



## COUNCIL OF THE ISLES OF SCILLY

Town Hall, St Mary's TR21 0LW  
Telephone: 01720 424455 – Email: [planning@scilly.gov.uk](mailto:planning@scilly.gov.uk)

Town and Country Planning Act 1990  
Town and Country Planning (Development Management Procedure) Order 2015

### PERMISSION FOR DEVELOPMENT

Application No: P/22/064/FUL Date Application Registered: 12<sup>th</sup> September 2022

Applicant: Paul Osborne  
The Kavorna  
Hugh Street  
Hugh Town  
St Marys  
Isles Of Scilly  
TR21 0LL

Site address: The Kavorna Hugh Street Hugh Town St Marys Isles Of Scilly  
Proposal: Replace existing scantle tiles with natural slate tiles to southern section of main building (Listed Building)

In pursuance of their powers under the above Act, the Council hereby **PERMIT** the above development to be carried out in accordance with the following Conditions:

**C1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.**  
Reason: In accordance with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

**C2 The development hereby permitted shall be carried out in accordance with the approved details only including:**

- Plan 1 Location Plan
- Plan 2 Site Plan
- Plan 3 Proposed Roof Plan
- Preliminary Roost Assessment
- Design and Access Statement
- Heritage Statement (AMENDED), Ridgway Heritage, 2022, Ref: RHC 2022-36

**These are stamped as APPROVED**

Reason: For the clarity and avoidance of doubt and in the interests of the character and appearance of the Listed Building and Conservation Area, Area of Outstanding Natural Beauty and Heritage Coast in accordance with Policies OE1 and OE7 of the Isles of Scilly Local Plan 2015-2030.

**C3 The roof shall be covered with natural 'Camborne' slates, as specified in the Heritage Statement (Ridgway Heritage, 2022, Ref: RHC 2022-36) using corrosion resistant**

**fixings. Before roofing starts, samples of slates and fixings shall be made available for inspection on site, and subsequent written approval, by the Local Planning Authority. The approved slates and fixings shall then be used to roof the approved building/structure. The roof shall be retained as such thereafter.**

Reason: To preserve the character and appearance of the Listed Building and to ensure compatibility with building traditions of the area in accordance with Policy OE7 of the Isles of Scilly Local Plan (2015-2030).

- C4 The scheme for bat avoidance measures as set out in Appendix 2 of the Preliminary Roost Assessment for Kavorna, Hugh Town (Ref: Report No: 22021/06) dated November 2021 carried out by IOS Ecology shall be fully adhered to during the course of the development hereby approved.**

Reason: In order to secure the strict protection of European protected species.

- C5 All works involving machinery required in connection with the implementation of this permission shall be restricted to between 0800 and 1800 hours Monday to Saturdays. There shall be no works involving machinery on a Sunday or Public or Bank Holiday.**

Reason: In the interests of protecting the residential amenities of neighbouring properties.

### **Further Information**

1. In dealing with this application, the Council of the Isles of Scilly has actively sought to work with the applicants in a positive and proactive manner, in accordance with paragraph 38 the National Planning Policy Framework 2021.
2. In accordance with the provisions of Section 96A of the Town and Country Planning Act which came into force on 1st October 2009, any amendments to the approved plans will require either a formal application for a non-material amendment (for which a fee of £234 would be required) or the submission of a full planning application for a revised scheme. If the proposal relates to a Listed Building you will not be able to apply for a non-material amendment and a new application for a revised scheme will be required. Please discuss any proposed amendments with the Planning Officer.
3. The Applicant is reminded of the provisions of the Wildlife and Countryside Act 1981 and the E.C. Conservation (Natural Habitats) Regulations Act 1994, the Habitat and Species Regulations 2012 and our Natural and Environment and Rural Communities biodiversity duty. This planning permission does not absolve the applicant from complying with the relevant law protecting species, including obtaining and complying with the terms and conditions of any licences required, as described in part IV B of Circular 06/2005. Care should be taken during the work and if bats are discovered, they should not be handled, work must stop immediately and a bat warden contacted. Extra care should be taken during the work, especially when alterations are carried out to buildings if fascia boards are removed as roosting bats could be found in these areas. If bats are found to be present during work, they must not be handled. Work must stop immediately and advice sought from licensed bat wardens. Call The Bat Conservation Trust's National Bat Helpline on 0845 1300 228 or Natural England (01872 245045) for advice.
4. This decision is not a determination under the Building Regulations. Please ensure that all building works accord with the Building Regulations and that all appropriate approvals are in place for each stage of the build project. You can contact Building Control for further advice or to make a building control application: [buildingcontrol@cornwall.gov.uk](mailto:buildingcontrol@cornwall.gov.uk).

Signed: 

**Chief Planning Officer**

*Duly Authorised Officer of the Council to make and issue Planning Decisions on behalf of the Council of the Isles of Scilly.*

**DATE OF ISSUE: 8<sup>th</sup> November 2022**



# COUNCIL OF THE ISLES OF SCILLY

Planning Department  
Town Hall, The Parade, St Mary's, Isles of Scilly, TR21 0LW  
☎0300 1234 105  
✉planning@scilly.gov.uk

Dear Paul Osborne

## Please sign and complete this certificate.

This is to certify that decision notice: P/22/064/FUL and the accompanying conditions have been read and understood by the applicant: Paul Osborne.

1. **I/we intend to commence the development as approved:** Replace existing scantle tiles with natural slate tiles to southern section of main building (Listed Building) at: The Kavorna Hugh Street Hugh Town St Marys Isles Of Scilly **on:** .....
2. I am/we are aware of any conditions that need to be discharged before works commence.
3. I/we will notify the Planning Department in advance of commencement in order that any pre-commencement conditions can be discharged.

You are advised to note that Officers of the Local Planning Authority may inspect the project both during construction, on a spot-check basis, and once completed, to ensure that the proposal has complied with the approved plans and conditions. In the event that the site is found to be inaccessible then you are asked to provide contact details of the applicant/agent/contractor (delete as appropriate):

**Name:** ..... **Contact Telephone Number:** .....  
**And/Or Email:** .....

**Print Name:** .....

**Signed:** .....

**Date:** .....

Please sign and return to the **above address** as soon as possible.

For the avoidance of doubt you are reminded to address the following condition(s) before slates are used on this roof. Although we will aim to deal with any application to discharge conditions as expeditiously as possible, you are reminded to allow up **to 8 weeks** for the discharge of conditions process.

### PRE-INSTALLATION CONDITION(S)

C3 The roof shall be covered with natural 'Camborne' slates, as specified in the Heritage Statement (Ridgway

Heritage, 2022, Ref: RHC 2022-36) ) using corrosion resistant fixings. Before roofing starts, samples of slates and fixings shall be made available for inspection on site, and subsequent written approval, by the Local Planning Authority. The approved slates and fixings shall then be used to roof the approved building/structure. The roof shall be retained as such thereafter.



# COUNCIL OF THE ISLES OF SCILLY

Planning Department

Town Hall, St Mary's, Isles of Scilly, TR21 0LW

☎01720 424455

✉[planning@scilly.gov.uk](mailto:planning@scilly.gov.uk)

## **THIS LETTER CONTAINS IMPORTANT INFORMATION REGARDING YOUR PERMISSION – PLEASE READ IF YOU ARE AN AGENT DEALING WITH IS ON BEHALF OF THE APPLICANT IT IS IMPORTANT TO LET THE APPLICANT KNOW OF ANY PRE-COMMENCEMENT CONDITIONS**

Dear Applicant,

This letter is intended to help you advance your project through the development process. Now that you have been granted permission, there may be further tasks you need to complete. Some aspects may not apply to your development; however, your attention is drawn to the following paragraphs, which provide advice on a range of matters including how to carry out your development and how to appeal against the decision made by the Local Planning Authority (LPA).

### **Carrying out the Development in Accordance with the Approved Plans**

You must carry out your development in accordance with the stamped plans enclosed with this letter. Failure to do so may result in enforcement action being taken by the LPA and any unauthorised work carried out may have to be amended or removed from the site.

### **Discharging Conditions**

Some conditions on the attached decision notice will need to be formally discharged by the LPA. In particular, any condition that needs to be carried out prior to development taking place, such as a 'source and disposal of materials' condition, an 'archaeological' condition or 'landscaping' condition must be formally discharged prior to the implementation of the planning permission. In the case of an archaeological condition, please contact the Planning Department for advice on the steps required. Whilst you do not need to formally discharge every condition on the decision notice, it is important you inform the Planning Department when the condition advises you to do so before you commence the implementation of this permission. Although we will aim to deal with any application to discharge conditions as expeditiously as possible, you are reminded to allow up to **8 weeks** for the discharge of conditions process.

**Please inform the Planning Department when your development or works will be commencing. This will enable the Council to monitor the discharge and compliance with conditions and provide guidance as necessary. We will not be able to provide you with any written confirmation on the discharge of pre-commencement conditions if you do not formally apply to discharge the conditions before you start works.**

As with the rest of the planning application fees, central Government sets a fee within the same set of regulations for the formal discharge of conditions attached to planning permissions. Conditions are necessary to control approved works and development. Requests for confirmation that one or more planning conditions have been complied with are as follows (VAT is not payable on fees set by central government). More information can be found on the Council's website:

- Householder permissions - £34 per application
- Other permissions - £116 per application

### **Amendments**

If you require a change to the development, contact the LPA to see if you can make a 'non material amendment' (NMA). NMA can only be made to planning permissions and not a listed building consent. They were introduced by the Government to reflect the fact that some schemes may need to change during the construction phase. The process involves a short application form and a 14 day consultation period. There is a fee of £34 for householder type applications and £234 in all other cases. The NMA should be determined within 28 days. If the change to your proposal is not considered to be non-material or minor, then you would need to submit a new planning application to reflect those changes. Please contact the Planning Department for more information on what level of amendment would be considered non material if necessary.

### **Appealing Against the Decision**

If you are aggrieved by any of the planning conditions attached to your decision notice, you can appeal to have specific conditions lifted or modified by the Secretary of State. All appeal decisions are considered by the Planning Inspectorate – a government department aimed at providing an unbiased judgement on a planning application. From the date of the decision notice attached you must lodge an appeal within the following time periods:

- Householder Application - 12 weeks
- Advertisement Consent - 8 weeks
- Minor Commercial Application - 12 weeks
- Other Types - 6 months

You can obtain the appeal forms by calling 0303 444 5000 or submit an appeal through the Planning Portal <http://www.planningportal.gov.uk/planning/appeals/online/makeanappeal>

You can apply to the Secretary of State to extend this period, although this will only be allowed in exceptional circumstances.

### **Building Regulations**

With all building work, the owner of the property is responsible for meeting the relevant Planning and Building Regulations. Building Regulations apply to most building work so it is important to find out if you need permission. This consent is to ensure the safety of people

in and around buildings in relation to structure, access, fire safety, infrastructure and appropriate insulation.

The Building Control function is carried out on behalf of the Council of the Isles of Scilly by Cornwall Council. All enquiries and Building Control applications should be made direct to Cornwall Council, via the following link [Cornwall Council](#). This link also contains comprehensive information to assist you with all of your Building Control needs.

Building Control can be contacted via telephone by calling 01872 224792 (Option 1), via email [buildingcontrol@cornwall.gov.uk](mailto:buildingcontrol@cornwall.gov.uk) or by post at:

Building Control  
Cornwall Council  
Pydar House  
Pydar Street  
Truro  
Cornwall  
TR1 1XU

Inspection Requests can also be made online: <https://www.cornwall.gov.uk/planning-and-building-control/building-control/book-an-inspection/>

### **Registering/Altering Addresses**

If you are building a new dwelling, sub dividing a dwelling into flats or need to change your address, please contact the Planning Department who will be able to make alterations to local and national databases and ensure postcodes are allocated.

### **Connections to Utilities**

If you require a connection to utilities such as water and sewerage, you will need to contact South West Water on 08000831821. Electricity connections are made by Western Power Distribution who can be contacted on 08456012989.

Should you require any further advice regarding any part of your development, please contact the Planning Department and we will be happy to help you.



