



**IMPORTANT – THIS COMMUNICATION AFFECTS YOUR PROPERTY**

## **COUNCIL OF THE ISLES OF SCILLY**

Old Wesleyan Chapel, Garrison Lane, St Mary's TR21 0JD  
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**

<b>Application No:</b>	<b>P/25/050/FUL</b>	<b>Date Application Registered:</b>	<b>30 May 2025</b>
<b>Applicant:</b>	<b>The Cooperative Group Food Ltd C/o Pegasus Planning Group Limited</b>	<b>Agent:</b>	<b>Stacey Pester Pegasus Planning Group Limited First Floor, South Wing Equinox North, Great Park Road Almondsbury Bristol United Kingdom BS32 4QL</b>
<b>Site address:</b>	<b>Co-operative Retail Services Ltd Hugh Street Hugh Town St Mary's Isles of Scilly</b>		
<b>Proposal:</b>	<b>Construction of a single storey extension, shopfront alterations and installation of plant</b>		

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 Site Location Plan, drawing number: A110-BOW-A0-ZZ-DR-A-0001 date stamped 29/05/2025**
  - **Plan 2 Proposed Plant Layout, drawing number: 300200280425-R5, REV A, date stamped 29/05/2025**
  - **Plan 3 Proposed Elevations, drawing number: A110-BOW-A0-ZZ-DR-A-0013, rev P3 date stamped 29/05/2025**
  - **Plan 4 Proposed Elevations with Demolition, drawing number: A110-BOW-A0-ZZ-DR-A-0014 revision P3, date stamped 29/05/2025**
  - **Plan 5 Proposed Demolition Plan, drawing number: A110-BOW-A0-ZZ-DR-A-0005, Revision No: P2, date stamped 29/05/2025**
  - **Plan 6 Proposed Ground Floor Plan, drawing number: A110-BOW-A0-ZZ-DR-A-**

0010, Revision No: P3, date stamped 29/05/2025

- Plan 7 Proposed First Floor Plan, drawing number: A110-BOW-A0-ZZ-DR-A-0011, Revision No: P2, date stamped 29/05/2025
- Plan 8 Proposed Refuse Location
- Planning Statement, Pegasus Group, ref: P20-1954 date stamped 29/05/2025
- Pre-Construction Site Waste Management Plan, Weatherhead, date stamped 29/05/2025
- Sustainable Design Measures, Bowman Riley, date stamped 29/05/2025
- Noise Impact Assessment, NSL Noise Solutions Ltd, Ref: 86738, date stamped 29/05/2025
- Heritage Statement, Pegasus Group, ref: P20-1954, date stamped 29/05/2025
- Habitat Regulations Assessment, Middlemarch, ref: RT-MME-180243-01 date stamped 29/05/2025
- Flood Emergency Management Plan, Pegasus Group, Ref: P20-1954 date stamped 29/05/2025
- Flood Risk Assessment, Pegasus Group, Ref P20-1954 date stamped 29/05/2025
- Ecological Walkover Statement, Middlemarch, Ref: RT-MME-163130, date stamped 29/05/2025
- Design and Access Statement, Bowman Riley, Ref: A110-BOW-A0-ZZ-RP-A-0001 Rev P1 date stamped 29/05/2025

**These are stamped as APPROVED**

Reason: For the clarity and avoidance of doubt and in the interests of the character and appearance of the 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).

#### **PRE-COMMENCEMENT CONDITION: Site Waste Management Plan**

**C3 Prior to the commencement of any demolition or construction works, a detailed Site Waste Management Plan (SWMP) shall be submitted to and approved in writing by the Local Planning Authority. The SWMP shall include:**

1. A full breakdown of expected waste types and quantities (in m<sup>3</sup> or tonnes);
2. Details of the licensed waste carriers and their registration numbers;
3. The destination sites for all waste streams, including permit or exemption references;
4. Proposals for on-site reuse, recycling, and minimisation of waste;
5. Procedures for monitoring, updating, and reporting waste management throughout the project.

**The development shall thereafter be carried out in full accordance with the approved SWMP, and a final waste audit report shall be submitted to the Local Planning Authority within 3 months of completion of the development.**

Reason: This is a pre-commencement condition that requires details that were not submitted as part of the application but are required to fully understand the impact upon landscape and management of waste, to be submitted to and agreed in writing by the Local Planning Authority. This is to ensure adequate consideration is given to the minimisation of unnecessary waste generation, and adherence to the waste hierarchy, in accordance with the requirements of Policy SS2 (2) and Policy OE5 of the Isles of Scilly Local Plan 2015-2030.

#### **PRE-COMMENCEMENT CONDITION: Construction Environmental Management Plan**

**C4 Prior to the commencement of development, a detailed Construction Ecological Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall be prepared with input from a suitably qualified ecologist and shall include, but not be limited to, the following:**

1. Measures to prevent pollution of adjacent designated sites, including:

- Adherence to Environment Agency Pollution Prevention Guidelines (PPG1, PPG5, PPG6).
  - Compliance with CIRIA C532 guidance on water pollution control.
  - Dust and debris control measures in line with IAQM guidance.
  - Biosecurity protocols for invasive non-native species (INNS).
2. Site-specific protocols for:
    - Storage and handling of fuels, oils, and chemicals (e.g. bunded containers, spill kits).
    - Refuelling, plant washing, and material storage at safe distances from waterbodies.
    - Emergency response procedures in the event of accidental pollution.
  3. Ecological safeguards including:
    - Toolbox talks and site inductions led by a qualified ecologist.
    - Ecologist oversight during construction (watching brief/on-call).
    - Measures to prevent harm to wildlife (e.g. covering pipework, escape ramps in excavations).
  4. Lighting controls to avoid illumination of Town Beach or adjacent intertidal habitats.

**The development shall thereafter be carried out in full accordance with the approved CEMP. No development shall commence until written approval of the CEMP has been issued by the Local Planning Authority.**

Reason: To ensure that the development does not result in adverse effects on the integrity of the Isles of Scilly SPA, pSPA, and SAC, in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended).

- C5 The development hereby approved shall be carried out in full accordance with the measures and procedures set out in the document titled "Flood Emergency Management Plan" prepared by Katie Moore, dated 16 May 2025, and submitted as part of the planning application. The flood resilience measures, including but not limited to:**

- Raised electrical infrastructure,
- Evacuation procedures and signage,
- Designation of a responsible person,
- Provision and maintenance of a flood evacuation kit,

**shall be implemented prior to the first use or occupation of the development and maintained thereafter for the lifetime of the development. An annual review of the FEMP shall be undertaken by the designated responsible person, and records of the review and any updates shall be made available to the Local Planning Authority upon request.**

Reason: To ensure the safety of site users in the event of flooding and to comply with the requirements of the National Planning Policy Framework and relevant policies of the Isles of Scilly Local Plan.

- C6 The materials used in the construction of the development hereby approved shall be as detailed within the permitted application particulars and shall be retained permanently as such, unless prior written consent is obtained from the Local Planning Authority to any variation.**

Reason: To safeguard the appearance of the building and the character of the area.

- C7 No construction plant and/or machinery shall be operated on the premises, as part of the implementation of this permission, before 0800 hours on Mondays through to Saturdays nor after 1800 hours. There shall be no works involving construction plant and/or machinery on a Sunday or Public or Bank Holiday.**

Reason: In the interests of protecting the residential amenities of the islands.

## Further Information

1. **STATEMENT OF POSITIVE ENGAGEMENT:** In dealing with this application, the Council of the Isles of Scilly has actively sought to work with the applicants in a positive and creative way, in accordance with paragraph 39 of the National Planning Policy Framework 2024.
2. **POST-DECISION AMENDMENTS:** 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 or the submission of a full planning application for a revised scheme. Please discuss any proposed amendments with the Planning Officer. There is a fee to apply for a non-material amendment and the most up to date fee will be charged which can be checked here:  
[https://ecab.planningportal.co.uk/uploads/english\\_application\\_fees.pdf](https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf)
3. **DISCHARGING CONDITIONS:** In accordance with the Town and Country Planning (fees for Application and Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2017 a fee is payable to discharge any condition(s) on this planning permission. You are advised to check the latest fee schedule at the time of making an application as any adjustments including increases will be applied:  
[https://ecab.planningportal.co.uk/uploads/english\\_application\\_fees.pdf](https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf)
4. **BUILDING REGULATIONS:** 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).
5. **BIODIVERSITY NET GAIN:** Based on the information available this permission is considered to be one which will not require the approval of a biodiversity gain plan before development is begun because one or more of the statutory exemptions or transitional arrangements are considered to apply. These can be found in the legislation. The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that, unless an exception or a transitional arrangement applies, the planning permission granted for the development of land in England is deemed to have been granted subject to the condition ("the biodiversity gain condition") that development may not begin unless:  
(a) a Biodiversity Gain Plan has been submitted to the planning authority, and  
(b) the planning authority has approved the plan.  
The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan in respect of this permission would be the Planning Department at the Council of the Isles of Scilly.
6. **COMMENCEMENT NOTICE:** Under Section 93G of the Town and Country Planning Act 1990 (as amended), this decision notice informs you that a 'commencement notice' must be served on the Local Planning Authority - subsections (2) and (3) are set out below:  
(2) Before the development is begun, the person proposing to carry it out must give a notice (a "commencement notice") to the local planning authority specifying the date on which the person expects the development to be begun.  
(3) Once a person has given a commencement notice, the person:
  - may give a further commencement notice substituting a new date for the date previously given, and
  - must do so if the development is not commenced on the date previously givenThe notice should be provided to the Local Planning Authority a minimum of seven (7) days before the development commences.  
Failure to provide the commencement notice could lead to the Local Planning Authority serving notice on them to require information to be provided, and if that is not provided within 21 days, they will be guilty of an offence, as below:  
(5) Where it appears to the local planning authority that a person has failed to comply with the requirements of subsection (2) or (3)(b), they may serve a notice on any relevant person requiring the relevant person to give the authority such of the information prescribed under subsection (4)(a) as the notice may specify.  
(7) A person on whom a notice under subsection (5) is served is guilty of an offence if they fail to give the information required by the notice within the period of 21 days beginning with the day on which it was served.  
(9) A person guilty of an offence under subsection (7) is liable on summary conviction to a fine not exceeding level 3 on the standard scale.  
PLEASE NOTE: The requirement under Section 93G of the Town and Country Planning Act 1990



(as amended) is separate from any requirements under the Community Infrastructure Levy Regulations 2010 (as amended) or any requirements for serving notices secured through the signed Section 106 Legal Agreement.

7. **PROTECTED SPECIES:** 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.

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:** 30 July 2025



# COUNCIL OF THE ISLES OF SCILLY

Planning Department  
Old Wesleyan Chapel, Garrison Lane, St Mary's TR21 0JD  
☎0300 1234 105  
✉[planning@scilly.gov.uk](mailto:planning@scilly.gov.uk)

Dear The Cooperative Group Food Ltd,

## **IMPORTANT:** Please sign and complete this **Commencement Certificate**.

Anyone intending to begin development under a granted planning permission (including permissions varied under Section 73) is required to notify the local authority of the Commencement Date.

### **What if plans change?**

If development does not start on the stated date, a new notice must be submitted with the revised date.

### **What happens if you don't comply?**

The local planning authority (LPA) can serve a notice requiring the information. Failure to respond within 21 days is an offence, punishable by a fine of up to £1,000, unless the person has a reasonable excuse.

### **Why is this important?**

It gives LPAs better oversight of when development begins, helping with enforcement, monitoring, and infrastructure planning.

### **Relation to other notices:**

This is separate from Building Control commencement notices, though similar in purpose.

This is to certify that decision notice: P/25/050/FUL and the accompanying conditions have been read and understood by the applicant: The Cooperative Group Food Ltd.

1. **I/we intend to commence the development as approved:** Construction of a single storey extension, shopfront alterations and installation of plant at: Co-operative Retail Services Ltd Hugh Street Hugh Town St Mary's 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 you commence (where relevant) or as part of 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.

### PRE-COMMENCEMENT CONDITION(S)

C3 Prior to the commencement of any demolition or construction works, a detailed Site Waste Management Plan (SWMP) shall be submitted to and approved in writing by the Local Planning Authority. The SWMP shall include:

1. A full breakdown of expected waste types and quantities (in m<sup>3</sup> or tonnes);
2. Details of the licensed waste carriers and their registration numbers;
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# COUNCIL OF THE ISLES OF SCILLY

Planning Department

Old Wesleyan, Garrison Lane, St Mary's, Isles of Scilly, TR21 0JD

☎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 - £86 per application
- Other permissions - £298 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). 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 £44 for householder type applications and £298 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.

If the scale of change is not considered to be 'non-material' you may be able to make a 'minor material amendment' which would require to you apply to vary the conditions (providing the change is not contrary to a specific condition). The fee for a householder variation of condition application would be £86, for other non-major (other than householder) development applications the fee would be £586 and for major development the fee would be £2,000.

### **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
- Planning Application – 6 months
- Listed Building Consent – 6 months
- Advertisement Consent - 8 weeks
- Minor Commercial Application - 12 weeks
- Lawful Development Certificate – None (unless for LBC – 6 months)
- Other Types - 6 months

Note that these periods can change so you should check with the Planning Inspectorate for the most up to date list. You can apply to the Secretary of State to extend this period, although this will only be allowed in exceptional circumstances.

You find more information on appeal types including how to submit an appeal to the Planning Inspectorate by visiting <https://www.gov.uk/topic/planning-development/planning-permission-appeals> or you can obtain hard copy appeal forms by calling 0303 444 5000. Current appeal handling times can be found at: [Appeals: How long they take page](#).

### **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 by email: [planning@scilly.gov.uk](mailto:planning@scilly.gov.uk) 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 0800 0831821. Electricity connections are made by Western Power Distribution who can be contacted on 08456012989.

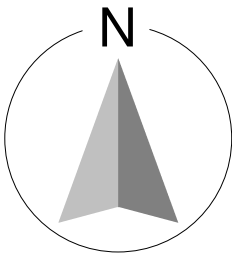
Should you require any further advice regarding any part of your development, please contact the Planning Department and we will be happy to help you.

APPROVED

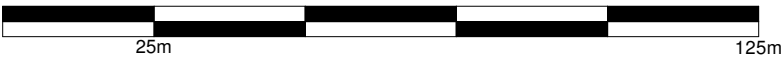
By Lisa Walton at 2:38 pm, Jul 30, 2025



1 - SITE LOCATION PLAN  
1 : 1250



Key  
 Red Line Boundary



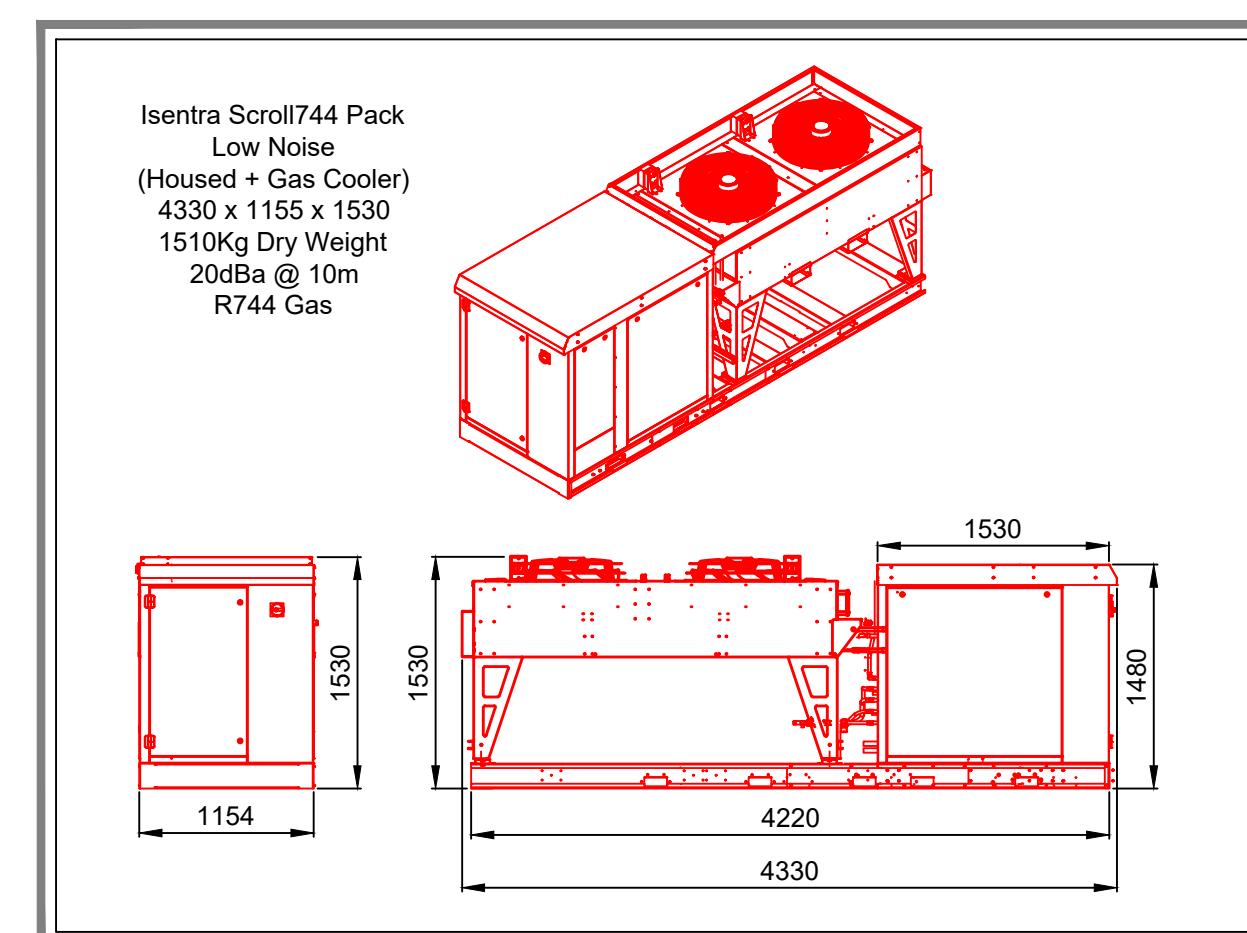
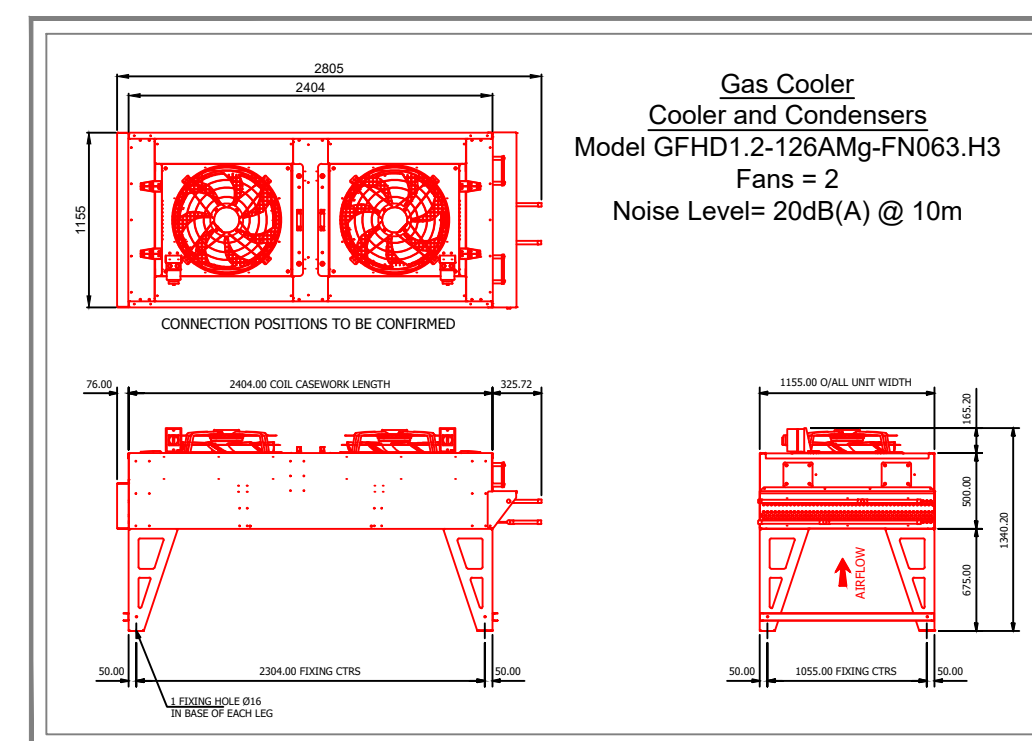
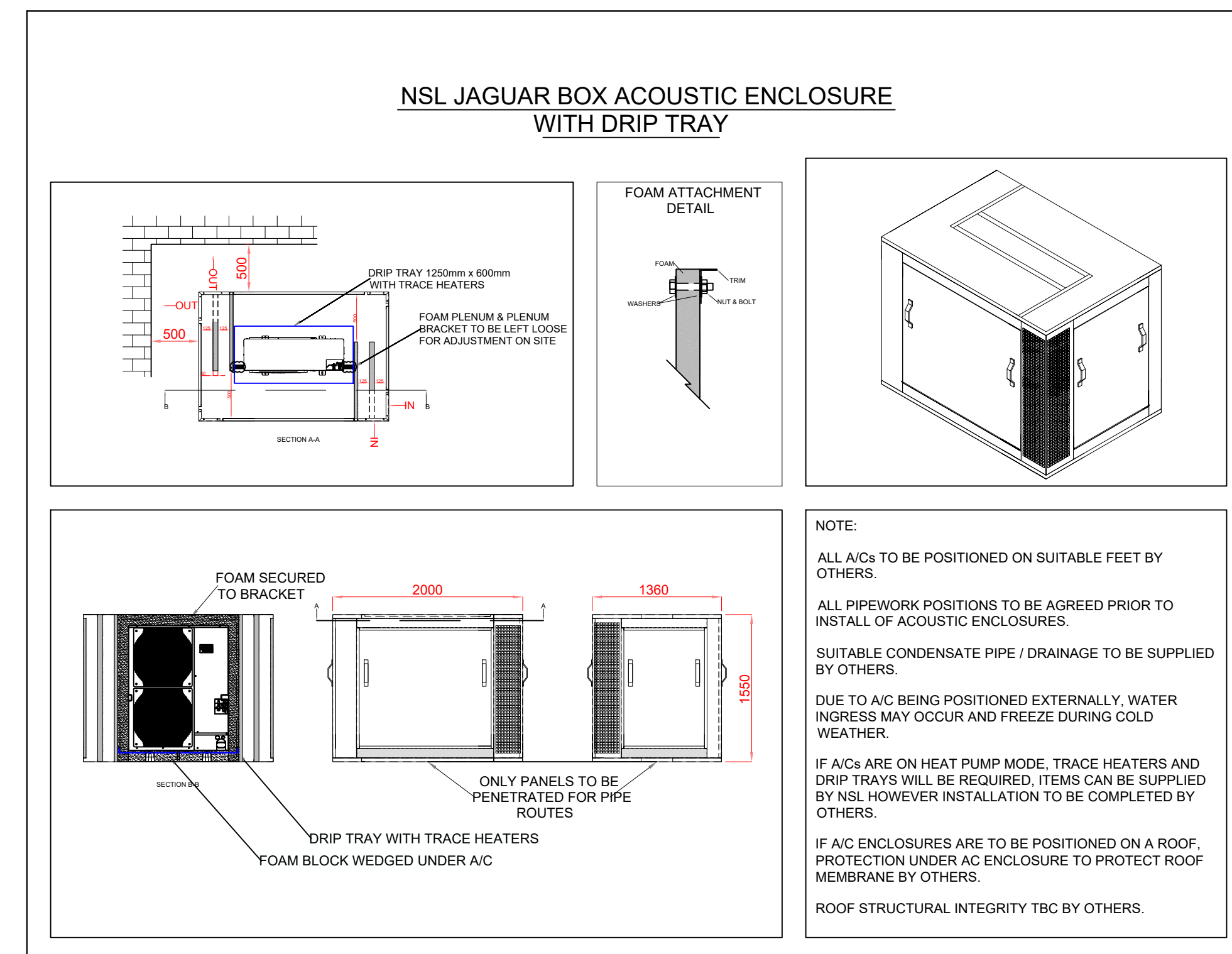
SCALE 1:1250

RECEIVED  
By Tom.Anderton at 9:25 am, May 29, 2025

P2 Revised for planning submission24.04.25SBCS					Date: 01/23/25	Checked by : CS	Sheet Name: Site Location Plan	Project No: A1100	Revision: P2
P1 Updated to show spot levels and alterations to plan and elevations01.04.25GM DH					Drawn by: SP	Scale @ A4 : As indicated	Purpose of issue:Information	Status:S2	Drawing No: A110-BOW-A0-ZZ-DR-A-0001
Revision					Date	By	Chk	CO-OP 4 Hugh Street	






















