

# **STATEMENT OF COMMON GROUND**

**Appeal Reference; 8482**

**PLANNING APPLICATION; P/21/045/COU , LAND AT LAWRENCES BROW, ST MARTINS.**

**APPLICATION FOR SEASONAL AGRICULTURAL WORKERS ACCOMMODATION IN A  
PRE-EXISTING BUILDING. Planning meeting ;21 September 2021, Isles of Scilly**

**Reason for refusal;**

“I am writing to you to advise you that the above application has been carefully considered, and the recommendation is to refuse planning permission. This is primarily because the business case put forward has not been considered sufficient on which to base the need for a unit of staff accommodation, as required by the Local Plan.” Lisa Walton, Planning officer.13<sup>th</sup> September 2021.

**R1 *“Has not been adequately demonstrated as necessary for the viability of the applicants business” LPA***

- ***I am writing below, to address the reasons for refusal, to demonstrate the significant and necessary need for this previous planning application, for this existing business, (The Original Planning Application is as attached above, including all plans, drawings, flood evacuation policy, Design and access statement, waste management plan, and relevant photographs.)***
- ***The land upon which this 1937 building stands, has been let from The Duchy of Cornwall as an Agricultural tenancy, and has been worked extensively, for close to thirty years.***
- ***The Current County Parish Holding number; 39/003/0129.  
The Duchy of Cornwall agricultural tenancy 111, “Land at Lawrences Brow”***
- ***There are two primary business activities taking place on this agricultural holding, The first business activity on this land, throughout this near 30 year period has been, and is to date, the large scale growing, production and sale of organic vegetables, for sale to businesses, residents and visitors to St Martins, during the busy holiday season. It is a valuable and needed business, which has come to be relied upon by locals and visitors alike, who order Vegetable selection boxes each year, prior to their arrival on the island. These are collected from the business premises, or delivered, on request, to their holiday accommodation.  
There are two polytunnels and approximately 1.5 acres of good agricultural land, which produces chemical-free, Organic fruit, vegetables, and herbs, and also free-range eggs from the resident flock of approximately eighty birds.***

*Please find attached a sample of annual seed ordering list, and a sample annual list of produce in production for harvesting. To demonstrate the scale of production.*

*Additional seeds and plants throughout the entire growing season, to take advantage of plug plants which can only be purchased at certain times of the year*

*The size, scale and diversity of our range, naturally increases for each subsequent year, as the business expands organically, to satisfy increasing demands, which cannot be satisfied through the very fragile import links, from the Mainland.*

*Sourcing a reasonable range of seasonal and Organic vegetable and fruit products from Mainland wholesalers, has always been a matter of contention, with long lead times, poor quality through long distance travel, and a complete lack of ability to buy any produce which is Organic, or slightly out of the ordinary. Wholesale vegetable supplies to the Islands, are generally grown abroad, carrying the load of many fuel miles in their transport here, the possible burden of chemically enhanced production, and the possibility of being grown in countries which do not have proper safeguards for the agricultural workers, employed in their production or delivery.*

*This business has for nearly Thirty years provided a huge range of Fossil-free Vegetables and Fruits, grown on the island, and sown, nurtured and harvested by people residing on the very landscape, that this produce derives from.*

*We have an eager and repeated, very supportive and appreciative customer base, who have come to expect our range and quality. Both Visitors, and residents, seek us out, throughout the whole year. They have all come to expect our presence and produce.*

- Agricultural help, to work this sizeable enterprise has always been needed, to maintain a succession of sowing, weeding, watering harvesting and packaging ready for sale. Some local deliveries are also required, to visitors' holiday accommodation on demand, or to local businesses or resident families. Agricultural workers who work on the land of this business have previously been housed and lodged with local families, or under-utilised buildings.*
- The availability of available seasonal accommodation has now become acute, with most previously vacant premises, now being converted into holiday accommodation, which is good as it increases demand for our produce, but diminishes the vital and needed accommodation for the seasonal workers coming to work for the business, which is essential to allow this business to survive and expand. Most other businesses in Scilly are suffering the same consequence.*
- I am a single person, and cannot possibly maintain and expand such an enterprise, without essential help. This is a given fact. The last two years have been especially difficult under the limiting conditions of the pandemic, which did not reduce visitors or demand, but reduced seasonal help, without the needed adequate accommodation being available to hire in.*
- It is vital to enable a continuation of repeat agricultural workers, who have been properly trained in all aspects of this business..*