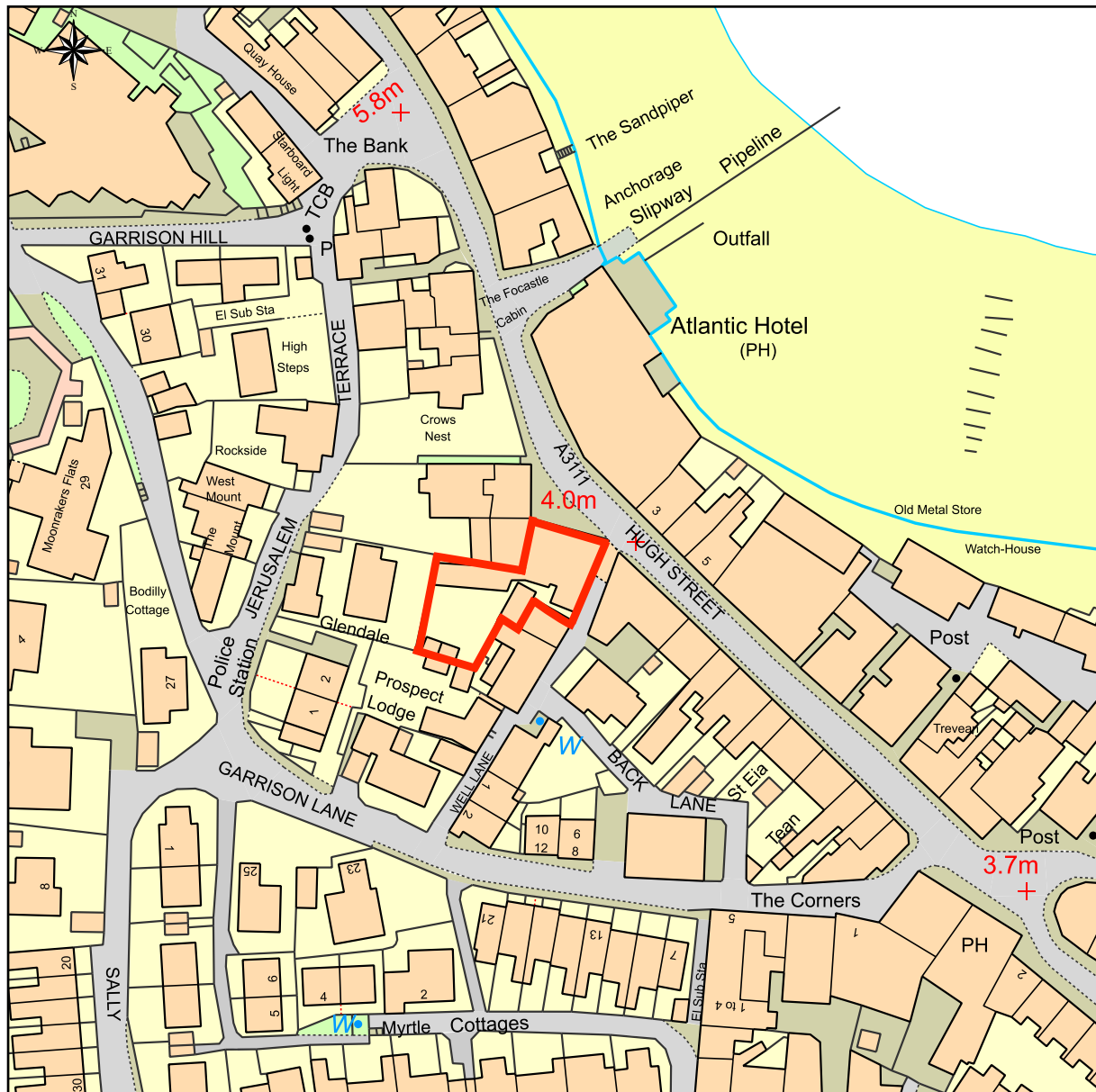
**APPROVED**

By Lisa Walton at 12:02 pm, Nov 09, 2022

## Plan of Kavorna

**RECEIVED**

By A King at 12:03 pm, Sep 09, 2022



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0m 20m 40m 60m 80m 100m

Scale: 1:1250, paper size: A4

Kavorna

Location Plan

21, Hugh St.  
St. Mary's  
Isles of Scilly



**emapsite™**  
plans

Prepared by: Paul Osborne, 01-11-2021



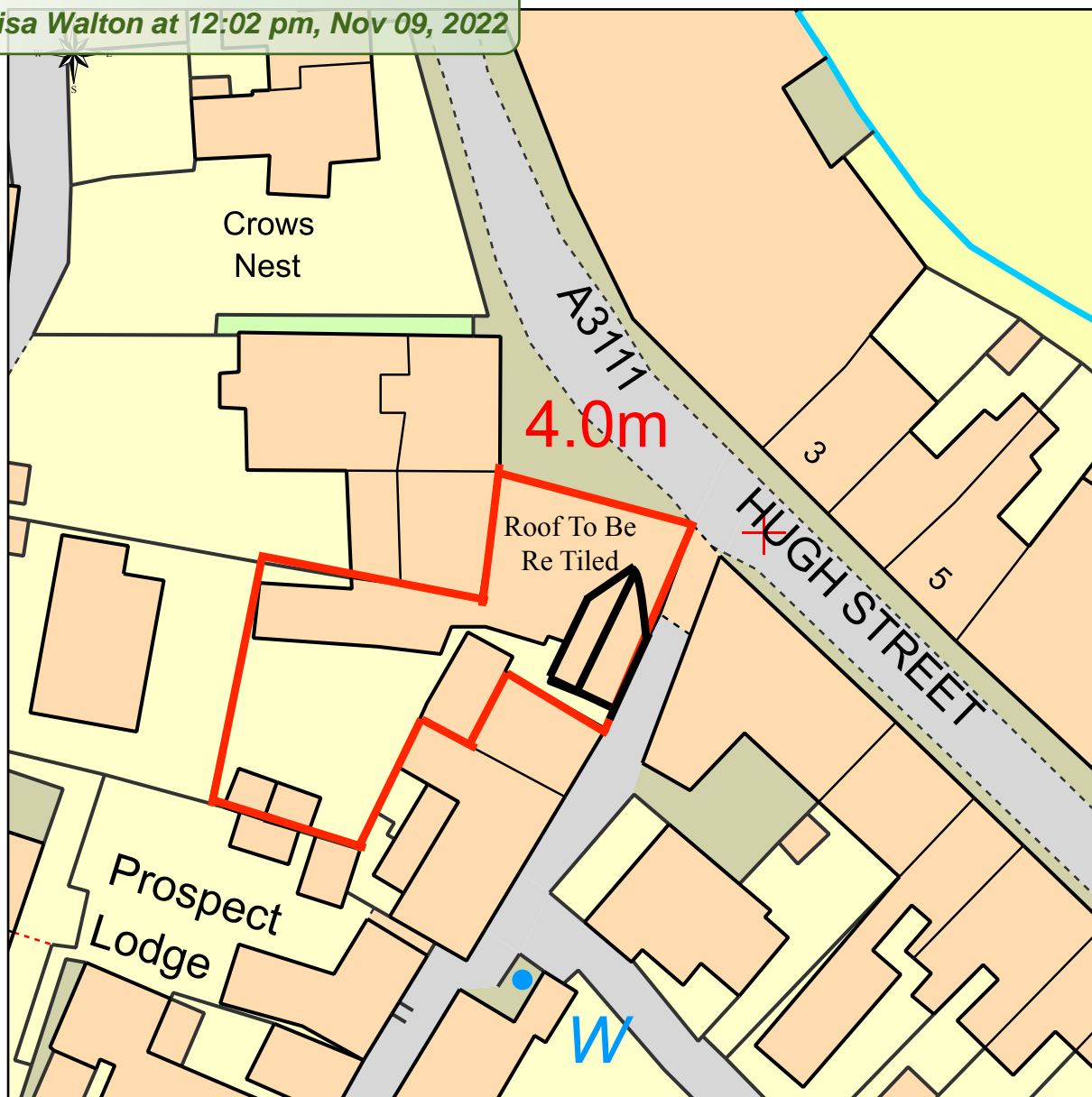
# Site Plan of Kavorna

RECEIVED

By A King at 12:04 pm, Sep 09, 2022

**APPROVED**

By Lisa Walton at 12:02 pm, Nov 09, 2022



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0m 5m 10m 15m 20m 25m 30m 35m 40m

Scale: 1:500, paper size: A4

Kavorna

Site Plan

21, Hugh St.  
St. Mary's  
Isles of Scilly



**emapsite**<sup>™</sup>  
plans

Prepared by: Paul Osborne, 01-11-2021

**APPROVED**  
By Lisa Walton at 1:36 pm, Nov 09, 2022

**RECEIVED**  
By A King at 12:02 pm, Sep 09, 2022

**APPROVED**  
By Lisa Walton at 12:03 pm, Nov 09, 2022

*Proposed Natural Slate Roof*

*Fibre Cement Tiles*

*GRP Roof*

*GRP Roof*

*Concrete Tiles*

*Scantle Slate Roof*

Proposed Roof Detail

*N*

*Kavorna  
Hugh St  
St. Mary's  
Isles of Scilly*

*Proposed Roof  
Detail*

*Mr Mrs P Osborne*

*Date - August 2021  
Amended -  
Scale - 1 : 100*

*PAUL OSBORNE  
CARN THOMAS  
ST. MARY'S, ISLES of SCILLY.  
TR21 0PT Tel (01720) 423066*

**KV-PRD-1a**

**RECEIVED**

*By Liv Rickman at 9:05 am, Oct 05, 2022*



**RIDGEWAY**  
HERITAGE CONSULTANCY

# **Kavorna, 21 Hugh Street, St Marys, Isles of Scilly TR21 0PT**

## **A Heritage Statement**



**Client: Mr Paul Osborne,**

**Project No: RHC 2022-36**

**Date: 19/08/2022**

**RECEIVED**

*By Lisa Walton at 12:03 pm, Nov 09, 2022*

# Kavorna, 21 Hugh Street, St Mary's Isles of Scilly TR21 0PT

## A Heritage Statement

RHC Project No. 2022-36

July/August, 2022

Document Control Grid			
A	17.08.22	RWM	Review draft
B	18.08.22	RWM	Client draft
C	30.08.22	RWM	Final version
D	04.10.22	RWM	Revision

Front cover: Kavorna, looking south-west from Hugh Road.

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Table 2: Criteria used to determine the significance of impact.

## SUMMARY

Kavorna, 21 High Street, Hugh Town, is a Grade II-listed building of eighteenth-century origin. It has been subject to a number of nineteenth and twentieth-century alterations, and formerly comprised two dwellings in the later nineteenth century. As a vernacular structure, it comprises an important element within the historic core of Hugh Town, and its slate roofs contribute importantly to its historic character and significance.

The scantle slate roof of the rear south wing of Kavorna suffered from displacement of slates and partial collapse, in August, 2021. Applications for the repair of the roof were submitted in November, 2021, for replacement with natural slates. Affected parts of the roof have now been temporarily secured, pending more detailed applications for repair and replacement. Internal inspection has confirmed that the basic timber frame of the roof is structurally sound, and that partial failure has been due to the corrosion of iron head-nails securing the slates, and of those securing the battens. The timber battens are of uneven dimensions and spacing, and have been subject to localised decay. The timber structural elements of the roof are of machine-cut softwood, and therefore of probable mid-nineteenth-century, or later, date. The existing roof is therefore not of eighteenth-century date, as suggested, but probably replaced an earlier thatched roof.

Replacement with Natural 'Camborne' Slates, of suitable size and secured with copper nails, would be the most appropriate course of action. These would closely replicate the colour and texture of the existing scantle slates, and would conserve the appearance and historic character of the building. The irregular and unevenly-spaced battens will require removal and replacement, before new natural slates are laid. The proposed replacement of the slate roof can be achieved in a manner which will preserve its historic character, and that of surrounding parts of the Conservation Area. While the south wing of Kavorna has only limited visual connections with surrounding historic buildings within this part of Hugh Street, it is evident that the proposed replacement of slates will have no adverse effects on any associated heritage settings, and will enhance the overall visual aspect of the building and surrounding area.

These proposals are in accordance with the statutory requirements stated in Sections 66 of the Planning Act, National Planning Policy Framework and Policy OE7 of the Isles of Scilly Local Plan 2015-2030. They would also be consistent with supplementary planning documents, including the Isles of Scilly Design Guide (2006) and the Isles of Scilly Conservation Area Character Statement and Supplementary Planning Document (2015).



## 1. INTRODUCTION

- 1.1 In June, 2022, Ridgeway Heritage Consultancy was commissioned by Mr Paul Osborne, to undertake a heritage statement to support applications for planning permission and Listed Building Consent for repairs to the roof of Kavorna, 21 Hugh Road, St Mary's, Isles of Scilly TR21 0PT (NGR 090184 010594) (Figs. 1, 2, 3 and 5). Kavorna is a substantial building which originally comprised two dwellings of eighteenth-century date, which has been subject to a number of nineteenth and twentieth-century alterations. It is listed at Grade II, in view of its architectural and historic interest (NHLE 1218783), and comprises part of the historic streetscape of Hugh Street, which is located within the historic core of Hugh Town and includes a significant number of listed and non-listed historic buildings. Hugh Street comprises part of a single Conservation Area, which includes the entire area under the jurisdiction of the Council of the Isles of Scilly.



**Fig. 1: The north-east, front elevation of Kavorna, with the Grade II-listed Post Office to the left, and Grade II-listed Lloyds Bank to the right.**

- 1.2 Hugh Town, St Marys, comprises the only truly 'urban' settlement on the Scilly Isles. Within this, Hugh Street has possibly the greatest sense of enclosure, which is partly relieved by an informal square at its eastern end (Figs. 3 and 5). Street frontages within Hugh Street are almost continuous, and include a number of shopfronts and town houses of predominantly nineteenth-century date (Fig. 12). The historic core of Hugh Town is associated with fine urban grain and relatively high building density, with a focus on enclosed streets rather than

the harbour frontage (Figs. 3, 5, 10 and 11). Kavorna comprises part of a succession of historic buildings along both sides of Hugh Street, which include the nineteenth-century and Grade II-listed Lloyds Bank, immediately to the north-west (NHLE1141218) (Fig. 1), and the Grade II-listed Post Office immediately to the south-east (NHLE 1291788) (Figs. 1 and 6).

