

TREGARTHEN'S HOTEL, ISLES OF SCILLY

Addendum to the Built Heritage Statement and Archaeological Desk-Based Assessment

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1 INTRODUCTION

- 1.1 This Addendum is provided as a supplement to the Built Heritage Statement and the Archaeological Desk-Based Assessment that were produced in 2018 to support the consented planning application [reference: P/18/031/FUL] for the redevelopment of the Tregarthen's Hotel, Hugh Town, Isles of Scilly (hereafter 'the Site'). The planning consent included for the development of a pair of semi-detached dwellings for restricted holiday letting (use class C3) and associated landscaping within the Hotel's northern garden. The Addendum has been researched and prepared by RPS Heritage (formerly CgMs) on behalf of Tregarthen's Hotel Ltd, to assess the potential impact on the historic environment arising from a revised scheme for development within the northern garden at the Tregarthen's Hotel comprising five class C3 micro lodges and associated landscaping. This revised scheme will significantly reduce the volume of material requiring excavation from the Site, as both the 2018 consented scheme and a subsequent amended scheme consented in 2019 [reference: P/19/037], have been found to be unviable due to the costs associated with removing significant amounts of spoil.
- 1.2 The original Built Heritage Statement and Archaeological Desk-Based Assessment make suitable reference to the relevant legislation contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Ancient Monuments and Archaeological Areas Act 1979 (as amended by the National Heritage Act 1983 and 2002, updated in April 2014), and both national and local planning policy. In addition, relevant Historic England guidance, notably *GPA2 Making Changes to Heritage Assets* and *GPA3: The Setting of Heritage Assets*, were consulted to inform judgements made. This Addendum does not repeat the detail of relevant legislation, policy and guidance where this remains unchanged since the production of the 2018 Statement but has been delivered with appropriate professional regard to these items. Where relevant policy and guidance has changed since the production of this original report, this is outlined below in Chapter 2.
- 1.3 Similarly, the historiography and the assessment of the Site's significance provided in the original Built Heritage Statement is not repeated here, nor is the detailed assessment of the Site's archaeological potential. However, this Addendum has been delivered with due regard to these reports' assessment of the significance of relevant heritage assets and the Site's archaeological potential. The Addendum will need to be read in conjunction with the Built Heritage Statement and Archaeological Desk-Based Assessment supporting the 2018 consented scheme.
- 1.4 The findings of this report are based on the known conditions at the time of writing and all findings and conclusions are time limited to no more than two years from the date of this report.

2 LEGISLATION, PLANNING POLICY & GUIDANCE

- 2.1 Since the original Built Heritage Statement was produced in 2018, there have been no changes to relevant legislation, which is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Ancient Monuments and Archaeological Areas Act 1979 (as amended by the National Heritage Act 1983 and 2002, updated in April 2014). Likewise, no relevant alterations or additions have been made to Historic England guidance documents, nor those provided by the local planning authority, the Council of the Isles of Scilly.
- 2.2 Where changes have been made to the National Planning Policy Framework (February 2019), these are outlined below. The Council of the Isles of Scilly is also now at an advanced stage of preparing a new Local Plan, which is known as the Isles of Scilly Local Plan 2015-2030. As this Local Plan is close to completion and adoption it may now be given more weight in the consideration of planning applications. Relevant policies are therefore also outlined below.

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, February 2019)

- 2.3 The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied and was most recently updated in February 2019.
- 2.4 In this current version, Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are '*an irreplaceable resource, and should be conserved in a manner appropriate to their significance*'.
- 2.5 Of particular relevance in this case are Paragraphs 189-201, which are concerned with the potential impacts of proposed developments on the historic environment.
- 2.6 For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 190, which requires LPAs to take this assessment into account when considering applications.
- 2.7 Under '*Considering potential impacts*' the NPPF emphasises that '*great weight*' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.
- 2.8 Paragraph 195 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 196 requires this harm to be weighed against the public benefits of the proposed development.
- 2.9 Paragraph 200 notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. It also states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset should be treated favourably.
- 2.10 Furthermore, paragraph 201 states that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. When determining the impacts arising from the loss of a building or element that does positively contribute, consideration should be given to the

relative significance of that building and the impact to the significance of the Conservation Area or World Heritage Site as a whole.

