



Historic England

Ms Lisa Walton
Council of the Isles of Scilly
Planning department, Town Hall
The Parade
St Mary's
Isles of Scilly
TR21 0LW

Direct Dial: 0117 975 0732

Our ref: P01315850

22 December 2020

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, ISLES OF
SCILLY, TR21 0PP
Application No. P/20/090/FUL**

Thank you for your letter of 23 November 2020 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 development within the Tregarthen's Hotel site - the erection of five micro lodges for holiday letting, with associated waste treatment plant and landscaping.

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 Ref P00472897 24 September 2015; P/16/055, HE Ref P00514443 06 July 2016; P/18/031/FUL, HE Ref P00885830 4 June 2018). We have also provided pre-application advice on previous schemes, although not for the current proposals.

The significance of the designated heritage assets

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



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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 the proposed development

Consent was previously granted in 2019 for an application for two, two storey, semi-detached dwellings in an L-shape, providing additional holiday accommodation. This scheme has not been built out and the current proposal for 5 micro lodges is now submitted as an alternative provision of holiday accommodation with reduced expense associated with spoil removal.

The micro-lodges are located towards the front of the kitchen garden in a linear arrangement on the most level part of the site. The logic for locating them in this position from a cost / spoil removal perspective, and also in terms of maximising views is clear. However, the impact of this arrangement on views towards Garrison Hill includes the partial obscuring of a section of those rubble walls which are important in understanding the significance and the broader setting of the Garrison Gate and Star Castle. The Heritage Addendum Statement addresses this impact, and explains that the level of minor harm caused is different, but equivalent to, the harm caused by the previous consented scheme.

Notwithstanding the above, we consider that the avoidance of harm would be a better





outcome for the proposal, and that an alternative layout may successfully achieve this aim. We have no objection to the height, form, use or design of the micro lodges, but consider that their arrangement within the kitchen garden could be amended to address the blocking effect that they currently create. The L-shaped arrangement of the previous scheme tucked the development into the site and provided open views to the Garrison Walls. We recommend that a layout similar to this is considered, which may have the beneficial outcome of providing some communal open green space to the front of the lodges.

In relation to the archaeological impacts, we would advise that a proportionate and appropriate scheme of archaeological monitoring and recording is still required given ground works associated with the sewage treatment plant in this iteration, or other additional soil removal in a future iteration of the scheme of a different layout. The Heritage Addendum addresses the issue of likelihood of archaeology being found in this area and we consider that it makes several valid points. We therefore recommend that you seek the additional professional input of your own archaeological advisors as to the level of monitoring and recording required.

Historic England Position

This is a sensitive and important site with several very highly designated assets in close proximity. Any proposal should be considered against the need for great weight to be applied to the conservation of heritage assets, with greater weight being applied the more important the assets (National Planning Policy Framework (NPPF), paragraph 193). The significance of heritage assets can be harmed by development within their setting. Where harm is caused, clear and convincing justification must be provided (NPPF 194). In our opinion, because alternative layouts for the micro-lodges are likely to reduce or even remove the harm caused, such justification is lacking.

Recommendation

Historic England has concerns regarding the application on heritage grounds. These concerns relate to the blocked effect that the micro lodges will create to the rubble walls associated with Garrison Hill, harming the significance of the heritage assets where a part of that significance stems from their setting. We recommend that amendments to the layout of the scheme are sought to address our concerns and remove the identified harm.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 193, 194 and 196 of the NPPF.

In determining this application 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





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features of special architectural or historic interest which they possess; and section 72(1) of the same Act, 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

Catherine Marlow

Catherine Marlow

Inspector of Historic Buildings and Areas

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