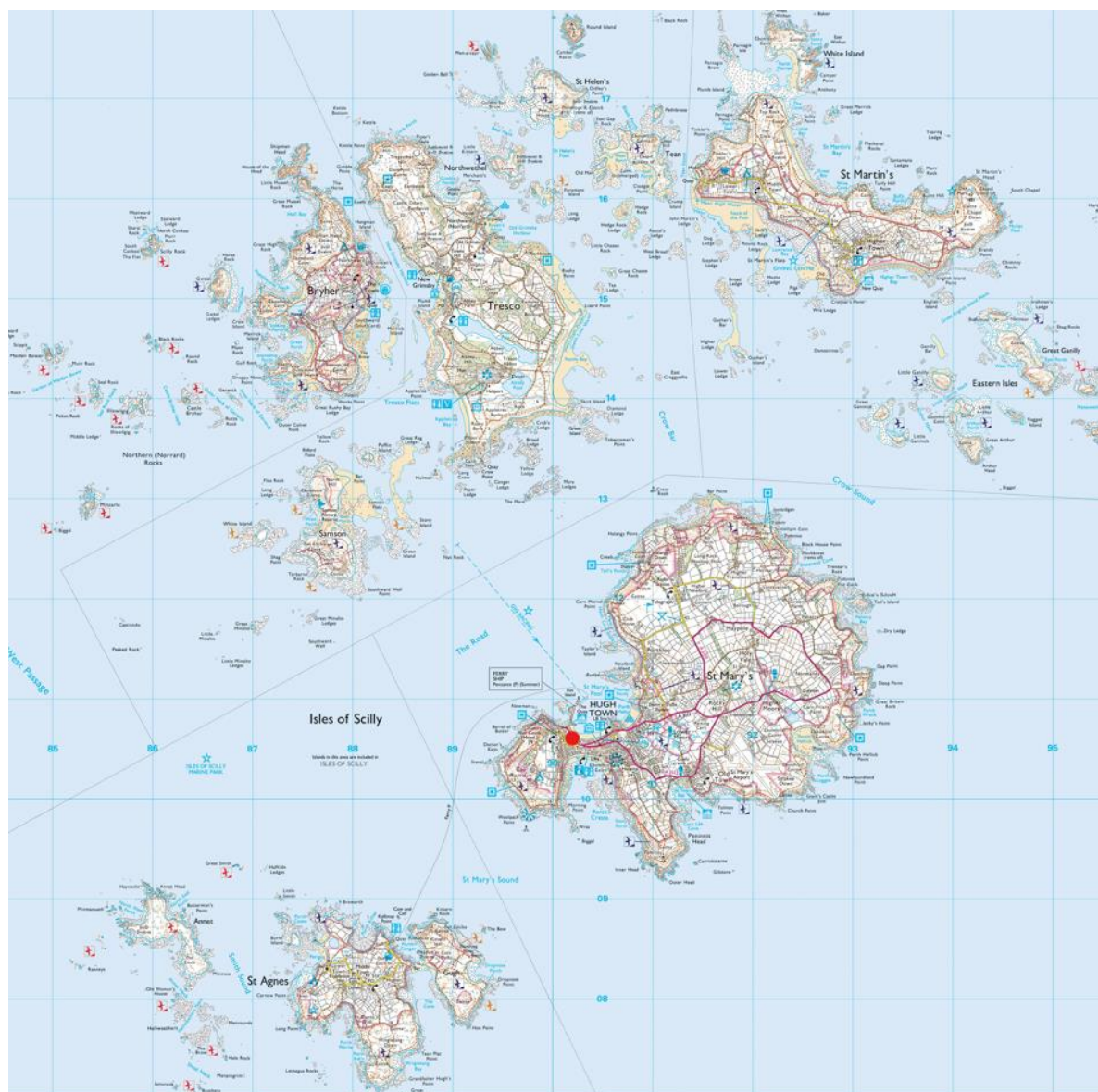
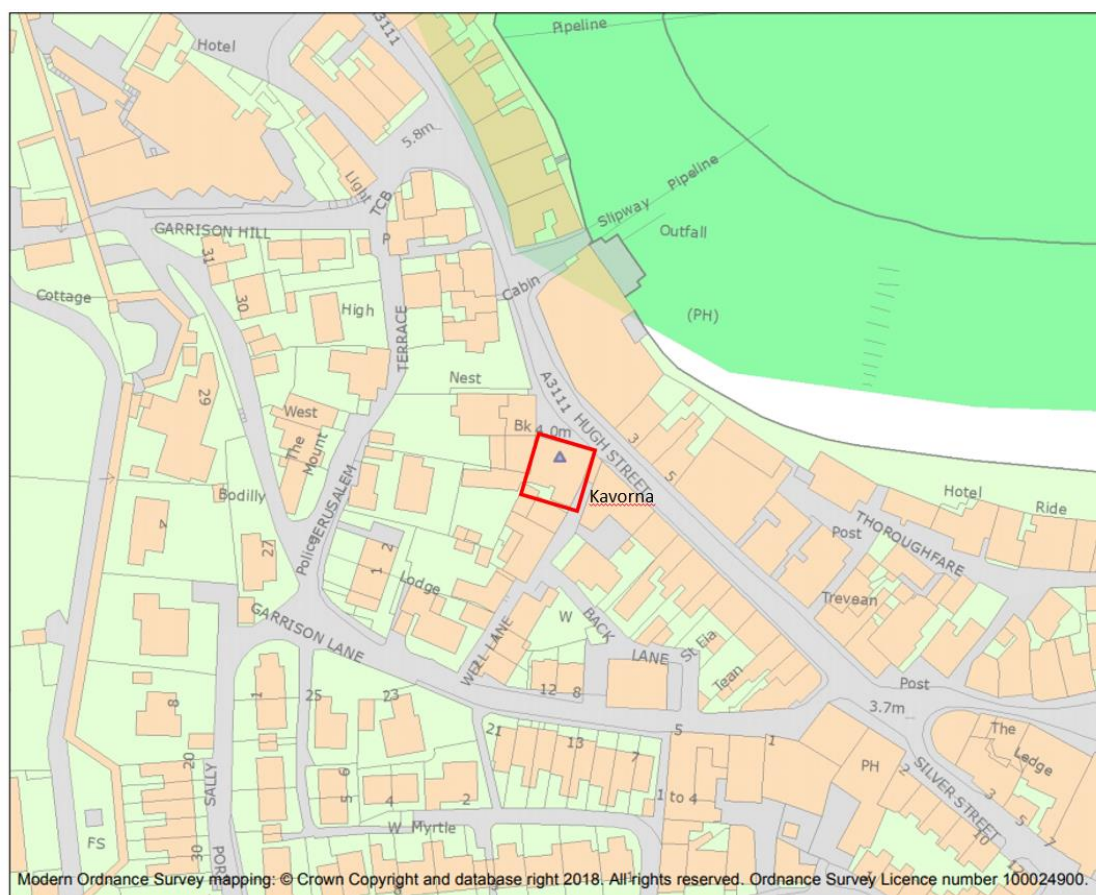


Fig. 2: Location Plan (approximate scale 1:50,000).

- 1.3 The rear, south wing of Kavorna has suffered from severe rippling of the slate scantle tiles on its northern side (Figs. 4, 15 and 16). The area affected by rippling finally collapsed during a storm in August, 2021. In 2019, the southern side of the south wing also suffered from a rippling slip, which was successfully repaired at that time (Figs. 7 and 16). Accordingly,

applications for planning permission (ref. P/21/093/FUL) and Listed Building Consent (ref. P/21/094/LBC), which included the repair of the affected slate roof, together with the removal of an existing structure to the rear of the property, were submitted in November, 2021. Both applications were consented, on February 25, 2022.



**Fig. 3: The location of Kavorna along Hugh Street (Approximate scale: 1: 2000).**

- 1.4 The applications were supported by a Heritage Impact Statement (Osborne 2021), which outlined the scope of proposed works, and recommended the complete replacement of the scantle slate roof covering of the southern part of the building, with one of Natural Slate, as recommended by the Isles of Scilly Design Guide (2006). The applications also specified proposals for the removal of an existing store building to the rear of the property.
- 1.5 A Delegated Planning Response from the local planning authority included the following comments:



Initially the proposal included a re-roofing of a section to the rear of the property, which runs to the south-east elevation, as a return on the main structure. This would have seen the loss of the wet-laid scantle roof, and its replacement with a dry-laid natural slate finish. While this existing scantle appears to have failed on the south roof slope, this is now not included in the application, as the applicant intends to carry out a temporary repair to this roof only, with a view to fully assessing the structure and applying separately for this work, where a permanent solution would be sought. Additionally, the proposal includes the removal of a large single-storey modern outbuilding, which is situated close to the main building, but within the private rear garden. Internally, the works include alterations which will see the removal of two later stud-wall partitions that will see a current small kitchen and bedroom being opened up into one larger kitchen/dining space.



**Fig. 4: Slippage of slates on the south roof of the rear south wing, in 2021 (Paul Osborne).**

#### *Impact of the proposals*

- 1.6 While the owner needs to urgently repair the rear south scantle roof, there is insufficient heritage assessment to conclude on whether permanent loss of scantle is justified, or would result in harm to significance. The applicant is therefore seeking to temporarily secure the south roof slope, and will apply separately for a permanent solution. Internally, the removal of the stud-wall is not significant, as this is a much later insertion within the building, as

evidenced by its modern construction. The removal of the 1970s outbuilding will be a positive change to the curtilage, as this is a large modern construction that in its current position, results in harm to the setting of this building.

- 1.7 Accordingly, the Delegated Planning Response recommended approval of the applications, as no harm to the designated heritage asset had been identified.

***Local Planning Authority Advice***

- 1.8 The following Consultation advice was received on 22 November, 2021 regarding the initial proposals contained in applications ref P/21/093/FUL and P/21/094/LBC:

Analysis of the c.1880 and c.1907 Ordnance Survey maps suggest that the building may have been subdivided in the late 19th/early 20th century. Both maps show the rear (south) wing, which is considered in the listing description to be potentially of 18<sup>th</sup>-century date. The scantle slate roof may date to this period, and is considered as a distinctive part of the building's architectural significance and part of the reason for its designation. It is not properly described in the submitted Heritage Statement, with no details of the existing roof structure, the likely origin of the slate, potential date and construction details, including the lathes, roof trusses, hip details and whether the roof covering was originally wet laid and torched.

- 1.9 This roof has the potential to be of 18<sup>th</sup>-century date, but evidence relating to the significance of this historic fabric has not been adequately assessed in the submitted Heritage Statement. Concern is also expressed that there is a lack of detail in the application documents about the proposed re-roofing scheme, including where will the 'natural slate' be sourced, the fixings, the sizing (random?) of the slates and if they will be laid in diminishing courses (as a scantle roof) and if not, the justification for the proposal (and why the existing roof material cannot be re-laid on new lathes and re-pegged?).

- 1.10 The following comments were received from the Chief Planning Officer on January 17, 2022:

- Firstly, the application does not include sufficient information in relation to understanding the existing roof structure in the HIA (and its significance). It would appear that this section of the building is particularly old, and therefore its construction (including photographs) should form part of the heritage assessment;

- The details of the proposed re-roofing scheme are also unclear in the submission (the nature of the supporting structure, its timbers, whether they will be retained, and the size and type of tiles to be used).
- Secondly, the application includes the insertion of a door and further information is requested as to where the proposed door is (ie within an existing window opening?).
- In terms of the roof, the proposed scheme appears to provide an inadequate level of detail in terms of the significance of the building.
- Demonstrating understanding of the significance of the building is both a National Planning requirement (Para 194) and a requirement of the Local Plan (Policy OE7).
- It will be necessary to determine whether there is historic roof fabric remaining within the structure. Photos of the roof space, trusses and underside of the roof covering should be supplied.
- The justification for re-roofing and the loss of the historic fabric, as the building is listed, should include a structural assessment to back up how the roof needs to be treated, so an expert opinion should be provided if this is the case.

1.11 Following further consultation with the local planning authority, the client confirmed, in a communication of January 24, 2022, that he was now permitted to remove affected areas of scantle slate at that time, and make good with natural slate. This interim measure would allow further time to prepare and submit a further application, with supporting documentation, for the complete replacement of scantle with natural slate

### ***The Scope of the Heritage Statement***

1.12 It proposed to re-roof the southern part of Kavorna with dry-laid natural slate, instead of the existing scantle slates. This may potentially affect aspects of historic fabric which could be of eighteenth-century date, and which are integral to the external appearance, historic character and appearance of the listed building. Such proposed change may also have implications for the setting of neighbouring heritage assets, and for the appearance and special interest of surrounding parts of the Conservation Area.

1.13 In considering applications for development which results in impacts to listed buildings, the statutory duty, under Sections 16 (2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990, is 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". It will also be necessary to articulate the significance of this heritage asset and to assess the impact of the proposed works upon that significance, in accordance with Paragraph 194 of the National Planning Policy Framework:

*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their 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.*



**Fig. 5: Aerial image of 2005, of Kavorna, and its rear wing, within their built context (Geoinformation Systems).**

- 1.14 It will also be necessary to articulate the significance of this heritage asset and to assess the impact of the proposed works upon that significance, in accordance with Paragraph 195 of the National Planning Policy Framework:

*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*



1.15 In order to assess the potential effects of the proposed changes to slate roofing on the significance of Kavorna, and on the special interest of the associated Conservation Area, it will be necessary to:

- provide a description of the form, date and architectural interest of the building;
- provide a detailed articulation of significance of Kavorna, and of those aspects of architectural interest and historic fabric which most contribute to its significance;
- to assess the current form condition and mode of construction of relevant parts of the roof of Kavorna, and to provide a clear understanding of the effects of the proposed alterations to the roof on the form, fabric and significance of the building;
- to assess the effects of the proposed changes to Kavorna on the significance of surrounding heritage assets and Conservation Area, through changes to their appearance or setting;
- to propose a suitable methodology of replacement, including sourcing of materials and treatment of supporting timber elements; and
- assess the effect of the proposed alterations on the significance of Kavorna , and any resulting levels of harm.

## 2. PLANNING POLICY CONTEXT AND GUIDANCE

2.1 This Heritage Statement has been compiled in accordance with the following statutory, planning policy and guidance documents:

- National Heritage Act 1983 (amended 2002);
- Planning (Listed Buildings and Conservation Areas) Act 1990;
- National Planning Policy Framework 2012 (amended 2021);
- National Planning Practice Guidance: Conserving and Enhancing the Historic Environment (2016 revised 2021);
- English Heritage guidance: 'Conservation Principles; policies and guidance for the sustainable management of the historic environment' (2008);
- Historic England guidance: 'Historic Environment good practice advice in planning: Note 2; Managing significance in decision-taking in the historic environment' (2015a); and
- Historic England guidance: 'Historic Environment good practice advice in planning: Note 3: The Setting of Heritage Assets' (2015b).

### ***Planning (Listed Buildings and Conservation Areas) Act (1990)***

2.2 The 1990 Planning Act states that:

*'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall, or as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest that it possesses (Section 66).'*

### ***National Planning Policy Framework (2012, rev. 2021)***

2.3 The Framework sets out national planning policy relating to the conservation and enhancement of the historic environment. It defines the historic environment as: "all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past activity, whether visible, buried or submerged, and landscape and planted or managed flora." Individual components of the historic environment are considered to constitute heritage assets: "buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of their heritage interest".