- *Part of the holding was previously used for breeding and rearing of Rare Breed, free range Pigs, Gloucester Old Spot and Saddleback. The holding supplied many local farms with weaners over a long period, (approximately 60 pigs were raised and sold on from this holding) The meat produce from the pigs were also used in the related Sister businesses of St Martins Bakery, and Seven Stones Inn, for a number of years, in the form of dinner service meals, Sausages, Charcuterie and Pate's.*
- *This was alongside the huge range of Fruit and Vegetables that went directly to those businesses, grown on this land, and in the case of the Bakery, was supplied to many other businesses throughout the entirety of the Isles of Scilly, who were regular clients of St Martins Bakery. (A full list of all businesses supplied can be seen later in this document.)*
- *The produce from this land also formed the backbone for special island food events. The award-winning St Martins Bakery was contracted to provide retirement buffets for every retiring Duchy land Steward, over a period of 15 years, it was also requested to provide luncheon buffets for Princess Alexandra (2000) and HRH Prince Charles in 2002.*
- *The sister business, St Martins bakery, was voted "Best UK Food Retailer" by BBC Radio 4 Food Programme in 2002, beating all commercial food premises throughout Mainland UK, including all of the leading supermarkets and restaurants.*
- *St martins Bakery was also voted "Best pasty on Scilly" for 4 consecutive years. All of the vegetables used to make these award-winning Pasties, came from Land at Lawrences brow.*
- *All of the fruit, Vegetables, herbs, and many meat dishes, came directly from the Land at Lawrences Brow, St Martins, to enable these very successful events to take place, and awards to be won. This land was a continual supplier to both sister businesses, St Martins Bakery, and Seven Stones inn St Martins, all owned by myself, of many Fruits and vegetables over a twenty-year period, along with other St Martins food vending businesses, and other Isles of Scilly businesses generally spread throughout the islands.*
- *These events, and the produce grown to supply Island businesses, were nurtured and harvested by our valued employees accommodated on the Island. All of this success, and the many awards and accolades and national commendations, could not have been achieved without a continuous supply of well trained loyal and dependant staff, returning each year and securely accommodated.*
- *Organic production of fruit and vegetables, and the care and management of laying birds requires intensive training, which takes energy and time, and is an added cost to the business, therefore it is desired to attract the same workers to return each season, which diminishes these added costs and burdens on the business. This cannot be achieved relying on transient, sometimes temporary (campsite) accommodation, which is not conducive to attracting the same people to return each year, with their valuable embedded knowledge.*

***This holding is an Organic holding. We do not use chemistry for fertilising or pest and weed control, therefore the business is more reliant on worker participation, than other businesses which are more mechanised, and employ the use of machinery and chemicals to improve yield, by artificial fertilisation, or by removing competition, by chemical eradication.***

***Two methods of eradication we employ are weeding, and mulching to destroy weeds, and the physical removal of pests or competition. These are manually hungry methods.***

***To improve yields, we drag seaweed from the beach, which we use as a mulch to kill competition and feed the ground. These methods all require manual help, and some training.***

***Another method of soil improvement use on the holding, is Carbon sequestration.***

***We employ two methods of fixing Carbon in the soil;***

***Hügelkultur and biochar.***

***Hügelkultur, is a form of growing vegetables on beds created with slowly decomposing woody material.***

***Biochar, is a method of impregnating Charcoal with Microbiological cultures to create hosts within the soil, to enrich the growing value of the soil.***

***Both of these methods are very successful, but require training and an understanding of continuation and constant maintenance. This can only be realised by attracting staff to return, once fully trained, to an enjoyable work experience, with stable accommodation. This is the brutal fact of successful production on this holding. Without accommodation, on this site, as it was erected for 85 years as agricultural workers accommodation, this pattern is broken.***

***If Accommodation has to be sought and begged in any available temporary space on the island, this inevitably leads to a greater fragility for the business, and an unstable footing to plan future diversification, expansion and development. The business needs bespoke on-site secure accommodation. The barn on Lawrences brow would accommodate two seasonal agricultural workers.***

***For the seasons of 2020 and 2021 the business derived produce from neighbouring land, with the permission of the leaseholder of this adjacent plot. This agreement still stands and further fields are also being currently sought, for more expansion.***

***This additional land was underutilised by the present lessee, who was pleased to see the land finally put into useful agricultural production. This partner relationship continues, with mutual benefits.***

***With the help of some permanent Island residents, this secondary land was worked, the hedging cut and maintained, and eventually harvested in the summer of 2021, again with island resident help, and machinery used to enable a larger***

*scale harvesting, machinery was used for turning and eventually shredding the crops on this additional plot.*

*The proposed accommodation, was erected in 1937, in the centre of this agricultural holding for the express purpose of accommodating agricultural workers, on the very land, that they were employed to work, which was primarily then, the seasonal flower, and early Potato industry.*

- *It is implied in the wording of the refusal that this application is some sort of “Development” This implies constituting a new change (dictionary definition) The building remains exactly as it has always been externally. No change. The term “New Development is therefore an incorrect description.*
- *This is the permission being presently sought, namely accommodation in the same building, unaltered externally, which was previously used for the same purpose. There is a reasonable Justification here. This is the internal-only refurbishment of an existing building, it is not an additional or new development, the building has existed here, in its present form, since 1937, remaining exactly as constructed, completely unchanged.*
- *This is in effect a continuation of Historic use. I could not provide previous utility bills to demonstrate occupation, as the building does not rely on utility companies at all. It is completely self sufficient in Power, water, waste management, and sewerage. It is no draw on any Island facilities at all.*
- *I have demonstrated here a “functional and operational need” for the requirement of the business as it exists, needing dedicated on-site accommodation as shown in the (Local plan LC4)*
- *I have also demonstrated the future diversification, expansion and employment requirements of the business. Additional accommodation is absolutely necessary for inevitable expansion and development, in front of this vibrant business.*
- *Policy SS3 of the Local Plan is quoted to form part of the reasons for refusal. I would expect it would not be welcome to reproduce the whole policy here, but have read it with some scrutiny. My internal-only renovation of this Historical building does not conflict with any of the clauses proposed within the policy, indeed it is a shining example how the re-use of an existing building can be empathetically and successfully enable a building to be brought into beneficial use , resulting in the stimulation of employment and the general local economy overall.*