Isles of Scilly Local Plan 2015-2030 (submission draft, July 2019)

- 2.11 The Council of the Isles of Scilly is at an advanced stage of preparing a new Local Plan, which will guidance development on the Isles of Scilly until the year 2030. The Plan was subject to examination in January 2020 and a public consultation is being held on the proposed main modifications to the plan between 25th September and 6th November 2020. Although yet to be adopted, relevant policies, which may be given weight in the decision-making process, are set out below.

Policy SS2 Sustainable Quality Design and Place-Making

'(1) Development will not be permitted if it considered to be of poor or unsustainable design. New development must be of a high-quality design and contribute to the islands' distinctiveness and social, economic and environmental elements of sustainability by [inter alia]:

- a) Respecting and reinforcing the character, identify and local distinctiveness of an area whilst not stifling innovation, and with the scale, density, layout, height, mass and materials responding positively to the existing townscape, landscape and seascape setting;*
- b) Ensuring that development does not dominate or interrupt important public views, key landmark buildings or significant cultural and heritage features; making efficient use of the land whilst respecting the character of the site and surrounding area and neighbouring land uses;*

[...]

(2) Development proposals that involve the construction or conversion of buildings will need to be supported by a statement of Sustainable Design Measures (SDM) and a Site Waste Management Plan (SWMP).'

Policy OE7 Development Affecting Heritage

'(1) Great weight will be given to the conservation of the islands irreplaceable heritage assets. Where development is proposed that would lead to substantial harm to assets of the highest significance, including undesignated archaeology of national importance, this will only be justified in wholly exceptional circumstances, and substantial harm to all other nationally designated assets will only be justified in exceptional circumstances. Any harm to the significance of a designated or non-designated heritage asset must be justified.

(2) Proposals causing harm will be weighed against the substantial public, not private, benefits of the proposal, and whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long-term use of the asset;

(3) in those exceptional circumstances where harm to any heritage asset can be fully justified, and development would result in the partial or total loss of the asset and/or its setting, the applicant will be required to secure a programme of recording and analysis of that asset, and archaeological excavation where relevant, and ensure the publication of that record to an appropriate standard in a public archive.

(4) proposals that will help to secure a sustainable future for the islands' heritage assets, especially those identified as being at greatest risk of loss or decay, will be supported.

(5) Conservation Area

Development within the Isles of Scilly Conservation Area will be permitted where:

- a) it preserved or enhances the character or appearance of the area and its setting;*
- b) the design and location of the proposal has taken account of:*
 - i. the development characteristics and context of the area, in terms of important buildings, spaces, landscapes, walls, trees and views within, into or out of the area; and*
 - ii. the form, scale, size and massing of nearby buildings, together with materials of construction.*

(6) Listed Buildings

Development affecting Listed Buildings, including alterations or change of use, will be supported where:

- a) It protects the significance of the heritage asset and its setting, including impacts on the character, architectural merit or historic interest of the building; and*
- b) materials, layout, architectural features, scale and design respond to and do not detract from the Listed Building; and*
- c) a viable use is proposed that is compatible with the conservation of the fabric of the building and its setting.*

(7) Scheduled Monuments and Archaeology

Proposals that preserve or enhance the significance of Scheduled Monuments or Archaeological Sites, including their setting, will be supported where measures are to be taken to ensure their protection in situ based upon their significance. Where development would involve demolition or removal of archaeological features, this must be fully justified, and provision must be made for excavation, recording and archiving by a suitably qualified person(s) prior to work commencing, to ensure it is done to professional standards. Development within the Garrison on St Mary's (i.e. any land or building within the Garrison Wall Scheduled Monument) and its setting should accord with the Garrison Conservation Plan 2010 (or any successor plan). Proposals that would result in harm to the authenticity and integrity of the Garrison as a strategically important coastal defensive site should be wholly exceptional. If the impacts of a proposal are neutral, either on the site's significance or setting, then opportunities to enhance or better reveal significance should be taken.