Refrigeration Pack DA1											Model: iSentra Low Noise					Refrigerant				R744
Pack ID	Compressor		New/ Reused	Manufacturer	SST°C	Capacity (kW)	THR kW	Design Current (A)	FLA (A)	Power Input kW	PEIS/R Cat	Elect Supply (V)	Housed	Control type	dB(A) @10m	Receiver (Litrs)	Weight Kg			
HA	1x ZTWI6AG(Inverter) 1x TUBI8AG(Standard) 1x AZTIV6AG(Inverter) 1x TUBI8AG(Standard)	New	Copeland	-4°C	25															
LA		New	Copeland	-29°C	2.44	50.3	TBC	80.3	22.86	IV	400v/3ph/50Hz	Yes	RDM	20	37.5	1510 (dry)				
TOTAL Combined Duty					27.44	50.3	0	80.3	22.86											
Refrigeration Gas Cooler												Refrigerant		R744						
GC ID	Model	70-8	Manufacturer	THR Capacity (kW)	Ambient	Coil Material	Elect Supply	Start Current (A per Fan (Max))	FLC Current (A)	Free Field level Day @10m (Fan Control Voltage)	Free Field level Night @10m (Fan Control Voltage)	Weight Kg								
DA1 GC1	GFDH1-D-126AMg-FN063.H3	New	Cooler & Condensers	50.3	35	Cu/AlMg	400v/3Ph/50-60Hz	TBC	2 x 2 fans	70dB(A) 481rpm	70dB(A) 481rpm	442 (dry)								

**RECEIVED**  
By Tom.Anderton at 9:29 am, May 29, 2025

- ### Notes/Legend
1. Do Not Scale.
  2. Cabinet setting out dimensions are based on customer information.
  3. All Dimensions are to be checked on site prior to installation.
  4. Cabinet, Coldroom and Plant installers are to check site access prior to installation.
  5. Refrigeration layout, pipework and drainage requirements are indicative only and subject to change to reflect updated layouts and on site conditions.
- |   |   |
|---|---|
|    | Task Lighting by MC<br>(Indicative Locations)                         |
|    | Suction Transducer  |
|    | C/P Panel   |
|    | Test Button   |
|    | Refrigeration Distribution Board                                      |
|    | Personnel Trap Alarm Beacon.<br>Mounted Centrally Above Coldroom Door |
|    | = Sensor - CO2  |
|    | Entrapment Alarm  |
|  | Sounder/Leak Detection Beacon   |
|  | Leak Detection Beacon   |
|  | Drops boxed by MC   |
|  | Cold Room Drainage required   |
|  | Drainage required<br>(Single 50mm upstand)<br>Service Penetration     |
|  | LED Light   |
|  | Refrigeration Distribution Boards                                     |

Revision Details				
Rev	-	30/04/25	Drawn/Checked	LCC/MAJ
First Issue using 5808 Isles Of Scilly P7F13				
Rev	A	06/05/25	Drawn/Checked	LCC/MAJ
Plant area amended				

Un-Controlled Document

Preliminary

Drawing No.	Rev	Scale (A1)
300200280425-R5	A	1:50

R5	A
Client	

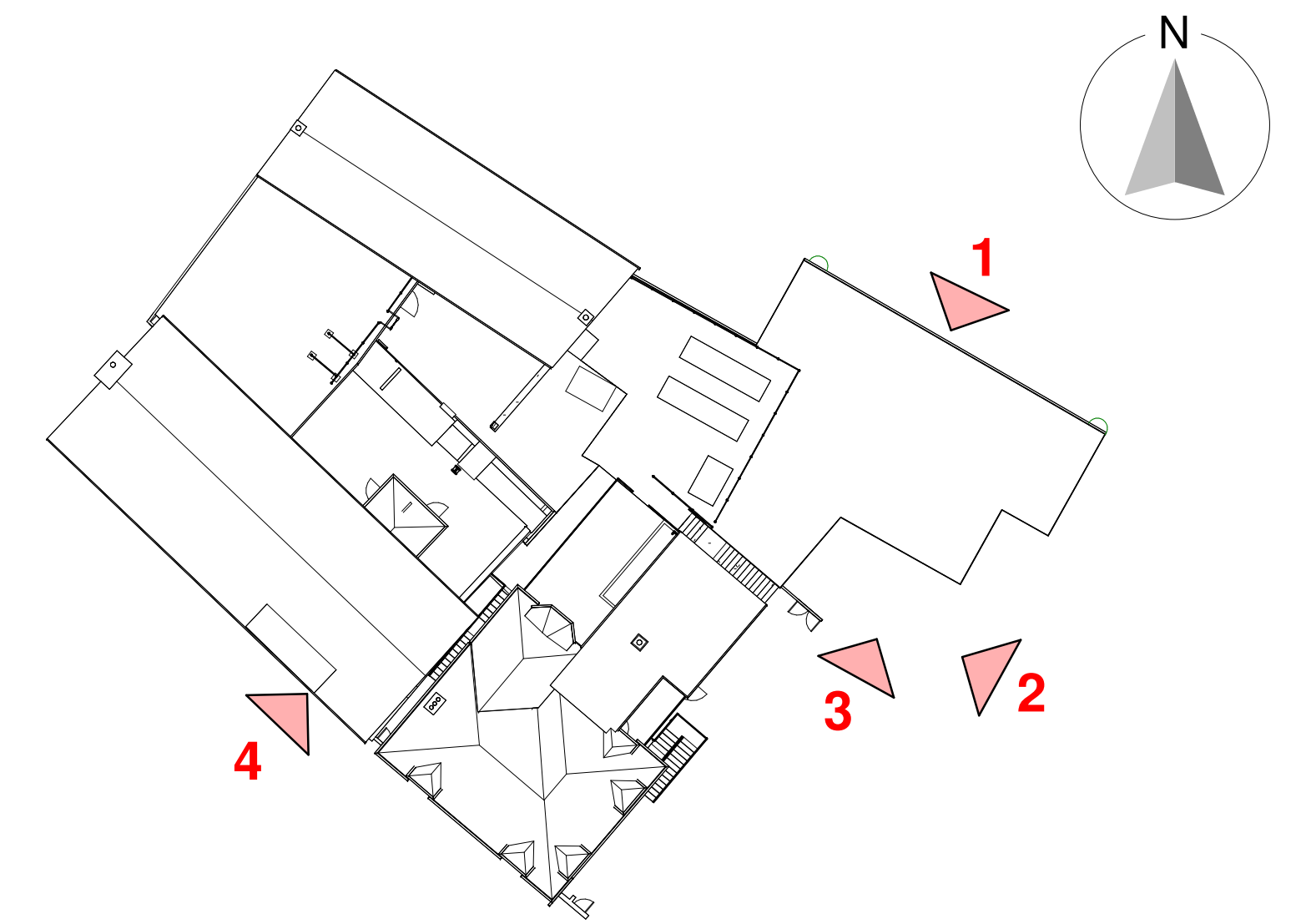


Co-Op  
Scilly Isles

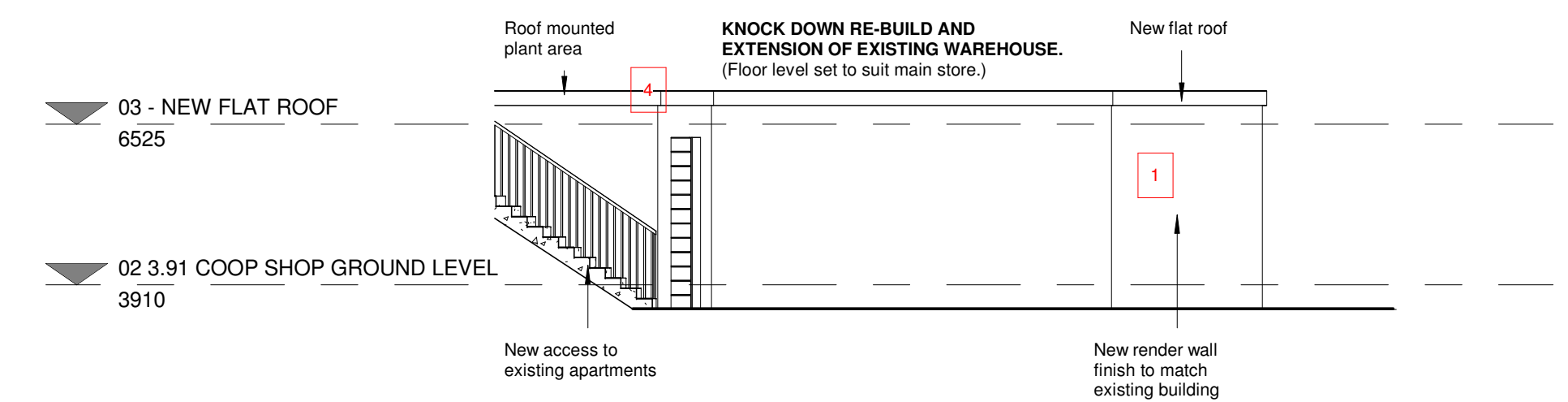
CR3 Plant  
Layout

EPTA  
Avonside House, Kingfisher Park,  
Headlands Business Park, Blashford,  
Ringwood, Hampshire  
BH24 3NX  
Tel: 01425 485700  
Fax: 01425 485701

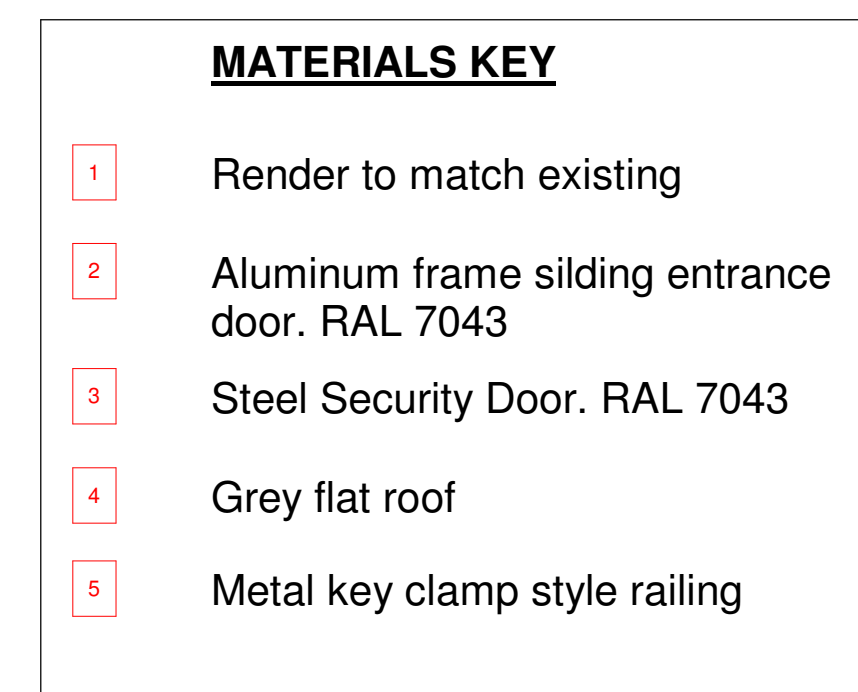




### Proposed Key Plan



3 - Proposed South Elevation  
1 : 100



SCALE 1:100

**RECEIVED**  
By Tom.Anderton at 9:29 am, May 29, 2025

All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plan; all conflicts should be reported to the appointed Principal Designer.

All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plan; all conflicts should be reported to the appointed Principal Designer.

Sheet Name: Proposed Elevations

**Status:**

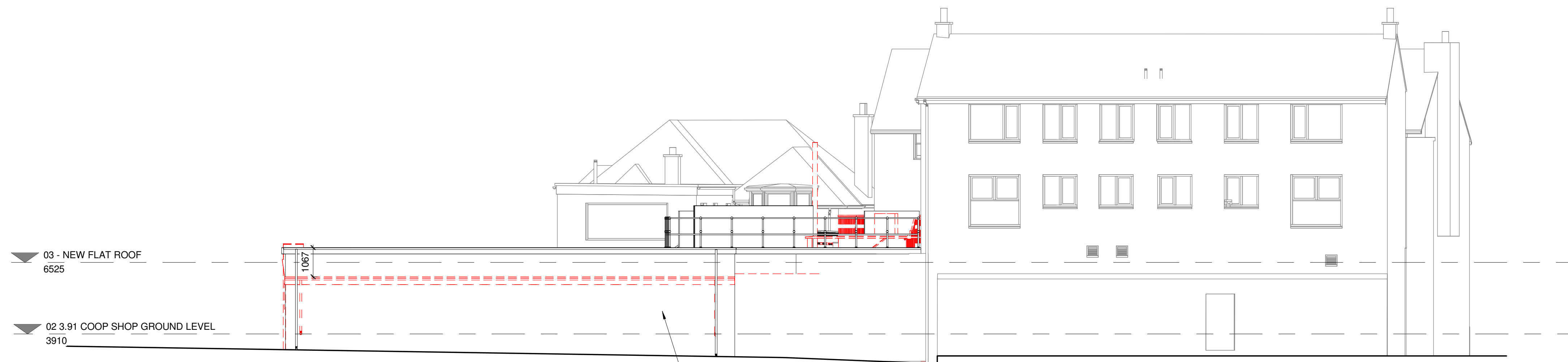
Checked by: CS

**Scale @ A1:** As indicated

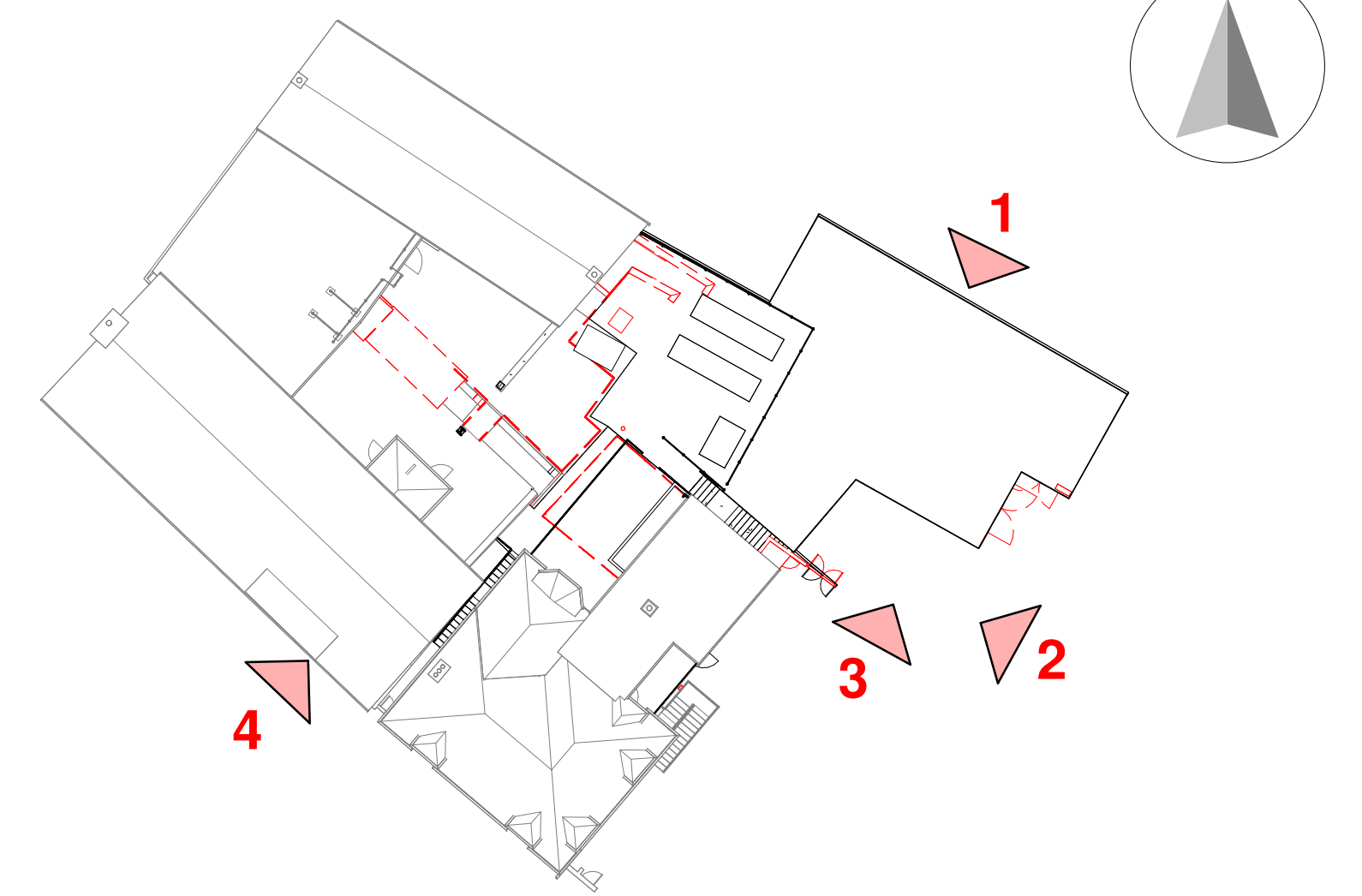
Revision: P3



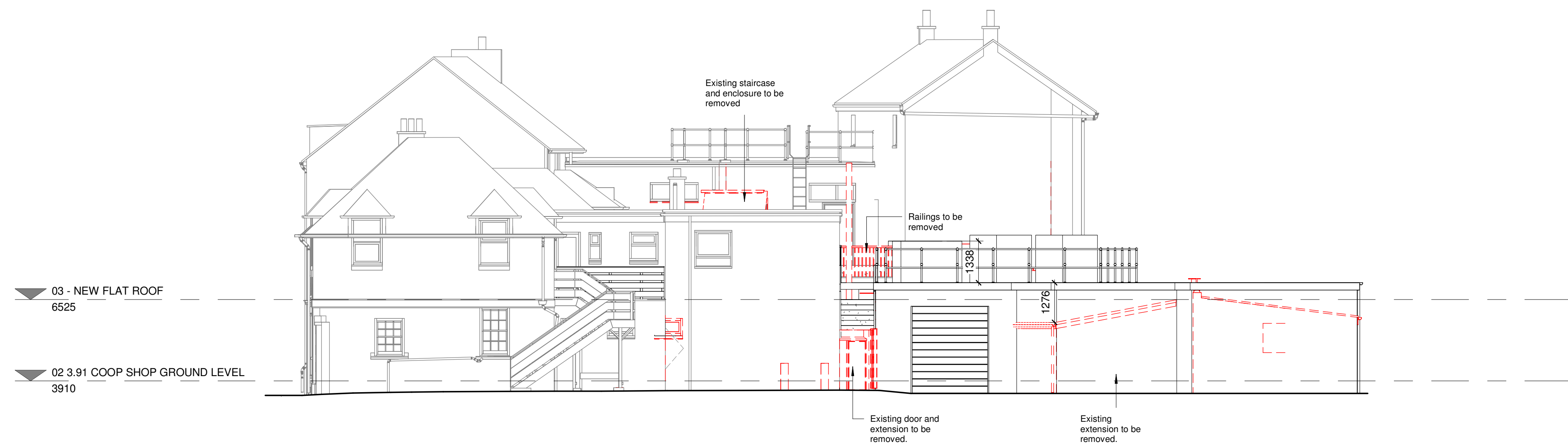
Do not scale from this drawing. This drawing is the copyright of Bowman Riley Architects Limited. ©  
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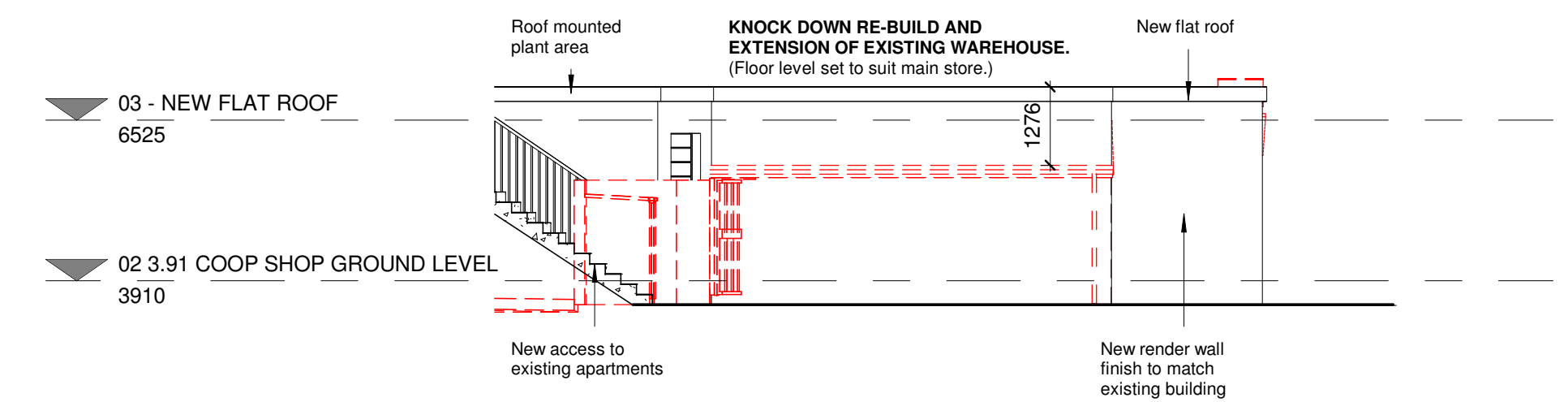
1 - Proposed North East Elevation with Demolition  
1 : 100



Proposed Key Plan with Demolition



2 - Proposed South East Elevation with Demolition  
1 : 100



3 - Proposed South Elevation with Demolition  
1 : 100



4 - Proposed South West Elevation with Demolition  
1 : 100

**APPROVED**  
By Lisa Walton at 2:38 pm, Jul 30, 2025

**RECEIVED**  
By Tom.Anderton at 9:29 am, May 29, 2025

P3	External Plant Updated	09.05.25	SB	CS
P2	Revised for planning submission	24.04.25	SB	CS
P1	Updated to show spot levels and alterations to plan and elevations	01.04.25	GM	DH
Revision		Date	By	Chk
All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plan; all conflicts should be reported to the appointed Principal Designer.				

CO-OP  
4 Hugh Street  
St Mary's, Isles of Scilly, TR21 0LL

Sheet Name: Proposed Elevations with Demolition

Purpose of issue: Planning Status:

Date: 27.11.2024 Checked by: CS

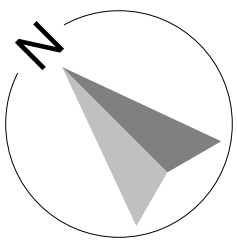
Drawn by: DMM Scale @ A1: As indicated

Project No: A1100 Revision: P3

Drawing No: A110-BOW-A0-ZZ-DR-A-0014







Key  
--- To be demolished  
■ Site Boundary



1 - Existing Demolition Plan  
1 : 100

**APPROVED**  
By Lisa Walton at 2:39 pm, Jul 30, 2025

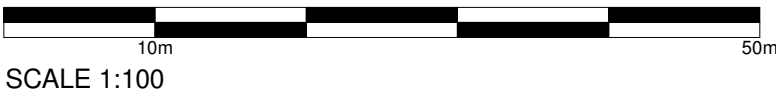
**RECEIVED**  
By Tom.Anderton at 9:29 am, May 29, 2025

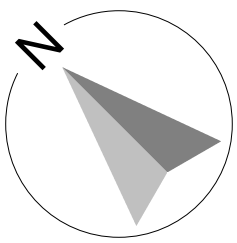
P2 Revised for planning submission 24.04.25 SB CS  
P1 Updated to show spot levels and alterations to 01.04.25 GM DH  
plan and elevations

Revision	Date	By	Chk
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All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plan; all conflicts should be reported to the appointed Principal Designer.

CO-OP  
4 Hugh Street  
St Mary's, Isles of Scilly, TR21 0LL  
Sheet Name: Proposed Demolition Plan  
Purpose of issue: Planning Status:  
Date: 01/27/25 Checked by: CS  
Drawn by: SP Scale @ A1: 1 : 100  
Project No: A1100 Revision: P2  
Drawing No : A110-BOW-A0-ZZ-DR-A-0005





Key

- Sales Floor Area
- Back of House Area



**APPROVED**  
By Lisa Walton at 2:40 pm, Jul 30, 2025

**RECEIVED**  
By Tom.Anderton at 9:29 am, May 29, 2025

P3	Revised for planning submission	24.04.25	SB	CS
P2	Updated to show existing and proposed levels	08.04.25	GM	DH
P1	Updated to show spot levels and alterations to plan and elevations	01.04.25	GM	DH
	Revision	Date	By	Chk
All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plan; all conflicts should be reported to the appointed Principal Designer.				

