This is likely to have the effect of lengthening the seasonal occupation, supporting a more consistent flow of tourism income pursuant to the stated objective of Policy 4(b) of the Local Plan.

Design & Access Statement

6.37 USE

The proposed development is the same as a typical campsite in land use terms, falling within Sui Generis in the Use Classes Order (as amended).

AMOUNT

The development comprises six individual glamping tents and associated ancillary facilities.

LAYOUT

The layout comprises the six units arranged in a linear sequence along the South and East site boundaries. There are no additional service runs or other communal structures.

SCALE

The scale of the development does not exceed 3m above the highest adjoining land level, with platforms adjusting to any minor variations in height.

LANDSCAPING

The existing vegetation at the site boundaries is to be retained and managed. No additional soft or hard landscaping is proposed.

APPEARANCE

The exterior surfaces of the development are to comprise untreated timber platforms, timber cladding and dark green canvas tent coverings.

ACCESS

Access to the site is obtained on foot from the vehicular facilities at the Karma Hotel, these being in existence already and safely incorporated into the highway network of Lower Town. An existing array of permissive footpaths provide safe, navigable routes into and through the site, as well as beyond into the island's interior walking.

The site has good access to local facilities, including those situated at the Karma Hotel and the nearby Sevenstones Inn, just 50m from the site.

7. SUMMARY AND CONCLUSIONS

7.1 The application seeks planning permission for the stationing of six glamping tents on a seasonal basis on land at Karma Hotel, St Martin’s.

7.2 This Statement has reviewed the relevant Development Plan Policy Framework as it applies in this case, together with the other material considerations. On the evidence presented it has been demonstrated that the proposal accords with all relevant Development Plan policies and national guidance, and there are no other material considerations present to override them.

7.3 It is therefore urged that the Local Planning Authority grant planning permission for this sustainable development.

Signed.....

Chris Marsh
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Appendix A

Copy of pre-application response



COUNCIL OF THE ISLES OF SCILLY

Planning & Development Department

Town Hall, The Parade, St Mary's, Isles of Scilly, TR21 0LW

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✉planning@scilly.gov.uk

Mr Chris Diplock

By e-mail only to

Chris.diplock@karmagroup.com

31 October 2017

Dear Mr Diplock

Ref: PA-17-048 Proposed glamping tents, Karma Hotel, St Martins

Thank you for your enquiry regarding a proposal for six glamping tents near the Karma Hotel on St Martins. I note the intention is to provide additional alternative visitor accommodation in association with the hotel that currently offers 27 en-suite rooms and 3 suites. I hope the following advice is helpful and sets out the relevant planning policies before examining your proposal.

By way of background the Exmoor National Park Authority has been commissioned to assist the Council for the Isles of Scilly with its planning work, while they review their Local Plan. Exmoor Officers are in regular contact, and working together, with Planning Officers on the Isles of Scilly so that there is consistency of advice. This is a case that the National Park Authority has been asked to advise on.

The whole of the islands are an Area of Outstanding Natural Beauty (AONB) and a Conservation Area. Policy 1 of The Isles of Scilly Local Plan concerns environmental protection. This policy advises that applications will only be permitted where they conserve or enhance the natural beauty, wildlife, and cultural heritage of the AONB, protect the unspoilt character and good appearance of the Heritage Coast, and preserve nationally important archaeological remains and their settings. Policy 2 Sustainable Development also requires development proposals to contribute to the sustainability of the islands through conserving or enhancing the landscape, coastline, seascape and existing buildings.

The National Planning Policy Framework states that great weight should be given to conserving landscape and scenic beauty in AONBs. To accord with these policies in terms of landscape character and impact, it is a common approach to group any new buildings and structures with existing buildings. This ensures that there is little or no encroachment into open countryside.