*Every single business here on St Martins, and the isles of Scilly generally is struggling to find accommodation for its workers. This is demonstrated by the precedents of a wave of Shepherd huts being granted planning recently, and even the council itself purchasing a three-dwelling accommodation for approximately £900,000 recently, to house essential workers, without any other stable accommodation being available anywhere. This is a serious situation, one of great*

*danger to the economy of the Islands. An increasing visitor demand, coupled with a diminishing accommodation market is causing great local friction.*

*The Islands are indeed, on the brink of a “Housing Emergency”, as stated by the council housing lead member at a recent public council meeting*

#### **RENEWABLE FOSSIL-FREE FUEL, FROM LAND AT LAWRENCES BROW**

- *This is another example justifying the essential need, for the business ON this agricultural holding, to offer Seasonal agricultural workers, on-site accommodation, in a pre-existing building, centrally located on this holding since its erection in 1937.*
- *Running conjointly, with the Organic food production on this land is a fossil-free, renewable fuel business. This has been enabled by the expansion within the holding itself, and the utilisation of a neighbours un=worked 1.5 acre plot.*
- *This is described in thorough detail in the appeal document below. The additional under- utilised parts of the holding were used for “addition-crops”, which were harvested, shredded and blended with the Bracken also growing on this holding, and neighbouring leased land, to produce renewable fuel briquettes. These briquettes are largely made from dried and shredded Bracken, but which require blending with specifically grown organic crops, to create a desired combustible fuel briquette. The holding, Land at Lawrences brow, produced material for a trial production of 1.5 tons of bracken briquettes, destined for local use.*
- *These briquettes have been laboratory tested for calorific burn, toxins and ash content. The results are excellent. There will be additional planting in subsequent years of crops specifically grown, as ingredient for the briquette mix, both throughout the rest of the holding, and newly acquired land to lease.*
- *Negotiations are ongoing with the Duchy of Cornwall regarding the establishment of bespoke business premises, to produce the briquettes here on St Martins, and additional plots of land are being sought, with the Duchy’s support, to provide additional areas which can be planted with recipe-crops, for the unique blend of this new Fossil-Free fuel.*
- *A five-year license has been sought, and granted, by The isles of Scilly Wildlife Trust, to allow the harvesting of Bracken on all of their leased land in the Isles of Scilly. This Bracken, when added to the recipe crops, specifically grown for the “blend” on Land at Lawrences Brow, and other annexed holdings, will produce Bracken briquettes on a considerable scale.*
- *The intention is to produce briquettes on a scale, which will be enjoyed by businesses and the resident population here.*
- *Inevitably additional agricultural workers will be needed for this diversification, requiring secure accommodation for them to reside in, for the Season. Without this help, this business simply cannot exist, let alone grow.*
- *The trial production of briquettes, was a great success and warmly welcomed by fuel importers here on Scilly. They were also approved of by the resident*

*consumers presently relying on imported solid fossil-fuels, like anthracite, Phurnacite, and briquettes made currently in Eastern Europe.*

- *The aim of this business is to completely eradicate the need to import solid Fossil-fuels into Scilly completely. Eventually this business model will be rolled out and mirrored by business set-ups on the Mainland UK.*
- *It has already attracted National press interest, and was featured in Cop 26 week, by Farming Today R4. The following publicity continues, and will help market this new renewable fuel product, and stimulate the economy and create additional employment possibilities, on the isles of Scilly.  
(Farming Today Cop 26, feature broadcast on “Fernfuel” “Bracken for Fuel” is attached above)*
- *This diversification, backed by a very supportive media, will help create a strong and resilient, stand-alone business, which does not rely completely on tourism to survive. As demonstrated by recent events, tourism can be a fragile industry to completely rely on, in these uncertain times.*
- *There is a Centre page feature article, on the creation of Bracken briquettes, from the land at Lawrences Brow, St Martins. This was published in “The Western Morning News,” and is also attached above.*
- *Along with the press interest for this production of Organic vegetables and Renewable fuels on this holding, the support it has received by people of note, is considerable, and much appreciated.*
- *Tim Smit (Eden Project founder) Came specifically to St Martins, to have a long meeting with me, in August 2021, regarding this exciting new renewable fossil-free fuel. He kindly stated that he would allow his name to be attached to this new initiative, and upon leaving he assured me he would continue to work to access working grants for this new fuel.*

*He sent me this for marketing use.*

*“I would be delighted if this technology could be brought into use, as I believe its potential, could be significant” (Tim Smit Aug 2020)*

- *Dale Vince, owner of Ecotricity Energy Company has also made regular connection with me, regarding Bracken briquettes. Although his company produces energy through the power of wind, he recognises the desire to replace fossil fuels for environments which through planning restriction can not site wind farms. We have talked at length about future consideration of tidal power being employed on Scilly. Here are his thoughts on my business.*

*“I look forward to seeing them, and trying them.*

*Hotter than Oak, that’s impressive. Bracken is a renewable crop, no doubt, there is the possibility here to balance things. It looks like you have all of the main ingredients here, to make this work, fuel source, Briquette machine, market, and the desire.....Good luck with it” (Dale Vince July 2021)*

