



Historic England

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Mr Andrew King  
Council of the Isles of Scilly  
Town Hall  
The Parade  
St Mary's  
Isles of Scilly  
TR21 0LW

Direct Dial: 0117 9750671

Our ref: P00505481

14 April 2016

Dear Mr King

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015**

**TAMARISK, GARRISON ROAD, THE GARRISON, ST MARY'S, TR21 0LS  
Application No P/16/021/FUL**

Thank you for your letter of 21 March 2016 notifying Historic England of the above application.

**Summary**

The application is for remodelling of an existing bungallow, incorporating an increase in ridge height of c1.5m. This has the potential to result in harm to the settings of designated heritage assets. The application is supported by a Heritage Impact Statement (HIS), however, the application still fails to adequately demonstrate the full impact of the proposals.

**Historic England Advice**

The proposals have the potential to result in increased visibility over the Scheduled Garrison Walls and adjacent Grade II Listed Hugh House. This may result in harm to these assets significance through impacts on their setting.

The Garrison Walls are designated as part of the Scheduled Monument, Post-medieval breastwork, curtain wall and associated defensive structures on the periphery of The Garrison, St Mary's (1018370), and are also Listed at Grade I. The walls themselves, incorporating a number of battery's and gun platforms were built from the turn of the 17th century until the end of the Napoleonic Wars in 1815, although they were adapted and modified throughout the 19th and mid 20th centuries. The section of wall that Tamarisk, and Hugh House, look out over dates from the first phase of building c1601, having been preceded only by the building of Star Castle between 1593 and 1594.

The Garrison Walls provide important evidence for the long history of fortification of the



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Scilly Isles in general, and St Mary's in particular. As the earliest, and arguably most imposing section, they are particularly susceptible to harm as a result of development within their circuit where that development overtops or is visible beyond the defensive walls.

Hugh House itself is Listed at Grade II (1141186), and was built in 1792 as an Officers Mess for the Garrison. It is an imposing building and is the dominant structure in views over these sections of the wall. As the dominant structure Hugh House is particularly significant as an indicator of the increased importance of the defences and their intensification of use as a permanent garrison. That the building is so dominant is a significant element of its design and the increased importance and status of the garrison.

The proposed development will have the potential for both direct and indirect harm on the designated heritage assets described above. The direct harm that would result from an increased footprint is not of concern and may be dealt with by the imposition of a planning condition requiring archaeological mitigation through the provision of a programme of archaeological works subject to a Written Scheme of Investigation. Such a condition is outside the remit of Historic England and we recommend that you consider the advice of your specialist archaeological planning advisor on this matter.

The potential indirect impact that will result from the increase in ridge height is, however, of more concern. Although there will be little or no increased visibility from the walls or battery's, the key issue is that of views across the walls from Hugh Town, Porthcressa and beyond. With regards the impact on the Garrison Walls, whilst we welcome the summary in the HIS, we are not convinced by the arguments proposed regarding the "minor or moderate benefit" to the setting of the assets as a result of "good design acknowledging local vernacular and materials". In particular we remain to be convinced that the increased scale and mass will offset the current "modern architectural style of Tamarisk - materials, form and detailing that make no reference to their context".

Similarly, we remain to be convinced that the impact of the increased scale and massing on the dominance of Hugh House has been adequately addressed. Whilst it is true that Tamarisk is set back in relation to Hugh House, that has little bearing on distant views from, for instance, Porthcressa, where the increased ridge height has the potential to vie with Hugh House for dominance.

As the application affects a listed building, the statutory requirement to have **special regard** to the desirability of preserving the building, its setting and any features of special interest (ss.16, 62, 1990 Act) must be taken into account by your authority when making its decision.

Under the NPPF it is a **core planning principle** to conserve heritage assets in a



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manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (para.17 NPPF). When considering the impact of a proposed development on the significance of a designated heritage asset, **great weight** should be given to the asset's conservation. No other planning concern is given a greater sense of importance in the NPPF. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, **any harm or loss should require clear and convincing justification** (para.132, NPPF). The onus is therefore on you to rigorously test the necessity of any harmful works.

If a proposal cannot be amended to avoid all harm, then if the proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (para.132, NPPF). Where a proposed development would lead to substantial harm to or total loss of significance, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is **necessary** to achieve substantial public benefits that outweigh that harm or loss, or all of the tests in paragraph 133 of the NPPF apply.

Substantial harm to or loss of a grade II listed building, (park or garden) should be exceptional. Substantial harm to or loss of grade I and II\* listed buildings, (grade I and II\* registered parks and gardens, scheduled monuments, World Heritage Sites, battlefields and protected wreck sites), should be wholly exceptional (para.132 NPPF).

*Para 128 of the NPPF requires local planning authorities to "require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."*

In this instance we believe that there is potential for harm to the two designated heritage assets discussed. The key issue being whether that harm is sufficient to require an objection from Historic England and refusal of the application by your authority. In this we would advise that the supporting information provided is still insufficient to fully determine that level of harm. For this reason we would, again, recommend that the applicant produce good quality visualisations sufficient to demonstrate the actual level of visibility of the proposed development. We would recommend that these visualisations take the form of one or two photomontage taken from the Porthcressa Beach area and based on 80mm fixed focal length single image



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base photography. Upon receipt of this we would advise that it will be possible to safely identify the level of potential harm and advise your authority further.

**Recommendation**

The application will result in an increase in scale and massing over the existing structure and as such will have an impact on the setting of the Scheduled Garrison walls and Listed Hugh House. Historic England believe that this will result in harm to the significance of these assets and recommend that good quality photomontage based on 80mm fixed focal length single image base photography be produced to demonstrate the actual increase in visibility in relation to the Garrison walls and in scale in relation to the adjacent Hugh House.

Historic England recommend that the application be refused or deferred until such visualisations have been made available.

We would welcome the opportunity of advising further. Please consult us again if any additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity.

Yours sincerely

**Nick Russell**

Assistant Inspector of Ancient Monuments  
E-mail: [nick.russell@HistoricEngland.org.uk](mailto:nick.russell@HistoricEngland.org.uk)  
cc L Walton CloS



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