CO-OP  
4 Hugh Street  
St Mary's, Isles of Scilly, TR21 0LL

Sheet Name: Proposed Ground Floor Plan

Purpose of issue: Planning Status: CS

Date: 01/24/25 Checked by: CS

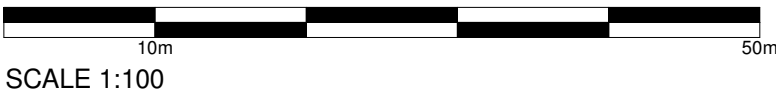
Drawn by: SP Scale @ A1: 1 : 100

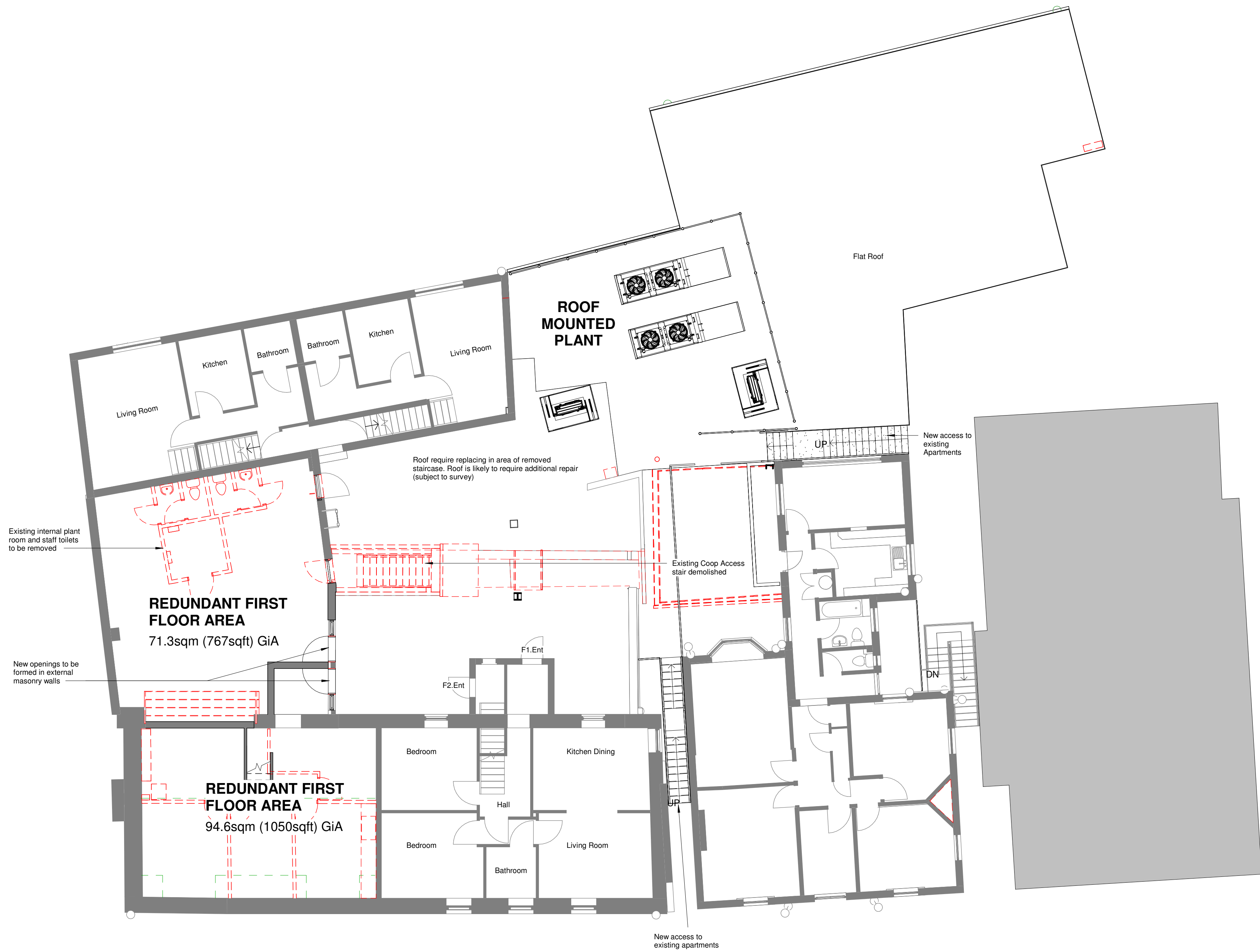
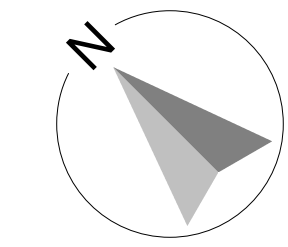
Project No: A1100 Revision: P3

Drawing No : A110-BOW-A0-ZZ-DR-A-0010



1 - PROPOSED COOP PLAN  
1 : 100





1 - PROPOSED FIRST FLOOR  
1 : 100



**APPROVED**  
By Lisa Walton at 2:41 pm, Jul 30, 2025

**RECEIVED**  
By Tom.Anderton at 9:29 am, May 29, 2025

P2	External Plant Updated	09.05.25	SB	CS
P1	Updated to show spot levels and alterations to plan and elevations	01.04.25	GM	DH
Revision	Date	By	Chk	
All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plan; all conflicts should be reported to the appointed Principal Designer.				

CO-OP  
4 Hugh Street  
St Mary's, Isles of Scilly, TR21 0LL

Sheet Name: Proposed First Floor Plan

Purpose of issue: Planning Status: CS

Date: 01/29/25 Checked by: CS

Drawn by: SP Scale @ A1: 1 : 100

Project No: A1100 Revision: P2

Drawing No : A110-BOW-A0-ZZ-DR-A-0011



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P:\Architectural\Real\A1100 - Co-op Scilly Isles Extension\A1100 - 07 Revit\07 - Planning Drawings & Model\A1100-BOW-A0-ZZ-M3-A-001-P2\_Existing & Proposed Plans & Elevations.rvt

**APPROVED**  
By Lisa Walton at 2:41 pm, Jul 30, 2025



Proposed Refuse Location



**RECEIVED**

By Tom.Anderton at 9:25 am, May 29, 2025

**APPROVED**

By Lisa Walton at 2:43 pm, Jul 30, 2025

**PEGASUS**  
GROUP

# Planning Statement for Construction of a Single Storey Extension, Shopfront Alterations and Installation of Plant

Co-op Food store and former Barclays Bank, Hugh Street, St Mary's, TR21 0LL

On behalf of Co-operative Group Food Ltd

Date: May 2025 | Pegasus Ref: P20-1954

Author: Stacey Pester

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## Document Management

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	07.05.25	SP	CE	-
2	21.05.25	SP	CE	Client comments.



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# 1. Introduction

- 1.1. This Planning Statement ('Statement') is submitted in support of an application for planning permission for the construction of single storey extension, shopfront alterations and the installation of plant equipment to facilitate the extension of an existing convenience store occupied by the Co-operative at 4 Hugh Street, St Mary's.
- 1.2. The Statement sets out the background to the site and development proposals, including the relevant planning history and planning policy framework, together with their physical context and assesses the proposals in terms of their compliance with policy.
- 1.3. This Statement should be read in conjunction with the supporting documents to the application, including drawings prepared by Bowman Riley.

## 2. Site and Surrounding Area

- 2.1. The 'Site' comprises the Co-op convenience store located at 4 Hugh Street and the adjacent former Barclays Bank unit (both Use Class E). The Co-op convenience store is a trading store but the bank has been closed for some time.
- 2.2. The Site is located within the defined town centre of Hugh Town on the Island of St Mary's. St Mary's is the Isles of Scilly's largest island and Hugh Town represents the central hub of the island. The Isles of Scilly as a whole are designated as an Area of Outstanding Natural Beauty (AONB) and Heritage Coast. The buildings on site are not Listed.
- 2.3. The Site is located in Flood Zone 3, an area with a high probability of flooding from rivers and the sea. It is also within the St Marys Flood Prone Land.
- 2.4. The two separate buildings are adjacent to one another but are not adjoining. The former bank is a two storey brick and stone building with render and a pitched tile roof. The Co-op convenience store is 2.5 storeys, with living accommodation within the roof space and with a white rendered finish.
- 2.5. Both units front onto Hugh Street which is a narrow road. The buildings located directly opposite the Site and on the opposite side of Hugh Street appear to be in residential use and these are two storey buildings of a stone construction. Land to the rear overlooks the beach and harbour. Other surrounding land uses are predominantly residential and commercial.
- 2.6. Within the site, there are also 5 no. existing flats comprising:
  - 2 flats over the Co-op (one on the first floor and one on the second floor) and 2 maisonettes to the rear of the shop overlooking the beach; and
  - 1 flat on the first floor over the former Barclays Bank unit
- 2.7. In addition to this Site, the Co-op is proposing to relocate its business into the former Seasalt retail unit on Garrison Lane during the construction period. This unit is an existing bay fronted shop unit with a first floor comprising residential accommodation. This shop is also located within the defined town centre of Hugh Town.

### 3. Planning History

- 3.1. Many of the planning permissions for the Co-op convenience store are minor in nature with some more recent and relevant exceptions as follows:
- Planning application reference P/16/O18: Conditional permission granted for the reconfiguration of existing doors 26.04.2016;
  - Planning application reference P/15/O54: Conditional permission for the reconfiguration of plant unit and installation of new warehouse doors and roller shutter 17.09.2015;
  - Planning application reference P.4193: Conditional permission granted for the enlargement of ground floor retail area, transfer warehouse to first floor and alterations to shop frontage 18.03.1997;
  - Planning application reference P.0644: Conditional permission granted for a new shopfront 04.11.1966;
  - Planning application reference P.0619: Conditional permission granted alterations and extensions to retail grocery shop and erection of maisonettes 10.10.1966; and
  - Planning application reference P.5376: Demolish structure and rebuild warehouse and 4 no. flats. We understand that the decision notice was not issued because the s106 legal agreement was not signed.
- 3.2. In relation to the former Seasalt retail unit, the planning history confirms that the lawful use of this unit is as a shop (Use Class E). "Erection of ground floor extension to provide additional retail floor area (Use Class A1) (As amplified by plans received 23/02/21)."
- 3.3. A pre-application ref. PA-24-046 was submitted in May 2024 to extend the Co-op convenience Store and create 1 no. additional residential dwelling. The residential element does not form part of these proposals however the pre-application response has been provided in Appendix 1.
- 3.4. The response outlined that the Local Authority supported the proposed reconfiguration, internal works and extension to of building, recognising the important of the Co-Operative convenience Store as the only supermarket on St Mary's.

## 4. The Proposal

- 4.1. This application seeks planning permission for the construction of a single storey extension, shopfront alterations and the installation of plant equipment. The Co-op has been exploring options to extend its convenience store on St Mary's for a number of years and has purchased the adjacent former bank in order to do this.
- 4.2. The proposal is that the sales floorspace will extend across the entire ground floor area of the existing Co-op shop unit with the back of house area to be located within the ground floor area of the former Barclays Bank unit.
- 4.3. Under this arrangement, the sales floorspace increases from 266 sq.m to 455 sq.m and the back of house (BOH) area from 148 sq.m to 442 sq.m. The latter is partly due to the proposal to knock down and rebuild the single storey warehouse to the rear of the Site and enclose part of the service yard between the rear of the former bank unit and the warehouse. The extent of the proposed works are identified on the plans submitted in support of this planning application.
- 4.4. A new shopfront is also proposed to the existing shop. No change is proposed to the servicing regime albeit the back of house ('BOH') area will now be larger and able to store more goods. External plant is proposed to remain in the same broad location as existing albeit will be relocated from the ground floor, to the first floor back of house roof.
- 4.5. The existing plant serving the Co-operative convenience store will be replaced with new plant equipment. This will consist of 2no. combined gas cooler and compressor packs and 2no. external air conditioning (AC) units. The AC units will be installed within acoustic enclosures and will only operate when the store is open. The refrigeration plant will operate at all times but will run at a reduced duty at night.
- 4.6. A new access is proposed from Hugh Street to the existing apartments on the first floor. No change is proposed to the existing refuse collection and storage arrangements.



## 5. Planning Policy

5.1. The following policy is considered relevant to this application.

### **Local Planning Policy**

5.2. The adopted Development Plan comprises the Isles of Scilly Local Plan (2015–2030) and was formally adopted by the Council on 25<sup>th</sup> March 2021.

5.3. The Site is located within the defined Town Centre of Hugh Town on the Island of St Mary's according to the Local Plan Policies Map.

### **Isles of Scilly Local Plan (2015 – 20230)**

5.4. **Policy SS1** of the Local Plan sets out the principles of sustainable development. It states that:

*‘Development proposals will be permitted where they make a positive contribution to the social, economic and environmental needs of the Isles of Scilly in a manner that does not compromise the ability of future generations to meet their own needs and to enjoy the islands outstanding environment.’*

5.5. **Policy SS2** of the Local Plan advises on sustainable quality design and place-making. It states that:

*‘Development will not be permitted if it is considered to be of poor or unsustainable design. New development must be of a high-quality design and contribute to the islands’ distinctiveness and social, economic and environmental elements of sustainability.’*

5.6. **Policy SS3** of the Local Plan encourages the re-use of buildings. It states that:

*‘The re-use of redundant buildings for commercial use will be permitted provided that:*

- a) the building is structurally sound and capable of conversion without substantial rebuilding, extension or alteration;*
- b) the proposal would not result in the requirement for another building to fulfil the function of the building being converted;*
- c) the proposed use is restricted primarily to the building;*
- d) the development would not harm its immediate setting or the amenity of adjoining/neighbouring properties or land uses; and*
- e) suitable nesting and roosting sites for birds and bats are incorporated into the design.’*

5.7. **Policy SS4** of the Local Plan entitled ‘Protection of Retailing, Recreation and Community Facilities’ is directly relevant to the proposed development. Part 1) of this policy states that:

*'Development for new retail provision will be supported provided it is: i) appropriately designed, scaled and located in accordance with other policies in the Local Plan; and ii) does not harm the amenities of the surrounding area whilst maintaining pedestrian and highway safety.'*

5.8. Parts 2) to 5) of the policy are not relevant because it provides criteria against which the loss of ground floor retail / other uses will be considered.

5.9. **Policy OE1** of the Local Plan advises on protecting and enhancing the landscape and seascape. It advises that:

1. *'Development will only be permitted where it aligns with the statutory purpose of Areas of Outstanding Natural Beauty (AONB), and therefore conserves and enhances the islands' landscape, seascape and scenic beauty. Development must take into account and respect:*
  - a) *the distinctive character, quality, scenic beauty and sensitivity of the landscape and seascape;*
  - b) *the undeveloped and special character of the Heritage Coast;*
  - c) *other qualities, such as important features and views, dark skies and tranquility, and having regard to the AONB Management Plan; and*
  - d) *the Isles of Scilly Landscape Character Study and any successor or associated documents.*
2. *Development will not be supported on the uninhabited islands.'*

5.10. **Policy OE5** advises on managing waste. It states that:

*'3. All development proposals must demonstrate best practice in addressing waste management solutions, must align with the waste hierarchy, and a site waste management plan (SWMP) must be submitted to support planning applications.*

*4. Construction and demolition waste should be minimised and must be managed and re-used on-island where there will be no harmful impacts. Where re-use on-island would result in an environmental risk to human health, biodiversity, the historic environment, the amenity of neighbouring properties or land uses, or the water environment, then appropriate off-island management or disposal will be required.'*

5.11. **Policy OE7** of the Local Plan advises on development affecting heritage. It states that:

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

- 2) *Proposals causing harm will be weighed against the substantial public, not private, benefits of the proposal, and whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long-term use of the asset.*
- 3) *In those exceptional circumstances where harm to any heritage asset can be fully justified, and development would result in the partial or total loss of the asset and/or its setting, the applicant will be required to secure a programme of recording and analysis of that asset, and archaeological excavation where relevant, and ensure the publication of that record to an appropriate standard in a public archive.*
- 4) *Proposals that will help to secure a sustainable future for the islands' heritage assets, especially those identified as being at greatest risk of loss or decay, will be supported.'*

5.12. **Policy WC1** advises that Development proposals that strengthen, enhance and diversify the islands' economy will be supported where they are appropriately designed, scaled and located, in accordance with other policies in the Local Plan.

5.13. **Policy WC3** advises on new employment development and states that:

1. *'The redevelopment or extension of buildings or erection of new buildings for employment use will be permitted provided that proposals accord with Policy WC1, and where:*
  - a) *it is well integrated within an existing settlement; or*
  - b) *it is in the countryside where the business activity and scale is appropriate to its location and demonstrates a functional and/or operational requirement to be in such a location; or*
  - c) *it is an extension to an existing business where relocation would be impractical or unviable; and in all cases.*
  - d) *it does not result in an unacceptable impact on the environment or residential amenities, in accordance with other relevant policies within the Local Plan.'*

## **Material Considerations**

### **National Planning Policy Framework 2024 (NPPF)**

- 5.14. The revised National Planning Policy Framework (December 2024) (NPPF') sets out the Government's policies for the planning system to ensure that the planning system helps to achieve sustainable development.
- 5.15. The key objective of the NPPF is to achieve sustainable development and paragraph 8 confirms that there are three overarching objectives which need to be pursued, namely economic, social and environmental. The economic role should contribute to sustainable development by building a strong, responsive and competitive economy and ensuring sufficient amount of and right type of development to support growth.

- 5.16. **Paragraph 11** confirms that a presumption in favour of sustainable development is at the heart of the NPPF and for planning applications this means proposals for development conforming to the Development Plan should be approved without delay.
- 5.17. **Paragraph 39** relates to decision making and confirms that *"local planning authorities should approach decisions on proposed development in a positive and creative way"* and that:
- "Decision-makers at every level should seek to approve applications for sustainable development where possible."*
- 5.18. **Paragraph 85** states that:
- "significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development."*
- 5.19. **Paragraph 98** states that planning decisions should:
- "plan positively for the provision and use of ...community facilities (such as local shops...) and other local services to enhance the sustainability of communities and residential environments."*
- 5.20. **Paragraph 198** states that development should:
- "mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life."*
- 5.21. Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local authorities should approach development decisions positively – looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Securing the optimum viable use of the property and achieving public benefits are key material considerations for application proposals.
- Isles of Scilly Design Guide SPD (adopted 2006)**
- 5.22. The Isles of Scilly Design Guide was approved in 2006 to complement the Local Plan and the AONB Management Plan. It offers clear and practical guidance in order to achieve high quality and sustainable design and ensure the special character of Scilly is retained and where possible enhanced.
- Biodiversity and Geological Conservation SPD (adopted 2008)**
- 5.23. The document is designed to assist those who are submitting and determining planning applications in Scilly to understand how to ensure that biodiversity and, where relevant, geodiversity is protected, conserved and enhanced as a consequence of development.
- Bats and Buildings Guidance (2014)**

- 5.24. If a planning proposal has the potential to disturb the habitats of protected species, an ecological assessment will need to be commissioned. In relation to bats, this would require a preliminary bat roost assessment (sometimes referred to as a 'bat survey') to assess the possibility of bats being present in your property. The guide 'What to expect from a bat survey' provides advice.

## 6. Planning Assessment

### Principle of Development

- 6.1. This planning application proposes the construction of a single storey extension, shopfront alterations and the installation of plant equipment to facilitate the extension of an existing convenience store occupied by the Co-operative.
- 6.2. The 'Site' comprises the Co-op convenience store located at 4 Hugh Street and the adjacent former Barclays Bank unit (both Use Class E). The Co-op convenience store is a trading store but the bank has been closed for some time.
- 6.3. The Co-op convenience store provides a vital service to the population of St Mary's and the wider area. The proposal seeks to provide a more modern and efficient Co-op convenience store within the defined town centre of Hugh Town via integration of the adjacent, vacant commercial unit. No change of use is required to that unit to facilitate this integration into the larger Co-op convenience store. This is because both units have a lawful Use Class E use.
- 6.4. The Co-op convenience store is the only supermarket on St Marys, and therefore the proposed works to improve the store are essential. The Co-op convenience store has not had any major investment since a refit in 2015 and the proposed development will allow it to operate at its optimum level and supply a full range of stock for customers. This is particularly relevant during the summer months when it is difficult for the convenience store to hold the stock in the BOH area that it needs and for the sales floor to accommodate the additional customers.
- 6.5. Policy SS4 is supportive of new and seeks to protect against the loss of existing retail particularly in Hugh Town. The proposals to retain and extend the existing retail unit is therefore compliant with Policy SS4.

### Design and Heritage

- 6.6. The Isles of Scilly Design Guide (2006) aims to ensure the highest standard of development are achieved by identifying key character areas and design principles to inform planning applications. The SPD provides an assessment of the character of Hugh Town and Hugh Street. It states the following:

*'This is the only truly 'urban' settlement on the islands. The historic (mainly 18th and 19th Century) core extends from the ramparts and batteries of the Garrison to the west, along Town Beach on the north side and along Porthcressa Beach to Buzza Hill and Peninnis Head to the south. The isthmus upon which it is built is about 500 metres in length by about 150 metres in width. Within this small area there are a variety of townscapes. The historic town contains about 70% of the Listed Buildings on the Isles of Scilly. Any new development or redevelopment must be considered within this context.'*

*'Hugh Street has the greatest sense of enclosure, relieved by an informal 'square' to the east. The frontages are almost continuous with good 19<sup>th</sup> Century shop fronts and town houses.'*

*The Parade is the largest public space on the island. This was originally an unenclosed parade ground. It has now been grassed and surrounded by a hedge. It suffers from clutter of street furniture at its western end. The simple classical Town Hall dominates the space.'*

*'The remainder of Hugh Town is of the suburban form. The scarce supply of urban building land has meant that detached properties are situated on very small plots. In the case of the Museum building and Porthcressa Flats, it has resulted in three storey developments with flat roofs, built in the 1960s.'*

- 6.7. The site is located in 'The Historic Core: the Bank and Hugh Street' Character Area as shown in section 6 of the Character Areas map excerpt below:



- 6.8. A Heritage Statement has been submitted in support of this application and concludes that the proposals are acceptable in the context of the Isles of Scilly Conservation Area and Area of Outstanding natural Beauty and Heritage Coast. There is no evidence to suggest that the archaeological potential of the Site should preclude development.
- 6.9. The extent of the proposed works are identified on the plans submitted in support of the proposals outlined above. The submitted plans show existing areas to be demolished and the new extension proposed.
- 6.10. A new DDA compliant entrance with bi-parting entrance doors are proposed. These shopfront alterations are minimal and necessary to upgrade the front of the premises for the occupation of unit as a Co-op convenience store. No changes are proposed to the principle elevation of the former Barclays Bank building. No change is proposed to the servicing regime albeit the BOH area will now be larger and able to store more goods.



- 6.11. The existing plant serving the Co-operative convenience store will be replaced with new plant equipment. This will consist of 2no. combined gas cooler and compressor packs and 2no. external air conditioning (AC) units. The AC units will be installed within acoustic enclosures and will only operate when the store is open. The refrigeration plant will operate at all times but will run at a reduced duty at night. This will screen the plant equipment and mitigate against a detrimental impact in terms of noise to residential amenity.
- 6.12. A new access is proposed from Hugh Street to the existing apartments on the first floor. No change is proposed to the existing refuse collection and storage arrangements.
- 6.13. The location of the plant towards the rear of the site and will be seen in the context of the BOH area where a level of plant and enclosures is expected to support a commercial use. As such, it will not appear out of place or cause harm to the character of the area or be detrimental to the Isles of Scilly Conservation Area.
- 6.14. The buildings on site are not listed and therefore demolition and a replacement construction would be acceptable to upgrade the Co-op convenience store.
- 6.15. The proposal is therefore in accordance with local plan policies OE1 and OE7 and national planning policy.

#### **Amenity**

- 6.16. The site is an existing Co-op convenience store and the proposed development is to improve the convenience store and in turn its service provided to the local residents.
- 6.17. The proposed plant will be relocated from the existing location on the ground floor, to first floor level above the proposed back of house area.
- 6.18. A Noise Impact Assessment (NIA) has been submitted in support of the application. It has identified the nearest noise sensitive receptors as the flats above the Co-op convenience store and has assessed the likely impact from the proposed plant.
- 6.19. NSL Jaguar box acoustic enclosures are proposed around the outdoor AC units to mitigate noise levels and protect residential amenity. The AC units will run during the store opening hours only. The refrigeration plant will operate at all times but will run at a reduced duty during the night.
- 6.20. The report concludes that there will be no detrimental impact provided mitigating measures are implemented as recommended.

#### **Flood Risk**

- 6.21. The Site is located within Flood Zone 3 and within an area susceptible to coastal flooding. Scilly. The site is located immediately south of St Mary's Harbour.
- 6.22. As the proposals involve the extension of existing buildings on site on current hardstanding, there will be no change in impermeable area, or the flood risk vulnerability as a result of the development.
- 6.23. The majority of the proposed Finished Floor Levels (FFL's) will remain the same, at a level of 3.91mAOD. Any lower existing FFL's are proposed to also be raised to this level as part of

the proposed development. There are proposed re-grading works for the external levels up to the new goods-in door.

- 6.24. The proposal involves the construction of a single storey extension and shopfront alterations of an existing Co-op food shop. Para 176 of the NPPF states “Applications for some minor development and changes of use should not be subject to the Sequential or Exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 63 (small non-residential extensions with a footprint of less than 250m<sup>2</sup>).”
- 6.25. The proposed extension area is 244m<sup>2</sup> and therefore as the proposed extension area is less than 250m<sup>2</sup>, the Sequential Test does not need to be applied for the proposal. On this basis, a Sequential Test should not be required for the proposed development.
- 6.26. A Flood Risk Assessment (FRA) and Foul Impact Assessment has been submitted in support of the application. A Flood Emergency Management Plan (FEMP) has been prepared and will be made available to staff who will be responsible for safely evacuating customers.
- 6.27. The FRA concludes that the proposed extension is proposed on an area of existing hardstanding and therefore, there will be no change in impermeable area compared to the existing arrangement. There will be no change in the amount of surface water leaving the site and, as such, there is no requirement (or opportunity) to alter the site’s current drainage arrangement. The proposals will continue to utilise the existing drainage infrastructure associated with the site.
- 6.28. The proposal is considered to accord with the requirements of the National Planning Policy Framework (NPPF) with residual risk to the site fully mitigated, and as such considered low risk.

#### **Ecology and Biodiversity Net Gain**

- 6.29. An Ecology Report has been submitted in support of this application. A walk over survey was carried out 6<sup>th</sup> May 2024 and a survey report provided.
- 6.30. The survey advises that the nature of redevelopment work proposed will fall entirely within the built environment and is considered unlikely to pose a risk to any of the features for which the SAC is designated, however a precautionary recommendation for a Construction Ecological Management Plan is made.
- 6.31. All habitats on site are of low nature conservation importance. No legally protected, priority or otherwise intrinsically notable habitats were recorded. No species were present on site where development is proposed.
- 6.32. In accordance with current guidance regarding Biodiversity Net Gain (BNG), the red line boundary for the proposed redevelopment is entirely occupied by previously developed land with a sealed surface. It is therefore exempted from the need to achieve mandatory BNG as it falls beneath the de minimis threshold.

