



Historic England

SOUTH WEST OFFICE

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Direct Dial: 0117 975 1308

Our ref: P00885830

4 June 2018

Dear Ms Walton

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990
TREGARTHEN'S HOTEL, GARRISON HILL, HUGH TOWN, ST MARY'S.
Application No. P/18/031/FUL**

Thank you for your letter of 8 May 2018 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

The proposals comprise a revised scheme for redevelopment of Tregarthen's Hotel including the following elements: Erection of a pair of semi-detached dwellings for restricted holiday letting (use class C3) including associated landscaping; Alterations to external facade of hotel lounge and hotel bedrooms including replacement windows/doors, formation of new windows and removal of existing chimney; Formation of a new pedestrian opening in the existing wall adjacent to Garrison Hill; Formation of external seating areas and new balustrades to hotel rooms and hotel lounge; Installation of ground source heat pump/loop, break tank for foul sewage; Replacement flagpole; Downlights on existing lettering on front of main hotel block; Downlights and new external lettering on rear of main hotel block; Additional external lighting to wall on Garrison Hill (hotel side).

Historic England's advice has focused primarily on ensuring that any development on the site is achieved without harmful impact on the significance of designated heritage assets, in particular but not exclusively those on The Garrison. We have continued to take a holistic approach to advising on proposals for development on the Tregarthen's site, assessing the impact across the designated heritage assets affected.

Significance of Designated Heritage Assets

Historic England has previously provided your authority with detailed assessments of the significance of the designated heritage assets surrounding the Tregarthen's Hotel site (P/15/0101 HE Reference P00472897 24 September 2015; P/16/055 HE



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Reference P00514443 06 July 2016). In the context of the current application we will therefore focus on the particular elements of significance which we consider have potential to be affected by these proposals.

The scheduled and Grade I listed Garrison wall forms one of England's most impressive post-medieval defensive works. Due to the infeasibility of defending all the islands individually, its role in the defence of St Mary's was integral to the defence strategy for the archipelago as a whole. The part of the wall behind Tregarthen's Hotel is the oldest section, and is of great historic importance. It has the densest concentration of batteries and a strong visual relationship with other surviving defensive structures and the wider landscape. Its strategic position across the neck of land between Porthcressa and the Quay remains especially clear. Open views to and from the wall allow an understanding of its military function and the clear sightlines are an essential feature of its design.

Garrison Hill links the Garrison Gate with the historic core of the town of St Mary's. The gate and the lane leading to it up the steep gradient of the hill and beyond to Star Castle are key elements in views towards the Garrison particularly from the east. The rubble boundary walls on either side of the lane, into which an additional gated opening is proposed on the northern side in the current scheme, are an important feature which helps to frame this visually distinct historic route and the entrance to the Garrison. The walls contribute to a sense of enclosure with only glimpsed views into adjacent gardens and properties, and the sudden opening up of views across the roofs to the bay below. This character makes a strong contribution to the experience of walking down from the Garrison into the town. The separation of the Garrison from the town is an important aspect of its defensive function and therefore its significance.

The original Regency style house of Tregarthen's Hotel, later converted by its owner to a hotel, has been much altered and has suffered from incremental unsympathetic accretions. Despite this it is a prominent building and non-designated heritage asset within the Conservation Area, and in views towards the Garrison area of St Mary's including from the quay and Rat Island, on the seaward approach, and from the east. It is seen in many of these views within the context of the Garrison Walls which define the western boundary of the site.

Impact of Proposed Development

Consent was previously granted in 2016 for an application to remodel the hotel on which Historic England advised regarding the positive enhancements this scheme offered by removing, rebuilding or redesigning detracting elements in a manner more sympathetic to the domestic character of Hugh Town. However we also indicated our objection to those elements of the proposals which further screened the Garrison wall behind the hotel in key views from the breakwater and in longer views such as from the area around the lifeboat station. The advice below takes the same position in relation to this key aspect of historic significance.



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Historic England is pleased to see those elements of the current proposal which offer potential for sympathetic enhancement of the Tregarthen's site and the significance of surrounding designated heritage assets. We would strongly advise that a strategic approach be taken by the local authority to considering all further development on the site addressing potential to remove or mask the more harmful elements of earlier extension and improve the character and appearance of the conservation area. In the event various elements of a revised version of the 2016 scheme come forward we would recommend that these are conducted on the basis of an overall masterplan to ensure a consist approach and a clear understanding of any cumulative impact, whether that be positive or negative. Previous schemes have included for the removal of elements on the current site up against the curtain walls and we would welcome the progression of this potential for enhancement.

Notwithstanding this we have highlighted specific areas of the application where we have concerns regarding the potential harmful impact of the proposals and advise that your authority should consider carefully whether there is sufficient information at the current time to fully understand the effect of these elements [NPPF 128], whether their inclusion in the proposed scheme has been clearly and convincingly justified [NPPF 132], whether any harm can be minimised through (for example) amendments to design [NPPF 129], and whether any residual harm is ultimately outweighed by public benefits associated with the proposals [NPPF 134].

In our opinion additional information in the form of further visualisations including photomontages as opposed to sketch drawings is required. These should provide a visual context for the submitted elevations in relation to the surrounding urban and historic landscape to assist your authority in understanding and assessing the impact of the current proposals and if necessary to identify how any harm might be avoided or reduced.

