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Integrated Health &
Social Care Centre,
Isles of Scilly
Heritage Impact Assessment

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1 Introduction

Purpose

- 1.1 This report has been prepared to support the submission for planning permission for the new Integrated Health & Social Care building as part of St Mary's Hospital on Hospital Lane, St Mary's, Isles of Scilly.
- 1.2 The purpose of the report is to set out the history and heritage significance of the site and its context and to consider the impact of the proposals on that significance.
- 1.3 The report should be read in conjunction with the plans and Design & Access Statement prepared by Bluesky Architects as well as the Landscape Visual Impact Assessment prepared by Mei Loci Landscape Architects.

Author

- 1.4 The author of this report is Nick Collins BSc (Hons) MSc MRICS IHBC. Nick set up Portico Heritage in 2014. Previously he was a Director of Conservation at Alan Baxter & Associates. Nick spent nine years at Historic England where he was a Principal Inspector of Historic Buildings & Areas leading a specialist team of historic building inspectors, architects, and archaeologists on a wide range of heritage projects in East & South London. Previously a Conservation Officer at the London Borough of Bromley, Nick began his career at real estate consultancy Jones Lang LaSalle as a Chartered Surveyor.
- 1.5 Nick has undertaken a considerable amount of work in the West Country, including for the Lost Gardens of Heligan in Cornwall, Plymouth City Council and the Hall for Cornwall in Truro.

2 The site and its context

The Site

- 2.1 St Mary's Hospital is located on the south side of Hospital Lane, situated on the high ground to the south east of Hugh Town, overlooking St Mary's Sound and Porthcressa beach, just off the road to Old Town beyond Buzza Hill.
- 2.2 Prior to its construction, the site was agricultural land, close to the quarries on Buzza Hill and the extant former windmill, now Buzza Tower (see figure 1).



Figure 1: Ordnance Survey Map 1875 with the site of the present hospital identified

History¹

- 2.3 Hugh Town is the main urban centre on St Mary's and the wider Isles of Scilly. It is located on a narrow isthmus which joins the Garrison (historically the Hugh) peninsula with the rest of St Mary's.
- 2.4 During medieval times nearby Old Town was the main centre of population. The key elements of the medieval landscape: Ennor Castle, St Mary's Church and the Old Quays,

¹ The history section of this report is drawn from a number of sources, including The Isles of Scilly Museum: Inside the Archipelago (2011); Laws, P (1980) The Buildings of Scilly; Madden, P (1996) Scilly's Building Heritage

still form a coherent and visible group around Old Town Bay together with Old Town itself.

- 2.5 In 1570 Queen Elizabeth I granted the Godolphin family the lease of the Islands and for the next 215 years, except during the Civil War period, this Cornish family 'owned' Scilly. The Dukes of Leeds, heirs to the Godolphins, assumed the lease in 1785, reverting to the Crown in 1831.
- 2.6 The Godolphins and Star Castle (built in just 18 months during the 1590s to ward off a second Spanish Armada) transformed Scilly. Law and order came to the islands. So did an influx of new residents from Cornwall. Houses were put up against the Garrison walls and a quay was built in 1601 as Hugh Town grew in size and strategic importance. As the military defences increased, The Hugh became known as The Garrison.
- 2.7 A new 99-year lease was taken on by Hertfordshire squire Augustus Smith in 1834. Smith lived in Scilly until his death in 1872. Imbued with notions of self-help, he took over from a regime of absentee landlords and lacklustre land agents. He found declining trade and failing crops supporting an inflated population on holdings split between all a family's surviving sons.
- 2.8 As Lord proprietor and Chief Magistrate, Smith re-allocated tenancies. He insisted that only the eldest son could succeed to land. The dispossessed found work on Smith's new projects or left the islands.
- 2.9 Smith forbade marriage unless a couple had a house of their own and made parents pay a penny a week for sending children to school, tuppence if they stayed at home.
- 2.10 In 1838 he built his home next to the old Abbey on Tresco, planted trees as wind breaks, thus creating Tresco Gardens from species brought home by Scillionian sea captains, and helped to organise and finance a local shipbuilding industry.
- 2.11 After the death of Augustus Smith in 1872 the Islands were inherited by his nephew, Thomas 'Algernon' Smith-Dorrien-Smith.

