



COUNCIL OF THE ISLES OF SCILLY

Planning Department

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Email only: elly@arborarchitects.co.uk

23rd February 2023

Dear Elly,

**PLANNING REFERENCE
DEVELOPMENT PROPOSED:**

P/23/006/COU

Change of use of land from agricultural to commercial and the construction of a new single storey (use class A1) retail premises for existing business based at Trethagan.

LOCATION:

Trethagan, Churchtown, St Martin's, Isles Of Scilly,
TR25 0QL

Further to the submission of the above application, as received at this office on 24th January 2023. I have now had a chance to review the proposed details and I would like to provide the applicant with an opportunity to respond to the concerns I have identified. Specifically, based on the case being made, I do not consider the proposal has been adequately justified in terms of the scale of the existing business and the size of the unit proposed and would therefore not comply with the requirements of Policy WC3 of the Local Plan.

The Local Plan, at policy WC3, is supportive of new employment development. The business activity and scale, however, have to be appropriate for its location and it must demonstrate there is a functional and/or operational need for the development to be in the location proposed. The case made indicates that a new build is the only viable option, but it does not elaborate on why this has to be located in the adjacent field, other than the applicant's father-in-law being agreeable to its use. In terms of location, Trethagan is a large dwelling situated within a large private domestic curtilage. It would seem sensible therefore (if expanded facilities are demonstrably justified) for the business to be located within the grounds of this property. The same privacy screening and sustainable design measures could be incorporated to separate this from the existing dwelling and it would avoid the need to proliferate development along this road to the detriment of agricultural land. It would eliminate the need for a new vehicular access which necessitates the removal of trees and hedges from the existing field boundary and removes the need for staff facilities. The ecological and biodiversity enhancements suggested in the supporting statement can just as easily be incorporated to this existing site.

In terms of scale, the case is made that additional space is required for stock storage but there is no indication as to whether the bulk of the sales are from visiting tourists as a result of being

on St Martins or whether sales occur predominantly online? Similarly there is no indication of on-site manufacture of any aspect of the product, which could justify some form of larger unit. The supporting statement refers to an urgent need to expand the shop, after the 2022 summer season of post-covid tourism, and the size of the current summer house proving inadequate space to display goods for sale and being too small for customers. I would like to understand how much direct sales of goods currently takes place from the outlet on St Martins (compared to online sales per year) and how much of an increase would be expected as a result of the larger retail outlet. Additionally, on what basis you have calculated this increase that would support the employment of an additional member of staff, and justify the investment of a substantial retail outlet. It is unclear how improved facilities at Scilly Billy increases tourism to St Martins or any indication of peaks or troughs in footfall of customers.

Without this information it would seem wholly disproportionate to permit the size of building now proposed, particularly in a greenfield site, if large areas of retail space would not result in an increase in direct sales on-island. It is unclear whether the unit would be open on a year round basis or how many days per week. There would appear to be no obvious demand for the type of goods being sold, in terms of local trade, as evidenced on St Mary's where many of the tourism based outlets close or have reduced opening times out of the summer season. So whilst the application includes the hours of operation and an increase from 1 full time employee to 2, it is unclear whether this full time employment would equate to permanent year round work. Again, without this information, it appears to be disproportionately large building in a greenfield site where the opening times are likely to be limited to the summer season. It is therefore unclear how the proposal would further strengthen, enhance and diversify the island economy.

The supporting statement references the pre-application advice advising on a low-rise agricultural style building being most appropriate. This view was an informal opinion based on an assumption that adequate justification can be provided that demonstrates a functional and operational requirement, and that the proposal overall can be justified as necessary in this location and in terms of its scale. In line with my above comments, I do not believe this application adequately demonstrates this.

Whilst policies are supportive of employment development this has to be clearly demonstrated as essentially required and I remain to be convinced that the expanded and enlarged retail outlet is necessary in this case. As reflected in the pre-application response, the policies of the Local Plan seek to be supportive of employment developments that diversify, in particular, the local economy and there is no suggestion that the existing business has not become an important brand to the applicant and the island of St Martins. We do, however need to be satisfied that the proposal is necessary and whilst a case has been made, there is insufficient justification, in my view, to require the scale of retail outlet being proposed.

Please send a response back to me as soon as possible, if you are unable to adequately address the issues and respond to me within 14 days of the date of this letter (so by 9th March 2023) I will be recommending this application for refusal.

Yours sincerely

Lisa Walton *MRTPI*
Chief Planning Officer