## 7. Site Waste Management

- 7.1. Site Waste will be managed both at construction stage and during the operation of the retail use of the Site.

### **Site Waste Management Plan**

- 7.2. A Site Waste Management Plan (SWMP) prepared by Weatherhead has been submitted in support of the application. It advises that it is difficult to dispose of waste locally as, if it is not re-used on site, it needs to be shipped to land fill sites on the mainland.

- 7.3. Weatherhead are the CDN Principal Contractor for the development and are responsible for:

- Obtaining relevant information from sub-contractors.
- Updating the SWMP at least every three months as the project progresses.
- Keeping the SWMP on site during the project.
- Ensuring that other contractors know where the SWMP is kept.
- Allowing other contractors and the client access to the SWMP during the project.
- Handing the completed SWMP back to the client at the end of the project.
- Keeping a copy of the SWMP for two years.

### **Operational Waste Management Plan**

- 7.4. The operational waste is also important to consider. Currently, with regards to food waste, it is collected from a large bin at rear of convenience store on Mondays, Wednesdays, and Fridays.
- 7.5. In urgent circumstances, collections can be arranged for the same day, such as when Co-op have mass waste, due to fridge or freezer breakdowns.
- 7.6. The waste is collected using a standard refuse vehicle by Richard Hand Haulage, who then take the waste to the council waste site for incineration.
- 7.7. The refuse vehicle reverses down the back lanes behind the convenience store in the same way as deliveries come to store. They hook the bin onto the back of the vehicle, and it lifts and auto tips.
- 7.8. All other waste is backhauled in the same way as every other Co-op convenience store across the UK which gets collected by island carriers and taken back to the mainland. Delivery vehicles deliver their goods to the store on pallets and the rubbish and recycling is palletted up before leaving site.
- 7.9. Overall, the waste created as a result of demolition will be dealt with by Weatherhead in accordance with a SWMP. There is already an Operational Waste Management Plan in place



for this Co-op convenience store. The proposals are therefore compliant with Local Plan Policy OE5.

## 8. Conclusion

- 8.1. This application seeks planning permission for the construction of a single storey extension, shopfront alterations and the installation of plant equipment. The Co-op has been exploring options to extend its convenience store on St Mary's for a number of years and has purchased the adjacent former bank in order to do this. The proposed development will allow the Co-op to make a significant investment in the upgrading and improvement of the Islands' main food store. This will benefit residents all year round as well as holiday makers during the summer period.
- 8.2. It has been demonstrated that the proposal will have no harmful impact on visual amenity, or on the amenity of residents close to the site. Nor will there be a harmful impact on the character or appearance of the local area, Isles of Scilly Conservation Area and Area of Outstanding natural Beauty and Heritage Coast.
- 8.3. The submitted reports conclude that the proposals would be acceptable in terms of Ecology, Biodiversity Net Gain and Flood Risk.
- 8.4. The proposal is therefore in accordance with the aims of local and national planning policy.



## **Appendix 1 – Preapplication Response ref. PA-24-046**



# COUNCIL OF THE ISLES OF SCILLY

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Mr C Edge  
Associate Planner  
Pegasus Group

Email only: [chris.edge@pegasusgroup.co.uk](mailto:chris.edge@pegasusgroup.co.uk)

18 June 2024

Dear Chris,

## **Re: PA-24-046 The Co-operative Supermarket, St Mary's**

Further to your email of 02 May 2024 and our follow-up Teams meeting on 20 May regarding the above. Thank you for your patience whilst we consider the questions you have raised. As you are aware, the store in Hugh Town, is located in the Isles of Scilly Conservation Area. Although the building of the Co-op, Barclays Bank and its warehouse building are not listed buildings, Hugh Street is the primary retail frontage and situated in the heart of the historic environment. Proposals that seek to improve the physical appearance of the Co-op and its warehouse are very welcome. There appears to be a deterioration in appearance of this building and the back of house/warehouse facilities. Similarly, since becoming vacant, the former Barclays Bank building has declined. Proposals that would see improvements in this area would be supported, provided no other harm is identified.



### **1. Advice on the Principle**

I guess in response to your first point, I would note that, as residents living on the Isles of Scilly, and I don't think I'm overstating the matter, we recognise the

reconfiguration and internal works to the Co-operative Store on St Mary's are both essential, as the only supermarket on St Mary's, and would likely improve the overall shopping experience for islanders and visitors alike. As you note Policy SS4 is supportive of new, and seeks to protect against the loss of existing retail particularly in Hugh Town. New residential units are supported where these are required in connection with staff accommodation needs of an existing business and are restricted as such, or are to meet a local need and again are restricted as such. In relation to material changes of use to achieve staff accommodation, then these should not displace existing uses, if storage space is still required by the business, for example. We have no objection to the principle of these proposals.

## **2. New residential for staff accommodation.**

Our usual route to support an application for additional staff accommodation is to require a case to be made about the circumstances of why, if the business is existing, there is a need for additional staff accommodation. This could be that the business is successful, and it wishes to expand and requires additional staff; or the accommodation previously available is inadequate or has just been lost, with an explanation as to why it may no longer be available. In the former, so we can be assured on the longevity of the business we may ask for a business plan to support the need for accommodation.

We would expect the application to be supported by a statement explaining the existing circumstances: how many staff are employed and the current arrangements as well as the proposed circumstances: how many staff are employed and the proposed arrangements. If the case meets the reasonable staff accommodation needs of the business, and there are no other issues of harm to consider, then we would be supportive of new staff accommodation. These will be subject to conditions that any new unit created is only used by staff in connection with that specific business. If the accommodation is for permanent year-round use, then we would expect it to meet minimum space standards as defined in the [Governments Technical Housing Standards](#).

## **3. Feedback on the overall scale**

Although you have provided us with some existing and proposed floor plans, there only appears to be proposed ground and first floor plans, for both the Coop and Barclays Bank, but only existing plans for the coop, no existing plans for Barclays Bank. I note you have not provided any elevations. As you note, a heritage impact assessment will be required to assess the full impact on the Conservation Area and the setting on nearby listed buildings. The Islands are also designated as an Area of Outstanding Natural Beauty and Heritage Coast. Both [Policies OE1 and OE7](#) will be relevant, and it will be critical that the overall development, in terms of design and scale, reflect these designations as a National Landscape, which is given the highest status of protection. Any development that is deemed to be inadequately protecting



or enhancing the character of the Conservation Area or scenic beauty of the AONB would be refused. It is tricky to provide feedback on the overall scale without the elevations.

I would draw your attention to the [Isles of Scilly Design Guide](#) which is still an adopted SPD relevant to development on the Isles of Scilly. We would advocate for traditional forms, natural materials and highly sustainable design that respects and enhances the wider character of this area. You note that you would demolish the existing single storey warehouse building and replace this with a two storey building. Clearly the height and massing will be important in terms of the harbour elevation, in particular, but also the potential for higher buildings to affect the amenity and outlook of existing property. Although *loss of a view* is not a material planning consideration, we would require the design and scale to ensure the *reasonable* outlook of existing property is not adversely affected. Higher buildings can also have an impact in terms of light and overshadowing. If the proposal is higher than the existing, then we would suggest the [Building Research Establishment \(BRE\) guidance](#) could be used to establish how existing properties are affected. Please refer to our [Local Validation Checklist](#) for other matters to consider in relation to submitting an application on the Isles of Scilly.

#### **4. Advice on the acceptability of the other detailed issues discussed in this letter.**

The proposed incorporation of the adjoining Barclays Bank, given the lack of use as a bank for several years, would see the re-use of a key building within Hugh Street, which, if retaining a commercial use, could deliver much needed vitality into the town centre. As noted above the principle of achieving additional staff accommodation is acceptable, providing the units meet the Nationally Described Space Standards for their size and intended number of permanent occupants. Splitting the larger flat above into two smaller flats is acceptable in principle. Please ensure the split is designed with the Building Regulations in mind, in terms of fire safety, sound attenuation, construction and means of escape. There may be implications from a flooding perspective, as noted below, requiring appropriate and proportionate means of escape including flood recovery to be included in a Flood Risk Assessment.

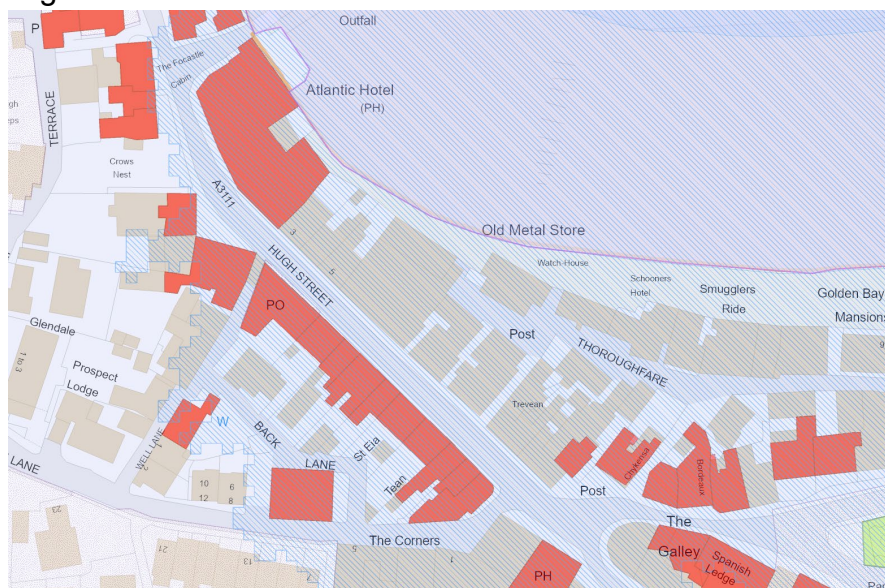
The use of former Seasalt store on Garrison Lane, as a food store on a temporary basis would be acceptable, without any further change of use. If new signs are required, then they would either be deemed consent if falling under [Class 5 of Schedule 3](#) of the Advertisement Regulations. If proposed signs exceed what is deemed consent, then an application for Advertisement Consent would be required.

#### **5. Any further policy requirements or pertinent issues that should be considered and/or incorporated if this proposal is progressed to submission of a planning application.**

A detailed **Heritage Impact Assessment** should be produced to guide and inform the resulting development to ensure appropriate account is taken of the wider Conservation Area and nearby listed buildings and the heritage coast. A **design and access statement** should also reflect on vernacular and how the proposal has been designed to enhance both the street scene and harbour elevations. The latter should also achieve accessibility improvements for customers. This latter is clearly going to be an important consideration given the nature of the development. We would also expect that if external lighting is proposed, this is the minimum necessary to operate safely and these are timed to go off when not required. If additional lights are required, over and above the existing lights then I would suggest a **lighting strategy** is submitted to assess the impact on the Dark Skies, in accordance with Policy OE4.

Other issues, please submit a **Site Waste Management Plan**, both for short-term construction waste and long commercial waste purposes. We are likely to require a **Construction Environmental Management Plan** (CEMP) which is usually submitted by pre-commencement condition, if the development is approved. As the site is located close to the [Isles of Scilly Complex Special Area of Conservation \(SAC\)](#) it may be worth formally requesting an Environmental Impact Assessment (EIA) and a Habitat Regulations Assessment (HRA) Screening Opinion. The proposal should not adversely affect the [qualifying features of the SAC](#). There is no official requirement to obtain a screening opinion on this, but we would need to ensure the development was not going to result in any harm to this designation.

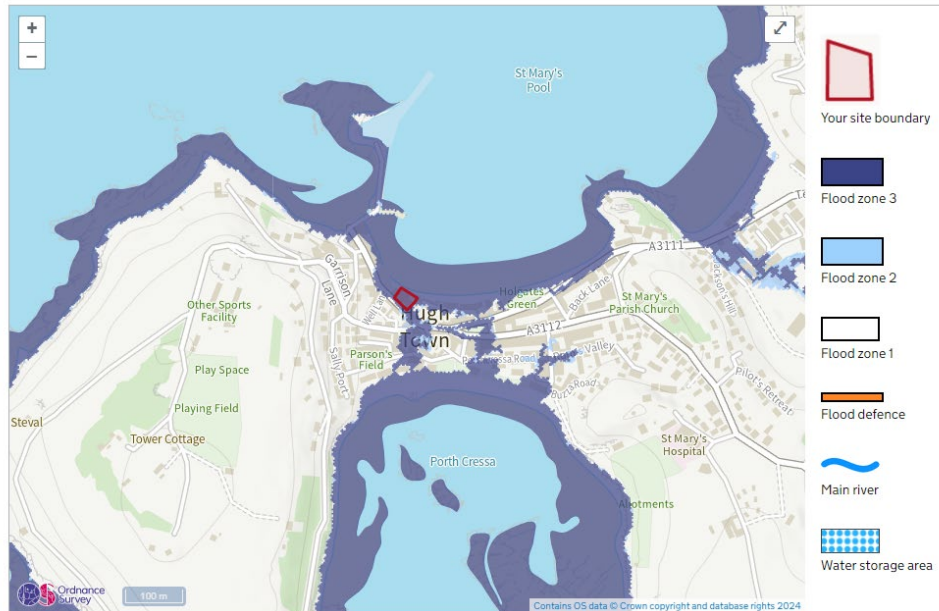
You may be aware that Hugh Street is an area susceptible to coastal flooding. The Local Plan policies map for this area is show below and the blue hatch is areas at risk of flooding:



Any development in this location has to be supported by a **Flood Risk Assessment** to demonstrate how users/occupants would be safe in the event of a flooding

situation. This would be required for the replacement warehouse, in particular, and the increase in residential units. So, although it does not appear there would be additional residential at ground floor, any means of escape from the building should be considered.

The Environment Agency show this area as Flood Zone 3 and as such also requires a Flood Risk Assessment:



Other issues include the need to assess the buildings for protected species. Any demolition or alteration of a roof would require an application to be supported by a **Preliminary Ecological Appraisal**. If there is a probability of buildings/structures to be active habitat for species then further assessment may be required which, in the case of bats and birds, may only be carried out when relevant species are active. There is a [list on our website](#) of ecologists who may be able to assist in carrying out any relevant assessment.

As of 02 April 2024 it became mandatory (with [some exemptions](#)) for development to deliver 10% **Biodiversity Net Gain (BNG)**. The measure is calculated using the [DEFRA Small Sites Metric Tool](#). Further advice on this should be sought from an ecologist in terms of the implications for your development. If this is not clearly addressed as part of your application, then it may be that it is invalid.

## 6. A list of documentation that will be required for the validation of a future planning application for the proposed development.

Please see our [Local Validation Checklist](#).

I hope that the above information is of use to you should you progress with an application. As we do not currently charge for a pre-application advice service, there

is a limit to the feedback we can provide on specific proposals. Whilst we recognise the significant improvements that this development could bring, and will seek to provide further comments, if I have missed responding to any particular point, but we do advise that, if you disagree with our response, you seek your own independent professional planning advice, particularly if the property has complex planning history, for example, or if you require more detailed guidance and advice on interpreting the requirements and planning policies when making a planning application.

Any advice given by Council officers for pre-application enquiries does not indicate any formal decision by the Council as Local Planning Authority. Any views or opinions are given without prejudice to the formal consideration of any planning application. The recommendation on any application can only be made after the Council has consulted local people, statutory consultees and any other interested parties in accordance with statutory procedures. The final decision on an application will then be made by the Full Council or by the Chief Planning Officer under delegated powers in accordance with the Council's approved Scheme of Delegation and Planning Protocol and will be based on all of the information available at that time. You should therefore be aware that officers cannot guarantee the final formal decision that will be made on your application(s).

Yours faithfully,



**Lisa Walton**  
**Chief Planning Officer | Council of the Isles of Scilly**

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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**RECEIVED**

By Tom.Anderton at 9:25 am, May 29, 2025

**APPROVED**

By Lisa Walton at 2:43 pm, Jul 30, 2025

**BOW  
MAN  
RILEY**

# Design and Access Statement

Co-op Food – 4 Hugh Street, St Marys, Isles of Scilly, TR21 0LL

Document no:	A110-BOW-A0-ZZ-RP-A-0001
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## 1.0 Introduction

### 1.1 Introduction

This Design and Access Statement has been prepared by Bowman Riley, on behalf of The Co-operative to accompany a full planning application for the proposed works to the existing store located on Hugh Street, Isles of Scilly, TR21 0LL.

The proposed works will include:

- The creation a larger retail space by extending into the existing Back of House (BOH) area
- The creation of a new larger BOH warehouse area to the rear of the property by:
  - Demolishing the existing ancillary building
  - Constructing a new BOH warehouse to include: the footprint of the former ancillary building; the existing service yard and the ground floor of the neighbouring premises (the former bank)
- The relocation of the existing plant to the roof area of the proposed BOH warehouse
- The replacement of the existing external staircase with two new external staircases to provide access to the facilities and accommodation above the existing store and above the former bank

The purpose of this report is to illustrate how the proposed works will integrate and facilitate the use of the existing building. This report should be read in conjunction with Bowman Riley's drawings and the third-party consultant's supporting documents.



## 2.0 Physical Assessment

### 2.1 Local Context

This section looks at the site and its context. It aims to identify and analyse the local characteristics in terms of use, design and construction styles, to ensure there is minimal impact to the external facade.

The existing Co-op store is located on Hugh Street within the island's main town of Hugh Town.

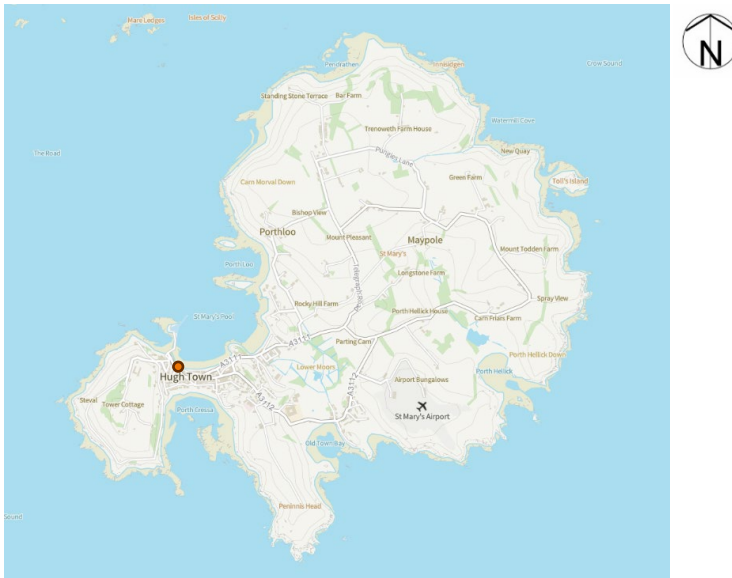


Figure 1.0 – Map of the Isle of Scilly illustrating the location of Hugh Town.

The store is bounded by the beach and sea front to north, Hugh Street to the south, an adjoining building to the northwest and a former bank to the southeast which is separated by an alleyway.



Figure 2.0 – Map of Hugh Town illustrating the location of the existing Co-op store and former bank on Hugh Street.

The existing Co-op store forms the end of a terrace of buildings along Hugh Street. The store is a two-storey building with light-coloured rendered walls and a slate roof. The windows and doors are timber painted white.

The former bank is a detached building with alleyways to the southeast and southwest. It is a two-storey building with light-coloured render, natural stone quoins, plinths and window cills with a slate roof. The windows are white uPVC and the main entrance door is timber painted blue with a timber decorative surround painted white.



Figure 3.0 - Front elevation of the Co-op store.



Figure 4.0 – Front elevation of the former bank.

The existing BOH facilities includes a service yard, a flat roofed single storey warehouse and a mono pitched single storey ancillary warehouse.

A two-storey building provides accommodation to the rear of the building which is built above the existing store and accessed through the existing service yard.

The walls to the rear of the store are a mix of natural stone and a light-coloured render with painted timber windows and doors.

The windows and doors to the rear of the former bank building are white uPVC.



Figure 5.0 - View from the beach of the ancillary.



Figure 6.0 - Existing service yard.

## 3.0 Design

### 3.1 Proposed Scope of Works

The proposed works will create a larger Co-op convenience store by acquiring the neighbouring premises (formally a bank). The acquisition will allow the sales area to be increased by relocating the existing BOH into the adjacent building (former bank).

The demolition of the existing ancillary building will allow for the creation of a new larger single storey BOH warehouse. The new BOH warehouse will include the footprint of the former ancillary building; the existing service yard and the ground floor of the neighbouring premises (the former bank).

The sales area will be increased by demolishing the internal walls and partitions, relocating the stairs and moving the plant area to the roof of the new BOH.

Deliveries will continue through the previous access in the back service yard.

After completion, the ground floor will be composed of two-parts; the increased sales area and the larger upgraded BOH.

### 3.2 Amount

The application site has an area of 978m<sup>2</sup>.

A summary of the existing, proposed and additional areas have been listed below:

#### **Sales Area**

- Existing gross internal area: 266m<sup>2</sup>.
- Proposed gross internal area: 442m<sup>2</sup>.
- Additional sales area created as part of the proposed works: 176m<sup>2</sup>.

#### **BOH Area**

- Existing gross internal area: 148m<sup>2</sup>.
- Proposed gross internal area: 349m<sup>2</sup>.
- Additional BOH area created as part of the proposed works: 201m<sup>2</sup>.

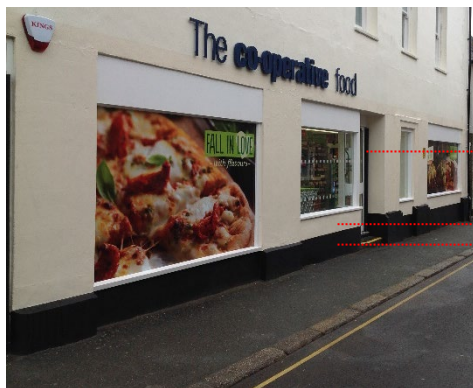
### 3.3 Appearance

Hugh street is the historic core of the settlement and is Hugh Town's commercial focus. It is a narrow main street with several irregular types of buildings enclosed by stone-fronted or plain rendered buildings, creating a tight grained, strongly urban streetscape.

The general appearance of the exterior will remain the same. Improvements will be made to the main existing entrance doors by replacing the single door with DDA compliant bi-parting doors. The new doors will accommodate the larger footprint of the store. The existing steps to the main entrance will be removed and resurfaced to create an accessible entrance.



Figure 7.0 - Existing Southwest Elevation (4).



Existing entrance door removed and replaced with new aluminium framed glazing.

Wall below the new glazing to be made good and finished with light-coloured and dark-coloured render to match the existing.

Figure 8.0 – Photograph of the existing store front off Hugh Street.



Figure 9.0 – Proposed Southwest Elevation (4).



The new BOH will include a new office space, bakery, staff area and warehouse area. The warehouse will be capable storing items such as pallets and trollies thus reducing items stored in the service yard.

The proposed works to the building will create a more linear and cleaner looking elevation.

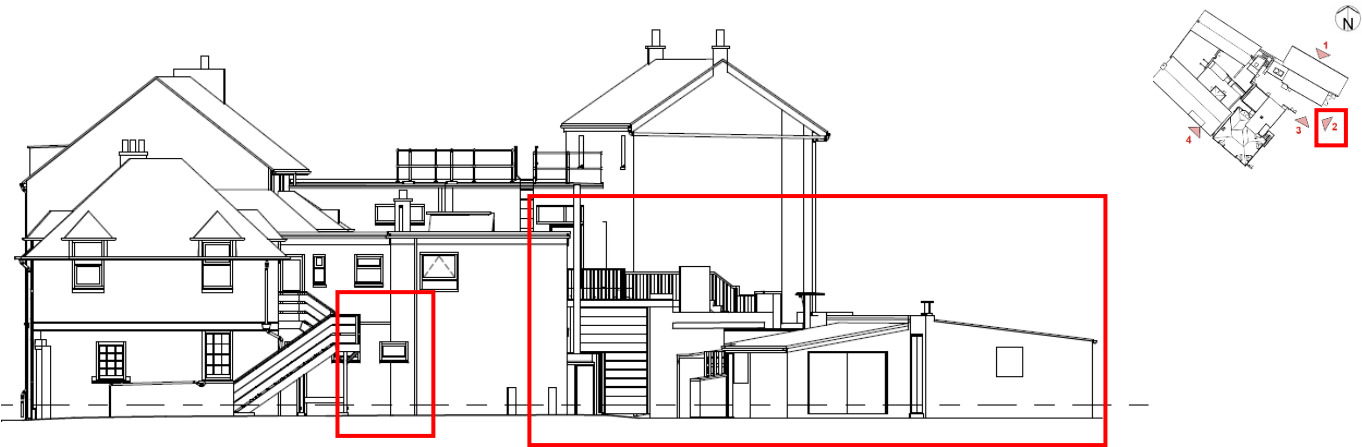


Figure 10.0 – Existing Southeast Elevation (2).



- Light-coloured render to match the existing.
- New grey flat roof to match existing.
- New goods and fire escape doors to RAL 7043.

Figure 11.0 – Photograph of the existing service yard to the rear of the building.