2.4 Key tenets of the Framework are that:

- when considering the impact of a proposed development on the significance of a heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater that weight should be (Paragraph 199).
- heritage significance can be harmed or lost through alteration or destruction of the heritage asset, or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to, or loss of, a Grade II-listed building, park or garden should be exceptional. Substantial harm to, or loss of, designated assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, Grade I or II\*-listed buildings, registered parks and gardens and World Heritage Sites should be wholly exceptional (Paragraph 200).
- where a proposed development 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 (Paragraph 202).
- With regard to non-designated heritage assets, a balanced judgement will be required having due regard to the scale of any harm or loss, and to the significance of the heritage asset affected (Paragraph 203).
- 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. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably (Paragraph 206)

2.5 Local Planning Authorities are urged to request applicants to describe the significance of any heritage assets affected by a proposed development, including any contribution made to significance by their setting. The level of detail required in the assessment should be “proportional to the assets’ importance, and no more than is sufficient to understand the potential impact of the proposal on their significance”.

### ***Local Planning Policy***

#### *The Isles of Scilly Local Plan 2015-2030*

- 2.6 Planning policies for the protection and conservation of the historic environment are contained within Policy OE7, of the Isles of Scilly Local Plan 2015-2030. Relevant aspects of Policy OE7 are as follows:

#### Policy OE7: Historic Environment

- 2.7 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.

- 2.8 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.

#### 2.9 Development affecting Heritage

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.

#### 2.10 Conservation Areas

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

- a) it preserves 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.

## 2.11 Development affecting Listed Buildings

- 6) Development affecting Listed Buildings, including alterations or changes 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.

### *The Isles of Scilly Character Area Statement and Supplementary Planning Document*

- 2.12 This document provides descriptions of heritage assets and character areas within St Mary's, together with a brief set of management prescriptions and actions (Isles of Scilly Council 2015).

### *The Isles of Scilly Design Guide 2006*

- 2.13 This document provides guidance of new developments and alterations, and includes the following relevant points:

#### Traditional Materials

- Granite is traditionally the main building material for all types of buildings on the Isles of Scilly. The local brown granite from which the islands are formed, is more granular and less durable than on the mainland.
- Timber, which had been washed ashore from wrecks, has been used in buildings when available. Modern infill on the islands has developed a vernacular of rough sawn vertical batten (flat wooden strips) and board timber extensions.
- The traditional roofing material on the islands was thatch from reeds. Thatched roofs have all disappeared from the Isles of Scilly. Slates imported from the mainland became popular in the 19th and 20th Centuries, particularly Delabole 'smalls' and 'peggies'. Slate roofs are frequently scantled (small slates cut roughly, at random widths

usually diminishing from bottom to top of the roof slopes, often bedded on mortar and trimmed all the way round).

2.14 Roof materials and colours

- Scantling slate (small slates cut roughly in random widths usually diminishing from bottom to top of the roof slope, often embedded in mortar and trimmed all the way round) is an established building tradition which should be used as first preference wherever possible.
- It is important however that the specification and detailing are correct, and that builders who are experienced in this work are selected.
- Slate in larger more regular sizes can also be used. It is likely that a rough-edged type would be appropriate. Reconstituted slate may not be sufficiently robust in this exposed location. It may also fade in colour, over prolonged periods of time

### 3. METHODOLOGY

3.1 The Historic England *Planning Note No 3* (Historic England 2015b) provides key stages of consideration in regard to assessing the impact of a proposal on the setting of a heritage asset as follows:

- Identify the degree to which setting makes a contribution to the significance or the heritage asset or allows its significance to be appreciated;
- Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Explore ways to maximise enhancement and avoid or minimise harm; and
- Make and document the decision.

3.2 Paragraphs 9 and 10 of *Note Number 3* also provide an overall and general understanding of 'Setting'. Paragraph 9 states 'Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset or the ability to appreciate that significance'. While Paragraph 10 states 'The contribution of a setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.'

#### ***General***

3.3 The methodology employed by this assessment is in accordance with key professional guidance, including the *Standard and Guidance for Historic Environment Desk-Based Assessment* (Chartered Institute for Archaeologists 2014), the Historic England guidance *Conservation Principles* (2008) and Historic Environment Good Practice Advice in Planning Note 2: *Managing Significance in Decision-Taking in the Historic Environment* (Historic England 2015). Impacts to heritage settings were assessed using the methodology detailed within the current Historic England guidance *Historic Environment Good Practice Advice in Planning Note 3: the setting of heritage assets* (2015).



### *Sources of data*

- 3.4 This Heritage Statement has involved detailed consultation of readily-available historical information drawn from documentary and cartographic sources. The major repositories of information consulted have comprised:
- National Heritage List for England (EH);
  - Published and unpublished documentary sources;
  - Published and thematic studies relating the Isles of Scilly and Hugh Town;
  - Local Authority Supplementary Planning Documents, including Conservation Area Appraisals and Design Guides;
  - Historic maps and photographs;
  - English Heritage Archives (EHA) and AMIE (Archives and Monuments Information, England) data;
  - Online sources, including Local Plan policies and information.
- 3.5 A bibliography of documentary, archive and cartographic sources consulted is included in the References section of this report.

### *Setting*

- 3.6 Paragraph 013 of the PPG notes that all heritage assets have a setting, irrespective of the form in which they survive, and whether they are designated or not. The setting of a heritage asset and the curtilage of an asset may not have the same extent.
- 3.7 The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development, and associated visual/physical considerations. Although views of, or from, an asset will play an important part in the assessment of setting impact, the way in which an asset is experienced in its setting is also influenced by other environmental factors, such as noise, dust, smell and vibration, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity, but are not visible from each other, may have a historic or aesthetic connection that amplifies the experience of the significance of each (PPG, paragraph 013).

### *The Significance of Heritage Assets*

- 3.8 Heritage assets are defined by the National Planning Policy Framework (henceforth, 'the Framework'; revision of 2021) as 'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest'. The term Heritage Asset includes both designated heritage assets and assets identified by the local planning authority as possessing heritage significance (including locally- listed structures)'. Designated heritage assets include: World Heritage Sites; Scheduled Monuments; Listed Buildings; Protected Wreck Sites; Registered Parks and Gardens; Registered Battlefields; and Conservation Areas. Non-designated heritage assets include sites held on the Historic Environment Record, in addition to other elements of the landscape understood to have a degree of significance meriting consideration in planning decisions.
- 3.9 The assessment of the heritage value (significance) of a site determines the ways in which particular aspects of a place and different periods in its evolution contribute to, or detract from, those identified heritage values associated with the asset.
- 3.10 Heritage significance is defined in Planning Practice Guidance (Annexe 2, 2021) as 'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical fabric, but also from its setting'
- 3.11 Current national guidance for assessing the significance of heritage assets is based on the criteria provided by Historic England (formerly English Heritage) in *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment* (English Heritage 2008). Within this document, significance is weighed by the estimated potential for the asset to demonstrate the following criteria:
- Evidential value derives from 'the potential of a place to yield evidence about past human activity' (ibid, 28). It is primarily embodied by physical remains or historic fabric, but also includes buried archaeology;
  - Historical value derives from 'the ways in which past people, events and aspects of life can be connected through a place to the present' (ibid, 28). Illustrative historical values depend on visibility in a way that evidential value does not; and 'have the

power to aid interpretation of the past [...] through shared experience of a place' (ibid, 29). Associative historical values relate to historical connections with a notable family, person, event or movement;

- Aesthetic values derive from 'the ways in which people draw sensory and intellectual stimulation from a place' (ibid, 30). Aesthetic value might be generated through conscious design and artistic endeavour, fortuitous and organic change, and the relationship of structures and materials to their setting;
- Communal value is tied to historical (associative) value and aesthetic value, deriving from 'the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory' (ibid, 31);
- Communal values may be commemorative, symbolic or social. The latter is typically 'associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence,' and might only be articulated when the resource is under threat (ibid, 32).

3.12 Further information on good practice in implementing historic environment policy in the NPPF is provided within the guidance Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015a). This document provides advice on the assessment of the significance of heritage assets in support of applications for planning permission, and emphasises that the information required regarding heritage significance should be no more than would be necessary to inform the planning decision.

### ***Assessing levels of Impact***

3.13 Impact assessment addresses predicted changes in the existing condition of the environment, as a result of a proposed development. The significance of an impact is generally determined as the combination of the 'sensitivity and/or value' of the affected receptor, and the predicted magnitude of change. In this case, heritage receptors comprise a group of Grade II-listed buildings, which may be considered both as individual structures and as a coherent group of related assets. These are considered to represent receptors of medium to high sensitivity and/or value.

*Magnitude of Impact*

- 3.14 The determination of the magnitude of change is based on the current level of survival, or condition, of the receptor. The variable factors which determine the magnitude of change include the vulnerability or sensitivity of the site or feature to change. The criteria commonly used to determine the magnitude of impact are as described in the following table:

Magnitude of Impact	Description
Major	The proposed development would cause a large change to existing environmental conditions. Complete destruction of the site or feature. Change resulting in a fundamental change to the ability to understand or appreciate the asset and its context and setting.
Moderate	The proposed development would cause noticeable change to existing environmental conditions. Change resulting in appreciable change to the ability to understand or appreciate the asset and its context and setting.
Minor	The proposed development would cause small change to existing environmental conditions. Change resulting in small change to the ability to understand or appreciate the asset and its context and setting.
Negligible	The proposed development would result in no discernible change to existing environmental conditions. Negligible change or no material change to the site or feature. No change to the ability to understand or appreciate the asset and its context and setting.

**Table 1: Criteria used to determine the level of impact.**

*Significance of Impact*

- 3.15 The significance of impact and environmental effect is determined by two variables:
- The importance or significance of the receptor; and
  - The magnitude of change affecting the receptor.

Environmental effects may be either adverse or beneficial, depending on the nature of the impact.

Receptor sensitivity/value	Magnitude of Impact			
	Major	Moderate	Minor	Negligible
Very high	Substantial	Substantial	Moderate	Slight
High	Substantial	Moderate	Slight	Negligible
Medium	Moderate	Slight	Negligible	Negligible
Low	Slight	Negligible	Negligible	Negligible

**Table 2: Criteria used to determine the significance of impact.*****Sectoral Guidance***

3.16 This Statement has been compiled in accordance with the following statutory, planning policy and guidance documents:

- National Heritage Act 1983 (amended 2002);
- Planning (Listed Buildings and Conservation Areas) Act 1990;
- National Planning Policy Framework 2012 (revised 2021);
- National Planning Practice Guidance: Conserving and Enhancing the Historic Environment 2016 (revised 2021);
- English Heritage guidance: 'Conservation Principles; policies and guidance for the sustainable management of the historic environment' (2008);
- Historic England guidance: 'Historic Environment good practice advice in planning: Note 2; Managing significance in decision-taking in the historic environment' (2015a); and
- Historic England guidance: 'Historic Environment good practice advice in planning: Note 3: The Setting of Heritage Assets' (2015b).

#### 4. KAVORNA: ITS FORM, HISTORY AND SIGNIFICANCE

##### *A Description of Kavorna*

- 4.1 Kavorna, No. 21 Hugh Street, St Marys, was added to the National List in December, 1992 (NHLE 1218783), in view of its historic and architectural interest. The listing description is given as follows:

*House, possibly originally 2 dwellings, now shop and flat. C18, with C19 and C20 alterations. Coursed granite rubble, with colour-washed render to front; gabled scantled slate roof; granite end stacks. L-plan with C18 rear left wing. 2 storeys; 4-window first-floor range. Ground floor has 2 inserted mid C20 segmental shop windows, 3/3-pane sash to right and 2 recessed doorways with half-glazed early C20 doors. Interior: plain C19 joists.*



Fig. 6: View, looking west, of the north-east, street-front elevation of Kavorna.

- 4.2 The rear left wing referred to in the listing description comprises the south wing of the building, which is the principal subject of this Heritage Statement (Figs. 4, 7, 16, 18 and 19). This may be considered as an authentic vernacular structure, which incorporates local materials, including walls of roughcast brown granite (Fig. 4). Kavorna is broadly representative of a vernacular building type of the Isles of Scilly, as two-storeyed and double-fronted, with sash windows, centrally-positioned doorways and internal chimneys (Isle of Scilly Council 2006). Slate has completely replaced traditional thatch as a roofing material, and



has been imported from the mainland, from the nineteenth century onwards. Traditionally, these slates often comprised 'smalls' or 'peggies'. Slate roofs, as here, were frequently scantled, with small slates cut roughly, and at random widths. These would diminish from top to bottom of the roof-slope, and were often bedded in mortar and trimmed all the way round.