- *I am a Duchy tenant on Land at Lawrences Brow, so naturally I have been in constant communication with the Wildlife Trust here, who themselves are Duchy tenants, and have granted me a renewable 5 year License to cut all Trust land here on Scilly, for fuel briquette manufacture.*
- *As Duchy tenant on this agricultural holding, I have notified the Duchy of this application. Over the last year I have been in constant dialogue with the Duchy, on the ground here on Scilly, regarding the use of Royal land, for the manufacture of a renewable fuel. I have had tremendous support and help in this. I have this week, received a letter, from His Royal highness, Prince Charles, on 12<sup>th</sup> January 2022.*

*The long letter thanks me for the croquettes, delivered to himself at Highgrove and without directly quoting, says something like,*

*It is, such a good idea, to harvest such an invasive plant, to turn it into a renewable, fossil free fuel.... Wonderful if this could help replace the need to import fossil fuels to the Scillies, (abbreviation) (HRH Prince Charles, Duke of Cornwall, Jan 2022)*

**STATEMENT;**

**I would like to strongly make the statement here, that the above information is an accurate and true account of the history of the business established, its present need within the Community, from residents and Visitors alike, and adequately states clearly, the need for the present vegetable and renewable fuel business, for seasonal agricultural workers to be employed by the business, and accommodated in the existing building, erected on that holding in 1937, for the very purpose of worker accommodation.**

**Without securely accommodated, on site staff, this diverse business will not be allowed to continue, nor expand. It will not be viable. It will simply cease to exist.**

**SECOND REASON FOR REFUSAL**

**“The retention of the converted agricultural building as a small unit of seasonal agricultural workers accommodation and ancillary shed and decking, although small in scale, is located within open countryside and is considered harmful to the character of the area, detracting from the scenic beauty of the area of outstanding natural beauty.”**

**I will address this point by point.**

- **The dictionary of Countryside is “The land and scenery of a rural area”**
- **The building is situated in a rural area, the rural area is an Parish Council agricultural holding, and Duchy of Cornwall agricultural tenancy (No, 111) for production. It has always been a site for food and flower production, and to this day is worked agriculturally. It is not a scene**



purely for the eye to wander across, although beautiful in itself.

It is, and has been for living memory, the landscape of agricultural toil and production.

- The extensive hedging was planted earlier in the 20<sup>th</sup> Century, as wind breaks, to allow agricultural practices to take place. Mankind intervened over a hundred years ago to protect this holding and landscape from the elements, to allow food and flowers to grow professionally on this land.
- The building, centrally erected in 1937, on this parish, was positioned as stated, central. This is to allow those working on the land, to be accommodated centrally on this holding.
- The building has only been renovated internally. There has been zero external change to the building externally, so the statement of being “harmful” is not correct. This building is unchanged. This building imposes and commits no harm to the surrounding land it sits on.
- Therefore it cannot “detract from the scenic beauty” Unless the council are recommending the destruction, and removal, of this 85 year old, unaltered building?
- A common ground statement agreement; Yes, I completely agree with the statement of the Planning Officer here; the existing building is “small in scale”. It will provide only a single, or double person occupancy, on a seasonal basis, for agricultural employment on the land it sits on and is surrounded by.
- There is anecdotal Local evidence, and local stories of prior occupation by agricultural workers, in the 1940’s and 1950’s. This is the continued use of the building for this very reason, seasonal agricultural workers accommodation. Upon occupation, furniture, oil lighting, bad-frames, hand tools, and writing ink bottles were removed. It had clearly been previously habited by seasonal agricultural workers for many years.



- The wooden solar shower/compost wc shed and 3mx6m wooded decking are temporary structures, not requiring planning consent here, and are completely screened by mature hedging.
- In the refusal it also uses the phrase “protecting important landscapes” This landscape has always been important. It has been important for agricultural production for well over 100 years, and important to those who farmed it then, and vitally important for those of us who farm it now. Protection was provided in dividing the holding into several individual fields, by the establishment of Evergreen hedging, which is

presently cut and maintained by ourselves to date, whilst we work on this land, providing continuous protection, for our produce, and employees. No hedging has, or will ever be removed, as it provides continuous protection from the wind, to allow us to sow, nurture and reap crops over the entire agricultural holding. We are continuously adding hedging on the site to fill gaps, and provide additional planting protection. We hugely appreciate the value of hedging for wildlife diversify. A small pond is also planned for the holding, to increase biodiversity.

- This holding is “important” to the business. As a worked holding, it provides an important financial income.
- The land has always been, and always will be, cared for sympathetically and empathetically. Birds are encouraged by the installation of nesting boxes in our designs. Insects and mammals are encouraged and helped by our chemical-free food and fuel material production. This land is our provider and we care for it completely and absolutely. Like the agricultural tenants before us, we realise that we are the caretakers of this land, we have a committed responsibility here. We are in harmony with nature. We must hand this land on, in the future, in good health.
- Our Organic growing of crops for renewable, fossil-free fuel production, on this land, will also help to improve the environment, not only locally, but essentially, globally.
- Our expansion of planting of Organic crops will improve the biodiversity of this land, as will the diminishing of Bracken, which is an invasive plant reducing biodiversity.
- We will reduce the Carbon footprint of the residents and visitors to Scilly, we feel deeply that the land is “Important” to us, for that very reason

#### ISLES OF SCILLY LOCAL PLAN (98)

*“ When considering all development proposals, there will be a presumption in favour of sustainable development, to reflect the NPPF”*

Following is a general description of the businesses established on Land at Lawrences brow.