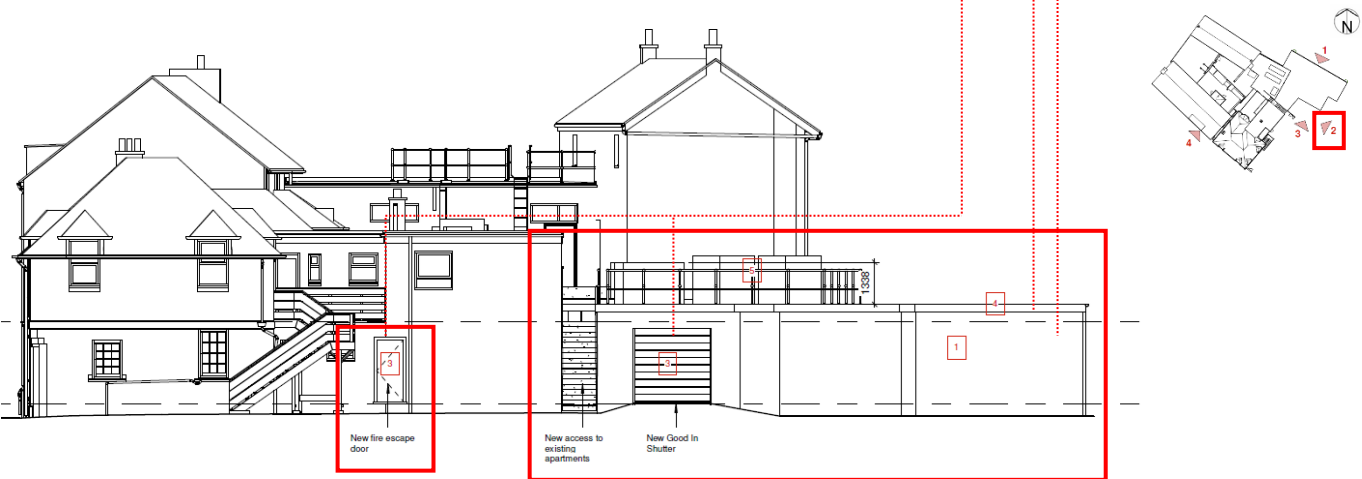


Figure 12.0 – Proposed Southeast Elevation (2).

The proposed single-story BOH warehouse will be sympathetic to its beach front location and will be finished with a light-coloured render to match the surrounding buildings.

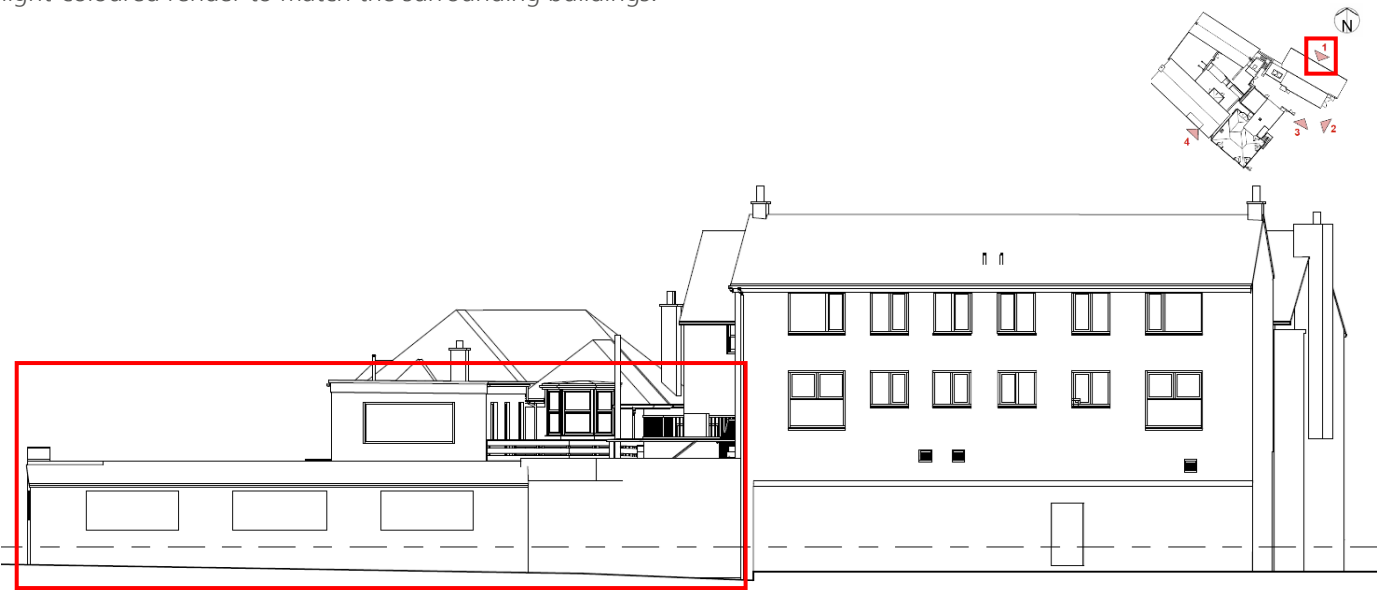


Figure 13.0 – Existing Northeast Elevation (1).



- Light-coloured render to match the existing surrounding buildings.
- Proposed single storey building to match a similar height of the existing ancillary building whilst lining through with the existing store floor level.

Figure 14.0 – Photograph of the existing single storey ancillary building as seen from the beach front.

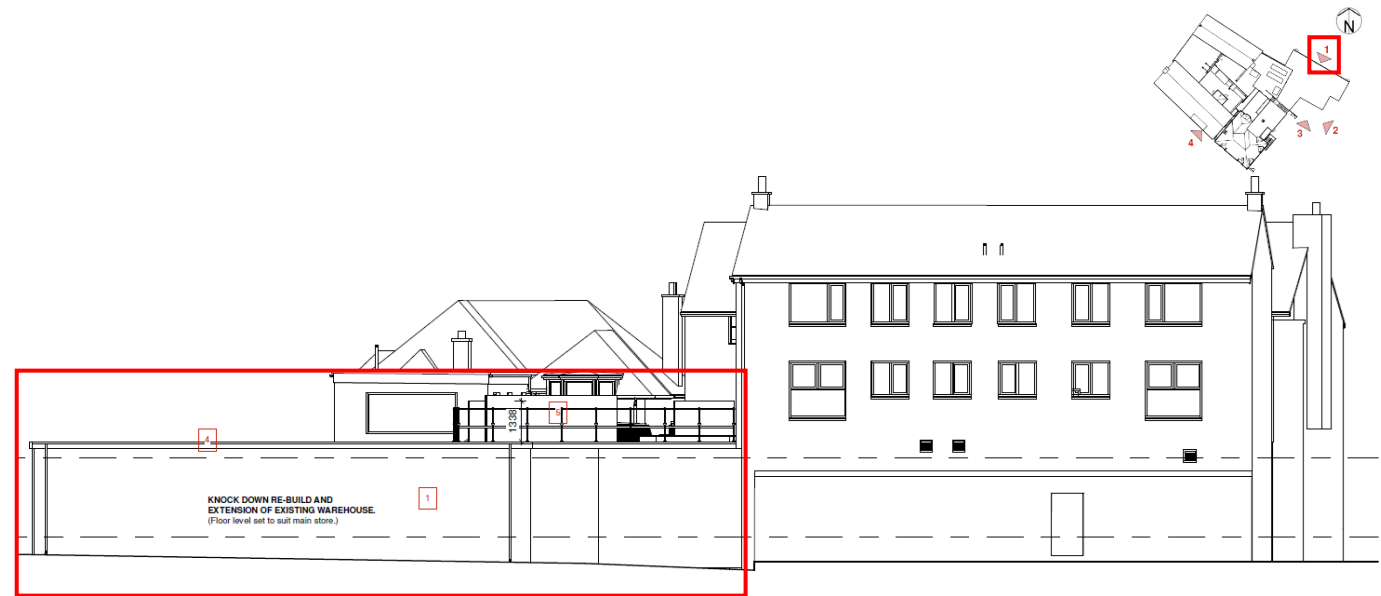


Figure 15.0 – Proposed Northeast Elevation (1).

### 3.4 Use

The use of the building will remain as existing (use class E).

The existing store is the only main food store on the island and the proposed works will provide an increased sales area to better serve residents of the island. The increased BOH area will provide a more coherent layout and improve the BOH operations.

### 3.5 Layout

The proposed layout increases the footprint of the current sales floor and utilises the former bank as extended BOH.

The new extension has been designed so as not to impact on the neighbouring properties and the layout seeks to achieve an efficient use of space, whilst meeting the Co-op's requirements of improving the service and customer experience.

### 3.6 Crime Impact Statement

This scheme has been designed to maximise natural surveillance and the felling of natural surveillance. The extension has been carefully designed to ensure that there is an active frontage to Hugh Street.

CCTV cameras are installed with the intention of improving the security to the store, customers and property boundaries that could be breached.

The proposed new goods in door on the northeast elevation will be a Soham security door which meets the aesthetics required on any working environment whilst offering maximum security.

# 4.0 Access

As previously stated, the existing store is located on Hugh Street which is main street of Hugh Town and strategically positioned within walking distance to prominent points of interest. The site is easily accessible for both pedestrians and those travelling by car or using public transportation.

Access for customers and deliveries will remain as existing. The proposed new entrance to the front of the store off Hugh Street will be DDA compliant.

Two new external staircases will be constructed to allow access to the facilities and accommodation above the existing store and above the new BOH as seen in figures 16.0 and 17.0 below.



Figure 16.0 – Existing ground floor plan.



Figure 17.0 – Proposed ground floor plan.



## 5.0 Conclusion

This report sets out the design principles of the proposal in context of the site area and its immediate surroundings to form a quality retail development with its own identity and character.

Planning permission should be granted for the development for the reasons listed below:

- The site is in a sustainable location in terms of accessibility and already used as retail space
- The proposal provides the local community with a modern Co-operative food store which will secure current jobs and provide additional employment opportunities in the area
- Makes efficient use of the site including the existing building footprint and utilising unused buildings



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# Ecological Walkover Survey

## Project Information & Site Context

<b>Site Name &amp; Location</b>	4 Hugh Street, St Mary's	<b>Grid Reference</b>	SV 90233 10592
<b>Client Name</b>	Henry Riley	<b>Report Number</b>	RT-MME-163130
<b>Site Area (ha)</b>	0.1 hectares	<b>Topography</b>	Flat
<b>Summary of Proposals</b>	<p>This survey was undertaken to inform a planning application for the redevelopment of an existing Co-operative supermarket, adjacent storage units and disused bank facility.</p> <p>The proposed work will be confined to the ground floor. The redevelopment will not impact existing living accommodation or roof spaces above any of the operational areas. The survey therefore focused on areas to be impacted by the scope of work.</p>		

## Methods

<b>Field Survey</b>	<p>An ecological walkover survey of the site was undertaken on 6<sup>th</sup> May 2024 by Tom Docker CEcol MCIEEM (Managing Director) during which the location and extent of all habitat types present within the site were noted. The presence, or likely presence, of protected species within the site was also recorded.</p> <p>In accordance with current guidance regarding Biodiversity Net Gain (BNG), the red line boundary for the proposed redevelopment is entirely occupied by previously developed land with a sealed surface. It is therefore exempted from the need to achieve mandatory BNG as it falls beneath the <i>de minimis</i> threshold.</p>			
<b>Weather Conditions</b>	<b>Temperature (°C)</b>	<b>Cloud Cover (%)</b>	<b>Wind Force (Beaufort)</b>	<b>Precipitation</b>
	13	20	F2-3	Nil
<b>Constraints</b>	None. All areas of the site could be fully accessed.			

## Results

<b>Nature Conservation Sites</b>	<p>The northern boundary of the site directly abutted Town Beach, which forms part of the Isles of Scilly potential Special Protection Area (pSPA), cited for its seabird assemblage and breeding populations of storm petrel <i>Hydrobates pelagicus</i>, great black-backed gull <i>Larus marinus</i>, lesser black-backed gull <i>Larus fuscus</i> and shag <i>Phalacrocorax aristotelis</i>. No evidence of breeding activity by any of these species was recorded on or adjacent to the site during the survey, although lesser blacked-backed gull was observed feeding and loafing adjacent to the quay, c. 100 m north of the survey area.</p> <p>The northern site boundary is also c. 60m from the boundary of the Isles of Scilly Complex Special Area of Conservation (SAC), designated for its important intertidal and low-tide habitats and reefs. The nature of redevelopment work proposed will fall entirely within the built environment and is considered unlikely to pose a risk to any of the features for which the SAC is designated, however a precautionary recommendation for a Construction Ecological Management Plan is made below.</p> <p>Although no adverse impacts on either of these internationally designated sites are anticipated, consultation with the local planning authority is advised to determine whether a Habitats Regulations Assessment (HRA) is needed to evidence compliance with the</p>
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	Conservation of Habitats and Species Regulations 2017 (as amended). A recommendation is made below.
<b>Overview of Habitats</b>	<p>The footprint of the proposed planning application was entirely occupied by the built environment, comprising:</p> <ul style="list-style-type: none"> <li>• A two-story building housing the existing Co-operative supermarket facility with offices, storage and accommodation above. This structure comprised rendered and painted stone and brickwork, with a pitched, slate-tiled roof and slate-clad dormer windows. The ground floor featured large glazed windows and doors that made up the supermarket frontage, with a series of single-glazed windows in wooden frames interspersing the frontage of the first floor.</li> <li>• A two-storey disused bank, separated from the supermarket by a narrow concrete alleyway. This building was of similar construction to the Co-operative supermarket, comprising rendered and painted stone and brickwork with a pitched, slate tiled roof. The former bank occupied the ground floor, with residential accommodation above.</li> <li>• A three-storey maisonette to the rear of the supermarket, fronting directly onto Town Beach. This block was constructed from rendered brickwork and featured a pitched, clay-tiled roof with a clay ridge tile. The ground floor was adjoined to the supermarket by a flat roofed storage and packing area, however the upper storeys were residential accommodation.</li> <li>• A “back of house” area comprising a concrete yard with a series of single-storey chillers and produce stores. The most substantive of these were two adjoined, single-storey concrete structures with half-pitched corrugated asbestos panel roofs. The main storage area directly fronted onto Town Beach and featured a series of boarded windows on its northern side. The concrete yard extended into an alleyway to the east of the disused bank building, providing direct access from Hugh Street.</li> </ul> <p>The site was devoid of vegetation aside from cracks at the edges of the concrete yard where sparse buck’s-horn plantain <i>Plantago coronopus</i> and tree bedstraw <i>Coprosma repens</i> were observed. A small amount of biting stonecrop <i>Sedum acre</i> was recorded in the guttering of the rear storage warehouse, and the wall directly abutting Town Beach supported occasional spleenwort <i>Asplenium</i> sp., fleshy yellow-sorrel <i>Oxalis magalorrhiza</i> and Pellitory-of-the-wall <i>Parietaria judaica</i>.</p> <p>All habitats on site are of low nature conservation importance. No legally protected, priority or otherwise intrinsically notable habitats were recorded.</p>
<b>Key Species Considerations</b>	<ul style="list-style-type: none"> <li>• <b>Nesting Birds:</b> An active house sparrow <i>Passer domesticus</i> nest was recorded between the gutter and an area of lifted lead flashing within the roof structure of the former bank building. This area will not be impacted by the proposed works. The ground floor sections that will be redeveloped are tightly sealed and of negligible value to nesting birds.</li> <li>• <b>Bats:</b> Proposed redevelopment work will be confined to the ground floor, which offers negligible potential to support roosting bats. The roof structures for all buildings appear to be in good condition and offer few potential ingress points for bats, except for isolated areas of lifted lead flashing within the former bank building. These areas are located some distance away from where the redevelopment work will occur, therefore no impact on roosting bats is anticipated.</li> <li>• <b>Grey Seal:</b> Scilly Complex SAC is known to support grey seal <i>Halichoerus grypus</i>, however the site offers no habitat for this species and the adjacent Town Bay is heavily used by boat traffic and for recreation at low tide. No impacts on this species are anticipated.</li> <li>• <b>Other Receptors:</b> No other key species receptors were identified during the walkover survey.</li> </ul>

## Recommendations

The recommendations below are based on Middlemarch's current understanding of the project. If works are changed in any way these recommendations will need to be amended if appropriate.

<b>R1</b>	<b>Consultation with LPA:</b> Due to the proximity of the site to two international nature conservation sites (Isles of Scilly pSPA and SAC), consultation with the local planning authority is recommended to determine whether the proposals need to be subject to the Habitats Regulations Assessment process.
<b>R2</b>	<b>Scope of Redevelopment:</b> Should the scope of the proposed redevelopment change to include any impact on the roof structures of the existing supermarket, maisonette block or former bank, the potential for impacts on nesting birds and roosting bat should be reconsidered.
<b>R3</b>	<b>Construction Ecological Management Plan (CEcMP):</b> A CEcMP should be produced for the site setting out the safeguards and appropriate working practices that will be employed to minimise adverse effects on biodiversity and ensure compliance with wildlife legislation. This should include measures to avoid any direct or indirect impacts on Town Beach and sensitive intertidal habitats beyond.

## Quality Assurance

Date	Version	Author	Checked & Approved By
15 <sup>th</sup> May 2024	Final	Tom Docker CEcol MCIEEM (Managing Director)	Tim Hextell MCIEEM (Principal Consultant)

## Photographs



**Plate 1: Supermarket frontage, from Hugh Street**



**Plate 2: Former bank frontage, from Hugh Street**





**Plate 3: Rear of maisonette block, from Town Beach**



**Plate 4: Service yard and storage area**



**Plate 5: Produce store**



**Plate 6: Storage warehouse**

**RECEIVED**

By Tom.Anderton at 9:25 am, May 29, 2025

**APPROVED**

By Lisa Walton at 2:44 pm, Jul 30, 2025



**Project Name: No. 4 Hugh Street, St Mary's, Isles of Scilly**

**Report Name: Flood Emergency Management Plan**

**Author: Katie Moore**

**Date: 16/05/2025**

**Checked/Approved By: Lucy Ginn/Natalie Morgan**

**Project number: P20-1954**

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## **Introduction**

The site is located on the Island of St Mary's, Isles of Scilly and it is proposed to construct a single storey extension and shopfront alterations to an existing Co-op shop at the site. This Flood Emergency Management Plan (FEMP) has been prepared to demonstrate how users would be safe in a flooding event. The plan provides details about safe access and egress, and the flood resilience measures to be implemented on site.

## **Site Location & Site Specific Flood Risk**

### **Site Location**

The site is located at No. 4 Hugh Street, St Mary's, Isles of Scilly, TR21 OLL. The site is currently two separate buildings which comprise a Co-op shop, associated storerooms and a former Barclays Bank building. The proposals are for the "construction of a single storey extension and shopfront alterations". The site is located within the defined town centre of Hugh Town on the island of St Mary's. The site is bordered by Hugh Street to the south-west, Thorofare to the east and St Mary's Harbour and beach to the north. A site location plan is included in **Appendix A**.

### **Fluvial & Tidal Flood Risk**

The site is located entirely within Flood Zone 3 associated with tidal flooding from St Mary's Harbour (Atlantic Ocean). According to the Isles of Scilly Local Flood Risk Management Strategy (LFRMS) (2017), there are no Main Rivers or Ordinary Watercourses located on the Isles of Scilly and therefore the Flood Map for Planning is reflective of Tidal flooding only and is included in **Appendix B**.

Despite the evident tidal flood risk on site, it is noted that the proposed redevelopment does not change the flood risk vulnerability classification as defined in the National Planning Policy Framework (NPPF). Both existing and proposed uses are classified as "Less Vulnerable".

The Isles of Scilly LFRMS (2017) states that "the quay and harbour walls provide protection to the north side of Hugh Town and Town Beach". In addition, the Isles of Scilly (PDZ18) forms part of the 'Rame Head to Hartland Point' Shoreline Management Plan 17. The site is located within an area designated as 'Hold the Line' and the management plan is to continue to maintain the defences and therefore it is considered that the overall, risk of tidal flooding at the site is considered to be Low.

This FEMP has been produced to show how users of the proposed development would be safe in the event of tidal flooding. The plan provides details about safe access and egress as well as appropriate flood resilience measures which will be undertaken as part of the proposed development.

### **Surface Water Flood Risk**

The new National Flood Risk Assessment (NaFRA2), published in January 2025, has updated the Risk of Flooding from Surface Water (RoFSW) products which show the chance of flooding from surface water to areas of land.

The RoFSW dataset shows that the site lies within areas at 'Low Likelihood', 'Medium Likelihood' and 'High Likelihood' areas. Surface water flood depths on site are not predicted to exceed 0.6 metres (m) in the Low Likelihood event. Data from the RoFSW dataset is included in **Appendix B**, this includes surface water extents and depths discussed above.

As a precautionary approach, it is recommended that all new electrical infrastructure for the proposal will be raised 600 millimetres (mm) above ground levels.

The LFRMS (2017) states that "there have been no significant past local events from local sources of flooding, namely surface water and groundwater" and "the risk from fluvial and pluvial flooding is considered to be very low".

Despite the evident surface water flood risk on site, it is noted that the proposed redevelopment does not change the flood risk vulnerability classification as defined in the NPPF. Both the existing and proposed uses are classified as "less vulnerable". The site is considered to be at Low risk of flooding from surface water.

This FEMP has been produced in order to show how users of the proposed development would be safe in the event of surface water flooding. This includes safe access and egress as well as appropriate flood resilience measures which will be undertaken as part of the proposed development.

#### Other Sources of Flood Risk

The Environment Agency's (EA's) Flood Outlines dataset records a historic flood event immediately south of the site, along Hugh Street in 2019 associated with "high tides leading to some minor pooling on the main streets as water came up the drains due to surcharge". The Historic Flood Map is included in **Appendix B**. The LFRMS (2017) indicates that Hugh Street also flooded in 2014 and Thorofare in 2011. Considering the proposal will remain classified as a 'less vulnerable' land use, the risk of historic flooding to the site will remain the same and therefore overall, the historic flood risk to the site is considered to be Low.

The EA's Reservoir Flood Extents data shows that the site is not predicted to at risk of reservoir flooding should a catastrophic breach occur during a wet day, when local rivers have already overtopped their banks or during a dry day when rivers are flowing under normal conditions. In addition, according to the LFRMS (2017), "there are no water reservoirs on the Isles of Scilly of sufficient size to pose a significant flood risk, all being considerably below the risk threshold of 25,000 cubic metres of water above natural ground level." The site is considered to be at Very Low risk of flooding from artificial sources.

The hydrogeology 625K digital hydrogeological map of the UK defines the site to be underlain by a "low productivity aquifer", and the British Geological Survey highlights that granite bedrock geology across the site. The combination of low productivity and granite bedrock geology would significantly reduce the risk of groundwater emergence, and therefore flooding, and the risk of groundwater flooding is considered to be Low.

As stated above, the Recorded Flood Outlines dataset records a historic flood event immediately south of the site, along Hugh Street associated with "high tides leading to some minor pooling on the main streets as water came up the drains due to surcharge" in 2019, associated with sewer flooding. As the existing site already comprises built development, there is already likely to be an existing sewer network located at the site and considering the flood risk vulnerability of the proposal is not due to change, the risk will remain unchanged. The risk of flooding from sewers to the site is therefore considered to be Low.

#### Flood Warnings

According to the Isles of Scilly Draft LFRMS (2025–2031), the EA works in partnership with the Met Office to provide flood forecasts and warnings and states "*Flood forecasting is undertaken by the Flood Forecasting Centre, a partnership between the Met Office and the Environment Agency*". The EA provides



advisory flood warning services to the Council and other professional partners, but currently not directly to the public.

At the time of writing this report, it is not clear how the council advise the residents of the Isles of Scilly of issued flood warnings, but it is assumed that alerts are made to local residents. Based on this, it is recommended that the site manager should contact the Council to establish how Flood Alerts and Flood Warnings will be received and that all staff should sign up to the Met Office Weather Warning email alerts.


The Draft LFRMS (2025–2031) further states that the EA’s national flood warning service does not currently cover the Isles of Scilly, however, the Council of the Isles of Scilly is working with the EA to extend the national flood warning service to cover the islands.



When this becomes available all staff will sign up to the EA’s free flood warning service to receive all levels of possible warnings including: a Flood Alert, Flood Warning and Severe Flood Warning. Warnings can be issued by the EA via text, email, mobile, landline or fax. The EA’s website will also be monitored regularly for new warnings and updates when available.

Table 1 below details the actions that will be taken by staff and customers following receipt of one of the various EA Flood Warnings. It is assumed that the Council’s current flood warning system would follow a similar approach. This information has been taken from the gov.uk guidance on “flood alerts and warnings: what they are and what to do”.

There will be a designated user of the site with the responsibility to ensure other site users sign up for flood warnings and are aware of the protocols detailed in Table 1 below and further below in this document.

*Table 1 – Flood Warnings & Associated Information*

Type of Flood Warning & Associated Message	Timings of Warning	What is at Risk / What May Happen	Action for Designated Responsible Person	EA Advised Action
<b><u>Flood Alert</u></b> Flooding is possible. Prepare now. 	Usually between 2 and 12 hours before flooding.	Fields, recreational land and carparks. Minor roads. Farmland. Coastal areas affected by spray or waves overtopping.	Be aware of water levels. Keep up to date with weather and flood warnings. Ensure all site users are aware of the flood alert. Prepare for possible evacuation.	Be ready to follow your flood plan. Have insurance documents and any medications ready. Avoid walking, cycling or driving through any flood water. Move any livestock and farming equipment away from areas likely to flood.
<b><u>Flood Warning</u></b> Flooding is expected. Act now.	Usually between 30 minutes to 2	Homes and businesses.	Recommended to evacuate all site users from the site before safe access	Protect yourselves and your loved ones.

