



Historic England

SOUTH WEST OFFICE

Mr Andrew King  
Planning & Development Department  
Council Of The Isles Of Scilly  
Old Wesleyan Chapel  
St Mary's  
Isles Of Scilly  
TR21 0JD

Direct Dial: 0117 975 0676

Our ref: P00960988

5 September 2018

Dear Mr King

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**WOOLPACK BATTERY, THE GARRISON, ST MARY'S  
Application No. P/18/058**

Thank you for your letter of 16 August 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 proposal seeks consent for a series of internal works to the Woolpack Battery to facilitate its change of use for seasonal accommodation for staff employed at Tregarthen's Hotel. Historic England has provided pre-application advice regarding these proposals to the applicant as your authority is aware, and visited the site earlier this year with our specialist engineering team to assess the potential impact of the proposals.

*Significance of Designated Heritage Asset*

The late 19th-early 20th century Woolpack Battery on The Garrison, the south western promontory of St Mary's in the Isles of Scilly, is designated as a scheduled monument (SM 15436; NHLE 1014783) and Grade II listed building (NHLE 1218945). The monument includes a large gun battery situated behind the southern crest of the summit plateau of The Garrison. The battery is one of two complementary gun batteries, with a barracks/caretaker's quarters between them, built between 1898 and 1901 and forming part of a defensive system designed to protect a naval signalling and re-fuelling station then being established on the islands. The defences were operational until 1906 but the monument also includes minor structures from reuse of the site during World War II. The built and earthwork structures in this monument are also Listed Grade II. The listing extends to include the built structures of the battery's underground magazine and war shelter which are excluded from this scheduling, although the ground beneath and above is included. For this reason Scheduled



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Monument Consent (SMC) will be required for the proposed scheme in addition to planning and listed building consent. The significance of the battery is well covered in the submitted Built Heritage Statement in fulfilment of the requirements of paragraph 189 of the NPPF.

*Impact of Proposed Development*

The proposals involve the incorporation of additional external windows into the light well, additional internal partitions to create separate living space for individuals, addition of a new interior window, and installation of facilities associated with kitchens and bathrooms.

The partitioning will to some extent affect the experience and understanding of the former use of the larger rooms. Similarly the introduction of new windows will affect the understanding of the operation and function of the site and its underground magazine and war shelter. It will therefore in our view cause some harm to the significance of the Grade II listed building and hence the scheduled monument. We would refer you to and recommend you are guided by your specialist conservation adviser in relation to the details of the internal proposals.

In both regards Historic England considers that the impact of the proposals can be further mitigated through enhancement of the interpretation of the site making clear what alterations have been made in the interests of identifying a viable use for the structure.

Notwithstanding the harm caused we also consider that the regeneration of the site together with the proposed repairs and provision for long term management represent a very positive enhancement and benefit in heritage terms.

*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)). In recognition of the other consents required it is also provided with regard to the consent process for works to scheduled monuments under the *Ancient Monuments & Archaeological Areas Act, 1979* and government policy relating to scheduled monuments (*Scheduled Monuments & nationally important but non-scheduled monuments, DCMS 2013*).

The policies of the NPPF make it clear that sustaining and enhancing the significance of heritage assets is considered desirable and recognise the importance of putting heritage assets to viable uses consistent with their conservation as well as the positive contribution that conservation of heritage assets can make to sustainable communities



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[NPPF 192]. They highlight the importance of giving great weight to the conservation of designated heritage assets demonstrating an understanding of heritage assets as an irreplaceable resource as reflected in the requirement for clear and convincing justification for any harm caused to their significance [NPPF 193/194]. 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 the heritage asset [NPPF 194]. In all cases where development will lead to harm to designated heritage assets, the NPPF places the onus on the determining body to rigorously test the public benefits against the level of harm caused [NPPF 195 & 196] and makes it clear that harm which is less than substantial is not considered to be automatically acceptable [NPPF 193 - 196].

*Historic England Position*

Historic England welcomes submission of a proposal that engages with the need for a long term viable and sustainable use for the Woolpack Battery that is consistent with its conservation as a nationally designated heritage asset. The Battery is currently on Historic England's Heritage At Risk Register due to water ingress into the below ground structures and slow decay as a result of a continued period without a permanent use. It was last occupied for seasonal residential accommodation in 2015. Whilst the application will cause some harm to the significance of the heritage asset we consider this to be justified by the proposed programme of repairs to the structure associated with the conversion, the commitment to produce a management plan with a clear timeline for removal of the asset from the Heritage At Risk Register within 5 years, and the regeneration of the asset through putting it to a viable use. Historic England was pleased to be approached by the applicant for pre-application advice earlier this year and can confirm that the current submitted scheme takes good account of the advice we provided. We consider that a schedule of proposed repairs should be agreed as part of any consent granted and would be pleased to offer more detailed advice in this regard to assist your authority further drawing on the experience and detailed reports produced by our Civil & Structural Engineering Team.

**Recommendation**

Historic England supports the application on heritage grounds.

In our opinion the application offers an opportunity to develop the use to which the battery was previously converted into a long-term sustainable solution for this structure on our Heritage At Risk Register. In our assessment the harm caused to the significance of the heritage asset is justified in the interests of putting it to a sustainable and viable use consistent with its conservation. We therefore consider that the application meets the requirements of the NPPF, in particular paragraph numbers 189, 192 and 196. Historic England will ensure that we work collaboratively with your authority and your specialist conservation and archaeological to ensure that the treatment of those elements of the proposals which will also require SMC are fully aligned.



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In determining this application you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses and under section 72(1) to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. You should also bear in mind the statutory duty under section 85(1) of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of AONBs.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely

**Dr Helen Woodhouse**

Principal Inspector of Ancient Monuments

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