[...]

(9) Non-designated Local Heritage Assets

Development proposals that positively sustain or enhance the significance of any local heritage asset and its setting will be permitted. Alterations, additions and changes of use should respect the character, appearance and setting of the local heritage asset in terms of the design, materials, form, scale, size, height and massing of the proposal. Proposals involving the full or partial demolition, or significant harm to a local heritage asset will be resisted unless sufficient justification is provided and the public benefits outweigh the harm caused by the loss of the asset.

(10) All development proposals should be informed by proportionate historic environments assessments and evaluations (such as heritage impact assessments, desk-based appraisals, field evaluation and historic building reports) which identify the significance of all heritage assets that would be affected by a proposal, and the nature and degree of any effects; and which demonstrate, in order of preference, how any harm will be avoided, minimised or mitigated.'

3 PROPOSALS

Background

- 3.1 In 2016, a permission was granted for the redevelopment of the Tregarthen's Hotel which was to include *'landscaping works to form outdoor dining terraces on former hotel garden and re-profiling of garden'* [reference: P/16/055].
- 3.2 In 2018 a revised scheme for the Hotel's redevelopment was granted permission, which included the *'erection of a pair of semi-detached dwellings for restricted holiday letting (use class C3) including associated landscaping'* within the Hotel's derelict former kitchen garden [reference: 18/031/FUL]. The permitted C3 units were to comprise a pair of cottage-style dwellings with an 'L' shaped footprint with their main axes running parallel with the existing cottages of Gibson and Hendra, which lie to the east of the northern garden. In order to retain outward views from those parts of the hotel to the rear of the northern garden and minimise the potential for screening of parts of the Garrison Wall, these dwellings were to be cut into the slope of the garden.
- 3.3 In 2019, permission was granted for a *'variation of condition 2 (approved plans) of planning permission P/18/031/FUL to...relocate and reduce the scale of the new units known as 'Crump' & 'Kittern' cottages including amendments to the landscaping details as approved under condition 16 of P/18/031/FUL to accommodate these changes'*. This proposal was submitted in response to engineering and construction challenges that made delivery of the 2018 scheme unsustainable and unviable. It was designed to revise the permitted scheme to minimise excavation into the Site and - to ensure the development did not sit more prominently - included a reduction in the scale of 'Crump' from the originally approved two storeys to a single storey.
- 3.4 However, as detailed in the Planning Statement accompanying the current application (Jackson Planning, 2020), the applicant has since had to reconsider the scheme for rationalisation of the Tregarthen's Hotel. This is due to continued practical difficulties with the disposal of spoil/construction waste, which mean the consented scheme for the former kitchen garden is not viable to implement. An alternative solution has therefore been developed, which is the subject of this application and outlined below.

Current Proposals

- 3.5 The current proposals comprise five micro lodges (restricted use class C3) and associated landscaping. The lodges will be located to the north of the derelict former kitchen garden, facing towards the harbour, with a new opening created within the existing stone garden wall to the lower part of the site to provide pedestrian access from the east to the front of each lodge.
- 3.6 Commensurate with their eco credentials, the micro lodges adopt a contemporary rather than traditional vernacular design. Nevertheless, within this architectural mode the design of the lodges has been sympathetically shaped to respond to the advice given in the Scilly Design Guide and the specific character of the Site and its immediate context within the north-western part of Hugh Town.
- 3.7 The single-storey lodges will be of a small scale, which will fit with the fine-grained and low-scale morphology characteristic of Hugh Town's townscape. The scheme will be lower in overall height than Gibson and Hendra and will sit approximately 1 metre below the height of the dwellings permitted in the current extant planning application (P/19/037/FUL).
- 3.8 The proposed lodges are redolent of Gibson and Hendra's gabled form, with a pitched roofscape addressing the waterfront in the same manner and in-keeping with both that of Hendra and Gibson and the wider Hugh Town townscape, of which this is a characteristic feature.