	<p>hours before flooding.</p>	<p>Railway lines and infrastructure.</p> <p>Roads.</p> <p>Coastal areas affected by spray or waves overtopping.</p> <p>Flood plains, including caravan park and campsites.</p> <p>Major tourist and leisure attractions.</p>	<p>and egress is lost.</p> <p>Check water levels before driving.</p> <p>Secure the building following evacuation.</p>	<p>Move your loved ones, pets and valuables to a safe place.</p> <p>Move to higher ground or the upper floor of a building.</p> <p>Turn off the gas, electricity and water in your home if it's safe.</p> <p>Put flood protection equipment in place.</p> <p>Do as the emergency services tell you.</p> <p>Help others if it's safe to do so.</p>
<p><b><u>Severe Flood Warning</u></b></p> <p>Severe flooding – flooding could cause risk to life and significant disruption to communities.</p> <p>Act now.</p> 	<p>When flooding threatens life and communities.</p>	<p>Deep and fast-flowing water.</p> <p>Dangerous debris in the water.</p> <p>Buildings collapsing or at risk of collapsing.</p> <p>Communities unable to escape.</p> <p>Infrastructure not working, like gas, electricity, and water.</p> <p>The evacuation of lots of people.</p>	<p>Recommended to evacuate all site users from the site before safe access and egress is lost.</p> <p>Check water levels before driving.</p> <p>Secure the building following evacuation.</p>	<p>Stay in a safe place.</p> <p>Be ready to evacuate your home.</p> <p>Do as the emergency services tell you.</p> <p>Call 999 if you are in immediate danger.</p> <p>If you are caught in a flash flood move to higher ground of the upper floor of a building if it's safe.</p>
<p><b><u>All Clear Status</u></b></p> <p>Flood Alerts/Warnings are no longer in force in the area.</p>			<p>Keep updated on weather reports.</p> <p>Only return to site if informed</p>	

			<p>it is safe to do so.</p> <p>Beware of debris and pollution in flood waters.</p>	
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### **Safe Access & Egress**

During a major flood event, a safe and well organised evacuation of site users will take place. The main sources of flood risk to the site are expected to be tidal and surface water as discussed above.

Following receipt of an issued Flood Alert from the Council, the designated person responsible will monitor for any updates. Should a Flood Alert be escalated to a Flood Warning, the designated person responsible will advise all site users of the threat of flooding and evacuation procedures should be actioned (detailed below).

If a Flood Warning or Severe Flood Warning is issued, the designated person responsible will inform site users of the need to evacuate. There is likely to be several hours warning before flood waters would be expected to impact the site. The proposed evacuation route is detailed in **Appendix C**. During an evacuation, site users will be directed off site via Hugh Street and subsequently south via Well Lane towards Garrison Lane. This route directs site users to higher ground and in the direction away from where flood waters are expected to flow. Garrison Lane shows a notable rise in levels compared to the site; surface water is not predicted to accumulate here, and this area is located in Flood Zone 1 (see **Appendix B and C**). Site users will then gather at the defined evacuation point along Garrison Lane; this point is shown on **Appendix C**.

The following evacuation protocols should also be noted:

- The designated person responsible will announce the need for a site evacuation.
- The designated person responsible will reassure site users that they are not in immediate danger and that the evacuation is a precaution.
- If safe to do so, the designated person responsible will turn off key services such as water, gas and electricity.
- The designated person responsible will direct site users to the identified evacuation point.
- Priority for additional help will be given to disabled site users.
- The designated person responsible will ensure the site is clear and securely locked.
- A rollcall of site users will be complete once at the identified evacuation point.
- All staff will be sent home.

### **Resistance & Resilience**

Preventative measures identified which may help the site's resistance and resilience to flooding are listed below:

- Sandbags will be deployed around the perimeter of the site prior to evacuation if safe to do so.
- Local electrical circuits could be isolated if flood waters have entered any buildings.
- Any new electrical sockets installed as part of the extension will be located higher up the wall and above the predicted surface water flood depths.

### **Responsibilities & Annual Review Requirements**

It is important for it to be clearly defined who is responsible for implementing and maintaining the FEMP at the site and for ensuring all site users are aware of the strategy, including new site users. There will be a designated responsible person for this. This person will be confirmed at a later stage but is expected to be whoever is responsible for site operation following the proposed redevelopment.

The FEMP will be reviewed annually at a minimum. The following checks will be complete by the designated person responsible:

- Update contact numbers.
- Contact the EA or Council to understand if predicted flood risk has changed.
- Contact the Council to ensure site users are registered to receive Flood Alerts and Flood Warnings.
- Carry out a test of the evacuation plan with site users to ensure they are familiar with the plan and associated procedures.

Flood Evacuation Kits will also be checked at least annually. The following items will be included within Flood Evacuation Kits:

- Torch – in case of loss of power.
- Rechargeable radio – to remain up to date with flood/weather updates.
- High visibility clothing – to be used in times of evacuation during low light.
- Waterproof clothing – to be used in times of evacuation during poor weather.
- First aid kit – to be used in case of emergency.
- Flood evacuation route plan – to ensure the correct route is taken.
- List of important numbers – e.g. Environment Agency Floodline, emergency services, utility providers.
- Bottled water.

### **Additional Guidance**

1. Do not walk through flowing water – currents can be deceptive and knock you off your feet.
2. Do not swim through fast flowing water – you may get swept away or struck by an object in the water.
3. Check the depth of standing water before walking through it.
4. Do not drive through a flooded area – depths of over 0.5m can carry a car away.
5. Avoid contact with flood water – this may be contaminated.

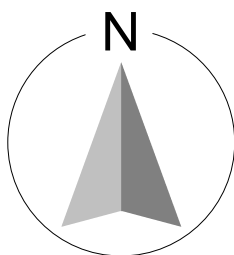
**Appendices**

- A) Site Location
- B) Flood Risk Plans
- C) Proposed Evacuation Route

Appendix A – Site Location



1 - SITE LOCATION PLAN  
1 : 1250



Key

Red Line Boundary



SCALE 1:1250

P2	Revised for planning submission	24.04.25	SB	CS
P1	Updated to show spot levels and alterations to plan and elevations	01.04.25	GM	DH
Revision	Date	By	Chk	

Date: 01/23/25

Checked by : CS

Drawn by: SP

Scale @ A4 : As indicated

Do not scale from this drawing  
This drawing is the copyright of Bowman Riley Architects Limited.©

Sheet Name: Site Location Plan

Purpose of issue: Information

CO-OP  
4 Hugh Street

Status: S2

Project No: A1100

Revision: P2

Drawing No: A110-BOW-A0-ZZ-DR-A-0001



Appendix B – Flood Risk Plans



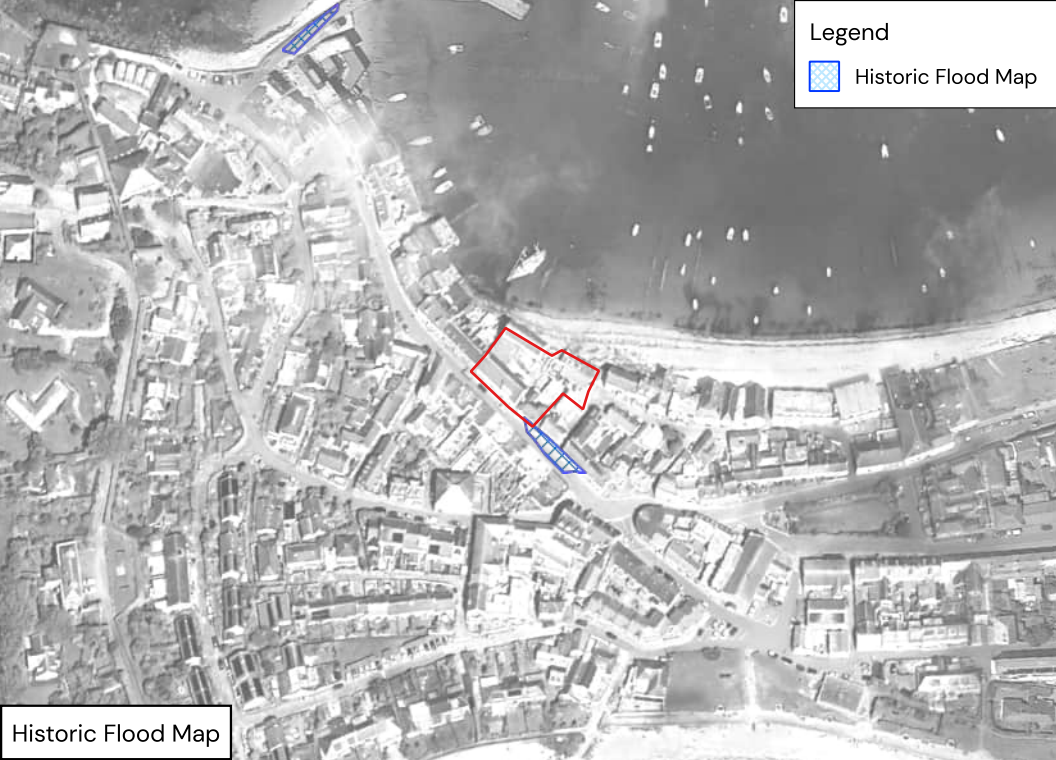
### Legend

 Flood Zone 2

 Flood Zone 3



## Flood Map for Planning



Legend



Historic Flood Map

Historic Flood Map

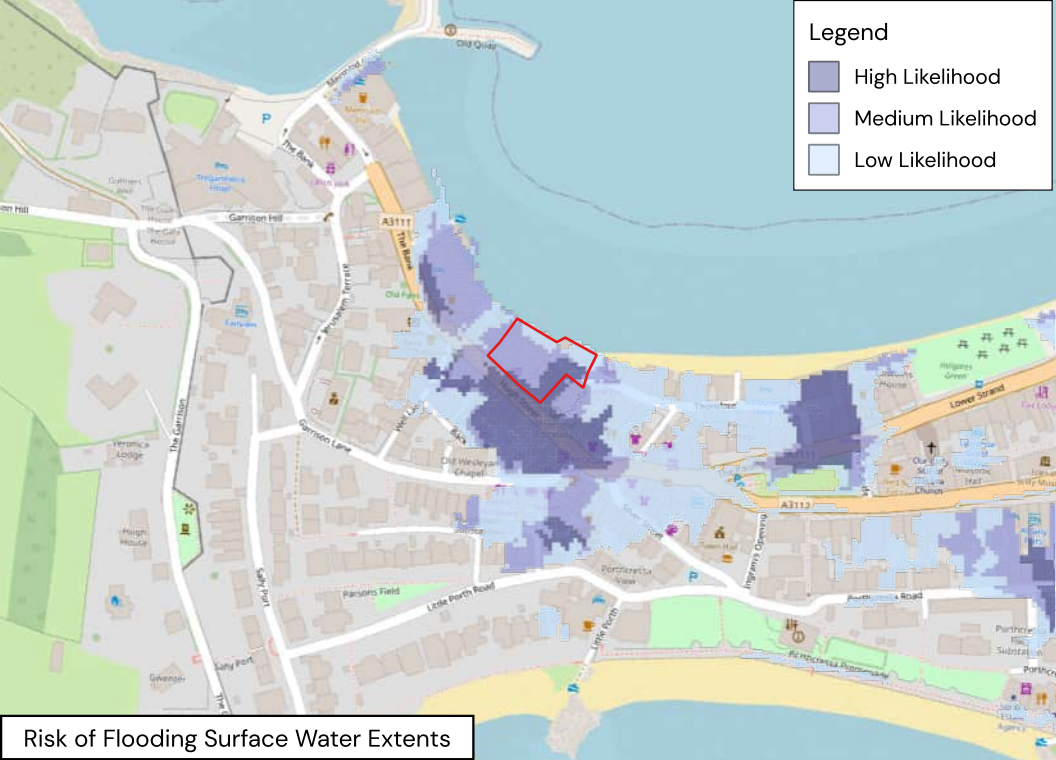


### Legend

- High Likelihood
- Medium Likelihood
- Low Likelihood

Risk of Flood Surface Water - 0.6m Depth

Depth: 0.6m



## Legend

- High Likelihood
- Medium Likelihood
- Low Likelihood

Risk of Flooding Surface Water Extents

Appendix C – Proposed Evacuation Route



Site Location

Evacuation Route

Evacuation Point

Proposed Evacuation Route



**APPROVED**

By Lisa Walton at 2:44 pm, Jul 30, 2025

**PEGASUS**  
GROUP

# FLOOD RISK ASSESSMENT

## Co-op Food – Single Storey Shop Extension

No. 4 Hugh Street, St Mary's, Isles of Scilly, TR21 OLL

On behalf of Co-operative Group Food Ltd

Date: 19/05/2025 | Pegasus Ref: P20-1954 – Author: Katie Moore

**RECEIVED**

By Tom.Anderton at 9:25 am, May 29, 2025







## Document Management

Version	Date	Author	Checked by:	Approved by:	Reason for revision
Version 1	16/05/2025	Katie Moore	Lucy Ginn	Natalie Morgan	First Issue
Version 2	19/05/2025	Katie Moore	Lucy Ginn	Natalie Morgan	Draft Watermark Removed

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3. Proposed Development	8
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5. Site Specific Flooding Issues and Existing Flood Records	11
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# Figures

Figure 2.1:	Site Location
Figure 5.1:	Flood Map for Planning
Figure 5.2:	Risk of Flooding from Surface Water Extents
Figure 5.3:	Risk of Flooding from Surface Water Depths – 0.6m
Figure 5.4	EA's Recorded Flood Outlines

# Tables

Table 4.1:	Flood Risk & Vulnerability Guidance
Table 5.1:	Flood Risk Summary

# Appendices

- Appendix A – Existing and Proposed Block Plan
- Appendix B – Flood Emergency Management Plan (FEMP)
- Appendix C – Sanitary Schedule

# 1. Introduction

## Background

- 1.1. Pegasus Group has been appointed by Co-operative Group Food Ltd to undertake a Flood Risk Assessment (FRA) for the “construction of a single storey extension and shopfront alterations” at No. 4 Hugh Street, St Mary’s, Isles of Scilly, TR21 OLL.
- 1.2. This assessment considers the risk of flooding from all sources, including tidal, fluvial, surface water, historic, groundwater, sewer and artificial sources.

## National and Local Policies

- 1.3. The National Planning Policy Framework (NPPF) (December 2024) states that a site-specific FRA will be required for proposals:
  - a) that are located in Flood Zone 2 or 3 (all development);
  - b) that are greater than 1 hectare (ha) in area within Flood Zone 1;
  - c) in an area within Flood Zone 1 which has critical drainage problems;
  - d) in an area within Flood Zone 1 identified in a Strategic Flood Risk Assessment as being at increased flood risk in the future;
  - e) in an area in Flood Zone 1 that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.
- 1.4. The site boundary is approximately 0.1ha in area and is located entirely in Flood Zone 3 and therefore a full FRA is required for the proposals.
- 1.5. Any new planning application that requires an FRA will also require a surface water drainage strategy to be submitted where the proposals increase the area of impermeable hardstanding on site.
- 1.6. In February 2016, the Environment Agency (EA) introduced new guidance relating to the climate change allowances that must be considered within an FRA. Since 2016, the allowances for sea level rise, peak river flow and peak rainfall have each been updated, with the most recent update occurring in May 2022.
- 1.7. In March 2025, the EA published new national risk information for flooding and coastal erosion to the Flood Map for Planning. This includes future scenarios accounting for climate change and new Flood Zone data. The Flood Zones are produced as part of the new National Flood Risk Assessment (NaFRA2).
- 1.8. This assessment has also reviewed the information and requirements included in the following local policy documents:
  - Isles of Scilly Local Flood Risk Management Strategy 2017 (LFRMS; 2017);

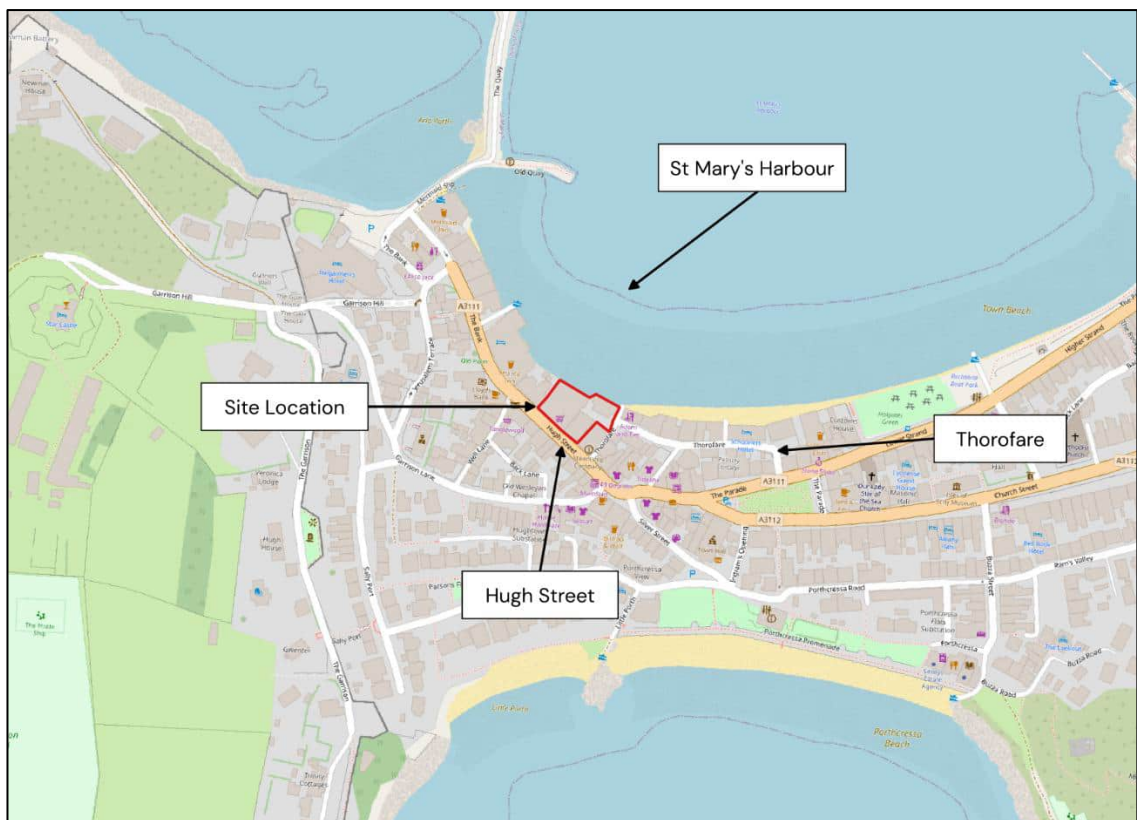
- Isles of Scilly Local Flood Risk Management Strategy 2025-2031 – consultation draft (Draft LFRMS; 2025-2031); and
- Rame Head to Hartland Point Shoreline Management Plan 17 (SMP17); the Cornwall and Isles of Scilly Shoreline Management Plan (SMP2, 2010) and the Isles of Scilly SMP2 Mid Term Review (SMP2 Review, 2016).

## 2. Existing Site & Hydrology

### Site Location & Existing Conditions

- 2.1. The site is located at No. 4 Hugh Street, St Mary's, Isles of Scilly.
- 2.2. The site is currently two separate buildings comprising a Co-op shop and associated storerooms, and a former Barclays Bank building.
- 2.3. The site is located within the defined town centre of Hugh Town on the island of St Mary's. The site is bordered by Hugh Street to the south-west, Thorofare road to the east and St Mary's Harbour and beach to the north.
- 2.4. The approximate co-ordinates of the centre of the site are E: 090233, N: 010584.
- 2.5. The site location is shown in Figure 2.1.

**Figure 2.1 – Site Location**



- 2.6. Light Detection and Ranging (LiDAR) data shows that the site is relatively flat, with levels ranging between 3.25 – 3.88 metres Above Ordnance Datum (mAOD). The Existing and Proposed Block Plan (shown in **Appendix A**) shows ground levels surrounding the existing buildings on site to be between 3.05 – 3.91mAOD.

#### Existing Drainage and Hydrology

- 2.7. According to the Isles of Scilly LFRMS 2017, there are no Main Rivers or Ordinary Watercourses located on the Isles of Scilly. The site is located immediately south of St Mary's Harbour.
- 2.8. Geological data from the British Geological Survey (BGS) shows the site is underlain by the "Isles of Scilly Intrusion – Granite" bedrock geology. BGS also record superficial deposits on site comprising "Head – Clay, Silt, Sand and Gravel" and "Blown Sand".
- 2.9. Soils mapping shows that the site consists of "freely draining acid loamy soils over rock".
- 2.10. The hydrogeology 625k digital hydrogeological map shows that the site is underlain by a "low productivity aquifer".
- 2.11. The site is not located within a Source Protection Zone.
- 2.12. The site is not located in a Drinking Water Safeguard Zone for either surface water or groundwater.

### 3. Proposed Development

- 3.1. The proposed development will comprise the “construction of a single storey extension and shopfront alterations” at No. 4 High Street, St Mary’s, Isles of Scilly, TR21 OLL.
- 3.2. The existing and proposed site block plan is included in **Appendix A**.
- 3.3. As the proposals involve the extension of existing buildings on site on current hardstanding, there will be no change in impermeable area.
- 3.4. The majority of the proposed Finished Floor Levels (FFLs) will remain the same, at a level of 3.91mAOD. Any lower existing FFLs are proposed to also be raised to this level as part of the proposed development. There are proposed re-grading works for the external levels up to the new goods-in door.



## 4. Development Vulnerability & Flood Zone Classification

### National Planning Policy Framework (December 2024)

- 4.1. The NPPF requires that, as part of the planning process:
- A 'site specific' FRA will be undertaken for any site that has a flood risk potential.
  - Flood risk potential is minimised by applying a 'sequential approach' to locating 'vulnerable' development.
  - Sustainable drainage systems are used for surface water management where practical.
  - Flood risk is managed through the use of flood resilient and resistant techniques.
  - Residual risk is identified and safely managed.
  - Safe access and escape routes are included where appropriate.
- 4.2. Table 1 of the 'Flood risk and coastal change' Planning Practice Guidance (PPG) defines each flood zone based on the probability of river and sea flooding in that area, as summarised below:
- Zone 1- Low probability (< 1 in 1000 years).
  - Zone 2- Medium probability (1 in 1000 – 1 in 100 years for fluvial events and 1 in 1000 – 1 in 200 years for tidal events).
  - Zone 3a- High probability (> 1 in 100 years for fluvial events and > 1 in 200 year for tidal events).
  - Zone 3b- The functional floodplain (>1 in 30 years for fluvial events).
- 4.3. The flood risk and coastal change PPG sets out a matrix indicating the types of development that are acceptable in different Flood Zones (see Table 4.1). The proposal is for the construction of a single storey extension and shopfront alterations which is classified as 'Less Vulnerable' as defined in Annex 3 of the NPPF. This existing use of the site is currently classified as 'Less Vulnerable' so there is no proposed change in flood risk vulnerability to that of the baseline.
- 4.4. The site is entirely contained within Flood Zone 3. Less Vulnerable development is considered appropriate in Flood Zone 3, as shown in Table 4.1.

**Table 4.1 – Flood Risk & Vulnerability Guidance**

Flood Zones	Flood Risk Vulnerability Classification				
	Essential Infrastructure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test Required	✓	✓	✓
Zone 3a	Exception Test Required	✗	Exception Test Required	✓	✓
Zone 3b	Exception Test Required	✗	✗	✗	✓

#### Sequential Test

- 4.5. According to the flood risk and coastal change PPG, “the Sequential Test should be applied to ‘Major’ and ‘Non-major development’ proposed in areas at risk of flooding”. The PPG states that the Sequential Test is intended to “steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account”.
- 4.6. The proposal involves the construction of a single storey extension and shopfront alterations of an existing Co-op food shop. Paragraph 176 of the NPPF states “Applications for some minor development and changes of use (small non-residential extensions with a footprint of less than 250m<sup>2</sup>) should also not be subject to the Sequential Test, nor the Exception test...but should still meet the requirements for site-specific flood risk assessments set out in footnote 63.”
- 4.7. The proposed extension area has a footprint of 244m<sup>2</sup> and therefore as the proposed extension area is less than 250m<sup>2</sup>, the Sequential Test does not need to be applied for the proposal.
- 4.8. It is also noted that the proposed extension is located on currently developed land and as discussed above, the flood risk vulnerability will not change as a result of the proposed development.
- 4.9. On this basis, a Sequential Test should not be required for the proposed development.

## 5. Site Specific Flooding Issues and Existing Flood Records

### National Planning Policy Framework

- 5.1. In accordance with the NPPF (December 2024), this FRA considers all sources of flooding including:
- a) Tidal Flooding – from the sea;
  - b) Fluvial Flooding – from rivers and streams;
  - c) Surface Water Flooding – from overland surface water flow and exceedance;
  - d) Historic Flooding – known historic flooding issues;
  - e) Groundwater Flooding – from elevated groundwater levels or springs;
  - f) Flooding from Sewers – exceedance flows from existing sewer systems; and
  - g) Artificial Sources – reservoirs, canals etc.