Dorrien-Smith & Architecture

- 2.12 Following the death of Augustus Smith, Algernon Dorrien-Smith continued the work started by his Uncle, including the construction of a number of new buildings across the Islands.
- 2.13 Dorrien-Smith appears to have had a curious architectural quirk – a delight in chunky stonework². This is to be seen, for example, in the use of huge unwrought blocks of granite for porches of cottages near New Grimsby Quay, and in the house, Rowsfield, on Middle Down in Tresco, built about 1897. It is also very visible on the principal High Street façade of the Post Office, bearing his initials and the date 1897. There the chunky stones have been used with great effect to form the quoins and lintels of the windows.

² Laws, P (1980) The Buildings of Scilly



Figures 2&3: Rowsefields & the Post Office 1897

The Twentieth Century

- 2.14 The 20th century heralded a further phase in building and development on Scilly particularly on St Mary's. In 1926 the Duchy of Cornwall replaced houses, cottages and Mumford's shop either side of Hugh Street with new flat-roofed terrace houses. Other similar contemporary terrace houses in granite with flat roofs were built by the Duchy in rural areas at Porthloo and Longstone.
- 2.15 By the 1930s other buildings had been provided in the town, including Barclays Bank with its colour washed and rendered granite façade, and the Isles of Scilly Steamship Company's offices.
- 2.16 It was during this period that the Hospital was constructed - opened in 1939 to the designs of Guy Aldis FRIBA, who worked with Geoffrey Bazeley in Penzance.

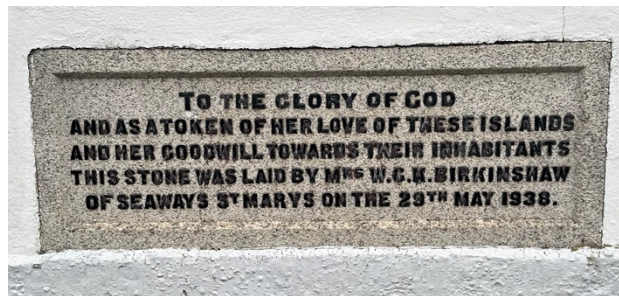


Figure 4: Foundation Stone laid in May 1938 by Mrs WGW Birkinshaw

The Hospital Today

- 2.17 The hospital is a predominantly single storey structure, rendered with a large, pitched slate roof over the original 1939 part of the building, containing additional accommodation. This first phase of the hospital building was designed in a loose cruciform shape however the ground floor of the building has been almost doubled in footprint with a single storey, flat roofed extension at its north-west end and now containing the main patient entrance.
- 2.18 This and further flat roofed extensions give the building an austere and utilitarian appearance.

- 2.19 Whilst much altered and extended in a functional manner, there are elements of the original building which are typical of the aspirations of the cottage hospital movement which, as described in Historic England's 'Health & Welfare Buildings' publication '*aimed to be as homelike as possible, and were thus domestic in character*'.
- 2.20 The main functions of the hospital are all on a level ground floor, whilst overnight nurses accommodation was provided for in the roof space.



Figure 5&6: The Hospital entrance and from the rear

- 2.21 St Mary's Health Centre, built in the 1990s with its prominent hexagonal central roof tower is located just to the south of the hospital.
- 2.22 To the west the topography drops steeply down towards the sea with high-hedged allotments lining the hillside. Both the hospital and health centre are visible across the bay from the Garrison peninsula with Buzza Tower prominent to the left.



Figure 7: View across Porthcressa Beach towards Buzza Hill, the hospital and health centre.