It shows the agricultural history of the land, and the story of the current businesses operating from that agricultural holding.

The following statements demonstrate many examples of Common Ground with the local planning policy. It demonstrates that the business is an existing viable business here on St martins. The internal development and ancillary

set up described in the planning application, fits the Isles of Scilly Local Plan guidelines like a glove.

It utilises an existing building for the same purpose. It has not changed that building, save for the installation of solar panels.

As per Local Plan requirement and suggestion, It provides its own electricity by solar power, therefore is carbon neutral in this aspect, as per plan, it harvests and provides its own water, so is not a demand on Island resources. It operates a well managed organised waste management plan. It has compost toilet facilities, therefore is not an imposition on fragile Island sewage systems. It is screened completely by mature hedging, it is accessible for all emergency services, and general vehicles. It is not at risk from flooding. It will provide accommodation and added employment on the Island. It will benefit the Island economy. It will provide a renewable fossil-free fuel. It now provides additional nesting facilities for local and migratory birds. The business will provide apprenticeships and agricultural/scientific training for many employees over time. It will satisfy a Local need, for quality Organic foods and fossil free renewable fuels, benefiting the whole community.

### **The Story; HISTORY AND BACKGROUND**

The industry and financial background of the Isles of Scilly has always historically been one, which was largely based on Agriculture and Fishing. Today while some fishing, mainly Crab and lobster still exists, the once main industry of early Potatoes and Flower farming has now been replaced by Tourism. The tourist industry, it is said, now comprises some 90% of income from the Islands, with some few remaining flower farms diversifying into direct flower delivery, via the internet.

The majority of once worked land, has now been largely abandoned, only being “cut” once a year, to enable grant to be paid, to those who still lease land. Many have since surrendered their land, and agricultural businesses, in favour of offering tourism accommodation for income in this financially fragile economy.

The Land at Lawrences brow, on St Martins, to which this application pertains, was previously leased by Duchy of Cornwall tenant flower-farmer, Fred Stevens, who in 1937 was the largest farm tenant and employer of farm labourers, on St Martins.

The building this application for use is named, was erected by Fred Stevens and Sons in 1937. Their cement signatures denoting this, are still visible inside the building on the concrete shuttered walls, which was the fabric this 6m x 4m building was created with.

The building was erected, on the Land at Lawrences Brow, for the accommodation of agricultural farm workers, employed by Mr Stevens. His family leased most of the land on the South and Eastern side of the island, the island's largest employer.

Upon occupying the building some thirty years ago, as the new lessee, I discovered, the remains of an Iron bedstead, seating furniture, a table, three oil Tilly lamps, a ceramic Denby Ink bottle, and a variety of hand tools. The building was clearly accommodated previously, by Farm workers.

Land at Lawrences brow, ploughing late 1930's ;



#### **BUILDING REPAIR AND RESTORATION**

***Local Plan (112) "The re-use of previously developed land and buildings is a sustainable way of reducing the need to construct new buildings"***

***Local plan (113) "To support growth and expansion of the rural economy, existing buildings that are suitable for conversion should be used for small scale business uses, to help sustain the rural economy without creating the need for new buildings, in the countryside. "***

I have continued to use this building as my agricultural base, and shelter for almost thirty years.

It was built on a solid concrete slab, with granite foundation.

The 6m x 4m building is made from shuttered concrete, and considerably strong.

After a recent near total collapse of the roof, through rotted ends of roof beams, it was decided to take the opportunity, for fully replacing the roof, like-for-like with corrugated metal sheets, and to add three Solar Panels to bring electricity to the building. This is in line with recommendations within the Local plan; Policy SS8 in that this ***"Contributes towards meeting domestic, community or business energy needs"***



The guttering was replaced and improved to enable more efficient water harvesting. The building is now self-sufficient in water consumption and is not connected to any island mains system, and is therefore not a drain on any island water resources.

The interior was studded out, fully insulated with Natural wool insulation and boarded throughout with fireproof boarding. The solar connection feeds into two 12v batteries which supply three double sockets, with phone charging ports, and a wi-fi connection to the internet, for studies and research for those inhabiting this building, and working on this land at Lawrences Brow.

Local Plan (100) Climate Change; *“For the isles of Scilly this means a particular focus on securing sustainable energy”*

Local Plan(102) *“To support the islands resilience to a changing climate, and to tackle climate change locally, the council is committed to ensuring that all new developments have as low a carbon impact, as practically possible”*

The fascia boards were replaced and an opportunity taken to provide 14 in-built nesting boxes behind the fascias, and the ends of the fascia boards left open to attract (successfully, as can be seen in the photo, LHS) returning nesting Swallows.



Local Plan SSC3(e) permission *“.....will be permitted, provided that...suitable nesting sites for birds, and roosting sites for bats, are incorporated into the design”*

The rest of the building exterior remains as it was, when erected in 1937, from rough shuttered concrete, visually it remains unchanged, from creation.