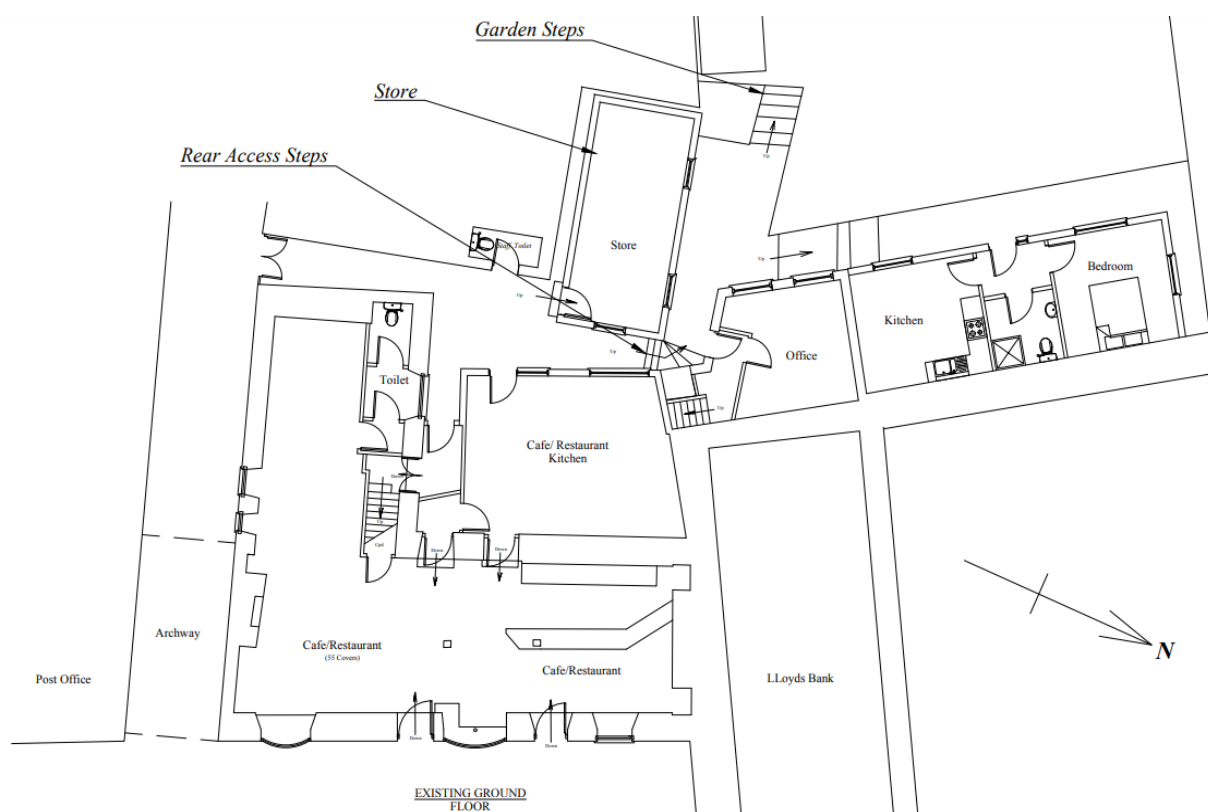
- 4.3 Kavorna has an L-shaped ground-plan, with the rear southern wing comprising an original element, with coursed, roughcast granite walls and a scantled slate roof (Figs. 4, 7 and 16). It is probable that the northern end of this original building extended, gable-end on, to the street frontage, although extensive nineteenth and twentieth-century alterations make it difficult to determine the precise structural relationship between the two principal phases of the building. The proportions and fenestration of the later, north range, although altered by later insertions, suggest a date not much later than *c.* 1800 (Figs. 1 and 6), and it is possible that the division of Kavorna into two separate dwellings may date from this phase of construction. The present internal floor-plan of the building is unfortunately not informative in this respect (Fig. 8).



**Fig. 7: The north-west elevation of the south wing of Kavorna, showing slate rippling, with details of traditional vernacular construction.**

- 4.4 The 25-inch Ordnance Survey map of 1908 (Fig. 9) clearly shows the property as two separate dwellings, with the eastern of the two incorporating the earlier southern wing, and extending to the street frontage. The western dwelling occupies a noticeably smaller ground-plan, and has a small structure to the rear, possibly a privy.





**Fig. 8: Existing ground-floor plan of Kavorna (approximate scale 1:100) (P. Osborne).**

- 4.5 It has been suggested that an existing house was subdivided in the later nineteenth century, although there is no evidence of this, and the current distribution of doors and windows on the front elevation of the building (Figs. 2 and 6)) suggests that the two dwellings were constructed to a plan. Kavorna had evidently been converted to a single dwelling by the time of the Ordnance Survey map of 1931 (Fig. 11). There are no records of the original plan-form of the building, or of the structural and internal changes that were made at that time.
- 4.6 Consultation advice provided by the local planning authority (Paragraph 1.9 of this report) has identified the rear south wing of Kavorna as being of probable eighteenth-century date, and suggests that the slate scantle roof may also date from this time. This is contentious, as it is widely recognised (cf. Council of the Isles of Scilly 2006; 2015) that most Scilly Island roofs were of thatch at this time, and were commonly replaced by imported slates from the mid-nineteenth century onwards.

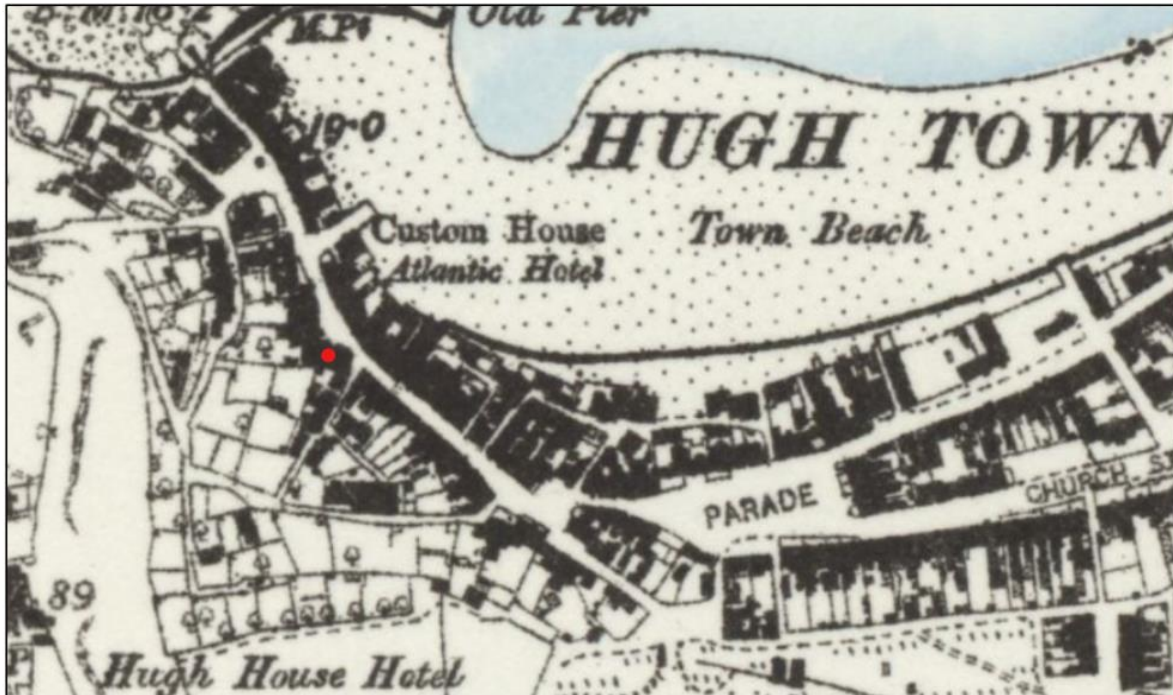


Fig. 9: Extract from Ordnance Survey England and Wales six-inch series 1842-1952, published 1889 (National Library of Scotland).

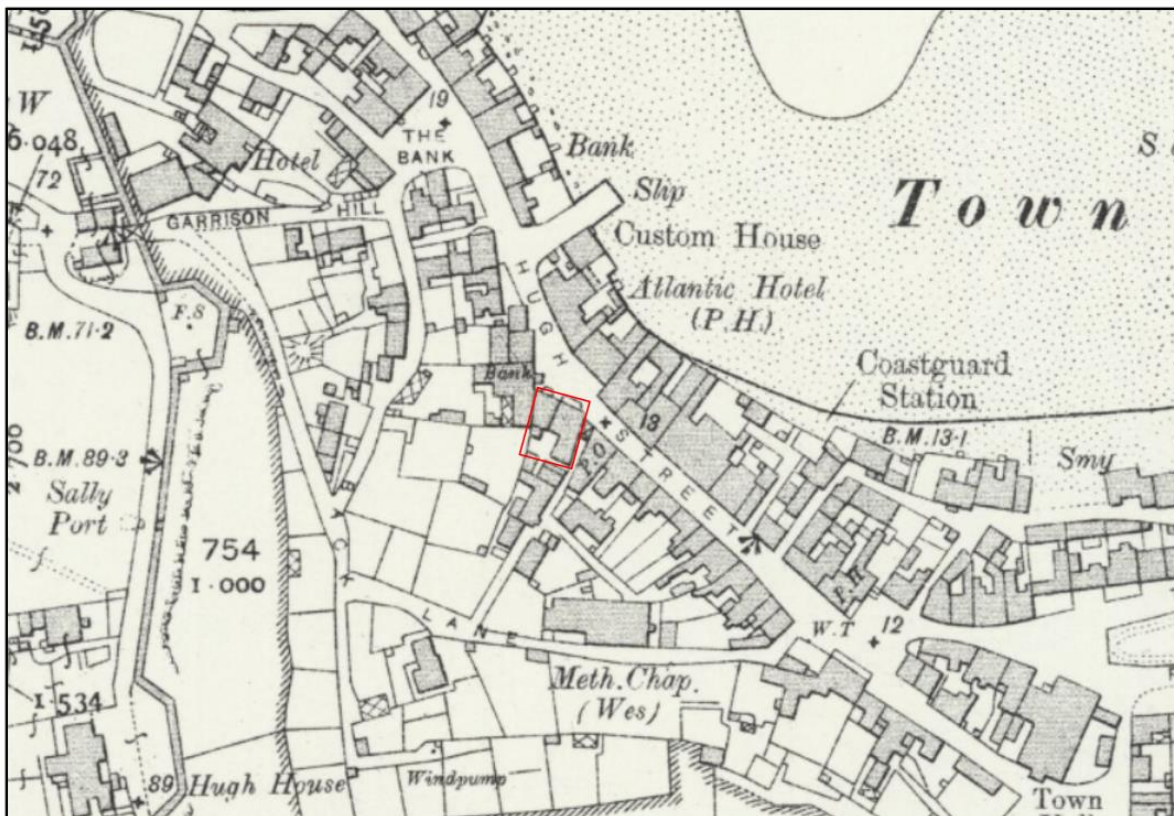


Fig. 10: Extract from Ordnance Survey England and Wales s25-inch series 1842-1952, published 1908 (National Library of Scotland).

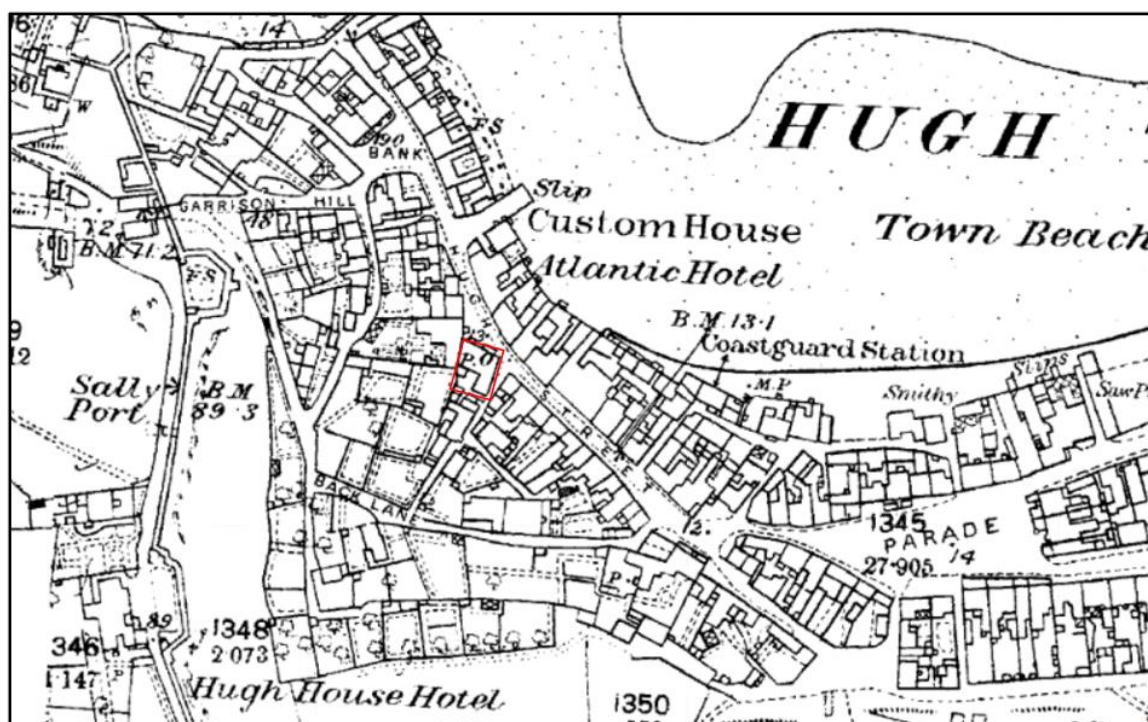


Fig. 11: Extract from Ordnance Survey 25-inch England and Wales series 1842-1952, published 1931 (Cornwall County Council).

### *The Significance of Kavorna*

- 4.7 The principal significance of Kavorna resides in its historic fabric and built form, as an historic building of eighteenth and nineteenth-century date, which is integral to the development of Hugh Town as a settlement. The significance of Kavorna as a heritage asset is articulated using the complementary group of heritage assets described in the English Heritage (Historic England) guidance *Conservation Principles* (2008).

### *Historical Illustrative Heritage Values*

- 4.8 Kavorna is associated with historical illustrative heritage values of high importance, which relate to its survival as a vernacular building displaying traditional methods of construction and use of local materials. It is also importantly illustrative of the eighteenth-century development of Hugh Town as a settlement, and the eighteenth-century shift in settlement focus away from Old Town (Fig. 21). Such changes also relate importantly to changes in economic activity within the Isles of Scilly in the early modern period. Kavorna, along with buildings of comparable date along Hugh Street, may therefore be considered to be representative of the early street-plan of the town (Figs. 3, 5 9 and 10). In terms of its form and fabric, Kavorna is also illustrative of long-term patterns of change and adaptation, and its



slate roofs provide evidence of this. These are also associated with historical illustrative values, which relate to historic traditions of roof construction and the sourcing of roofing materials.

#### *Design Aesthetic Heritage Values*

- 4.9 Kavorna displays the pleasing and harmonious design of a traditional vernacular building which reflects local historic character (Figs. 1, 6 and 7). As such, it is a building which makes a considerable contribution to the character and appearance of Hugh Street. It therefore comprises an important element within eastward and westward views along Hugh Street, and this aspect of setting contributes to the significance of the building (Fig. 12). The colour and texture of its slate roofs comprise an important aspect of the aesthetic quality of Kavorna, and thus contribute to its design aesthetic values and historic character (Figs. 1, 4, 6 and 16). In common with those of surrounding buildings, the slate roofs of Kavorna contribute to the appearance and character of surrounding streetscapes and this part of the wider Conservation Area.