- 3.9 Many newer buildings within the Site's immediate surrounds have a rendered finish. However, when painted, this can draw undue visual attention away from the historic elements of Hugh Town, many of which are designated, and from which Hugh Town's contribution to the significance of the wider Isles of Scilly Conservation Area is largely derived. An example of this is the Tregarthen's Hotel, the white painted render of which results in the building forming an overly dominant, negative element within the townscape. It is, therefore, proposed for the micro lodges to have dark, single ply membrane roofs with elevations of pre-weathered horizontal timber cladding in muted shades of silver/grey to have a visually recessive effect and to compliment the surrounding silver/grey granite structures.
- 3.10 The lodges will also have the benefit of obscuring a large part of the less sympathetic rendered, flat-roofed accommodation to the rear (south) of the former kitchen garden, particularly in views from the Pier and Rat Island, improving the appearance of the Tregarthen's Hotel within the townscape.
- 3.11 In addition to the micro lodges, native planting will also be re-introduced to the northern garden, which will provide privacy between each lodge and soften the landscape within the Site. Likewise, the use of gabion baskets filled with local stone to retain the upper part of the Site along the line of the proposed path will also contribute to a softer appearance to the landscaping within the site.
- 3.12 For full details of the proposals, reference should be made to the full suite of documents and plans accompanying the application.

4 ASSESSMENT OF IMPACT

Built Heritage

- 4.1 The 2018 Built Heritage Statement assessed the impact of the consented garden cottages on the significance of the Garrison Walls, Star Castle, the Guard House, Garrison Cottage, the Master Gunner's House, and Newman House, as well as the character and appearance of the Isles of Scilly Conservation Area. Of these assets, it identified that the proposed development only had the potential to impact on the experience of the Garrison Walls and on the character and appearance of the Isles of Scilly Conservation Area. It identified that the garden cottages would result in a small degree of change to sequential views of Star Castle, the Guard House, Garrison Cottage, the Master Gunner's House, and Newman House from the Pier and from Rat Island; but that this would have no material impact on the overall experience of their significance. As demonstrated below, this remains the case for the current proposals. No other built heritage assets are considered to have the potential to be affected by this scheme.

Star Castle

- 4.2 Star Castle is a Scheduled Monument and Grade I listed building (located c.115 metres west of the Tregarthen's Hotel at the northern high point of the Hugh headland. It is of very high significance and demonstrates the evolution in military fortification design which took place during the sixteenth century.
- 4.3 The asset's significance is primarily related to the architectural and historic special interest of its fabric, the evidential value regarding defence developments, and the strong group value it holds with other military structures in the Garrison and its immediate setting, the Garrison. The wider asset's setting covers large areas of the Islands to the west, north and east, and much of the roof scape of Hugh Town. There exists a degree of inter-visibility between Star Castle and the Tregarthen's Hotel, although this is restricted to the roof of the 1920s' hipped extension against the Garrison Walls; the second-phase, pitched-roof element of the original house; and a portion of the flat-roofed 'staff block'.
- 4.4 The derelict former kitchen garden (to the north of the Site) only appears in a small part of the views (in the middle foreground) of Star Castle from the Pier and Rat Island. There are notable sequential views from Rat Island and the Pier, with the roofline of Star Castle seen on the skyline above and to the right of middle-distance views of Tregarthen's Hotel. Longer views, such as those across the bay from Porthloo, allow indistinct experienced of the Tregarthen's Hotel and the Castle but closer views, such as those from Buzza Tower and from the former school, allow for some visual interpretation of the relationship, differing historic functional and built morphologies between the Tregarthen's Hotel and the Castle.
- 4.5 The proposed development of the micro lodges will result in a small degree of change to the wider setting of Star Castle, which will be perceptible in sequential views from Rat Island and the Pier. Namely, the development will introduce pitched-roofed and gabled built form within the northern garden that is reflective of, and sympathetic to, the surrounding townscape. This will be of benefit to this aspect of the asset's wider setting as it constitutes a positive improvement to the currently somewhat unkept appearance of the disused former kitchen garden, and because it will, to a small extent, obscure a dominant and unsympathetic part of the existing Tregarthen's Hotel in this asset's setting. However, it is considered that, overall, the proposed development will represent only a small change to a tiny portion of this asset's huge extended setting and will therefore result in no material impact to Star Castle's significance. This is the same level of impact as the schemes previously consented on the Site.