3 The heritage significance of the site and its context

The heritage context of the site

- 3.1 Whilst the hospital is not listed, Circus Field, close by to the south east, contains a Scheduled Ancient Monument: Platform Cairn on Northern Peninnis Head. The whole site also lies within the Isles of Scilly Conservation Area. There are a number of other designated heritage assets in the vicinity, including Grade II listed Buzza Tower and the Scheduled Round Cairn with Funerary Chamber on Buzza Hill. Both of the Scheduled Ancient Monuments (SAMs) are also located in 'Isles of Scilly Archaeological Constraint Areas' (although the Hospital itself is outside this area). This is shown in Figure 5.



Figure 5: Map showing the location of the nearby listed buildings (orange); Scheduled Ancient Monuments (hatched red) and Archaeological Constraint Areas (green)

- 3.2 The Historic Environment Record identifies other sites of interest, extant, archaeological and/or demolished. The closest to the site are a number of former quarry sites on and around Buzza Hill and two Bronze Age findspots to the north east the other side of Old Town Road.

Assessing heritage significance

- 3.3 The conservation area, listed buildings and Scheduled Ancient Monuments are 'designated heritage assets', whilst other structures (including any identified as making a positive contribution to the character and appearance of the conservation area) are 'non-

designated heritage assets' as defined by the National Planning Policy Framework (NPPF).

- 3.4 'Significance' is defined in the NPPF 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'. The Historic England 'Planning for the Historic Environment Practice Guide' puts it slightly differently – as 'the sum of its architectural, historic, artistic or archaeological interest'.
- 3.5 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' (English Heritage/Historic England, April 2008) describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value.
- 3.6 The site, the listed and unlisted buildings nearby, and their relationship to one another and the conservation areas collectively illustrate the development of the Isles of Scilly.

Isles of Scilly Conservation Area

- 3.7 The significance, character and appearance of the Isles of Scilly Conservation Area is embodied in the integration of the buildings and landscapes on Scilly and how its inhabitants have shaped the land over a long period.
- 3.8 The 'historic interest' to be found on the Isles of Scilly is well documented and the islands contain a remarkable abundance and variety of archaeological remains and thus 'evidential value' from over 4000 years of human activity.
- 3.9 The remote physical setting of the islands has lent a distinctive character to those remains, producing many unusual features important for the broad understanding of the social development of early communities.
- 3.10 The islands' archaeological remains demonstrate clearly the gradually expanding size and range of contacts of their communities.
- 3.11 By the post-medieval period (from 1540), the islands occupied a nationally strategic location, resulting in an important concentration of defensive works reflecting the development of fortification methods and technology from the mid 16th to the 20th centuries.
- 3.12 It was the construction of the defences at The Garrison (as well as other locations across the Islands) that directly and indirectly led to the growth of Hugh Town as the main urban and administrative centre of St Mary's and the Isles of Scilly. Similarly the encouragement of farming, flower growing and shipbuilding led to a growing of the economy and society. Important key buildings within Hugh Town that contribute to this evolution and character include the Town Hall, Church and former school.
- 3.13 Within this context the hospital makes an important contribution to the twentieth century social history and development of the Islands but is of little importance architecturally – described as '*plain and functional*' in Scilly's Building Heritage by Peter Madden. The

building has been considerably altered and extended, particularly to the rear and is necessarily utilitarian.

- 3.14 The Cairns at Circus Field and Buzza Hill also lie within this wider conservation area context, as do the quarries and former windmill, now Buzza Tower – important elements of the evolution of St Mary's.
- 3.15 Within the context of the conservation area, views from the Garrison, particularly key points along the Garrison Defences (a Scheduled Ancient Monument in its own right) are important in appreciating the evolution of Hugh Town and St Marys – not only do they provide wide panoramic views over the Island, but also the town's origins are inextricably linked to the Garrison. This includes from Hugh House (Grade II) standing prominently overlooking the town – firstly as Officer's Mess, then the first home of the Dorien Smith's and now the Duchy Office on the Islands.
- 3.16 These views include most of the key heritage assets in Hugh Town, including the Town Hall, church and many of the historic buildings within the town centre, as well as the key community structures such as the Airport Terminal building, health centre and hospital.