Local plan (113) *“Employment uses will often require only minor alterations to the structure or exterior of the building, thereby maintaining a traditional appearance in the rural scene and their original character”*

There is a decking established outside the original shuttered-concrete building, which connects it to a 2.4m x 1.8m shower/wc wooden shed, on a concrete base.

Warm water for the shower is provided by a solar-shower bag, situated on the roof. The wc is a compost system, with sawdust as the medium. Water for the hand wash basin, is drawn from the

main water harvested tanks(2 x 2,000L ) by bilge pumps. There is electrical light in this shed,



provided by the main roof-mounted solar panels. Solar shower/compost wc.

There is no connection to the islands sewer waste system, or mains water supply, it is self-sufficient in Harvested Water. It is not a drain on any island energy resource whatsoever. It is a standalone development, off-grid.

***Local Plan Policy SS2 (1V) "Reducing pressure on water resources and increasing re-use by incorporating efficient water management systems"***

***(L) "incorporating high standards of energy efficiency and maximising opportunities for the micro generation of renewable, low carbon and decentralised energy "***

#### **AGRICULTURAL CONTINUATION**

I have Organically grown Vegetables and fruit, on this land for that period of time, for the supply of food, to satisfy the demands of the residents and visitors, to the Isles of Scilly, for Seasonal, locally produced Organic food, with zero food-miles. The land is intensively and environmentally farmed, to produce good seasonal local food, with zero chemicals or pesticides. The land is nourished each year, with the help of staff, by dragging beach-tossed seaweed, to mulch and fertilise the ground, on an Autumnal annual basis.

This land supplies residents, businesses, and visitors, to the Island with food of a high standard, sown, nurtured and harvested by hand. It has required agricultural worker help for nearly thirty years of food production, and continues to need seasonal staff, to enable its labour- intensive production. The land contains a large Polytunnel (25m x 12m) for salad crops, rotational vegetable beds for seasonal production, and a flock of eighty birds, for egg production. It is self- sufficient in harvesting its own water.

The scale of production of food is considerable. The polytunnels alone containing in excess of 200 tomato plants, which need extensive pricking out, feeding and watering the seasonal growing of mange tout, a sound seller, requires approximately 6000 plants to be planted outside and nurtured, peas plants are approximately 1000 in number. These are just three items of the range the land produces and sells daily.

There are no chemicals used on the land, and we operate a no-dig method of growing. While this eliminates the need for weedkillers, it is labour intensive in the daily weeding of all beds.

Full training in agricultural processes is given to all workers and they are encouraged to initiate their own trial sowing, planting and growing methods, on plots within this site. Initiatives already being trialled are Hügelskultur and the use of Biochar as a means of sequestering Carbon.

It is later intended to offer Agricultural GCSE courses on site, in liaison with Little Arthur independent school, St Martins, where I sat my own GCSE in Agriculture, some years ago.

### **FOOD PRODUCTION AND SUPPLY**

This land has supplied many Island businesses, both directly to provide ingredient for their kitchens, and indirectly through its partner business, St Martins Bakery, as a bakery supply essential ingredient. The Bakery was voted “Best UK Food Retailer” by Radio 4 Food and farming award, 2002. The bakery directly supplied many businesses on St Marys, St Agnes, Tresco Estate and Bryher stores. It has been voted “Best Pasty on Scilly” for four consecutive years. All of the Potatoes, Swede, and Turnips come from the Land at Lawrences Brow. As do the salads and fruits from the polytunnels (there is another tunnel 600m away) The majority of food ingredient, came from this land.

Staff who previously helped work the land at Lawrences Brow, by producing food, were previously accommodated in a wide range of suitable island properties. These are no longer available for seasonal workers, as they have all now been converted into holiday accommodation.

The business sells to local food businesses on the island, has stands at local food festivals, during the busy Summer season, and at the Island Christmas market event, and has attended many “Local Produce Markets” organised monthly, on St Marys. The land also has its own dedicated and large, daily-stocked “Honesty Stall”, some 400m from the land where the Organic produce is grown. This is where visitors and residents buy their local food products, which come directly from this land, not imported foodstuffs, some travelling globally, that the local store tends to stock. The Honesty stall sells-out most days, during the very busy seasonal influx of visitors, and residents requiring ingredient, to feed their guests. It sells a huge cross section of the foods grown on the Land at Lawrences Brow, appreciated by all.

It is a needed and vital part of island food-economy, over the years it has become to be expected by residents here and the frequently returning visitors, who are regularly supporting customers, as are the local Islanders.

**Local Plan LC4:** *“Staff accommodation for businesses will be permitted where there is a functional and operational need for the proposed accommodation that cannot be met by existing suitable accommodation, available in the area”*

Currently on the island there is no available accommodation for seasonal agricultural workers. There is an acute shortage of available or suitable accommodation, each and every business is currently competing to attract seasonal workers, by offering tied workers accommodation, to accompany the work offered.

Every island is experiencing an acute accommodation shortage.

The majority of sustainable accommodation, previously used for seasonal workers accommodation, has now been converted to Holiday accommodation, which attracts higher profit.