**Fig. 12: A Postcard of c. 1930, looking east along Hugh Street, with Kavorna to the left of the picture.**

- 4.10 On the basis of this assessment, Kavorna is assessed as a heritage asset of high significance. Its historic fabric, including slate roofs, are integral to that significance, although it is recognised that these may not relate to the earliest phase of construction of the building. The proposed use of natural slate will assist in preserving the design aesthetic values of the building.

## 5. THE SLATE ROOF AND ITS REPAIR

- 5.1 This section provides a description of the relevant parts of the slate roof of Kavorna, and the damage it has sustained, together with recommendations and prescriptions for repair.

### *The Structure of the Slate Roof*

- 5.2 The timber construction of the roof is not of high quality, and the timber members, which appear to be largely machine-cut, must be of mid-nineteenth-century, or later date (Figs. 13 D, E and G; 14; 15 D and E). The quality of the roof structure must also cast doubt as to whether this part of the building was originally intended to comprise part of a dwelling, or was simply a storage or commercial structure of some kind. The roof is supported by A-frame trusses of substantial machined softwood timbers, which rest directly on wall-tops, rather than a timber wall-plate (Figs. 13 E and G; 15D). The trusses support two substantial purlins on each side, also of machined timber, and measuring approximately 100mm by 75mm in section (Figs. 13 E and G; 14; 15 D and E). There is no ridge-board, and the upper pairs of purlins are located irregularly in relation to one another, and without supporting struts (Fig. 13E). They appear to be secured to trusses by large iron nails.
- 5.3 The purlins support jack rafters, which are set at irregular intervals of between 300mm and 400mm. These are also of machined softwood, mostly measuring approximately 70mm by 50mm in section, although some are of thinner, flatter section (Figs. 13 A-H; 14; 15 C and D). Battens are highly irregular, mostly comprising rough-sawn strips averaging 40mm to 50mm in width, and displaying considerable variation in thickness and section (Figs. 13 A-H; 14; 15 A-F). These are set on rafters, at intervals of between 60mm and 100mm. In some areas, the condition of rafters and battens suggests relatively recent repair and replacement (Fig. 14).
- 5.4 Fixing of timbers throughout appears to be with iron nails, and there is no evidence of mortising or pegging of major timber joints. Individual wet-laid slates are head-nailed and hung on battens, with nails protruding below battens in many cases (Figs. 13 A and D; 17 C and H). Occasionally, particularly at lower levels of the roof-slope, slates have been secured by wooden pegs. The scangle slates display considerable irregularity along the battens, and some display evidence of shifting in relation to battens. The slates are consistently of uneven,

grey-green colouration, presumably of imported, but otherwise unknown origin (Figs. 13 B, C and D; 15A; 17 A, D and F).

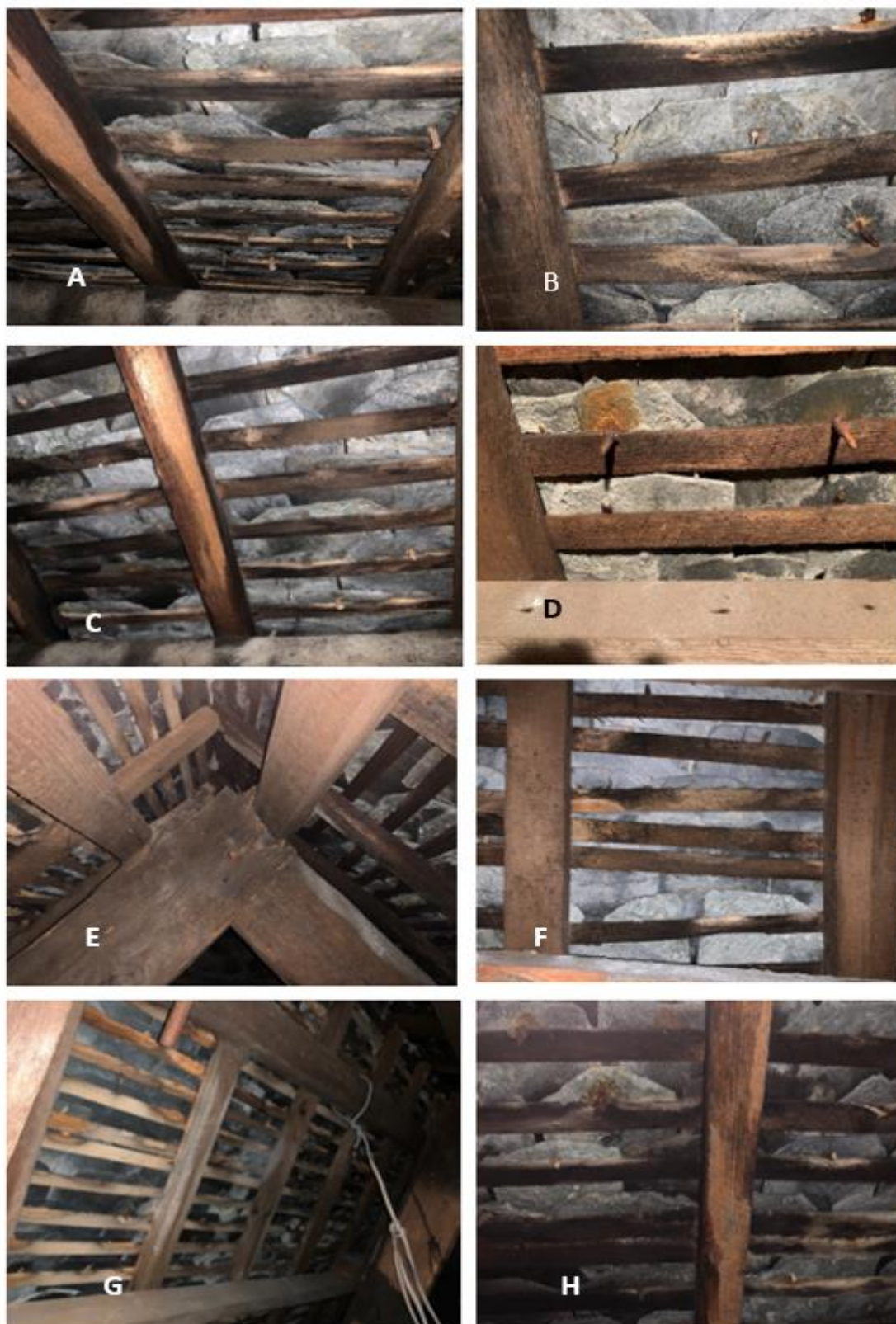


Fig. 13, A-H: Internal details of roof construction.





**Fig. 14: Internal details of roof construction: purlin, common rafters and battens.**

### ***The Failure of the Slate Roof***

- 5.5 The failure of parts of the slate roof results from deficiencies in original roof construction and choice of materials. None of this work can reasonably be dated earlier than the mid-nineteenth century, when it is assumed that a thatched roof was replaced. Within close proximity to the shoreline, the maritime climate has resulted in extensive corrosion of iron fixings, particularly of the iron nails securing the scantle slates (Fig. 13D). This is evident in the iron-staining visible on the undersides of a number of slates. In addition, it is clear that the smaller iron nails securing battens to rafters have also been subject to corrosion and failure, resulting in the downward slippage and displacement of battens under the accumulated weight of slates (Figs. 13F; 15B, C and F; 17B and F). A number of battens appear to be of insubstantial thickness, and are possibly not adequate to support the weight of slates, and a number of these

display evidence of *in situ* decay, possibly as a result of slight water ingress during winter storm conditions (Figs. 15A-F; 17A-H).



Fig. 15, A-F: Internal evidence of deterioration of roof battens and slate slippage.



- 5.6 It is also possible that the corrosion and failure of head-nails has enabled downward slippage and displacement of slates which have imposed additional weight on battens further down the roof-slope, thus causing them to break or become displaced, particularly if iron fixings have become corroded (Figs. 15B, C, D and F; 16; 17B). Given the cumulative weight and down-pressure of slates at mid-point on the roof-slope, this could result in a cumulative effect, causing the rippling noted on the north-west side of the south wing (Fig. 16).



**Fig. 16: Cumulative downward displacement of slates on the north-west side of the south wing of Kavorna.**

### ***Approaches to the Repair of the Slate Roof***

- 5.7 In a communication of January 17, 2022, the client considered that the local planning authority advice regarding a Structural Survey was deemed to be unnecessary, as the roof showed no sign of sagging, with the trusses, purlins and jack rafters all appearing to be in good condition. This inspection and photographic record confirmed that the purlins and jack rafters were of probable nineteenth-century date, due to the evidence of machine-cutting.



Fig. 17, A-H: Internal evidence of roof structure and deterioration.



5.8 Internal inspection further confirmed that damaged parts the roof were now affected by water ingress, but that the battens appeared to be in a moderate condition. Consequently, the roof failure was considered to be principally due to corrosion of the iron head-nails. It was also noted that many slates were in a poor condition, having become porous and fragmented, with some displaying a white, powdery texture. This may indicate the long-term exposure of these slates to weathering, particularly in a relatively exposed, coastal environment.

5.9 Internal inspection has confirmed that timber structural elements are basically sound, and that the roof is not at risk of structural collapse. However, complete replacement with natural slate would offer a practical and acceptable solution, and would be appropriate to the historic character of the building and its Conservation Area setting (Figs. 18 and 19). The Scantle Slates on the northern side of the rear building were removed in February 2022, and replaced with natural slate. This was undertaken for reasons of safety, to prevent the collapse of the roof, and was agreed that these would be replaced with Natural Slate tiles, subject to an application for planning consent. The current application now seeks to replace both northern and southern sides of the rear part of the building with Natural Slate, with the southern side to be removed during winter 2022/2023. Such repair is defined by Historic England as:

‘Work beyond the scope of maintenance, to remedy defects caused by decay, damage or use, including minor adaptations, to secure a sustainable outcome, but not involving alteration or restoration’ (*Conservation Principles* 2008).

5.10 Historic England has provided a series of broad guidance principles for the repair of historic buildings, which include the following:

- A conservative approach is fundamental to good conservation - so retaining as much of the significant historic fabric and keeping changes to a minimum are of key importance when carrying out repair work to historic buildings.
- The unnecessary replacement of historic fabric, no matter how carefully the work is carried out, can in most situations have an adverse effect on character and significance.
- The detailed design of repairs should be preceded by a survey of the building's structure, together with an investigation of the nature and condition of its materials and the causes and processes of decay.
- Repair can also help to reveal significance. An inappropriate alteration may have been made in the past, which is causing damage and looks unsightly.

## 5.11 Approaches to repair:

- Only techniques and materials which have been demonstrated to be appropriate to the fabric should be considered. These will normally be the same as the original or parent material, or where this is no longer available or appropriate, have compatible properties, both technically and aesthetically;
- Interventions should maximise the life expectancy of significant building fabric consistent with sustaining its significance;
- Interventions should be reversible, if technically feasible and practicable, or at least, re-treatable and should not prejudice future interventions when these become necessary;
- All works should be adequately recorded and the records made available for others;
- Interventions should contribute to or at least not compromise the sustainability of future management and maintenance (Historic England 2013).

***Specifications for Repair***

5.12 Specific technical guidance for repairs to the roofing of historic buildings is contained within the publication *Practical Building Conservation: Roofing*, published by Historic England in 2018. This identifies the main source of technical advice for slating as *BS 5534:2003 Code of practice for slating and tiling* (British Standards Institute 2014). This deals thoroughly with tally-slate roofing, although the guidance provided is conservative and may, on occasions, be at variance with the construction of an existing historic roof. However, any change that significantly alters the historic integrity or the character of the roof is unlikely to be justified. On the whole, if traditional techniques have performed well, then these should be replicated in repair.

5.13 It is recommended that Natural 'Camborne' Slate would represent an historically authentic source, which would be both durable and provide a good match for the existing scantle slates in terms of texture and colour. The local planning authority has approved the replacement of scantle slates with Natural Slates of this type on a number of historic buildings within Hugh Town and elsewhere. These have been used on both roofs and clad walls of the adjoining Post Office (Fig. 20). A standard size for natural slates of 195mm by 400mm would be appropriate to the removed scantle slates.

5.14 Natural 'Camborne' slate is characterised by a distinctive texture and subtle variations in colour. This may have been a source of much imported nineteenth-century slate in the Isles

of Scilly. The use of the slate would therefore provide an appearance which would be consistent with the existing roofs of Kavorna and surrounding buildings. Individual slates can be cut or graded on site, using normal hand tools. It is recommended that, while holing, slates should be graded by thickness, with the thicker slates used at eaves level, and the thinner at the top of the roof-slope. Slates should be fixed in accordance with BS:5543, Part 1, rev. 1990 (British Standards Institute 2014), and BS:8000: Slating and Tiling Workmanship, and by an approved contractor.

- 5.15 Replacement slates can be fixed with tingles or hidden fixings, rather than pegs or head-nails. Tingles are often made of lead strips nailed to the batten, and folded up over the tail of the slate, but they are liable to become unrolled by heating and cooling or by the weight of snow. Allowing an extra length of lead and folding it back down onto the slate below may be effective, but it is better to use a substantial copper strip – about 1 or 2 mm-thick – which is not so prone to this problem. Substantial copper strip is better, but the best option may be a strong non-corroding wire hooked under the tail of the slate. If the underside is accessible, similar wire can also be used to re-fix individual slates by tying them to the battens (Historic England 2018). In this case, copper nails are proposed as a means of securing slates, which will avoid the longer-term effects of corrosion.



Fig. 18: Drawing of the rear, south-west elevation of Kavorna, with location of the south wing (Paul Osborne).