Platform Cairn on Northern Peninnis Head

- 3.17 The cairn is located to the east of the hospital in a field known as 'Circus Field'. The SAM is largely 'below ground'.
- 3.18 Platform cairns are funerary monuments of Early Bronze Age date (c.2000-1600 BC)³. They were constructed as low flat-topped mounds of stone rubble, up to 40m in external diameter though usually considerably smaller, covering single or multiple burials. Some examples have other features, including peripheral banks and internal mounds constructed on the platform. A kerb of slabs or edge-set stones sometimes bounds the edge of the platform, and a peripheral bank or mound if present. Platform cairns can occur as isolated monuments, in small groups or in cairn cemeteries. In cemeteries they are normally found alongside cairns of other types. Platform cairns form a significant proportion of the 387 surviving cairns on the Isles of Scilly; this is unusual in comparison with the mainland. All surviving examples on the Isles of Scilly are considered worthy of protection.
- 3.19 This platform cairn on northern Peninnis Head has survived substantially intact with only minor disturbance evident from an antiquarian excavation and the modern cable trench. The prominent location of this cairn and its relationship with the other broadly contemporary cairns and field systems on and around Peninnis Head demonstrates well the nature of funerary activity and the organisation of land use during the Bronze Age.
- 3.20 The monument includes a prehistoric platform cairn situated on the summit of the northern end of the broad ridge forming Peninnis Head, in the south west of St Mary's in the Isles of Scilly. The platform cairn survives with a turf-covered circular mound of

³ Historic England Scheduled Monument Description LEN: 1009284

heaped rubble, 10m in diameter, straddling a slight crest on the spine of the ridge such that the mound is 0.6m high from the south west side and 0.3m from the north east, rising to a flattened upper surface 4m in diameter. A row of three large slabs, each 1m-1.2m long and 0.5m wide, considered to derive from an unrecorded antiquarian excavation at the cairn, lie parallel to each other embedded in the turf from 1m beyond the western perimeter of the cairn, with a further slab partly exposed to their south. A modern electricity cable trench is visible as a slight, turf-covered linear hollow, 0.5m wide and 0.03m deep, running north-south across the eastern perimeter of the cairn. Beyond this monument, further broadly contemporary cairns are located on the crest of the ridge from 750m to the SSE at the southern end of Peninnis Head, with prehistoric field systems fringing the lower slopes. Two broadly contemporary chambered cairns, of which one still survives, occupied the summit of Buzza Hill, 200m to the WNW, the north westward extension of the ridge containing this monument. Until modern development, these cairns were intervisible with this monument. The electricity cable and its service trench are excluded from the scheduling but the ground beneath is included.

- 3.21 Notwithstanding the fact that historically there was intervisibility between the cairns, today the setting of this cairn is visually and physically largely confined to the field within which it sits. 'Suburban' development has grown up on the northern side of Old Town Road and along Hospital Lane, as well as the hospital and Health centre breaking any historic connection between the sites.

Buzza Tower

- 3.22 Buzza Tower is located approximately 200m to the north west of the Hospital. It was first constructed in 1821 as a windmill of squared and coursed granite. It stands on the site of a Bronze Age kerbed cairn previously excavated by William Borlase in 1752.
- 3.23 The structure was restored and extended in 1911 in commemoration of a visit by King Edward VII. Circular in plan the tower stands three storeys high and has a ground-floor veranda.
- 3.24 The reasons for its designation are twofold: Architectural – an interesting example of a pre-1840 windmill, later monumentalised; historical – a distinctive, commemorative monument marking the visit of King Edward VII. It is also recognised to stand on an unscheduled kerbed cairn, and beside a scheduled cairn with funerary chamber⁴.
- 3.25 Reinterpreted as a landmark in 1911, the contribution that the tower's setting makes to its significance is considerable. It is particularly prominent from across Hugh Town and from the Garrison peninsula where it is seen in the backdrop of the town, the highest landmark other than the waste disposal chimney. This is shown in both figure 4 and figure 6, below.