### **RENEWABLE FUEL BRIQUETTES**

In July this year the business diversified, on this site, into producing a fossil-free, renewable, alternative fuel. This was achieved by harvesting 1.5 Tonnes of Bracken and ½ ton of specifically grown Organic crops, and after a process of drying, shredding and blending, the resulting particulate blend of organic material, was compressed and transformed into fuel Briquettes, suitable for all types of fires.

Laboratory tests have been undertaken on the Briquettes, for their calorific burn, and emissions.

The laboratory tests on the Briquettes are very successful.

They show a Calorific burn, which is longer and hotter than Oak logs, there are zero particulates or carcinogens in the flue gasses, and the ash content, which is high in Potash, is an excellent fertiliser.

The briquettes are being shared within the community, and to the two main importers of solid Fossil-fuels, into Scilly, for their trial, with view for permanent supply, throughout the Islands.

This new Renewable fuel has been warmly accepted, and It is now intended to establish a permanent business here, harvesting, growing additional recipe crops on spare land, and manufacturing fuel Briquettes on a large scale. It is hoped, and believed, that eventually they will replace the need for importing damaging fossil-fuels into Scilly.

Agreement has been reached with the Isles of Scilly Wildlife trust, and The Duchy of Cornwall, to harvest the invasive bracken here, to utilise under-used land, by planting the needed "recipe crops", which are a 15% addition to the Bracken Briquettes, and to manufacture the Briquettes, here on St Martins for local distribution, throughout the Isles. A license to harvest Bracken on The Isles of Scilly Wildlife Trust land, for an initial five years, is currently being drawn up.

Other under-utilised agricultural land, will also be cleared of Bracken, for fuel production, with the support and cooperation of the Duchy of Cornwall.

This initiative was followed by Radio Scilly(Islands FM) who broadcast a story on this enterprise, The Western Morning news, who covered this exciting new initiative, with a double-page spread, and a radio broadcast, aired during the Cop26 week, by Radio 4, Farming Today programme, as a shining example of an exciting fossil-free fuel.

There are other press articles about to be released, by Scilly Up to Date magazine, and Countryfile magazine.

To study the effect on the landscape that this bracken clearing will have, I have contacted and formed an Academic Partnership, with Exeter University, who will arrange students, on internships with this business, to come and stay on site, to monitor, measure and study the effects and benefits to biodiversity, that will be achieved, through the management of Allelopathic, invasive Bracken, which out-competes native, indigenous plants.

The expansion on Land at Lawrences brow, to produce additional recipe crops, will be considerable. This will inevitably increase the need to employ more seasonal workers to help with this expansion, all of the additional workers will require secure accommodation, this facility is currently available on this site, land at Lawrences Brow, St Martins. The detail of the accommodation can be seen below.

A limited company has since been formed, and will in future operate as Fernfuel Ltd, St Martins.

**REPAIR , RENNOVATION AND CONVERSION FOR SEASONAL AGRICULTURAL WORKERS USE**



The planning application asked for the provision of Seasonal agricultural workers accommodation. This conversion is for a unit for Two people to assist in the production of food and growing crops for renewable fuel briquettes, on this site, Land at Lawrences Brow.

The accommodation is stable, secure, warm, dry, well-equipped and is situated directly on the site.

The interior of the refurbished, seasonal agricultural workers accommodation;



There is a double bed, with two under bed storage drawers. Pine Table with 4 chairs.

There are both ceiling, wall lighting, and bedside light, powered by solar panels, three double plug sockets, with phone charge ports. Full Wi-Fi connection to the internet. A double LPG Gas cooking hob. Sink and draining board, Oak work surface. Undercounter Fridge, sink with bilge drawn water, from the harvested water tanks. One oil filled electric portable radiator. A fitted Smoke alarm. A Carbon monoxide alarm, 2 x fire blankets , one fire extinguisher. One clear roof panel for natural light. All furniture, bedding, soft furnishings, pans, crockery, and cutlery are new.

Outside there is 32 sq m of decking with a table and two chairs. A walkway to the shower/wc shed.

This building, is presently undergoing a sympathetic repair, renovation and conversion. It is completely Off-Track, is self-sufficient through generating and storing its own energy, it collects and harvests its own water and deals with any waste material generated. The exterior of the building, with the exception of the installation of a new roof, with solar panels, remains completely unchanged. It is visually exactly the same, as when it was originally erected in 1937.

It is not a draw on any Island resource, in any aspect. It is a commendable use of an existing, under-utilised building.

Local plan (137); Smart islands Plan; “These challenges include improving the resilience, reliability and management of the energy network, securing reliable sources of renewable energy”

*(146) “Promoting more efficient use of water will be essential to help balance the needs of the community and the environment”*

The site directly borders the route of the weekly waste management contractor; therefore, no extra fossil-fuels would be used in the collection of recycling-waste, from the site. The site is 200m close to the island fire/ambulance/first aid station, and 400m to the Island Stores/Post office, for provisions.

Local Plan (100) “In order to achieve suitable development, ensure the most efficient use of land and to protect the environment, development should be directed towards Brownfield sites wherever possible”

The site has no history of flooding, however, as per requirement, a flood evacuation plan was submitted with the planning application. It is completely accessible on foot, by delivery vehicle, or for emergency vehicle access. The site is completely screened by mature pittosporum hedging.