The Guardhouse, Newman House, Master Gunner's House and Garrison Cottage

- 4.6 The Grade II* Guardhouse and the three Grade II listed buildings are positioned across the north and north-eastern slopes of the Garrison. They are of high significance which is primarily related to the architectural and historic special interest of their fabric, the strong group value they hold with other former military structures in the Garrison and their immediate setting of the north-eastern portion of the Garrison.
- 4.7 Their wider setting is largely restricted to the Garrison. Elements of Tregarthen's Hotel are also within their wider setting by virtue of those taller elements of the Hotel close to the Garrison Walls and these hold some limited but direct inter-visibility with the assets, but when visually available, these are most often in sequential views. The sequential views are most particularly available from Rat Island and the Pier.
- 4.8 The proposed development of the micro lodges will offer some change to the wider setting of these assets, which will be mainly perceptible in sequential views from Rat Island and the Pier, with Tregarthen's Hotel in the middle distance. Principally, this will constitute the introduction of pitched-roofed and gabled built form within the former kitchen garden that is reflective of, and sympathetic to, the surrounding townscape; but also, the introduction native planting. This will be of benefit to this aspect of the asset's wider setting as it constitutes a positive improvement to the currently somewhat unkept appearance of the disused former kitchen garden, and because it will, to an extent, obscure a dominant and unsympathetic part of the existing Tregarthen's Hotel in views from Rat Island and the Pier.
- 4.9 Overall, the proposed micro lodge development is considered to only represent a small change to a tiny portion of these assets' large extended settings and, like the previously consented proposals for the site, will therefore result in no material impact to the overall significance of the Guard House, Garrison Cottage, the Master Gunner's House or Newman House.

Garrison Walls

- 4.10 The Garrison Walls are designated as both a Scheduled Monument and as a Grade I listed structure. A c.60m section of the early-seventeenth century Garrison Walls, running from Well Battery in the north, through Jefferson Battery and to the Gateway in the south, forms the western boundary of the Tregarthen's Hotel, running parallel to the western boundary of the former kitchen garden. It is of very high significance. The Garrison Walls' significance is primarily related to the architectural and historic special interest of its fabric, its military evidential value, and the strong group value it holds with other military structures in the Garrison, which forms part of its immediate setting.
- 4.11 On the Hugh Town side of the Walls, the asset has had its early openness and, consequently, the previous visual dominance and openness of the Walls profoundly changed by the nineteenth and twentieth-century development on the slope up to the Walls, which has lessened the contribution this part of the asset's immediate setting makes to its significance. The Tregarthen's Hotel is a prime example of such an effect on the Walls, with the 1920s' block, the staff block, and the two ancillary buildings (shed and garage) causing significant screening of the Walls' external elevation, although the original eighteenth-century residency caused a degree of enclosure to the Walls too. Additionally, notwithstanding a number of slight improvements made to the Hotel in recent years as part of its redevelopment, the whole sprawling and visually dominant extent of the Hotel with extensive and inappropriate flat roofs acts (in terms of the townscape character and appearance of Hugh Town and) as a negative townscape element in the Hugh Town setting of the asset.
- 4.12 The wider setting of the section of the Garrison Walls adjacent to the Tregarthen's Hotel covers large areas of the Islands to the north and east, specifically Rat Island, the Pier and the northern tip of Hugh Town adjacent to the Pier. However, views of this section of the Walls are largely

restricted to those available from the Tregarthen's Hotel former kitchen (northern) garden, the carpark to the east of the Hotel, and the Pier, with the key view being from Rat Island. There are some longer views available, such as those across the bay from Porthloo and from off islands, but these allow indistinct experiences of the Walls at best, and the asset's significance is not legible.