⁴ Historic England List Description LEN 1291886



Figure 6: Buzza Tower across Hugh Town

Round Cairn with Funerary Chamber on Buzza Hill

- 3.26 This round cairn on Buzza Hill has survived well. Its large mound remains intact and its large walled and slab-built closed funerary chamber is unusual. The recorded presence of this cairn as part of a cairn group on this hill and its relationships with the settlement sites on the coast of Porth Cressa Bay and the cairns and field systems on the ridge of Peninnis Head combine to illustrate well the diversity of funerary practices, the organisation of land use and the relationships between settlement and funerary activity among prehistoric communities.
- 3.27 The monument includes a large prehistoric round cairn with a central funerary chamber situated on the western crest of Buzza Hill, overlooking Porth Cressa Bay and the isthmus to the Garrison, on south western St Mary's in the Isles of Scilly.
- 3.28 The round cairn survives with circular, steep-sided mound of heaped rubble, 13.2m in diameter, situated across the western crest of the hill such that it rises up to 2.5m high on its west side and up to 0.5m high on the east. The funerary structure is visible near the centre of the mound's upper surface and survives as a rectangular chamber whose interior measures 2.4m long, north east-south west, by 1.5m wide and 0.9m deep. The chamber's sides are defined by a combination of edge-set slabs and coursed slab-built walling, whose upper edges are level with the upper surface of the mound. Each end of the chamber is closed by a single large edge-set slab, that at the north east end rising above the level of the other chamber sides to a height of 1.1m from the floor of the chamber.
- 3.29 The south west end of the chamber interior is covered by a large slab, called a capstone, rising proud of the mound's surface and resting on the side walling and end-stone. The capstone measures 2m long, across the chamber, by 1.3m wide and 0.5m thick.

- 3.30 This monument is one of a group of three recorded chambered cairns located on top of the prominent ridge forming Buzza Hill. The other two, of a type called entrance graves and located on the crown of the ridge, 45m to the east and 50m to the ENE, were the subject of the earliest recorded excavations at such cairns in 1752 by the antiquary Borlase, but both cairns have subsequently been destroyed as visible monuments by stone robbing and by the early 19th century construction of the Buzza Tower, formerly a windmill, believed to occupy the site of one of the cairns. A fourth funerary cairn, formerly visible from this monument until modern buildings intervened, survives on the northern end of the Peninnis Head ridge, 240m to the ESE. Prehistoric settlement sites are exposed in the cliff face on the eastern side of Porth Cressa Bay, from 180m to the SSE. Another, dispersed, cairn group is located on the southern end of Peninnis Head, with further prehistoric field systems around the flanks of the Head, from 950m to the south east.
- 3.31 Whilst the cairn is located in a prominent open position, with wide views in almost all directions, the setting of the monument relates primarily to those other cairns identified above. Being a largely 'ground level' structure its physical, visual setting is not large.

Summary

- 3.32 Whilst the hospital itself and the site of the proposed extension are neither listed nor of any direct heritage value, the whole site is within the Conservation Area and appears within the setting of Buzza Tower.
- 3.33 In terms of the setting of the Platform Cairn in Circus Field, although it has a more historical connection with other cairns in the area, its setting is now best appreciated within Circus Field itself. There is no intervisibility between the proposed development site and the cairn and the cairn is surrounded to the south, west and north by 20th century development.
- 3.34 With regards Buzza Tower and the Cairn on Buzza Tower there is some limited direct visual interrelationship between the site and these heritage assets, however any sensitivity relates primarily to ensuring that the Tower remains the prominent landmark in the wider landscape – and this includes views from Hugh Town and the Garrison.
- 3.35 The hospital and site contribute to the character and appearance of the conservation area in terms of an understanding of the historical evolution (both archaeologically and modern-day history) of the Islands and their occupation, however, particularly in relation to the hospital, this contribution is not architectural.
- 3.36 The prominent position of the hospital on the hill overlooking the town means that any extension will need to sit comfortably in the wide panoramic views, particularly from the Garrison, to ensure that it sits comfortably within the overall composition and within the context of the other important buildings within the town.

