

# RESPONSE TO COMMENTS FROM CORNWALL ARCHAEOLOGICAL UNIT 04.05.21

## INTRODUCTION:

This document has been drafted in response to consultation comments received 29th March 2021 provided by the Local Planning Authority's Development Management Archaeological Advice Officer (DMAAO). It has been composed by Gabriella Herrick (RIBA CA and AABC) & Nicholas Lowe (RIBA) to support the application P/21/018/ FUL at Blockhouse Cottages, Tresco.

Several detailed reports, written by suitably qualified professionals, have been submitted which describe in detail the existing Blockhouse Cottage row. Submitted documents and their authors include:

- Statement of Significance – G. Herrick RIBA CA and AABC (Llewellyn Harker Lowe)
- Heritage, Setting & Visual Impact Assessment – G. Herrick RIBA CA, AABC (Llewellyn Harker Lowe)
- Design and Access Statement – N. Lowe RIBA (Llewellyn Harker Lowe) & Tim Holden Consulting
- Written Scheme of Investigation for archaeological recording - Charlie Johns BA, MCIfA
- Condition Survey - Paul Chamings MRICS (Currie and Brown).

## APPLICATION CONTEXT:

Paragraph 189 of the NPPF requires *'the applicant to describe the significance of the heritage assets affected, including any contribution to 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.'*

In this instance, the designated heritage asset is the Isles of Scilly Conservation Area, within which the undesignated and unlisted Blockhouse Cottages are situated. Two detailed reports, written by a suitably qualified person (G. Herrick RIBA CA, AABC) have been submitted describing the significance of the setting and the contribution of the cottages to the conservation area. A full CV has also been issued to the planning officer.

These reports have concluded that the scale of harm caused by the replacement of the cottages would be considered 'less than substantial,' and the contribution of the cottages to the setting would be conserved in a manner appropriate to their significance.

There are 16 listed buildings on Tresco; that Blockhouse Cottages is not among them supports this assessment.

The application, along with all supporting submissions has been assessed by Historic England, the body appointed to consider the impact of proposals on the historic environment.

Historic England raised no objection to the proposals.

The AONB have been consulted, they have also raised no objections and welcome the many positive aspects of the scheme. In their comments they make the following assessment:

*“The application recognises the need to preserve the natural and historic landscape as key to attracting and retaining visitors to the island...”*

The response of these consultees corroborates the assessment outlined in the application submission.

## SIGNIFICANCE OF THE BLOCKHOUSE COTTAGES

In opposition to the above, the archaeological consultee continues to raise an objection to the proposals. The objections raised stem not from archaeological concerns, but rather the cottages' contribution to the historic character and significance of the Conservation Area.

*“We consider that the proposed demolition of Blockhouse Cottages amounts to ‘substantial harm’ and should be considered under the guidance outlined in paragraph 195 of the NPPF due to the positive contribution the cottages make to the Conservation Area as a heritage asset, a good example of the local vernacular and with several characteristic features linked to the adaptation for their exposed position.”*

Paragraph 206 of the NPPF states that while, ‘Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole’.

(Suffice to assume the CAU officer is in fact referring to paragraph 201 not 206).

It is our assessment that the CAU overstate the significance of the Blockhouse Cottages, in concluding that the proposed scheme amounts to 'substantial harm'. The evidence submitted to justify this standpoint is limited and sits in contrast to the 'No Objection' response issued by Historic England, and the fact that the buildings are not a designated asset (listed).

Given that the cottages are not listed, it therefore follows that their significance is attributable to their contribution to the Conservation Area. In this circumstance there is no assumption that the material fabric of the building is of intrinsic value, (as may be the case with a listed building). Indeed the building owners would be entitled to make wholesale changes to the internal fabric of these buildings without the requirement for any form of prior approval.

The Statement of Significance and the Heritage, Setting & Visual Impact Assessment establish that Blockhouse Cottages' contribution to the Conservation Area is primarily attributable to their exterior form and how this is viewed in the landscape setting of the Old Blockhouse and Grimsby Bay. This is corroborated by the short statement made by the CAU officer identifying the following features as noteworthy:

*“including their built form and detailing such as a shallow 30-degree roof pitch and granite rubble walls. The cottages are also distinctive in their adaptation to the exposure of their immediate location, with slit windows to the north elevation – an interesting and perhaps unusual example of this on the islands - and tall chimney stacks and caps which give a distinctive and unusual silhouette when viewed from elsewhere on the island and offshore.”*

With the exception of modest increases in fenestration on the Northern elevation to make the building viable, these aspects of the property are largely unaffected by the proposals (and the granite is visibly

reinstated). This is demonstrably illustrated by the comparative views that have been compiled and assessed in the Heritage, Setting & Visual Impact Assessment.

Also worthy of note is that the overall significance of these buildings has been materially compromised through degradation (which sets the buildings on a trajectory towards disuse), the addition of cement-based render and a series of unsympathetic repairs. The CAU comment on this as follows:

*“In the justification of the need to demolish the cottages, we consider that the Statement of Significance fails to present a convincing case. It states that the historic buildings detract from the aesthetic value of the Conservation Area, however, this is principally due to their present condition, poor maintenance and unsympathetic management in relation to their heritage values (with the insertion of UPVC windows and concrete render).”*

These comments appear to disregard the current dilapidated state of the existing building, which is a material consideration when assessing significance. The poor maintenance of the buildings is a long term issue; one that is reflective of their lack of viable use and the prohibitive costs of refurbishment. The external appearance of the building has been severely compromised by these changes, which in turn has a detrimental impact on the significance of the Conservation Area setting (the designated asset).

On balance, our assessment concludes that the impact of demolition and replacement of these buildings would result in ‘less than substantial harm’.