The site is within an area of Archaeological Constraint, given its proximity to the [prehistoric cairn cemetery and field system on Tinkler's Hill](#), a Scheduled Monument. The reason for the designation includes the following statement:

The small cemetery of platform cairns on Tinkler's Hill survives well, the attentions of antiquarian diggers and the 1950 excavation affecting two cairns but causing only limited disturbance to their form and fabric. The cemetery shows clearly the bias towards elevated land in the siting of such prehistoric funerary monuments and it also demonstrates a typically non-random distribution of cairns across upland terrain: much the largest cairn is prominently sited close to a striking natural feature but relatively remote from known prehistoric settlement

activity; by contrast the four smaller southern cairns, all but one in less prominent settings, are near the upper limits of prehistoric field systems occupying the favoured southerly aspects of the hill. This relationship between prehistoric funerary and settlement activity, and the form of field system deployed along the upper margins of the prehistoric settlement, is evident from the prehistoric field system surviving across the south of the plateau, its intermittent exposures confirming its extent across areas now largely masked by subsequent soil build up.

Policy 4 Economic Development is a policy that seeks to support opportunities for businesses and tourism subject to a set of criteria. In terms of tourist accommodation criterion (b) requires that the accommodation demonstrably improves the quality of existing tourist accommodation. The intention of the policy is to support businesses based on the island's traditional employment sectors in a way that is compatible with the environment.

Looking at the details in this case, I note that you reference six glamping tents on land that slopes up to the east of the Karma Hotel separated by the access road to the hotel premises. The area indicated is semi-natural habitat with low trees and shrubs that has little or no development. The site does not appear to be well related to the existing hotel complex, being set at a higher elevation above the access road to the hotel. Whilst it may be partially screened from some viewpoints in the wider landscape; in terms of landscape character this is an area of where visitor accommodation would not normally be considered to comply with the policy requirements and I consider would cause harm to the character of the landscape. It would introduce a domestic element to an area that is largely semi-natural in form and appearance.

Looking at the requirement of Policy 4, I am not convinced that the six glamping tents indicated by the submitted plan and reference to www.glampotel.com, would be considered to demonstrably improve the quality of the existing tourist accommodation offered by the hotel. While these glamping tents may be able to stand in position for some months each year they are not a locally characteristic form of accommodation or formed from local or natural materials. These tents appear to be light in colour that would contrast with the hue of local materials and could negatively impact on the surrounding landscape.

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 archaeological significance, of the area. I believe a group of glamping tents in this area would harm landscape character and the setting of a designated heritage asset on Tinker's Hill thereby failing Policy 1 and Policy 2 of the Local Plan. It is always open for you to make a planning application, and within your planning statement to try to address these concerns through a detailed policy and landscape character analysis. However, there does seem to be a range of fundamental planning issues that will be difficult to overcome and provide a convincing planning case to show policy compliance.

We would be very happy to work with you to consider alternative options to improve upon the high quality tourism accommodation offered by the Karma Hotel, in a way that is sympathetic to the traditional appearance of the hotel and surrounding landscape character, and sited to integrate more clearly with the hotel complex and facilities.

The above represents an informal opinion by officers and not a formal determination under the Town and Country Planning Act 1990. Should you wish to receive such a determination then an application should be made.

Any advice given by Council officers for pre-application enquiries does not indicate any formal decision by the Council as Local Planning Authority. Any views or opinions are given without prejudice to the formal consideration of any planning application. The recommendation on any application can only be made after the Council has consulted local people, statutory consultees and any other interested parties in accordance with statutory procedures. The final decision on an application will then be made by the Council's Committee or by Senior Managers under delegated powers in accordance with the Council's approved Scheme of Delegation, and will be based on all of the information available at that time. You should therefore be aware that officers cannot guarantee the final formal decision that will be made on your application(s).

Yours sincerely

David Wyborn

David Wyborn

Head of Planning and Sustainable Development (Exmoor NPA)

On behalf of the Local Planning Authority at the Council of the Isles of Scilly

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