- 4.13 The proposed development of the micro lodges will result in some changes to the immediate setting of the section of the small Garrison Walls adjacent to the Tregarthen's Hotel. These changes will cause both positive and negative impacts to the significance of this particular section of the Walls. The development will introduce pitched-roofed and gabled built form within the former kitchen garden that is reflective of, and sympathetic to, the surrounding townscape, along with native planting. This will result in a positive improvement to this aspect of the asset's immediate setting, improving the appearance of the currently unkempt, derelict former kitchen garden, and partially screening the visually dominant and unsympathetic part of the Tregarthen's Hotel that lies directly behind the former kitchen garden, particularly in important views from the Pier and Rat Island.
- 4.14 In some views of the asset, it is likely that the micro lodges will also screen a very small section of the Garrison Walls to the right (north). However, as shown in proposed Site elevations prepared by Grainge Architects, whilst the proposed lodges will slightly extend this screening horizontally as compared to the consented 2019 scheme (P/19/037/FUL) as a result of their layout within the Site, the reduced massing and height of the current proposals mean that there will be less screening to the higher part of the Garrison Walls, which appears above the lodges' roofscape. The effect of this is that, on balance, the current proposals are likely to result in a degree of screening to the Garrison Walls that is no more than the previously consented scheme. When considering the impact of the proposals on the overall significance of the asset, it must also be kept in mind that the section of the Walls in question is an extremely small part of this extensive asset. Additionally, the portion screened includes no architectural features or other such elements and is blank, featureless, undiagnostic wall.
- 4.15 Overall, it is clear that the Garrison Walls are of very high national significance and that, despite the small degree of negative impact arising, specifically from the highly localised screening to some experiences of the asset's significance, the aggregate impact of the proposed micro lodge development will result in at most a negligible level of less than substantial harm to the experience of the significance of the Garrison Walls. This is no greater than the level of harm as the schemes previously consented for the Site.

Hugh Town Townscape (Isles of Scilly Conservation Area)

- 4.16 Hugh Town's contribution to the significance of the Isles of Scilly Conservation Area resides heavily with the historic and architectural special interest of its many designated heritage assets, including listed buildings and scheduled monuments, allied to the fine-grained and low-profile morphology of the positive aspects of the settlement's townscape. The high levels of aesthetic value that the settlement derives from the juxtaposition of these individual assets within this fine-grained townscape is augmented by the scenic opportunities presented by the topography of the area of the island. However, a number of poor-quality later twentieth-century buildings and extensions have eroded the character and appearance of Hugh Town's townscape, as a result of the use of unsympathetic, non-traditional materials and forms. Most elements of the existing Tregarthen's Hotel can be included within this criticism (with the notable exception of the Hendra/Gibson and Port Light/Starboard Light cottages). Indeed, the Hotel is considered to form a dominating and negative element in the northern part of Hugh Town's townscape, with specific elements of the Hotel quite obviously causing harm to the Conservation Area's character and appearance. These elements include all of the flat roofed sections and the extended, sprawling mass of the whole Hotel, which is visually exacerbated by the white render finish. In its current

neglected and unkept state, the derelict former kitchen garden is also considered a negative element in the northern part of Hugh Town's townscape.

- 4.17 The proposed development will result in change to only a small part of the Hugh Town townscape, but will have clear benefits to its character and appearance. The proposals will see the introduction of new built form that is reflective of, and sympathetic to, the surrounding townscape into the derelict former kitchen garden, transforming its appearance and the contribution it makes to the wider townscape. Moreover, the proposed development will, to an extent, partly screen an unsympathetic part of the Tregarthen's Hotel and reduce its overall visual dominance, particularly in important views from Rat Island and the Pier.
- 4.18 These changes will be a notable positive enhancement to the townscape of the northern part of Hugh Town, given that they will occur in an area that is an important point of focus for the settlement – both functionally and historically – between the Pier and those elements of the Garrison that remain externally perceptible element.
- 4.19 As was also the case with the previously consented schemes, when considering its character, appearance and significance as a whole, the proposed development will result in a minor enhancement to the the Isles of Scilly Conservation Area.