## JUSTIFICATION FOR DEMOLITION

The CAU state that the submitted documents do not present 'a coherent or clear justification for the demolition of this non-designated heritage asset for all the elements outlined in paragraph 195'.

This requirement is based on the CAU assessment that the proposals would result in 'substantial harm' to the Isles of Scilly Conservation Area. Our assessment concludes that the impact of demolition and replacement of these buildings would result in 'less than substantial harm'. As such the tests for demolition outlined in paragraph 195 and referred to by CAU are not appropriate or necessary. Instead the scheme should be assessed in accordance with NPPF paragraph 196:

*Paragraph 201: Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole’.*

*196. Where a development proposal will 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, where appropriate, securing its optimum viable use.”*

In accordance with paragraph 196, the submission documents already outline the various public benefits associated with the scheme which can be briefly summarised as follows:

- The reinstatement of exposed granite elevations, using reclaimed material where possible, replacing the existing C20th cement render, and appropriate traditionally detailed timber sash windows providing enhancement to the Conservation Area setting.
- The provision of the building with a viable use.
- Contribution to the tourism offering; which underpins the entire island economy.
- Historic Building Recording to mitigate the loss of the original fabric.
- Improvement to the building's thermal performance coupled with on-site renewable energy generation and efficient heating systems.

Having assessed the impact of the proposals, taking into account the relative significance of the building and its contribution to the significance of the Conservation Area, it is our view that on balance the public benefits represent sufficient mitigation for the 'less than substantial harm' that the proposals entail.

We would again highlight that the 'no objection' response from Historic England supports this view.

#### FURTHER COMMENTS ON THE CONDITION OF THE EXISTING BUILDING & VIABILITY:

CAU also make the following comment:

*While the condition statement does provide a long list of repairs needed, as referred to in our original consultation response, we cannot find a reference within the document recommending the need to 'demolish' the cottages: there is no clear explanation that the costs are 'prohibitive' (as stated on page 7 of the Statement of Significance).*

With limitless funds, almost any building could be repaired or restored to a habitable standard. More pertinent factors are as follows:

- Is the cost of refurbishment justifiable against the long term revenue that could be generated by the refurbished building?
- Does the significance and quality of the existing building warrant the expense of the interventions required to retain the existing fabric?
- What impact would the necessary interventions have on the character and fabric of the existing buildings?
- Would the buildings have a viable use after conversion?

Without a sound business case there is little incentive to undertake the necessary works, and the buildings are likely to fall into further decline. It should be noted that as the building is not listed, there is no 'urgent works notice' mechanism to force necessary repairs.

In accordance with the terminology of the NPPF, any perceived harm caused by the scheme should be weighed against securing the optimum and viable use for the site.

The submitted Condition Survey and Costs Schedule provides a refurbishment estimate of £964,300. This estimate excludes: VAT (20%), Design Team Fees (15%), Transport of materials and labour to and from the island, builder's food and accommodation, mark up on labour due to scarcity and inconvenience also typically adds an additional 25% to mainland prices.

Including the above, a realistic budget figure to undertake a refurbishment of the existing property would be £1.6 million. With the added costs of ongoing maintenance and servicing interest on the investment, a return of ~£30,000 per cottage per annum would be required to break even on the investment over 20 years.

As staff accommodation is provided by the estate free of charge, this is not a viable use of resources. When alternatively compared against the average salary of an island worker after tax deductions, such a figure would never be affordable, (or justifiable given the scale of the properties and their compromised internal layout).

National space standards require 70msq for a 2 storey, 2 bedroom, 3 person dwelling, the current dwellings hover around this mark with one dwelling falling short at 62.8m<sup>2</sup>. Once the properties were dry-lined and insulated, internal space would be further reduced.

Refurbished in their current format, the cottages would not be attractive as holiday accommodation due to the small size of rooms, the lack of and light, and the inconvenient layout.

It would be preferable for the Estate to spend a smaller sum building 8 staff units, which will be fit for purpose, providing suitable accommodation for staff, instead of investing in the Blockhouse Cottages to provide inferior housing for fewer people. The estate must operate as a viable business in order to remain a sustainable enterprise. Its success is critical for the economic future of the entire island group.

Refurbishment works would be extensive and have a significant impact on the existing building. With the benefit of a visit to site it becomes clear that every building element requires extensive overhaul.

To take the external walls as an example; removing the cementitious render would not resolve the issue of moisture ingress. The unsympathetic work carried out in the 20<sup>th</sup> century was in response to ongoing damp issues. Removal of the render exposes the solid masonry walls, which will absorb and transmit moisture from the driving rain in the exposed location. The lack of DPC and solid floor structure means that moisture is wicked into the building from the sandy substrate and surrounding ground. Without any insulation, condensation is a perpetual issue on the cold external walls.

Perimeter drainage cannot be installed without a very expensive underpin due to the shallow foundations. Tanking membranes, drylining and insulation are likely to be required to overcome the moisture issues, further shrinking the already very small rooms and altering the internal character of the building. Removal of the hard render is highly likely to damage the masonry behind resulting in sections of the walls requiring rebuilding.

Such invasive and expensive processes are hard to justify for a building of limited significance and without a viable ongoing use.

## CONCLUSION

The submitted application has assessed the scheme in accordance with the terminology of the National Planning Policy Framework, providing detailed reports on the condition of the buildings, their significance and the contribution that the cottages make to the setting.

These conclude that the contribution of the cottages to the setting would be conserved in a manner appropriate to their significance and a viable use for the site would be secured. Therefore, in accordance with the terminology of the NPPF, the proposals are considered to be acceptable in heritage terms.

We would again highlight that the 'no objection' response from Historic England supports this view.