It is a beneficial employment of an already existing building, erected in 1937 to house agricultural workers, by the largest employer, and tenant Farmer on the Island. This is the purpose that the building is required for today.

This is a sympathetic renovation and refurbishment, of an existing building, providing Seasonal accommodation of quality and security. A stable base for those helping manage the land.

Local Plan SC4 "Staff accommodation for businesses will be permitted where there is a functional and operational need.

### SUMMARY

The present business cannot possibly continue, or survive, without adequate staffing.

Previous seasonal agricultural staff, have now been attracted to other employment on the Island, who can offer accommodation.

The business needs bespoke on-site accommodation to enable its continuation.

Finding or providing accommodation is a continuous problem and burden, for all island businesses. The competition, among Island businesses, to attract seasonal staff, for this reason, is very high. No business can attract staff for their continued operation, or expansion, without adequate accommodation.

It is inconceivable that any expansion, for my business, into land not presently turned over to food production can be expanded without adequate localised accommodation. The additional work demands placed on the business, by expansion, and diversification into growing and harvesting crops for a renewable fuel require additional staff, and adequate housing for them.

There is an acute desire among all local businesses to acquire food products locally, for their customers, without expensive freight costs, and damaging fuel miles. The residents and visitors to the Island fully support the need for fresh local produce, which helps local employment and stimulates the local economy. The visitors come here to experience locally grown Organic produce, not food products shipped in from the Mainland. They appreciate the fragile economy of the islands, and are fully supportive of all island businesses, who have to compete with multinational companies, offering low-cost foods. My business offers Organically produced local food.

The recent trial-harvesting of Invasive Bracken, and crops from this land, and their subsequent transformation into fuel Briquettes could only have been achieved by the help of retired, full time Island residents, who offered their free, volunteered support and help, with this exciting, and enterprising new initiative. It is intended to expand crop diversification on this land, and other island under-utilised agricultural land, to produce the needed addition recipe-crops, to form these renewable Fossil-Free fuel Briquettes. All newly sown crops will be grown Organically.

To enable this programme of expansion and diversification, additional trained staff are needed.

This recent trial production of 1.5 tonnes of crops, initiated on 14<sup>th</sup> July 2021, with the harvesting of Invasive Bracken and Organically grown “recipe crops” from the land at Lawrences brow, was reported in the Western Morning News newspaper, Radio Scilly, and Radio 4 Farming Today programme, (4/11/21) Countryfile magazine will later release a feature about this innovative new Fossil-Free fuel initiative.

Presently all spare Island accommodation capacity has been turned over to Seasonal Tourism accommodation making the hiring of staff very difficult.

All employment on the Island comes with tied accommodation, it is impossible to compete, and attract additional staff, without being able to offer accommodation, to help deal with the present overwhelming work. This building was specifically built, in 1937, for the sole purpose of providing seasonal accommodation for agricultural workers. This business has relied comprehensively on it during nearly thirty years of agricultural development on this land.

The majority of Island businesses, in some way, have been able to create seasonal accommodation, to allow and enable their businesses to survive, diversify and expand.

Without the provision of accommodation for workers to staff both existing, and developing businesses, the Island economy would remain static. and eventually suffer severe economic impact, and finally an irretrievable downturn. This is the view of all island business owners, in this fragile and remote Island environment. Every single business here desperately needs, and relies, on incoming seasonal labour to enable their survival. Every business needs accommodation to properly house them, this will encourage them to return, creating stability and continuity, vital for our economy.

At present, due to a shortage in accommodation for workers, some employees are at present having to live temporarily, in tents, on the Island Campsite, or swiftly erected wooden sheds, because of the acute shortage of bespoke accommodation, within this bustling, busy economy.

This is not satisfactory or indeed desired by businesses who wish to offer adequate accommodation to attract staff of quality, and staff with a continued dedication of support, those individuals who will return year on year, investing their experience and skills in the business, and seen by returning visitors, as a familiar and continued worker, of specific business identity.

The present lack of accommodation for workers is now also resulting in a very fast turnover of staff, who come for just one season, but are not prepared to return to those businesses, without adequate accommodation being provided.

The council has recently (2021) approved planning permission for Five Shepherds huts on St Martins, for businesses to supply their businesses with staff and agro-tourism income.

Two more additional Shepherds huts, for Seasonal workers use, on St Martins, are currently in the planning process. Permission for these, I believe, will be granted by Delegated powers, as I have been told by the proposed applicants, here in my Community.

The council itself recently announced “An Acute housing Crisis”, a vote for a motion declaring a “Housing emergency” was recently deferred.

To help serious accommodation problems, the Council has recently purchased a building, on St Marys, in excess of £700,000, to house three essential workers families, because of a shortage of employee accommodation.

**I believe that this appeal, historically and comprehensively demonstrates the Past, Present and Future need for this application for on-site, Seasonal workers accommodation.**

**This is vital, the business cannot continue, diversify or expand without this provision for essential workers here on St martins.**

**I ask for this appeal to be upheld, and the permission for Seasonal Agricultural Workers Accommodation, for this building, to be granted.**

**Yours Sincerely,**

**T Tobin-Dougan**

**Ganilly**

**St Martins**

**Isles of Scilly**

**TR25 0QL**