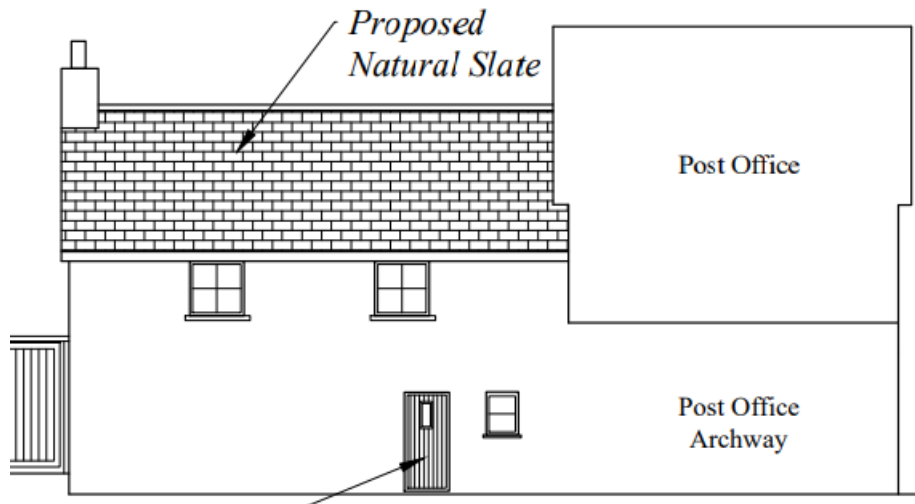


Fig. 19: Drawing of the side, south-east elevation of Kavorna, with the rear, south wing (Paul Osborne).



Fig. 20: Natural 'Camborne' slates on the roof and clad wall of the adjoining Post Office building (Paul Osborne).



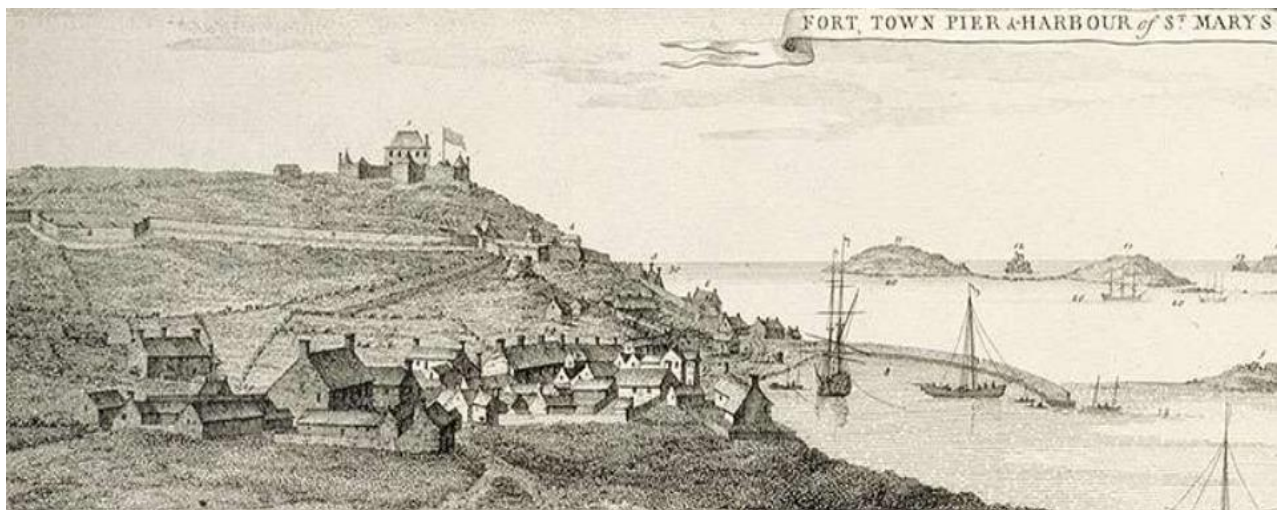
## 6. CONCLUSIONS

- 6.1 Kavorna, 21 High Street, Hugh Town, is a building of eighteenth-century origin, and is listed at Grade II. It has been subject to a number of nineteenth and twentieth-century alterations, which have partly obscured its earlier form. Historic mapping indicates that the building comprised two dwellings in the later nineteenth century, but was subsequently converted to a single dwelling in the early twentieth century, when it became a retail premises. The building retains important historical illustrative and design aesthetic heritage values, which relate to its historic fabric and architectural interest as a vernacular structure, and to its location within the early street-plan of Hugh Town. The slate roofs of Kavorna represent an important part of the aesthetic value and historic character of the building, and make an important contribution to its overall significance.
- 6.2 The rear south wing of Kavorna is of eighteenth-century date, and comprises the earliest part of the building. The scantle slate roof of the rear wing was found to have suffered from severe rippling and displacement of slates on the north side, and this affected area subsequently collapsed, in August, 2021. Applications for the repair of the roof were submitted in November, 2021, and included proposals for the replacement of the deteriorating scantle slate roofing, with natural slates. The applicant has subsequently agreed with the local planning authority to temporarily secure the affected parts of the roof, pending further, more detailed applications for repair and replacement. Consultation advice from the local planning authority has identified the roof as integral to the architectural interest of the building, and potentially of eighteenth-century date.
- 6.3 Internal inspection within the roof-space of the rear south wing of the building has confirmed that the basic timber structure of the roof, comprising trusses, purlins and jack-rafters, is basically sound, and therefore not in danger of collapse. The failure of parts of the roof has been due in large part to the corrosion of the iron head-nails securing the slates, and of those securing the battens. The timber battens themselves are of uneven dimensions and spacing, and have been subject to localised decay. It is notable that all timber structural elements of the roof are of machine-cut softwood, and therefore of probable mid-nineteenth-century date, or later. The affected roof is therefore not an original, eighteenth-century feature, as suggested, but seems likely to have replaced an earlier thatched roof, in common with many other historic structures on the Isles of Scilly. The relatively poor standard of construction of

the roof might suggest earlier use as a storage building or similar, rather than a domestic dwelling.

- 6.4 This Heritage Statement will support further applications for planning permission and Listed Building Consent, and includes a description of the building, and of its history and significance, together with an assessment of the damaged roof and recommendations for repair. Replacement with Natural 'Camborne' Slates, of suitable size, would be the most appropriate course of action. These would closely replicate the colour and texture of the existing scantle slates, and would offer a sustainable, long-term means of conserving the fabric and historic character of the building. Natural slates of this type have been widely used on historic buildings in Hugh Town and elsewhere, including on the Post Office building directly adjacent to Kavorna.
- 6.5 While integral to the appearance and significance of Kavorna, the existing scantle slate roof is not an original eighteenth-century feature, and should not therefore represent an overriding constraint to the proposed replacement. Inspection has confirmed that the existing timber framework of the roof is in basically sound condition, and does not require replacement, although the irregular and unevenly-spaced battens will require removal and replacement, before new natural slates are laid. It is proposed that the scantle slates of the repaired north roof of the affected rear wing will be left *in situ*, and repair and replacement undertaken on the south side.
- 6.6 The proposed replacement of the slate roof of the rear south wing of Kavorna is necessary to preserve the integrity and appearance of this building, and can be achieved in a manner which will preserve its historic character and that of surrounding parts of the Conservation Area. While the rear location of the south wing of Kavorna precludes much visual linkage with surrounding historic buildings within this part of Hugh Street, it is evident that the proposed replacement will have no adverse effects on any associated heritage settings.
- 6.7 The Planning (Listed Building and Conservation Areas) Act 1990 requires that special regard be given to the desirability of preserving a listed building and any features of architectural or historic interest it possesses. This statutory approach is reflected in Policy OE7 of the Isles of Scilly Local Plan 2015-2030. Similarly, Paragraph 199 of the National Planning Policy Framework (NPPF) states that, when considering the impact of development on the significance of a listed building, great weight should be given to its conservation. On the basis

of the assessment presented in this Heritage Statement, it is considered that the proposed changes to this Grade II listed building are wholly proportionate to its scale and character, and would result in an acceptably low level of harm to its significance. Such proposals are in accordance with the statutory requirements stated in Section 66 of the Planning Act, the National Planning Policy Framework and Policy OE7 of the Isles of Scilly Local Plan 2015-2030. It would also be consistent with supplementary planning documents, including the Isles of Scilly Design Guide (2006) and the Isles of Scilly Conservation Area Character Statement and Supplementary Planning Document (2015).



**Fig. 21: Detail from an engraving of 1752, showing the harbour and settlement of Hugh Town, St Mary's, possibly including Kavorna (English Heritage).**

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**APPROVED**

**By Lisa Walton at 12:06 pm, Nov 09, 2022**



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**APPROVED**

*By Lisa Walton at 1:35 pm, Nov 09, 2022*

## PRELIMINARY ROOST ASSESSMENT (PRA)

### SELECTED STRUCTURES AT KAVORNA HUGH TOWN, ST MARY'S, ISLES OF SCILLY



*Client: Paul Osborne*

*Our reference: 2021/06*

*Planning reference: Produced in advance of submission*

*Report date: 10<sup>th</sup> November 2021*

*Author: James Faulconbridge BSc (Hons), MRes, MCIEEM*

*Contact: ios.ecology@gmail.com*

## Executive Summary

### Bats – Results and Findings

The preliminary roost assessment (PRA) survey concluded that there was **negligible potential** for use of the structures under consideration by bats. This assessment relates solely to the re-roofing of a pitched roof of Kavorna and the demolition of a single-storey outbuilding, as identified in this report. It does not provide a comprehensive assessment of the buildings in question nor assess the potential impacts of works beyond the scope specified in this report.

Whilst a negligible potential is concluded, it is noted that there is a small chance of opportunistic/transient use of gaps beneath slipped tiles within the pitched roof during the bat active season only. This potential is not sufficient to justify further surveys or significant constraints to works, but should be taken into account in accordance with the precautionary principle.

This judgement was reached in accordance with the survey methodologies and evaluation criteria outlined in the Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition<sup>1</sup>

### Bats – Further Survey Requirements

No further surveys are recommended – the PRA conclusion does not require further survey information with regards to bats in order to inform a planning application.

### Bats – Recommendations

Standard good practice and vigilance should be observed by the contractors undertaking the proposed works in acknowledgement that bats are transient in their use of roosting opportunities and may explore potential locations. Recommendations to ensure legislative compliance are provided in Appendix 2.

Adherence to the Method Statement provided in Appendix 2 could be secured through a Planning Condition at the discretion of the Planning Authority, though it is noted that this should be a compliance rather than a pre-commencement condition and should not require discharge.

### Nesting Birds – Results and Findings

The survey did not identify any suitable nesting habitat for breeding birds associated with the elements of the structure under assessment.

### Nesting Birds - Recommendations

There is no requirement to replace nesting habitat for breeding birds as no suitable features are identified associated with the elements of the structure under assessment.

Any woody or climber vegetation removal required to facilitate the outbuilding demolition should be undertaken outside of the bird nesting season as a precaution.

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<sup>1</sup> Collins, J. (ed.) 2016 Bat Surveys for Professional Ecologists: Good Practice Guidelines (3<sup>rd</sup> edn). The Bat Conservation Trust, London.

## APPENDIX 1 – PRELIMINARY ROOST ASSESSMENT (PRA)

<b>Planning Authority:</b> Isles of Scilly	<b>Location:</b> 90187(E), 10585(N)	<b>Planning Application ref:</b> Report produced in support of application
<b>Planning application address:</b> Kavorna, Hugh Town, St Mary's, Isles of Scilly		
<b>Proposed development:</b> <p>The proposed works were identified by the client and accord with the documentation submitted in support of the application. These involve:</p> <ol style="list-style-type: none"> <li>1) The re-roofing of an existing pitched scantle-tiled roof with natural slate;</li> <li>2) The demolition of a single-storey outbuilding.</li> </ol>		
<b>Building references:</b> <p>The elements of the structure under assessment in this report are identified in the plans provided in Appendix 3.</p>		
<b>Name and licence number of bat-workers carrying out survey:</b> <p>James Faulconbridge (2015-12724-CLS-CLS)</p>		
<b>Preliminary Roost Assessment date:</b> <p>The visual inspection was undertaken on 3<sup>rd</sup> November 2021 in accordance with relevant Best Practice methodology<sup>2</sup>.</p>		
<b>Local and Landscape Setting:</b> <p>The property is situated at the north-western end of Hugh Town in St Mary's in the Isles of Scilly.</p> <p>The land use immediately surrounding the property comprises dense residential and small-scale commercial development. The shoreline of Town Beach lies close to the north of the property and beyond a band of further development, the more vegetated landscape associated with the Garrison and Star Castle lie to the west.</p> <p>Three records of common pipistrelle roosts are identified in relatively close proximity to the property – these relate to individual bats utilising features such as hanging slates around dormer windows.</p>		

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<sup>2</sup> Collins, J. (ed.) 2016 Bat Surveys for Professional Ecologists: Good Practice Guidelines (3<sup>rd</sup> edn). The Bat Conservation Trust, London.

**Building Description(s):****PITCHED ROOF**

The section of roof subject to this planning application is associated with the element of Kavorna which runs parallel to Well Lane. It attaches to and forms a single loft space with the remainder of the property which runs parallel to Hugh Street.

The building is of granite construction with a pitched scantle slate-tiled roof. The exterior facade is in good condition with exposed granite blocks with well-maintained pointing. The gable is well-pointed with no gaps along the roof verge. A wooden fascia board runs along the eaves with guttering attached – there are gaps beneath this boarding in places but these were generally wide and could be fully inspected from the ground with a torch and binoculars. Whilst discreet sections of the fascia provide cavities with dimensions suitable for bats to roost behind, these are infrequent and relatively exposed due to the irregular surface provided by the granite blockwork. The ridge tiles and concrete-rendered chimney are well-sealed and in good condition.

The scantle tiled roof itself is predominantly well-sealed with mortar beneath the tiles. The exceptions to this are areas where the roof has slipped, necessitating the proposed re-roofing works. Even in these instances, the mortar is often still present and intact; though in other places there are gaps beneath the tiles which provide direct potential access into the roof space.

Internally, a full inspection of the loft space was conducted including the adjacent areas of the loft within the roof running parallel to Hugh Street which would not be directly affected by the proposals. The roof is built around an A-frame timber structure with no under-felting or insulation – the tiles are directly visible attached to battens. No ridge beam is present – instead the ridge tiles directly cap the scantle tiles of the roof. No evidence of bats or other species such as rats, mice or birds were identified.