Archaeology

- 4.20 In the Archaeological Desk-Based Assessment supporting the consented 2018 scheme and in a subsequent letter to the Senior Planning Officer at the Isles of Scilly Council regarding archaeological impacts (dated 20th June 2018), it is noted that if any surviving features associated with the Garrison Wall were to be present in the proposed development Site, they would be likely to be of high significance. It is also noted that new development in the Site has the potential to impact on any surviving archaeological remains that might be present, by truncating or removing them.
- 4.21 However, it is also demonstrated that there is no archaeological evidence for the presence of any archaeological features within the former kitchen (northern) garden. An archaeological monitoring and recording (a 'watching brief') was carried out in 2015 by a ClfA qualified field archaeologist covering six geo-technical pits set across the former kitchen garden. This archaeological investigation identified no archaeological features, only the weathered surface of the granite bedrock below a homogenous layer of dark, humic garden soil of up to 2.5m in depth.
- 4.22 There is one antiquarian reference to a glacia associated with the isthmus section of the Garrison Wall, but no historic maps mark a glacia, there is no archaeological evidence associated with the isthmus section of the Garrison Wall and, if there was ever intended to be a clear field of fire through the proposed development site rather than solely over it, this was not maintained from the later eighteenth century onwards due to the encroachment of residential development adjacent to the isthmus section of the Garrison Wall.
- 4.23 The documents supporting the consented 2018 application conclude that the provision of archaeological monitoring and recording (a 'watching brief') of all ground works associated with the proposed scheme represents a sufficient and proportionate response to the level of archaeological potential within the footprint of the proposed micro lodges.
- 4.24 The micro lodges now proposed not only have a smaller footprint than the consented schemes, but have been specifically designed to be of a lighter-weight construction to reduce the volume of spoil required to be excavated for their footings. The current proposals will therefore have a lesser impact than either the consented 2018 or 2019 proposals. A programme of archaeological monitoring and recording (a 'watching brief') of all grounds works associated with the scheme therefore remains an appropriate measure for the current proposals. This can be secured through an appropriately worded condition on the planning consent.

5 CONCLUSION

- 5.1 This Addendum has been researched and prepared by RPS on behalf of Tregarthen's Hotel Ltd. It assesses the potential impact on the historic environment arising from a revised scheme for development in the former kitchen garden of the Tregarthen's Hotel comprising five class C3 micro lodges and associated landscaping. This proposal follows previous consents for class C3 dwellings within the kitchen garden [references: 18/031/FUL and 19/037/FUL] and should be read in conjunction with the Built Heritage Statement and the Archaeological Desk-Based Assessment prepared by RPS (formerly CgMs) to support the 2018 application.
- 5.2 This Addendum demonstrates that the proposed development will result in no material impact to Star Castle; the Guardhouse; Newman House; the Master Gunner's House; or Garrison Cottage. There will be a small degree of negative impact arising to the significance of a small portion of the Garrison Walls and the legibility of that significance, specifically from the highly localised screening to some experiences of the asset's significance; however, the aggregate impact of the proposed development will result in at most a negligible level of less than substantial harm to the experience of the significance of this asset. With regard to the Isles of Scilly Conservation Area, the proposals will result in an enhancement to the townscape of the northern part of Hugh Town, equating to a minor enhancement to the Conservation Area as a whole. In all cases, the level of impact arising from the proposed scheme is no higher than the level of impact arising from the previously consented schemes.
- 5.3 In relation to archaeological impacts, this Addendum concludes that a programme of archaeological monitoring and recording (a 'watching brief') of all grounds works associated with the scheme is an appropriate measure for the current proposals and can be secured through an appropriately worded condition. The proposal's ground works would represent a lesser level of ground impact than that for the consented schemes.
- 5.4 This Addendum meets the requirements of the NPPF and local planning policy. It provides sufficient information, in conjunction with the 2018 consented scheme's Built Heritage Statement, to fully identify the potential development impacts arising from the proposed revised scheme on the historic built environment. In conjunction with the 2018 Archaeological Desk-Based Assessment, it also provides sufficient information to inform decision-making on the application in regard to archaeology.
- 5.5 In common with the previously consented schemes, the proposal causes no significant negative impacts to the significance of the historic environment and, as such and on heritage grounds, can be similarly consented.

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