### Tidal Flooding

- 5.2. The Flood Map for Planning (2025) defines that the site falls within Flood Zone 3 associated with tidal flooding from St Mary's Harbour (Atlantic Ocean). The Flood Map for Planning is shown in Figure 5.1. This is further confirmed by the Isles of Scilly Interactive Policies Map, which shows the site is located on 'flood prone land' and states that "this dataset covers Flood Zone 3".
- 5.3. The Isles of Scilly (Policy Development Zone 18) forms part of the 'Rame Head to Hartland Point' Shoreline Management Plan 17. The site is located within "Unit 42.3 – The Quay to Custom House" where the approach is to 'Hold the Line' and the management plan is to continue to maintain the defences.
- 5.4. Despite the evident tidal flood risk on site, it is noted that the proposed change of use does not change the flood risk vulnerability classification as defined in the NPPF. Both current and proposed uses are classified as "less vulnerable", each being defined as "Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'more vulnerable' class; and assembly and leisure".
- 5.5. The LFRMS (2017) states that "the quay and harbour walls provide protection to the north side of Hugh Town and Town Beach", and therefore it is considered that the overall, risk of tidal flooding at the site is considered to be **Low**.
- 5.6. A Flood Emergency Management Plan (FEMP) has been prepared and is included as **Appendix B** and will be made available to staff who will be responsible for safely evacuating customers.

- 5.7. According to the Draft LFRMS (2025–2031), the EA works in partnership with the Met Office to provide flood forecasts and warnings. Typically, the EA currently provides advisory flood warning services to the Council and other professional partners, but currently not directly to the public. Based on this, it is recommended that the site manager should contact the Council to establish how Flood Alerts and Flood Warnings will be received and that all staff should sign up to the Met Office Weather Warning email alerts. This will ensure that all occupants are informed of any potentially significant flood events that could affect the site, and staff and customers would have sufficient time to safely leave the site.
- 5.8. More details on the FEMP are provided in **Appendix B**.

**Figure 5.1 – Flood Map for Planning**



### Fluvial Flooding

- 5.9. The Flood Map for Planning (2025) defines that the site falls within Flood Zone 3 associated with tidal flooding and is not reflective of fluvial flood risk.
- 5.10. There are no Main Rivers or Ordinary Watercourses located in the vicinity of the site and therefore no known history of fluvial flooding impacting the site.
- 5.11. Overall, the proposed development is considered to be a **Very Low** risk of fluvial flooding.

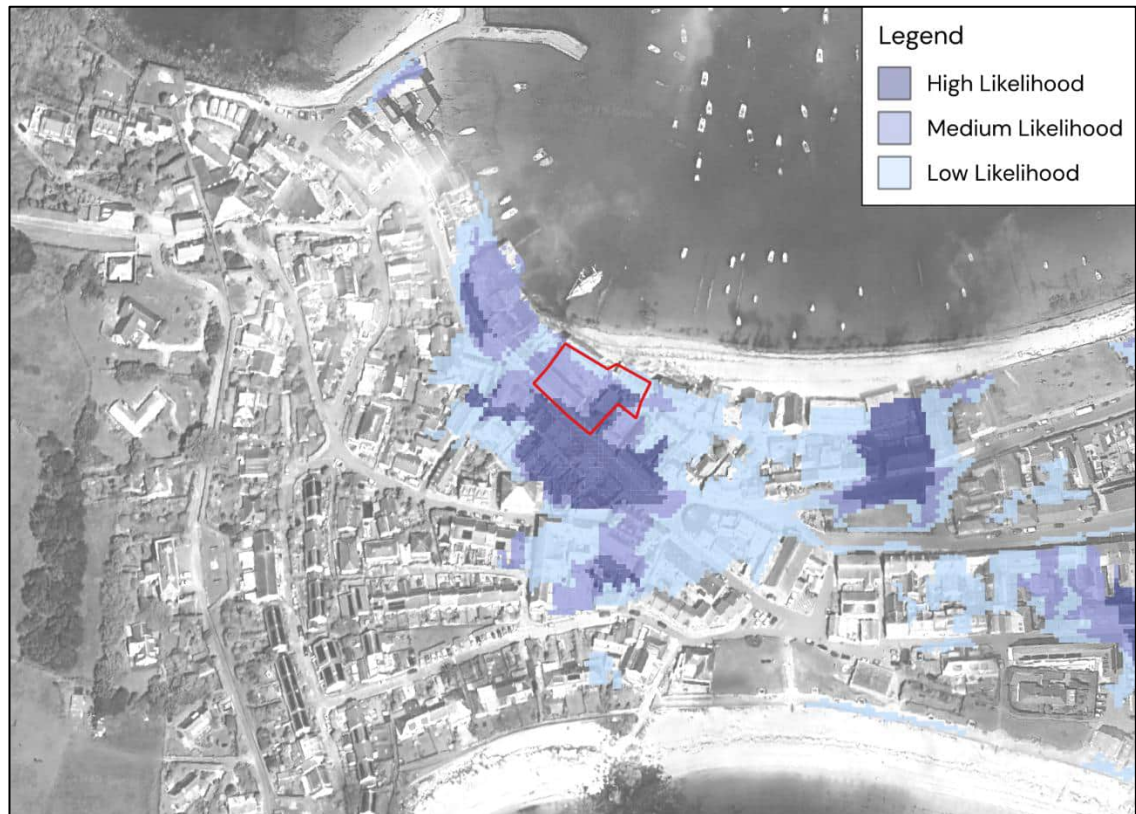
### Surface Water Flooding

- 5.12. Surface water flooding can occur during prolonged or intense storm events when the infiltration potential of soils, or the capacity of drainage infrastructure is overwhelmed leading to the accumulation of surface water and the generation of overland flow routes.
- 5.13. The new National Flood Risk Assessment (NaFRA2), published in January 2025, has updated the Risk of Flooding from Surface Water (RoFSW) products which show the chance of flooding from surface water to areas of land.
- 5.14. The RoFSW products are an assessment of where surface water flooding may occur when rainwater does not drain away through the normal drainage systems or soak into the ground but lies on or flows over the ground instead. It includes information about flooding extents and depths including the potential impact of climate change on flood risk, based on the latest UK Climate Projections (UKCP18).
- 5.15. Risk is displayed as one of three likelihood categories in the RoFSW dataset:
  - 'High Risk' (High Likelihood); >3.3% AEP (annual probability greater than 1 in 30).
  - 'Medium Risk' (Medium Likelihood); 1.1% to 3.3% AEP (annual probability between 1 in 100 and 1 in 30).
  - 'Low Risk' (Low Likelihood); 0.1% to 1% AEP (annual probability between 1 in 1000 and 1 in 100).
- 5.16. The latest RoFSW depth mapping shows the annual chance of flooding (based on the three likelihood categories listed above) beyond a specific depth, for depths at several intervals from 200 millimetres (mm) to 1200mm (i.e. 0.2m, 0.3m, 0.6m, 0.9m, and 1.20m).
- 5.17. The RoFSW dataset shows that the site lies within areas at 'Low Likelihood', 'Medium Likelihood' and 'High Likelihood' areas (see Figure 5.2).
- 5.18. Surface water flood depths on site are not predicted to exceed 0.6m in the Low Likelihood event (see Figure 5.3).
- 5.19. As a precautionary approach, it is recommended that all new electrical infrastructure for the proposal will be raised 600mm above ground levels.
- 5.20. A FEMP has been prepared and is included as **Appendix B** and will be made available to staff, who will be responsible for safely evacuating all customers.
- 5.21. The LFRMS (2017) states that "there have been no significant past local events from local sources of flooding, namely surface water and groundwater" and "the risk from fluvial and pluvial flooding is considered to be very low".
- 5.22. The flood risk vulnerability of the extension will remain the same as existing, defined as 'less vulnerable' and therefore there is no increased risk resulting from the development.
- 5.23. As the proposal involves the extension of existing buildings on site on current hardstanding, there will be no change in impermeable area. Therefore, there will be no change in the amount of surface water leaving the site and, as such, there is no requirement (or opportunity) to

alter the site's current drainage arrangement. The proposal will continue to utilise the existing drainage infrastructure associated with the site.

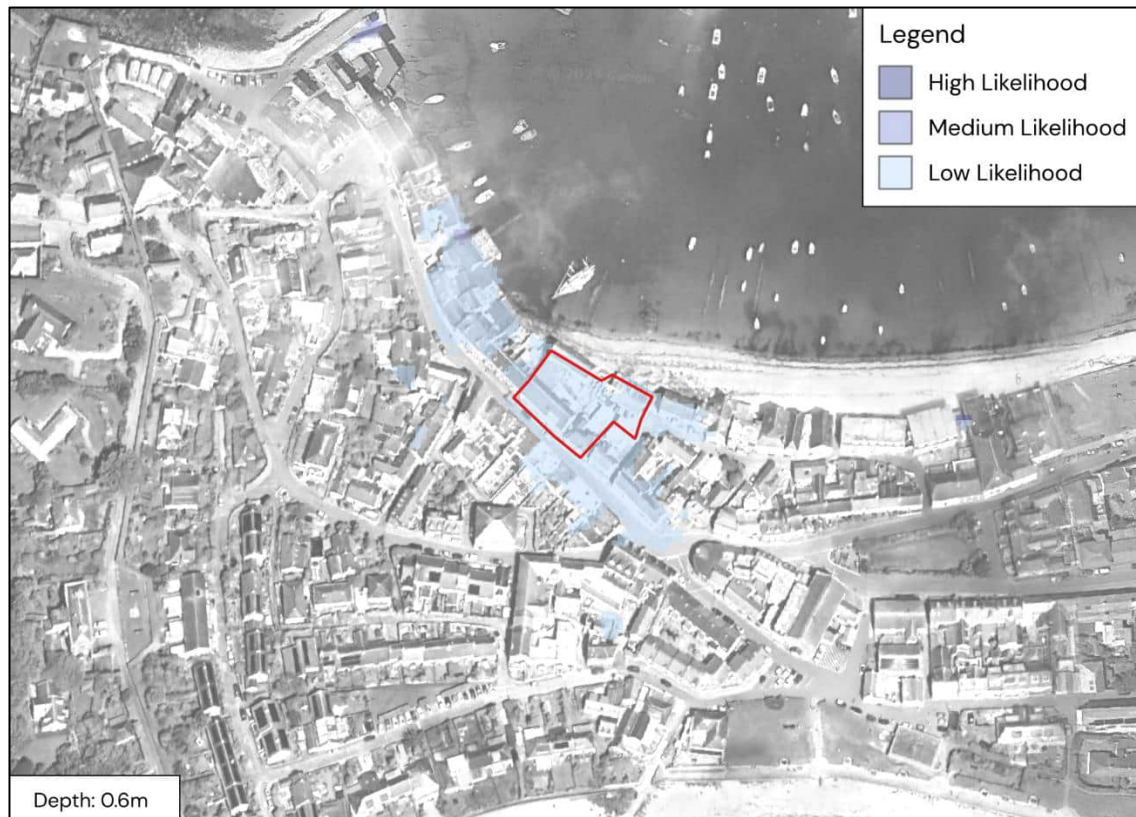
- 5.24. Given the above, the site is considered to be at **Low** risk of flooding from surface water.

**Figure 5.2 – RoFSW Extents**





**Figure 5.3 – RoFSW Depths – 0.6m**



#### Historic Flooding

- 5.25. The EA's Recorded Flood Outlines dataset records a historic flood event immediately south of the site, along Hugh Street in 2019 associated with "high tides leading to some minor pooling on the main streets as water came up the drains due to surcharge". The EA's Recorded Flood Outlines is shown in Figure 5.4.
- 5.26. The LFRMS (2017) indicates that Hugh Street also flooded in 2014 and Thorofare in 2011.
- 5.27. Considering the proposal will remain classified as a 'less vulnerable' land use, the risk of historic flooding to the site will remain the same and therefore overall, the historic flood risk to the site is considered to be **Low**.



**Figure 5.4 – EA's Recorded Flood Outlines**



#### Groundwater Flooding

- 5.28. As discussed in Section 2, the site is defined by the hydrogeology 625k digital hydrogeological map of the UK to be underlain by a “low productivity aquifer” and the site is underlain by granite bedrock geology, and therefore based on this, there is a low likelihood for groundwater emergence on site.
- 5.29. The LFRMS (2017) states that “there have been no significant past local events from local sources of flooding, namely surface water and groundwater.”
- 5.30. The topography on site is not conducive to groundwater flooding, as any groundwater to emerge would follow the existing site topography without accumulating to significant depths on site.
- 5.31. Overall, the risk of groundwater flooding at the site is considered to be **Low**.

#### Flooding from Sewers

- 5.32. As stated previously, the Recorded Flood Outlines dataset records a historic flood event immediately south of the site, along Hugh Street associated with “high tides leading to some minor pooling on the main streets as water came up the drains due to surcharge” in 2019.
- 5.33. Site topography is not conducive to sewer flooding, as any sewer flood waters to reach the site would follow the existing site topography without accumulating to significant depths on site.

- 5.34. The LFRMS (2017) states that “flooding and sea water ingress into the water supplies and sewerage poses a significant risk to this infrastructure” and that “only Hugh Town and Old Town on St. Mary’s have a formal piped foul drainage system.”
- 5.35. As the existing site already comprises built development, there is already likely to be an existing sewer network located at the site and considering the flood risk vulnerability of the proposal is not due to change, then the risk will remain unchanged.
- 5.36. The risk of flooding from sewers to the site is therefore considered to be **Low**.

#### Flooding from Artificial Sources

- 5.37. According to the LFRMS (2017), “there are no water reservoirs on the Isles of Scilly of sufficient size to pose a significant flood risk, all being considerably below the risk threshold of 25,000 cubic metres of water above natural ground level.”
- 5.38. The EA’s Reservoir Flood Extents data shows that the site is not predicted to at risk of reservoir flooding should a catastrophic breach occur during a wet day, when local rivers have already overtopped their banks or during a dry day when rivers are flowing under normal conditions.
- 5.39. All reservoirs which are represented in the reservoir flooding dataset fall under the requirements set out in the Reservoirs Act 1975. This act makes it a legal requirement to appoint a Supervising Engineer to produce an annual report and for the operator to address any issues raised therein. Since the introduction of the Reservoir Act, there have been no catastrophic failures of reservoirs. Consequently, it is considered that the probability of reservoir failure is very low and that the risk of flooding from reservoirs is also very low.
- 5.40. There are no other artificial sources of flooding identified that may pose a risk to the site.
- 5.41. Overall, the site is considered to be at **Very Low** risk of flooding from artificial sources.

#### Access & Egress

- 5.42. The site will be accessed via Hugh Street for customers and via Thorofare for staff members using the back of house entrance. The proposed access points are located within the redline boundary and as such, have been considered within the above assessment, with the conclusion that the site, including the proposed accesses, is at Very Low to Low risk of flooding from all sources.
- 5.43. The EA currently provides advisory flood warning services to the Council and other professional partners, but currently not directly to the public. Based on this, it is recommended that the site manager should contact the Council to establish how Flood Alerts and Flood Warnings will be received and that all staff should sign up to the Met Office Weather Warning email alerts. This will ensure that all site users are informed of any potentially significant flood events that could affect the site, and staff and customers would have sufficient time to safely leave the site.
- 5.44. In addition, a FEMP has been prepared and is included as **Appendix B** and details safe access and egress from the site, and this will be made available to staff.

## Post Development Flood Risk Summary

- 5.45. The risk of flooding to the site from all sources has been assessed above, with the conclusions summarised in Table 5.1.

**Table 5.1 – Flood Risk Summary**

Flood Source	Flood Risk	Mitigation/Comments
Tidal	Low	<ul style="list-style-type: none"> <li>• The site is located in Flood Zone 3.</li> <li>• The site forms part of the local Shoreline Management Plan which intends to 'Hold the Line'.</li> <li>• The LFRMS (2017) highlights that the quay and harbour walls protect the north side of Hugh Town.</li> <li>• A FEMP has been prepared and will be made available to staff who will be responsible for safely evacuating all customers.</li> </ul>
Fluvial	Very Low	<ul style="list-style-type: none"> <li>• The site is located in Flood Zone 3 associated with tidal flooding and not reflective of fluvial flooding.</li> <li>• There are no Main Rivers or Ordinary Watercourses located in the vicinity of the site and therefore no known history of fluvial flooding impacting the site.</li> </ul>
Surface Water	Low	<ul style="list-style-type: none"> <li>• The RoFSW dataset shows that the site has a Low to High Likelihood of surface water flooding.</li> <li>• Surface water flood depths on site are not predicted to exceed 0.6m in the Low Likelihood event.</li> <li>• As a precautionary approach, it is recommended that all new electrical infrastructure for the proposal will be raised 600mm above ground levels.</li> <li>• The LFRMS (2017) highlights that there have been no significant past local surface water flood events.</li> <li>• As the proposal involves the extension of existing buildings on site on current hardstanding, there will be no change in impermeable area. Therefore, there will be no change in the amount of surface water leaving the site and the proposal will continue to</li> </ul>

		utilise the existing drainage infrastructure associated with the site
Historic	Low	<ul style="list-style-type: none"> <li>• The EA's recorded flood outline dataset highlights a historic flood event south of the site, in 2019 associated with high tides.</li> <li>• The LFRMS (2017) highlights that Hugh Street flooded in 2014 and Thorofare in 2011.</li> <li>• Considering the proposal will remain classified as 'less vulnerable', the risk of historic flooding to the site will remain the same and therefore overall, the historic flood risk to the site is considered to be Low.</li> </ul>
Groundwater	Low	<ul style="list-style-type: none"> <li>• The site is underlain by a low productivity aquifer and granite bedrock geology which indicate a low likelihood of groundwater emergence on site.</li> <li>• The LFRMS (2017) highlights that there are no significant past local groundwater flood events.</li> <li>• Site topography is not conducive to groundwater flooding. Any groundwater to emerge will follow local topography without accumulating to significant depths on site.</li> </ul>
Sewers	Low	<ul style="list-style-type: none"> <li>• The Recorded Flood Outlines dataset records a historic flood event south of the site associated with high tides and drains due to surcharge.</li> <li>• As the existing site already comprises of built development, there is already likely to be an existing sewer network located at the site and considering the land use vulnerability of the proposal is not due to change then the risk will remain unchanged.</li> <li>• Any sewer flood water on site or in the close vicinity would follow local topography and would not be expected to accumulate to significant depths within the site boundary.</li> </ul>
Artificial	Very Low	<ul style="list-style-type: none"> <li>• The site is not predicted to be at risk during a catastrophic reservoir breach or any other artificial flooding source.</li> </ul>

## **6. Proposed Surface Water Drainage Strategy**

- 6.1. The proposed development will comprise the construction of a single storey extension and shopfront alterations. The proposed extension is proposed on an area of existing hardstanding and therefore, there will be no change in impermeable area compared to the existing arrangement. There will be no change in the amount of surface water leaving the site and, as such, there is no requirement (or opportunity) to alter the site's current drainage arrangement. The proposals will continue to utilise the existing drainage infrastructure associated with the site.

## 7. Proposed Foul Drainage Strategy

- 7.1. The proposed development is for a commercial extension to an existing shop. It does not involve any changes or increases to residential use, and therefore there will be no change in foul drainage demand when compared to the existing arrangement. It is proposed that the existing foul water system is maintained for the proposed development. In addition, the sanitary schedule (refer to **Appendix C**) outlines that there will be a reduction in toilets and sinks as part of the proposed development

## 8. Summary

- 8.1. The proposal will comprise “construction of a single storey extension and shopfront alterations” at No. 4 Hugh Street, St Mary’s, Isles of Scilly, TR21 OLL.
- 8.1. The site is 0.1ha in area and located in Flood Zone 3. The site is considered to be at Very Low to Low risk of flooding from all sources.
- 8.2. The proposed extension is proposed on an area of existing hardstanding and therefore, there will be no change in impermeable area compared to the existing arrangement. There will be no change in the amount of surface water leaving the site and, as such, there is no requirement (or opportunity) to alter the site’s current drainage arrangement. The proposals will continue to utilise the existing drainage infrastructure associated with the site.
- 8.3. The proposal is considered to accord with the requirements of the NPPF with residual risk to the site fully mitigated, and as such considered low risk.





## **Appendix A – Existing and Proposed Block Plan**





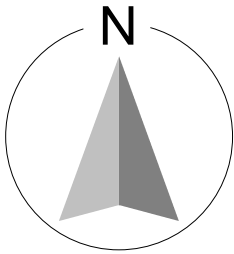
EXISTING BLOCK PLAN  
1 : 500



PROPOSED BLOCK PLAN  
1 : 500

P2	External Plant Updated	09.05.25	SB	CS
P1	First Issue	23.04.25	SB	CS
	Revision	Date	By	Chk

All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plan; all conflicts should be reported to the appointed Principal Designer.



SCALE 1:500

Key  
Red Line Boundary

CO-OP  
4 Hugh Street  
St Mary's, Isles of Scilly, TR21 0LL

Sheet Name: Existing and Proposed Block Plan  
Purpose of issue: Planning Status:

Date: 23/04/25 Checked by: CS  
Drawn by: SB Scale @ A3: As indicated

Project No: A1100 Revision: P2  
Drawing No: A110-BOW-A0-ZZ-DR-A-0017





## **Appendix B – Flood Emergency Management Plan (FEMP)**

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**Project Name: No. 4 Hugh Street, St Mary's, Isles of Scilly**

**Report Name: Flood Emergency Management Plan**

**Author: Katie Moore**

**Date: 16/05/2025**

**Checked/Approved By: Lucy Ginn/Natalie Morgan**

**Project number: P20-1954**

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## **Introduction**

The site is located on the Island of St Mary's, Isles of Scilly and it is proposed to construct a single storey extension and shopfront alterations to an existing Co-op shop at the site. This Flood Emergency Management Plan (FEMP) has been prepared to demonstrate how users would be safe in a flooding event. The plan provides details about safe access and egress, and the flood resilience measures to be implemented on site.

## **Site Location & Site Specific Flood Risk**

### **Site Location**

The site is located at No. 4 Hugh Street, St Mary's, Isles of Scilly, TR21 OLL. The site is currently two separate buildings which comprise a Co-op shop, associated storerooms and a former Barclays Bank building. The proposals are for the "construction of a single storey extension and shopfront alterations". The site is located within the defined town centre of Hugh Town on the island of St Mary's. The site is bordered by Hugh Street to the south-west, Thorofare to the east and St Mary's Harbour and beach to the north. A site location plan is included in **Appendix A**.

### **Fluvial & Tidal Flood Risk**

The site is located entirely within Flood Zone 3 associated with tidal flooding from St Mary's Harbour (Atlantic Ocean). According to the Isles of Scilly Local Flood Risk Management Strategy (LFRMS) (2017), there are no Main Rivers or Ordinary Watercourses located on the Isles of Scilly and therefore the Flood Map for Planning is reflective of Tidal flooding only and is included in **Appendix B**.

Despite the evident tidal flood risk on site, it is noted that the proposed redevelopment does not change the flood risk vulnerability classification as defined in the National Planning Policy Framework (NPPF). Both existing and proposed uses are classified as "Less Vulnerable".

The Isles of Scilly LFRMS (2017) states that "the quay and harbour walls provide protection to the north side of Hugh Town and Town Beach". In addition, the Isles of Scilly (PDZ18) forms part of the 'Rame Head to Hartland Point' Shoreline Management Plan 17. The site is located within an area designated as 'Hold the Line' and the management plan is to continue to maintain the defences and therefore it is considered that the overall, risk of tidal flooding at the site is considered to be Low.

This FEMP has been produced to show how users of the proposed development would be safe in the event of tidal flooding. The plan provides details about safe access and egress as well as appropriate flood resilience measures which will be undertaken as part of the proposed development.

### **Surface Water Flood Risk**

The new National Flood Risk Assessment (NaFRA2), published in January 2025, has updated the Risk of Flooding from Surface Water (RoFSW) products which show the chance of flooding from surface water to areas of land.

The RoFSW dataset shows that the site lies within areas at 'Low Likelihood', 'Medium Likelihood' and 'High Likelihood' areas. Surface water flood depths on site are not predicted to exceed 0.6 metres (m) in the Low Likelihood event. Data from the RoFSW dataset is included in **Appendix B**, this includes surface water extents and depths discussed above.

As a precautionary approach, it is recommended that all new electrical infrastructure for the proposal will be raised 600 millimetres (mm) above ground levels.

The LFRMS (2017) states that "there have been no significant past local events from local sources of flooding, namely surface water and groundwater" and "the risk from fluvial and pluvial flooding is considered to be very low".

Despite the evident surface water flood risk on site, it is noted that the proposed redevelopment does not change the flood risk vulnerability classification as defined in the NPPF. Both the existing and proposed uses are classified as "less vulnerable". The site is considered to be at Low risk of flooding from surface water.

This FEMP has been produced in order to show how users of the proposed development would be safe in the event of surface water flooding. This includes safe access and egress as well as appropriate flood resilience measures which will be undertaken as part of the proposed development.

#### Other Sources of Flood Risk

The Environment Agency's (EA's) Flood Outlines dataset records a historic flood event immediately south of the site, along Hugh Street in 2019 associated with "high tides leading to some minor pooling on the main streets as water came up the drains due to surcharge". The Historic Flood Map is included in **Appendix B**. The LFRMS (2017) indicates that Hugh Street also flooded in 2014 and Thorofare in 2011. Considering the proposal will remain classified as a 'less vulnerable' land use, the risk of historic flooding to the site will remain the same and therefore overall, the historic flood risk to the site is considered to be Low.

The EA's Reservoir Flood Extents data shows that the site is not predicted to at risk of reservoir flooding should a catastrophic breach occur during a wet day, when local rivers have already overtopped their banks or during a dry day when rivers are flowing under normal conditions. In addition, according to the LFRMS (2017), "there are no water reservoirs on the Isles of Scilly of sufficient size to pose a significant flood risk, all being considerably below the risk threshold of 25,000 cubic metres of water above natural ground level." The site is considered to be at Very Low risk of flooding from artificial sources.