4 The proposed scheme and its effect

- 4.1 The proposed scheme is illustrated in the drawings prepared by Bluesky Architects and described in further detail in the Design & Access Statement and other documents accompanying this application. The proposal is for an Integrated Health & Social Care Centre.

Hospital Extension

- 4.2 The proposed extension is formed of two parallel wings that sit perpendicular to the main original hospital protruding to the south west. These have been positioned and designed to ensure that all patient services and rooms are on a single level and that they interconnect into the existing hospital building in the most effective manner.
- 4.3 The roofscape has been designed to ensure that it reflects the form and pitch of the original hospital with a multitude of pitches to break up the visual and physical mass in closer and longer views. Traditional slate is proposed to ensure that the roof blends with both the existing hospital building and also the prevalent roofing material across the Islands. The roof ridge will be no higher than the existing hospital roof, so its height should be no more prominent in long views than the existing.
- 4.4 Due to the topography of the site a lower-ground level will be formed and the change in levels will inevitably make the building more prominent in longer views, particularly from the Garrison. However, it is the intention that this is softened by planting.
- 4.5 The extension site does not lie within the direct setting of either of the identified Scheduled Ancient Monuments and should not have any impact on their setting or significance.
- 4.6 With regards the Buzza Tower, the proposed extension will be visible within its wider setting – most relevantly in views across from the Garrison, however by ensuring that the height of the extension is no higher than the existing building this should mitigate any impact that it might have in detracting from the landmark status of the tower. The proposed planting will also be important in ensuring that the mass of the new building does not detract from wider views – ensuring that the building ‘beds’ into the landscape rather than being overly dominant.



Figure 8: The proposed extension within the context of Buzza Tower

- 4.7 The impact on the character and appearance of the conservation area is similar to that for the setting of the Buzza Tower. The proposed new extension will create a large new mass in views across Porthcressa Beach and St Mary's Sound which will be relatively prominent and of a scale that is unusual on the Islands. However, its visual impact will be mitigated by screening the lower level through planting and landscaping.
- 4.8 As one of the key 'civic' buildings on the Islands, this also mitigates the sensitivity of being able to see the building in longer views – It could be argued that it forms a group with other highly visible civic buildings and structures on the Island – Hugh House, Harbour Quay, Town Hall, Church, Airport Terminal and the Hospital.



Figure 9: The proposals in a wider context from the Recreation Field on the Garrison

- 4.9 In a wider context, as illustrated in figure 9 above, the impact of the proposals clearly diminishes, however they will certainly be visible.

Summary

- 4.10 Overall, the proposals have been driven by a desire to provide high-quality level-access facilities for the Isles of Scilly at the existing hospital. The building is already a prominent feature in the landscape (along with the adjacent Health Centre) and is one of the key 'civic/community' buildings on the Island. Whilst limited by budget and site constraints, the proposals have been designed using materials commonly found across the Islands, including render and pitched slate roofs.
- 4.11 We do not believe that the proposed extension will affect the setting of either of the identified SAMs.
- 4.12 With regards the setting of Buzza Tower and the wider conservation area, the scale of the proposals, particularly where views of the lower level are prominent, will make them visually obvious. In terms of impact on heritage significance and setting this will be considerably mitigated by materials and overall height as well as any landscape conditions. which we believe should enable the proposals to, on balance, preserve both the setting of the tower and the character and appearance of the conservation area.

5 Compliance with legislation, policy and guidance

Legislation

- 5.1 The legislation governing listed buildings and conservation areas is the Planning (Listed Building and Conservation Areas) Act 1990. Section 66 (1) of the Act requires decision makers 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’ when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay ‘special attention... to the desirability of preserving or enhancing the character or appearance of that area’.

