



Historic England

**RECEIVED**

By Lisa Walton at 8:59 am, Nov 11, 2022

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

Direct Dial: 0117 975 0732

Our ref: P01469613

10 November 2022

Dear Sir/Madam,

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

**TREGARTHEN'S HOTEL, GARRISON HILL, HUGH TOWN, ST MARY'S, ISLES  
OF SCILLY, TR21 0PP  
Application No. P/22/075/ROV**

Thank you for your letter of 27 October 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Background

The proposals comprise a revised scheme for development within the Tregarthen's Hotel site - the erection of five micro lodges for holiday letting, with associated waste treatment plant and landscaping.

Historic England has previously provided your authority with detailed assessments of the significance of the designated heritage assets surrounding the Tregarthen's Hotel site (P/15/0101, HE Ref P00472897 24 September 2015; P/16/055, HE Ref P00514443 06 July 2016; P/18/031/FUL, HE Ref P00885830 4 June 2018; P/20/090/FUL HE Ref P01315850 20 December 2020 and 16 February 2021; P/22/023/ROV, HE Ref P01469613 30 March 2022). We have also provided some pre-application advice on previous schemes, although not for the current proposals.

In relation to previous schemes, we had concerns that the proposals would cause a change to views towards Garrison Hill and partially obscure a section of the rubble walls which are important in understanding the significance and the broader setting of the Garrison Gate and Star Castle.

We recommended that the layout of the lodges within the kitchen garden was amended to address this blocking effect. The layout of the holiday lodges was slightly altered, and one lodge (closest to the wall) was reduced in height to reduce its blocking effect on the Garrison Hill wall. We considered that the blocking effect



Historic England, Fermentation North (1st Floor), Hawkins Lane, Bristol, BS1 6JQ  
Telephone 0117 975 1308 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.





previously raised as a concern had been reduced and the rubble wall behind the lodges appeared as a continuous and unbroken line in most views, emphasising the significance of both it and Garrison Hill.

After amendments made to address our heritage concerns, the most recent 2020 scheme was approved subject to conditions. A subsequent revision in early 2022 increased the height of the lodges very slightly. We therefore did not consider this height to change our previous position and recommended that your authority balanced the public benefits of the proposals against the residual low level of harm (National Planning Policy Framework (NPPF), paragraph 202).

## The current proposal

The current scheme proposes another variation of the existing 2020 consent, introducing a set-back second floor to lodge 5 (that closest to Garrison Hill) with a glazed balcony to the front terrace.

We consider that the current proposals represent a retrograde step in the scheme design. Whilst the two storey element of the lodge is towards the back of the site, it nonetheless will introduce greater mass and obscuring effect next to the scheduled and grade I listed Garrison wall. In addition, the terrace is very likely to be frequently used and populated with people, chairs, tables and other paraphernalia associated with the holiday use making it a more visible intervention than shown in plans and elevations.

The views identified in the application are from one location towards the site. However, views towards this site will be from varied locations on land and from boats. The dynamic views of the site should be taken into account as well as the fixed point view identified in the application, which we consider represents a 'best case scenario'.

We consider that the consented scheme represents the optimum use of this part of the site, and that the current application introduces unjustified additional harm. We therefore recommend that the consented scheme reverted to, without the proposed variation.

We also remind your authority of the need for a proportionate and appropriate scheme of archaeological monitoring and recording to be carried out, as recommended by your own archaeological advisors.

## Historic England's Position

This is a sensitive and important site with several very highly designated assets in close proximity. Any proposal (or variation to it) should be considered against the need for great weight to be applied to the conservation of heritage assets, with greater weight being applied the more important the assets (NPPF, paragraph 199). In this instance the highest possible weight should be applied to the conservation of the heritage assets given their scheduling and grade I listed status.





Where harm is caused, clear and convincing justification must be provided (NPPF 200). In our opinion, because an existing scheme for the micro-lodges is in place, which we have identified represents a very low level of harm, we consider that the justification is absent.

It is for your authority to consider whether the harm that we have identified can be counter-balanced against the public benefits of the proposals (NPPF, paragraph 202), which in this instance would be the additional benefits (if any) between the approved scheme and the current proposals.

## Recommendation

Historic England has concerns regarding the application on heritage grounds. These concerns relate to the additional blocked effect that the proposals will create to the rubble walls associated with Garrison Hill, harming the significance of the heritage assets where a part of that significance stems from their setting. We recommend that the application to vary the currently consented scheme is not consented.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 199, 200 and 202 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess; and section 72(1) of the same Act, to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

**Catherine Marlow**

Inspector of Historic Buildings and Areas

E-mail: [Catherine.Marlow@HistoricEngland.org.uk](mailto:Catherine.Marlow@HistoricEngland.org.uk)