The following features were identified as potentially suitable for use by roosting bats – these are given individual consideration below:

- The gaps beneath the fascia boards – however their dimensions and level of exposure result in negligible potential for use by roosting bats;
- The gaps beneath scantle tiles which have slipped – however the size of the scantle tiles mean that these gaps are generally too small and even at their largest would offer very little protection from predation, temperature fluctuations or the elements. The only potential use of these features by bats is likely to be restricted to opportunistic day roosts during the active season though no evidence was identified. The gaps which do occur could be inspected from the inside and offer direct passage into the loft space with no apex niche which is often favoured by pipistrelle bats.
- Free-hanging from timbers or within other discreet niches inside the loft space itself, as accessed through the gaps in the slipped tiles. However a comprehensive inspection of the loft identified no evidence of occupation.

No evidence of current or historic use by bats or nesting birds was identified during the survey and an overall negligible potential was determined; however it is noted that there is a small chance of opportunistic/transient use of gaps beneath slipped tiles within the pitched roof during the bat active season only.



OUTBUILDING	<p>The outbuilding is situated within a garden courtyard to the rear of the property. It is a single-storey building with a gently-sloping single-pitched roof. The change in ground level of the surroundings means that the front of the building is full height, whilst the distance between the ground and the eaves is only around 1m at the rear.</p> <p>The construction is fully-rendered and in good condition throughout. uPVC windows are well fitted in their frames with no gaps noted associated with these or the door.</p> <p>The roof is of corrugated sheet. The gaps at the peaks of the corrugations are open at both ends and could therefore be inspected fully with a torch and endoscope. No evidence of use by bats or other species could be determined and the construction means that the features do not provide the apex niche characters favoured by common pipistrelle. A fascia board with attached guttering is present on the rear aspect of the building. This is generally well fitted with only occasional cavities behind – however in the discreet locations where a gap does occur, it is open at both the top and the bottom resulting in an exposed feature which is unlikely to be utilised by bats. Tightly fitted fascia boards supporting wiring occur on other aspects also – no gaps were identified associated with these features.</p> <p>Internally, the building is used as a food store and is subsequently well-sealed and maintained with no potential access for bats or other species.</p>
<p><b>Survey Limitations</b></p> <p>There were no significant limitations to access or survey inspection which might affect the evidence base or subsequent conclusions of this survey.</p>	
<p><b>Assessment of Potential for use by Roosting Bats</b></p> <p>It is considered that overall, the western pitch of the roof provides <b>negligible potential</b> for use by roosting bats, however it is noted that there is a small chance of opportunistic/transient use of gaps beneath slipped tiles within the pitched roof during the bat active season only.</p> <p>The outbuilding is considered to provide <b>negligible potential</b> for use by roosting bats.</p>	
<p><b>Recommendations and Justification (Bats):</b></p>	
PITCHED ROOF	<p>No further surveys are recommended with regards to the proposed re-roofing of the pitched roof; however the works should be undertaken outside of the main active season of April - September inclusive and in accordance with the Method Statement provided in Appendix 2. This is considered proportionate to the unlikely risk of individual bats being present within discreet features within the roof on an opportunistic basis.</p> <p>Adherence to the Method Statement provided in Appendix 2 could be secured through a Planning Condition at the discretion of the Planning Authority, though it is noted that this should be a compliance rather than a pre-commencement condition and should not require discharge.</p> <p>The position of Kavorna within a densely residential/commercial complex of buildings means that there is an abundance of the type of features which can be used opportunistically and on a transient basis by roosting pipistrelle bats, therefore additional bat boxes and other roost creation measures are not considered necessary in this instance.</p>

OUTBUILDING	<p>No further surveys are recommended with regards to the outbuilding – the conclusion of <b>negligible potential</b> does not require any further information with regards to bats in order to inform a planning application.</p> <p>It is not recommended that any Planning Conditions are required with regards to bats in relation to the demolition of this outbuilding.</p> <p>Standard good practice and vigilance should be observed by the contractors undertaking the replacement works in acknowledgement that bats are transient in their use of roosting opportunities and may explore potential locations. Recommendations to ensure legislative compliance are provided in Appendix 2.</p>
<p><b>Assessment of Potential for use by Nesting Birds</b></p> <p>It is considered that the pitched roof and outbuilding provide <b>negligible potential</b> for use by nesting birds.</p> <p>It is noted that surrounding vegetation in the environs of the outbuilding may provide suitable nesting habitat though this is considered to be low risk.</p>	
<p><b>Recommendations and Justification (Birds):</b></p> <p>Removal of any woody or climbing vegetation which would be directly affected by the removal of the outbuilding should be undertaken outside of the breeding season which runs from March – September inclusive.</p> <p>There is no requirement to mitigate for loss of nesting habitat for breeding birds.</p>	
<p><b>Signed by bat worker(s):</b> <span style="float: right;"><b>Date:</b> 10<sup>th</sup> November 2021</span></p> <div style="background-color: black; width: 200px; height: 50px; margin-top: 10px;"></div>	



## APPENDIX 2

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### PRECAUTIONARY METHOD STATEMENT WITH REGARDS TO BATS

The purpose of this Method Statement is to ensure that works can proceed where presence of bats has been determined to be unlikely, but a precautionary approach is still advisable. It has been determined that direct harm to roosting bats during the proposed works would be highly unlikely.

Contractors should, however, be aware of **their own legal responsibility with respect to bats**:

#### **Relevant Legislation regarding Bats**

The Conservation of Habitats and Species Regulations 2017, or the 'Habitat Regulations 2017', transposes European Directives into English and Welsh legislation. Under these regulations, bats are classed as a European Protected Species and it is, therefore, an offence to:

- *Deliberately kill, injure or capture bats;*
- *Deliberately damage or destroy bat roosts.*

A bat roost is commonly defined as being any structure or place that is used as a breeding site or resting place, and since it may be in use only occasionally or at specific times of year, a roost retains such a designation even if bats are not present.

Bats are also protected from disturbance under Regulation 43. Disturbance of bats includes in particular any disturbance which is likely:

- (a) *To impair their ability -*
- *to survive, to breed or reproduce, or to rear or nurture their young; or*
  - *in the case of animals of a hibernating or migratory species, to hibernate or migrate; or*
- (b) *To affect significantly the local distribution or abundance of the species to which they belong.*

Bats also have limited protection under the Wildlife and Countryside Act 1981 (as amended) and the Countryside Rights of Way Act 2000 (as amended). It is, therefore, an offence to:

- *Intentionally or recklessly destroy, damage or obstruct any structure or place which a bat uses for shelter or protection.*
- *Intentionally or recklessly disturb bats whilst occupying any structure or place used for shelter or protection.*

Contractors should undertake works **at a time when the risk of bats being present is at its lowest as a precautionary practise.**

#### **Pitched Roof Only**

There is a small risk of bats making transient use of minor cavities created by the slippage of the tiles which have necessitated the replacement works. Works to the pitched roof should therefore be conducted outside of the active season when the conditions would not be suitable for opportunistic or transient use of these features.

Roof replacement works should therefore be undertaken between November – March inclusive. This timing of works recommendation applies to the pitched roof replacement only and does not apply to the demolition of the outbuilding.

Contractors should be aware of **where bats are most likely to be found** in respect to the structures in question:

#### **Pitched Roof Only**

There is a small risk of bats making transient use of minor cavities created by the slippage of the tiles which have necessitated the replacement works. The tiles around the area where the slippage occurred should be removed carefully in such a way that in the highly unlikely event of a bat being present beneath, they are not crushed by the removal of the tile.

#### **Pitched Roof and Outbuilding**

Fascia boards associated with both the pitched roof and the outbuilding have negligible risk of being used by roosting bats. These should be removed carefully by hand in such a way that in the highly unlikely event of a bat being present beneath, they are not crushed by the removal of the board.

Contractors should be aware of **the process to follow in the highly unlikely event of finding bats** or evidence indicating that bats are likely to be present:

If bats are identified, works should cease and the named ecologist contacted immediately for advice.

If the bat is in a safe situation, or a situation which can be made safe, they should remain undisturbed.

Only if the bat is in immediate risk of harm can the bat be moved with care and using a gloved hand. This is a last resort and should only be undertaken for humane reasons if the bat is at immediate risk of harm **and** if the ecologist cannot be contacted for advice.

## APPENDIX 3

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### LOCATION PLAN AND PHOTOGRAPHS



**Map 01** – Illustrating location of property within the local environs (red circle). Reproduced in accordance with Google's Fair Use Policy.



**Map 02** – Showing the roof to be replaced (blue) and the outbuilding (red) at Kavorna.





**Photograph 1:** Showing eastern aspect of the pitched roof to be replaced at Kavorna.



**Photograph 2:** Showing fascia board and guttering which runs along the eaves, along with the well-sealed gable end.



**Photograph 3:** Showing the areas of slipped tiles on the roof.



**Photograph 4:** Showing eastern pitch of the roof to be replaced.



**Photograph 5:** Showing the interior of the loft space with scandle tiles laid directly onto timber battens – no underfelting present.



**Photograph 6:** Showing the internal pitch of the roof – no ridge board/beam is present.





**Photograph 7:** Showing the western aspect of the outbuilding – this surrounding land is elevated on this side of the building resulting in low profile.



**Photograph 8:** Showing typical uPVC windows fitted tightly with rendering in good condition.



**Photograph 9:** Showing the timber fascia with guttering attached running along the western aspect of the outbuilding.



**Photograph 10:** Showing the western aspect with a pitched, corrugated roof.



**Photograph 11:** Showing the interior of the outbuilding – well sealed to a high standard and used for storage of food produce.



**Photograph 12:** Showing the view of the corrugated roof sheets viewed from the eaves on the western aspect.

Paul Osborne  
Jus Limin  
Carn Thomas  
St. Mary's  
Isles of Scilly

**RECEIVED**

**By Lisa Walton at 12:05 pm, Nov 09, 2022**

# Site Waste Management Plan

For

KAVORNA,

21, Hugh Street,  
St. Mary's, Isles of Scilly.



## INTRODUCTION

This document constitutes the 'best practice initiatives' adopted by KAVORNA by requiring the contractors employed to carry out the proposed works at Kavorna, 21 Hugh St, St Mary's, Isles of Scilly to embrace the principles of the Site Waste Management Plan as required by the Site Waste Management Regulations 2008.

PROJECT SITE - Kavorna, 21 Hugh St, St.Mary's, Isles of Scilly

CLIENT - Mr .Mrs P Osborne

CONTRACTOR - TBA

PROJECT SUMMARY - Re Place Existing Roof Tiles

START DATE - January 2023 (Subject tom Planning Approval)

PROJECT DURATION - To be confirmed by Contractor (Estimated 4 weeks)

PERSONS RESPONSIBLE FOR THE MANAGEMENT OF WASTE - Contractor

Third Party Waste Handling - Third parties handling waste will be required to provide documentary evidence of their licence to handle, transport, recycle and dispose of waste.

## OBJECTIVES

Project Objectives

- 1 To take all responsible steps to ensure that waste management controls are observed.
- 2 To minimise the amount of waste generated and maximised the amount of waste reused and recycled.
- 3 To re-use as much waste as possible on-site. Where reuse is not possible to identify the most appropriate waste management option in line with the waste hierarchy.
- 4 To manage waste as close as possible to site location
- 5 To make and improve awareness of waste management issues of all contractors and sub contractors and to ensure the correct waste management practices are followed on site.

## RESPONSIBILITIES

The responsibilities in relation to the SWMP are set out below.

The Site Waste Coordinator is the Principle Contractor on site, who is responsible for implementation of the SWMP. Duties include but are not limited to:

Ensuring waste is managed on site according to the SWMP. This includes ensuring appropriate segregation of waste on-site, making arrangements for the removal of waste from the site.

Ensuring all staff and sub-contractors understand their duties in relation to the SWMP. This includes organising appropriate training.

Ensuring correct records and documentation is kept. This includes checking waste transfer documentation, and maintenance of documentation relating to waste transfer.

The 'Site Waste Coordinator' is the point of contact for all staff, contractors and waste contractors in relation to the SWMP and waste management issues.

All contractors' staff operatives working on site are responsible for adhering to the principles for the movement and segregation of waste on site.

## WASTE CONTRACTORS

The waste contractors are to be listed with contact details, this list is to be compiled by the 'Site Waste Coordinator'

All waste contractors are responsible for adhering to the SWMP including:

All waste contractors are responsible for ensuring compliance with their Duty of Care including providing the appropriate records to the 'site waste coordinator'

All mainland Contractors receiving waste are responsible for ensuring waste is managed as specified in the SWMP. They are responsible for ensuring the waste treatment facilities have a waste licence and that records are provided to the 'site waste coordinator'

Mainland waste contractors receiving waste are responsible for transporting it to a licensed waste management facility

Mainland waste contractors are responsible for providing adequate containers for the collection and segregation of waste as specified in the SWMP.

## MANAGEMENT OF WASTE ON SITE

The principle contractor shall adopt the materials that'll be re-used or recycled on site will be segregated in designated areas ready for mainland transportation. The locations of the designated areas shall be identified by the contractor prior to commencement of works and recorded.

- Re-Use and Re-Cycle Off Site

- Materials that will be removed from site for recycling will be segregated from the waste stream and collected in containers for transport. The locations of collection and segregation area/s and the materials that will be collected at these sites are to be recorded.
- The waste containers will be colour coded according to the National Coding Scheme.
- All waste which can be reused or recycled as specified in the recorded tables just be segregated out of the waste stream by staff and sub-contractors.
- Contamination of the waste containers will be monitored.
- At the end of each day all staff and package contractors must ensure that waste is moved to the appropriate area/s as specified.
- All movable containers will be locked at the end of each day.
- Any problems found with arrangements for waste segregation should be reported directly to the 'site waste coordinator.'

## TRAINING

As part of adopting the principles of the SWMP the Principle Contractor shall implement training and as such the site waste coordinator shall be responsible for ensuring all of the contractors staff and operatives receive training the implementation of the SWMP

Details of training should be recorded.

## MEASURING AND MONITORING

The Site waste Coordinator will be responsible for ensuring that monitoring takes place throughout the project - to include:

Estimated Waste generated Schedule

Summary of Actual Waste Generated

Actual Waste Carrier Recorded.