National Planning Policy Framework

- 5.2 The National Planning Policy Framework (NPPF) was revised in December 2023. Section 16 deals with ‘Conserving and enhancing the historic environment’.
- 5.3 The NPPF at paragraph 200 states:
- 5.4 ‘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’.
- 5.5 At paragraph 203, the NPPF says that:
- In determining planning applications, local planning authorities should take into account:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable use is consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.6 Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- The nature of the heritage asset prevents all reasonable use of the site; and
 - No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 - The harm or loss is outweighed by the benefit of bringing the site back into use (paragraph 207)
- 5.7 Paragraph 208 says that ‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Council of the Isles of Scilly Local Plan 2015-2030

- 5.8 The Council of the Isles of Scilly Local Plan was adopted in March 2021. Policy OE7 relates to Development affecting Heritage.
- 5.9 This states:

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.

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 work proposed are the minimum required to secure the long term use of the asset.

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.

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.

Conservation Areas: Development in the Isles of Scilly Conservation Area will be allowed 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 into account of: (i) The development characteristics and context of the area, in terms of important buildings, spaces, landscape, 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.

Listed Buildings: 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.

Scheduled Ancient Monuments: Proposals that preserve or enhance the significance of scheduled monuments or architectural archaeological sites, including their setting, will be supported where measures are taken to ensure their protection in situ based upon their significance. Where development would involve demolition or removal of archaeological features, this must be fully justified, and provision must be made for excavation, recording and archiving by a suitably qualified person prior to work commencing, to ensure it is done to professional standards...

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

Compliance with legislation, policy & guidance

- 5.10 The conclusion of our assessment, contained in previous sections of this report, is that the proposed scheme, on balance, preserves and enhances the special architectural or historic interest of the listed Buzza Tower and its setting and the Isles of Scilly Conservation Area, (i.e. the *designated* heritage assets that are the subject of the Act). The proposed development thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It also preserves the setting of the identified Scheduled Ancient Monuments.

The National Planning Policy Framework

- 5.11 This report has provided a detailed description and analysis of the significance of the site and its heritage context, as required by Paragraph 200 of the National Planning Policy Framework.
- 5.12 With regards paragraph 203, the use of traditional materials and forms will help to ensure that the proposal reflects local character and distinctiveness.
- 5.13 The proposed scheme complies with Paragraph 207 and 208 of the NPPF in that it conserves the heritage assets whose setting it affects. For the reasons given earlier, we do not believe that the scheme involves any 'substantial' harm and that potential 'less than substantial harm to the significance of a designated heritage asset', has been mitigated through the design, landscape proposals and proposed materials.

5.14 Even if others were to believe that a small element of harm is still caused, this needs to be weighed against the considerable public benefits offered by the scheme for the whole community on the Isles of Scilly.

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5.15 With regards Policy OE7 of the Local Plan, irrespective of any potential harm, the benefits of the health care provision for the Islands are substantial and clearly wholly exceptional. Further, this report and others submitted demonstrates that all reasonable efforts have been made to mitigate the impact of the proposal – particularly, with regards heritage, in its visual impact from the Garrison.

5.16 In terms of the conservation area and Grade II listed Buzza Tower the design evolution has been cognisant of the sensitivity of the location in terms of views. The height of the proposal does not rise above that of the existing hospital or adjacent health centre and a comprehensive landscape proposal has been submitted as part of the overall application – ensuring the primacy of the Grade II listed Buzza Tower in long views and character and appearance of the conservation area is preserved.

5.17 Overall, the proposals have attempted to strike a balance between the health care needs of the Islands with the impact of any proposal on its surroundings. Even if a small element of less-than-substantial harm is identified through the scale of the proposal, we believe that this has been adequately mitigated to allow for a balanced judgement to be reached when considering the substantial public benefits that the proposals will deliver.

5.18 We therefore believe that the proposals meet the legislative, national and local policy requirements and guidance relating to the historic built environment.

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