- New Opening on Garrison Hill

We consider that there is potential for harm to be caused to the sense of enclosure experienced along Garrison Hill which makes a strong contribution to the significance the designated heritage assets on the Garrison derive from their settings. A clear justification for the incorporation of a new gated opening is required given its proximity to the adjacent entrance. The angle of access of the proposed entrance means that it is splayed wider than the existing simple entrance to the east. In the event your authority consider this new entrance is justified we advise that you consider the detailing carefully to ensure that the sense of enclosure is not reduced and any harm to the significance of designated heritage assets is therefore minimised.

- Introduction of Glass Balustrades

We consider that there is potential for harm to be caused by the introduction of glass



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balustrades around newly formed terraces which will appear in front of the Garrison Wall as it is viewed in particular from the quay, Rat Island and on the seaward approach. At present the existing flat roof preserves an uninterrupted view of this section of the wall which as advised above is of particular sensitivity being the oldest section and of great historic importance. It is not clear from the information submitted what visual impact the proposed balustrading would have and how intrusive it might appear in these views of the wall. We would advise that consideration should also be given to the visual impact of proposed glass balustrading on the elevation for the hotel lounge given the prominence of this face of the building in views of this part of Hugh Town. We advise that your authority should request additional visualisations clearly illustrating the appearance of the proposed balustrading in key views.

- Flagpole, Signage, Lighting, New Window Detailing

In relation to aspects such as the proposed flagpole, signage and lighting, your authority should ensure that you receive sufficient information to assess the potential visual impact. The submission of photomontages of the proposals would be helpful in making this assessment, in particular to assessing the impact at night of lighting in relation to lighting within the Garrison site.

- Archaeological Impacts

In relation to the archaeological impacts, in the event your authority is minded to grant consent, we would advise that a proportionate and appropriate scheme of archaeological monitoring and recording is required. The Desk Based Assessment (DBA) identified a high potential for archaeological remains directly relating to the significance of the Garrison with potential to be of equivalent significance to that of a scheduled monument. Given this we would be unlikely to consider, in the absence of intrusive evaluation, that a 'watching brief' is appropriate to deal with the eventuality of nationally important archaeological remains being identified which may necessitate either further investigation and recording, or amendment of ground works proposals to facilitate preservation of such remains in situ. In our experience any such risk would be more appropriately addressed through a flexible approach to the programme of archaeological work required in consultation with your authority's archaeological advisors.

Planning Policy Context

Historic England's advice is provided in line with the importance attached to significance and setting with respect to heritage assets as recognised by the Government's *National Planning Policy Framework (NPPF)* and in guidance, including the *Planning Practice Guidance (PPG)*, and good practice advice notes produced by Historic England on behalf of the Historic Environment Forum (*Historic Environment Good Practice Advice in Planning Notes (2015 & 2017)*).

The policies in the NPPF articulate Government's view of the importance of giving



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great weight to the conservation of designated heritage assets as part of sustainable development, demonstrating an understanding of heritage assets as an irreplaceable resource [NPPF 132]. The policies make it clear that sustaining, enhancing and better revealing the significance of heritage assets is considered desirable [NPPF 131, 137] and recognise the role of new development in meeting these objectives, delivering benefits for communities [NPPF 17].

The same weight is also reflected in the requirement for clear and convincing justification for any harm caused to a heritage asset's significance [NPPF 132] and in the need to try to avoid or minimise conflict between a heritage asset's conservation and any aspect of a proposal [NPPF 129]. Whilst some are given equal importance, no other planning concern is given a greater sense of importance in the NPPF. The policy confirms that significance can be harmed or lost through alteration or destruction of a heritage asset or development within its setting [NPPF 132]. In many cases non-designated heritage assets are important components within the setting of a designated asset and the NPPF indicates the need to take account of their significance under the planning process [NPPF 135].

The importance of the sufficiency of information submitted in relation to any proposal is highlighted. The NPPF sets this out to assist local authorities in identifying what they need to understand the significance of any heritage assets affected including the contribution made by their setting [NPPF 128]. In this way the policy framework ensures that local authorities' own assessment of the impact of a proposal will take account of this significance and can identify opportunities for conflict to be avoided or minimised as part of the decision making process [NPPF 129].

Historic England Position

Historic England has not been able to assess the visual impact of all elements of the proposals due to the lack of visual demonstration of the assessed impacts submitted for comparison with the scaled plans and elevations. In particular we consider that visualisations, including photomontages, of the changes to the current elevations are required. We consider, for example, that clear information illustrating how the proposed new glass balustrades added to the existing flat roof at first floor level are viewed against the extent of Garrison Wall behind is necessary to inform your authority's determination of this application. The elevations drawings do not provide this visual context within which the application needs to be assessed due to the potential impact on the historic environment.

Recommendation

Historic England has concerns regarding the application on heritage grounds. These concerns principally involve the potential visual impact of certain elements of the current proposal on the nationally important scheduled monument of the Garrison Walls which are also Grade I listed [NPPF 132]. They also involve the sufficiency of the information provided to assist your authority in making your determination in



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accordance with the policies of the NPPF relating to designated heritage assets [NPPF 128, 129].

We consider that the second of these concerns can be addressed through the provision of additional information in the form of visualisations and photomontages. On this basis Historic England will be able to advise further regarding the level of any harm caused by the elements of the proposals outlined in our advice above. We are not able to make more detailed recommendations at this time regarding whether any modifications might be necessary to address our concerns. We recommend that you request the additional visualisations discussed above and ask that you forward these to us so that we can provide further advice.

In considering whether you have sufficient information to determine the application at this point you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and of section 72(1) to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

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