The hydrogeology 625K digital hydrogeological map of the UK defines the site to be underlain by a "low productivity aquifer", and the British Geological Survey highlights that granite bedrock geology across the site. The combination of low productivity and granite bedrock geology would significantly reduce the risk of groundwater emergence, and therefore flooding, and the risk of groundwater flooding is considered to be Low.

As stated above, the Recorded Flood Outlines dataset records a historic flood event immediately south of the site, along Hugh Street associated with "high tides leading to some minor pooling on the main streets as water came up the drains due to surcharge" in 2019, associated with sewer flooding. As the existing site already comprises built development, there is already likely to be an existing sewer network located at the site and considering the flood risk vulnerability of the proposal is not due to change, the risk will remain unchanged. The risk of flooding from sewers to the site is therefore considered to be Low.

#### Flood Warnings

According to the Isles of Scilly Draft LFRMS (2025–2031), the EA works in partnership with the Met Office to provide flood forecasts and warnings and states "*Flood forecasting is undertaken by the Flood Forecasting Centre, a partnership between the Met Office and the Environment Agency*". The EA provides

advisory flood warning services to the Council and other professional partners, but currently not directly to the public.

At the time of writing this report, it is not clear how the council advise the residents of the Isles of Scilly of issued flood warnings, but it is assumed that alerts are made to local residents. Based on this, it is recommended that the site manager should contact the Council to establish how Flood Alerts and Flood Warnings will be received and that all staff should sign up to the Met Office Weather Warning email alerts.


The Draft LFRMS (2025–2031) further states that the EA’s national flood warning service does not currently cover the Isles of Scilly, however, the Council of the Isles of Scilly is working with the EA to extend the national flood warning service to cover the islands.



When this becomes available all staff will sign up to the EA’s free flood warning service to receive all levels of possible warnings including: a Flood Alert, Flood Warning and Severe Flood Warning. Warnings can be issued by the EA via text, email, mobile, landline or fax. The EA’s website will also be monitored regularly for new warnings and updates when available.

Table 1 below details the actions that will be taken by staff and customers following receipt of one of the various EA Flood Warnings. It is assumed that the Council’s current flood warning system would follow a similar approach. This information has been taken from the gov.uk guidance on “flood alerts and warnings: what they are and what to do”.

There will be a designated user of the site with the responsibility to ensure other site users sign up for flood warnings and are aware of the protocols detailed in Table 1 below and further below in this document.

*Table 1 – Flood Warnings & Associated Information*

Type of Flood Warning & Associated Message	Timings of Warning	What is at Risk / What May Happen	Action for Designated Responsible Person	EA Advised Action
<b><u>Flood Alert</u></b> Flooding is possible. Prepare now. 	Usually between 2 and 12 hours before flooding.	Fields, recreational land and carparks. Minor roads. Farmland. Coastal areas affected by spray or waves overtopping.	Be aware of water levels. Keep up to date with weather and flood warnings. Ensure all site users are aware of the flood alert. Prepare for possible evacuation.	Be ready to follow your flood plan. Have insurance documents and any medications ready. Avoid walking, cycling or driving through any flood water. Move any livestock and farming equipment away from areas likely to flood.
<b><u>Flood Warning</u></b> Flooding is expected. Act now.	Usually between 30 minutes to 2	Homes and businesses.	Recommended to evacuate all site users from the site before safe access	Protect yourselves and your loved ones.

	<p>hours before flooding.</p>	<p>Railway lines and infrastructure.</p> <p>Roads.</p> <p>Coastal areas affected by spray or waves overtopping.</p> <p>Flood plains, including caravan park and campsites.</p> <p>Major tourist and leisure attractions.</p>	<p>and egress is lost.</p> <p>Check water levels before driving.</p> <p>Secure the building following evacuation.</p>	<p>Move your loved ones, pets and valuables to a safe place.</p> <p>Move to higher ground or the upper floor of a building.</p> <p>Turn off the gas, electricity and water in your home if it's safe.</p> <p>Put flood protection equipment in place.</p> <p>Do as the emergency services tell you.</p> <p>Help others if it's safe to do so.</p>
<p><b><u>Severe Flood Warning</u></b></p> <p>Severe flooding – flooding could cause risk to life and significant disruption to communities.</p> <p>Act now.</p> 	<p>When flooding threatens life and communities.</p>	<p>Deep and fast-flowing water.</p> <p>Dangerous debris in the water.</p> <p>Buildings collapsing or at risk of collapsing.</p> <p>Communities unable to escape.</p> <p>Infrastructure not working, like gas, electricity, and water.</p> <p>The evacuation of lots of people.</p>	<p>Recommended to evacuate all site users from the site before safe access and egress is lost.</p> <p>Check water levels before driving.</p> <p>Secure the building following evacuation.</p>	<p>Stay in a safe place.</p> <p>Be ready to evacuate your home.</p> <p>Do as the emergency services tell you.</p> <p>Call 999 if you are in immediate danger.</p> <p>If you are caught in a flash flood move to higher ground of the upper floor of a building if it's safe.</p>
<p><b><u>All Clear Status</u></b></p> <p>Flood Alerts/Warnings are no longer in force in the area.</p>			<p>Keep updated on weather reports.</p> <p>Only return to site if informed</p>	



			<p>it is safe to do so.</p> <p>Beware of debris and pollution in flood waters.</p>	
--	--	--	--	--

### **Safe Access & Egress**

During a major flood event, a safe and well organised evacuation of site users will take place. The main sources of flood risk to the site are expected to be tidal and surface water as discussed above.

Following receipt of an issued Flood Alert from the Council, the designated person responsible will monitor for any updates. Should a Flood Alert be escalated to a Flood Warning, the designated person responsible will advise all site users of the threat of flooding and evacuation procedures should be actioned (detailed below).

If a Flood Warning or Severe Flood Warning is issued, the designated person responsible will inform site users of the need to evacuate. There is likely to be several hours warning before flood waters would be expected to impact the site. The proposed evacuation route is detailed in **Appendix C**. During an evacuation, site users will be directed off site via Hugh Street and subsequently south via Well Lane towards Garrison Lane. This route directs site users to higher ground and in the direction away from where flood waters are expected to flow. Garrison Lane shows a notable rise in levels compared to the site; surface water is not predicted to accumulate here, and this area is located in Flood Zone 1 (see **Appendix B and C**). Site users will then gather at the defined evacuation point along Garrison Lane; this point is shown on **Appendix C**.

The following evacuation protocols should also be noted:

- The designated person responsible will announce the need for a site evacuation.
- The designated person responsible will reassure site users that they are not in immediate danger and that the evacuation is a precaution.
- If safe to do so, the designated person responsible will turn off key services such as water, gas and electricity.
- The designated person responsible will direct site users to the identified evacuation point.
- Priority for additional help will be given to disabled site users.
- The designated person responsible will ensure the site is clear and securely locked.
- A rollcall of site users will be complete once at the identified evacuation point.
- All staff will be sent home.

### **Resistance & Resilience**

Preventative measures identified which may help the site's resistance and resilience to flooding are listed below:

- Sandbags will be deployed around the perimeter of the site prior to evacuation if safe to do so.
- Local electrical circuits could be isolated if flood waters have entered any buildings.
- Any new electrical sockets installed as part of the extension will be located higher up the wall and above the predicted surface water flood depths.

### **Responsibilities & Annual Review Requirements**

It is important for it to be clearly defined who is responsible for implementing and maintaining the FEMP at the site and for ensuring all site users are aware of the strategy, including new site users. There will be a designated responsible person for this. This person will be confirmed at a later stage but is expected to be whoever is responsible for site operation following the proposed redevelopment.

The FEMP will be reviewed annually at a minimum. The following checks will be complete by the designated person responsible:

- Update contact numbers.
- Contact the EA or Council to understand if predicted flood risk has changed.
- Contact the Council to ensure site users are registered to receive Flood Alerts and Flood Warnings.
- Carry out a test of the evacuation plan with site users to ensure they are familiar with the plan and associated procedures.

Flood Evacuation Kits will also be checked at least annually. The following items will be included within Flood Evacuation Kits:

- Torch – in case of loss of power.
- Rechargeable radio – to remain up to date with flood/weather updates.
- High visibility clothing – to be used in times of evacuation during low light.
- Waterproof clothing – to be used in times of evacuation during poor weather.
- First aid kit – to be used in case of emergency.
- Flood evacuation route plan – to ensure the correct route is taken.
- List of important numbers – e.g. Environment Agency Floodline, emergency services, utility providers.
- Bottled water.

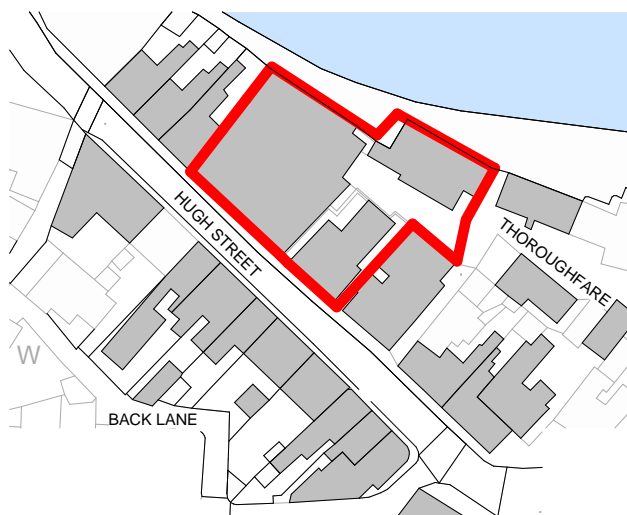
### **Additional Guidance**

1. Do not walk through flowing water – currents can be deceptive and knock you off your feet.
2. Do not swim through fast flowing water – you may get swept away or struck by an object in the water.
3. Check the depth of standing water before walking through it.
4. Do not drive through a flooded area – depths of over 0.5m can carry a car away.
5. Avoid contact with flood water – this may be contaminated.

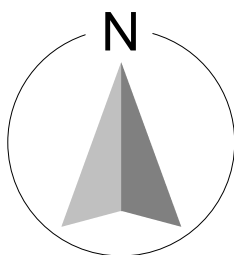
**Appendices**

- A) Site Location
- B) Flood Risk Plans
- C) Proposed Evacuation Route

Appendix A – Site Location



1 - SITE LOCATION PLAN  
1 : 1250



Key

 Red Line Boundary



SCALE 1:1250

P2	Revised for planning submission	24.04.25	SB	CS
P1	Updated to show spot levels and alterations to plan and elevations	01.04.25	GM	DH
Revision	Date	By	Chk	

Date: 01/23/25

Checked by : CS

Drawn by: SP

Scale @ A4 : As indicated

Do not scale from this drawing  
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Sheet Name: Site Location Plan

Purpose of issue: Information

CO-OP  
4 Hugh Street

Status: S2

Project No: A1100



Revision: P2

Drawing No: A110-BOW-A0-ZZ-DR-A-0001



Appendix B – Flood Risk Plans

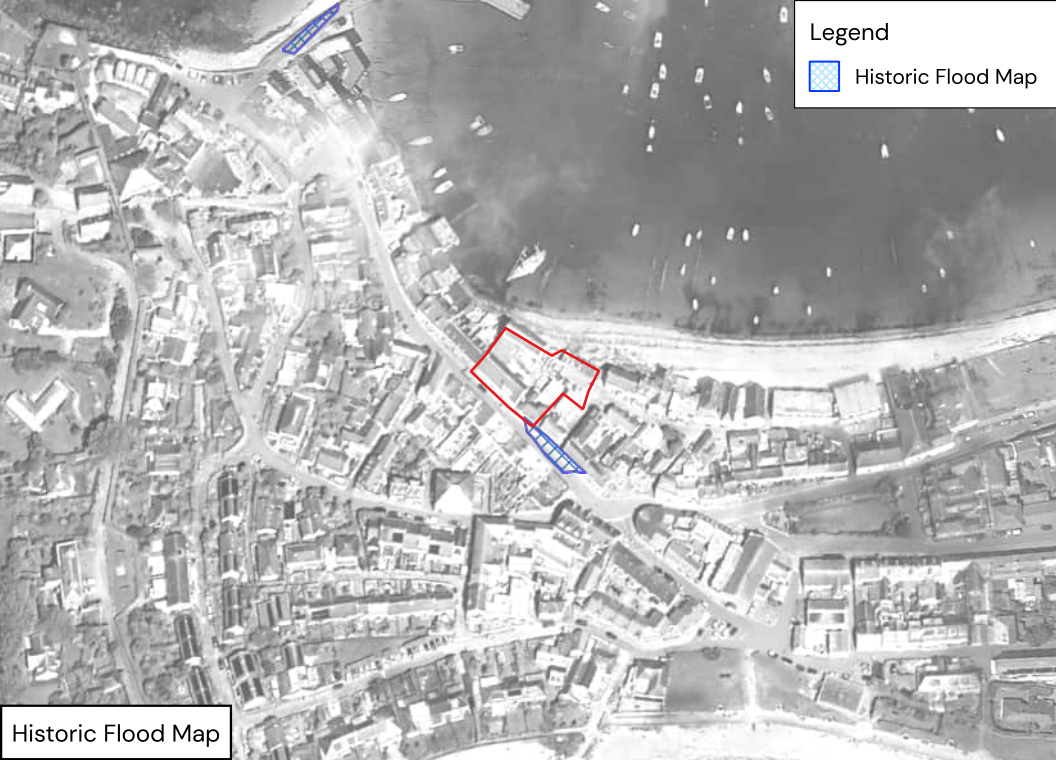
## Legend

-  Flood Zone 2
-  Flood Zone 3



Flood Map for Planning



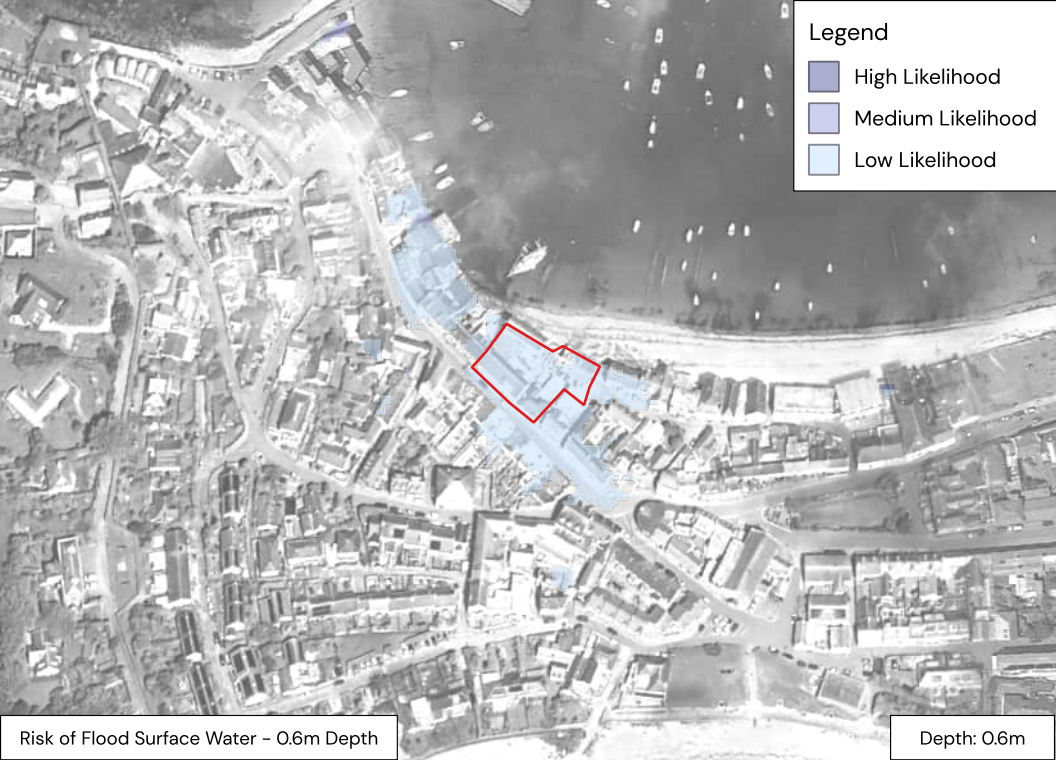


Legend



Historic Flood Map

Historic Flood Map

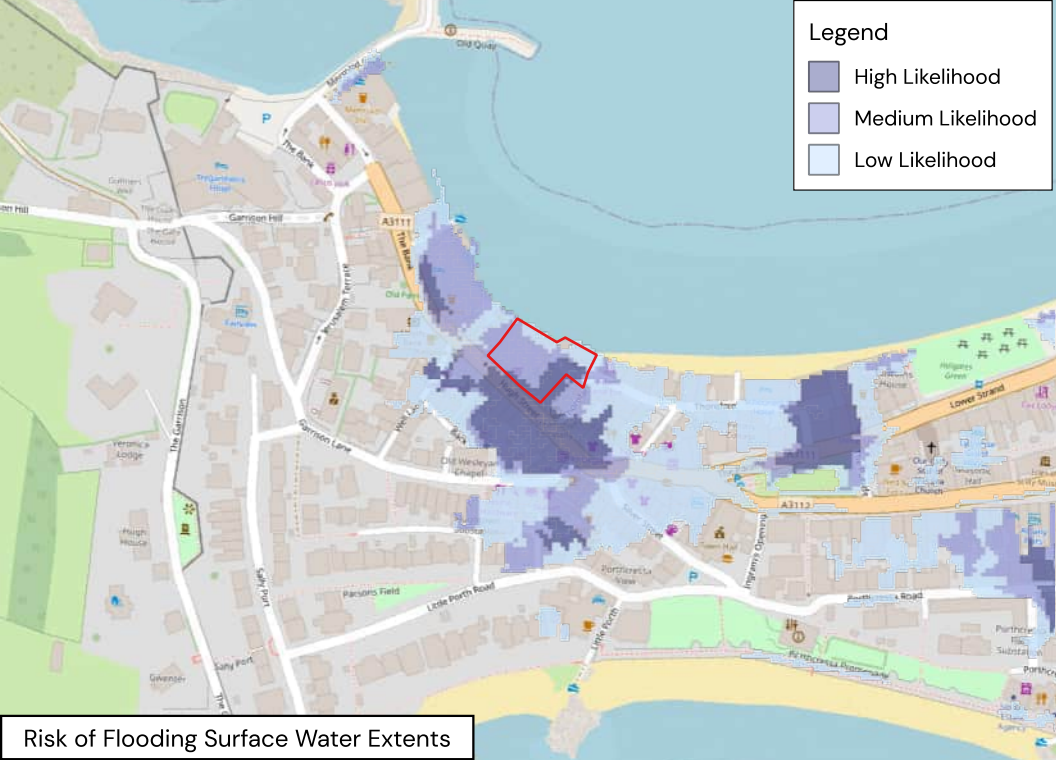


### Legend

- High Likelihood
- Medium Likelihood
- Low Likelihood

Risk of Flood Surface Water - 0.6m Depth

Depth: 0.6m



## Legend

- High Likelihood
- Medium Likelihood
- Low Likelihood

Risk of Flooding Surface Water Extents

Appendix C – Proposed Evacuation Route



Site Location

Evacuation Route

Evacuation Point

Proposed Evacuation Route



## **Appendix C – Sanitary Schedule**

---

### Isles of Scilly – Flat Sanitaryware schedule

#### Existing

Flat Name	Number of toilets	Number of sinks	Number of showers	Number of baths
Flat 1	1	2	1	0
Flat 2	1	2	0	1
Flat 3	1	2	0	1
Flat 4	1	2	0	1
Bank Flat	2	3	0	1

#### Proposed

Flat Name	Number of toilets	Number of sinks	Number of showers	Number of baths
Flat 1	1	2	1	0
Flat 2	1	2	0	1
Flat 3	1	2	0	1
Flat 4	1	2	0	1
Bank Flat	2	3	0	1

### Isles of Scilly – Coop Sanitaryware schedule

Phase	Sinks	Toilets
Existing	5	2
Proposed	4	1



**BRISTOL**

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**APPROVED**

By Lisa Walton at 2:46 pm, Jul 30, 2025



**MIDDLEMARCH**

# Report to Inform Habitats Regulations Assessment: Stage 1 and Stage 2

4 Hugh Street, St Mary's, Isles of Scilly

A Report To: Henry Riley

Report Number: RT-MME-180243-01

Date: July 2024

**RECEIVED**

By Tom.Anderton at 9:25 am, May 29, 2025



Middlemarch Environmental Ltd, Triumph House,  
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## Quality Assurance

Date	Version	Author	Checked and approved by
04/07/2024	Final	Louise Fox (Principal Ecological Consultant)	Amanda Flint (Nature-Based Solutions Manager)

## Declaration of Compliance

The information which we have prepared is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

## Disclaimer

The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client's brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

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# 1. Introduction

## 1.1 Project Background

Middlemarch has been commissioned by Henry Riley to prepare a Report to Inform a Habitats Regulations Assessment (HRA) associated with a proposed development of land at 4 Hugh Street, St Mary's, Isles of Scilly (hereafter referred to as the 'site'). This report has been prepared in line with the Conservation of Habitats and Species Regulations 2017 (as amended) ('Habitats Regulations') to support a planning application for the re-development of the site.

Middlemarch was commissioned to prepare this report to provide a robust evidence base to support the competent authority (Isles of Scilly Council) in undertaking both Stage 1 (Screening) and Stage 2 (Appropriate Assessment) of their HRA. The assessment is required due to the proximity of the site to the Isles of Scilly Special Protection Area (SPA) and Potential Special Protection Area (pSPA), Isles of Scilly Complex Special Area of Conservation (SAC) and the Isles of Scilly Ramsar.

## 1.2 Context for HRA

The need for projects with the potential to affect European designated sites to be assessed is stated in Article 6 of the European Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (hereafter 'the Habitats Directive'). Articles 6(3) and 6(4) of the Habitats Directive state that an 'Appropriate Assessment' is required for any plan or project that is considered likely to have a significant effect on a European site, either individually or in combination with other plans or projects. The land and marine aspects of the Habitats Directive, as well as certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known collectively as the Nature Directives) are transposed into English and Welsh law through the Conservation of Habitats and Species Regulations 2017 as amended ('the Habitats Regulations 2017').

Regulations 63, 64, 65 and 66 of the Habitats Regulations transpose the requirements of Articles 6(3) and 6(4) of the Habitats Directive into domestic law, as regards a competent authority deciding to undertake, or give any consent, permission, or other authorisation for, a plan or project. Additionally, regulations 75, 76, 77 and 78 of the Habitats Regulations incorporate the requirements of Articles 6(3) and 6(4) of the Habitats Directive, regarding the competent authority's granting of a planning permission by a general development order (permitted development). The requirements of Articles 6(3) and 6(4) of the Habitats Directive are further transposed into regulations 105 and 106 of the Habitats Regulations regarding the requirements of a competent authority (plan-making authority) to undertake an appropriate assessment of implications of any land use plan before the plan is given effect.

Changes have been made to parts of the Habitats Regulations so that they operate effectively from 1<sup>st</sup> January 2021 following the UK's departure from the European Union ('EU') and the end of the Brexit transition period. The changes are made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 ('Habitats Regulations 2019'), among other things which transferred functions from the European Commission to the appropriate authorities in England and Wales.

All other processes and provision in the Habitats Regulations remain unchanged and existing guidance is still relevant. The obligations of a competent authority in the Habitats Regulations for the protection of designated sites or species do not change. A competent authority is a public body, statutory undertaker, minister or department of government, or anyone holding public office.

The Habitats Regulations 2019 have created a National Site Network on land and at sea, including both the inshore and offshore marine areas in the UK to replace the EU's Natura 2000 network. The National Site Network includes:

- Existing Special Areas of Conservation (SACs), which are designated due to their importance to the habitats and species listed in Annexes I and II of the Habitats Directive;
- Existing Special Protection Areas (SPAs), which are designated due to their importance for wild birds in accordance with the Wild Birds Directive; and
- New SACs and SPAs designated under these Regulations.

SACs and SPAs in the UK no longer form part of the EU Natura 2000 ecological network. Any references to Natura 2000 in the Habitats Regulations and in guidance now refers to the new National Site Network. However, guidance provided by Freeths (2020a)<sup>1</sup> recommends that existing SACs and SPAs in the UK can continue to be referred to as 'European sites' and 'European marine sites'.

Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the National Site Network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats. All Ramsar sites remain protected by national policy in the same way as SACs and SPAs and are treated, for planning purposes, as European sites.

Under Regulation 63 of the Habitats Regulations, the Competent Authority may only agree to a proposed plan or project which is likely to have a significant effect on a European site after having undertaken an appropriate assessment to ascertain that it will not adversely affect the integrity of any European site either alone or in-combination with other plans and projects. Where likely significant effects on a European Site are anticipated and/or cannot be ruled out, at the appropriate assessment stage the plan or project may only be permitted by the competent authority by grant of derogation where the plan or project meets the following three tests, namely (a) that there are no alternative solutions; (b) that the proposed development needs to be carried out for imperative reasons of overriding public interest; and (c) the necessary compensatory measures are secured.

### 1.3 Site Description

Table 1.1 below provides a brief summary of the site and its surroundings.

**Table 1.1: Summary of Site and Surroundings (continues on page 6)**

Attribute	Description
Location	4 Hugh Street, St Mary's, Isles Of Scilly
National Grid Reference	SV 90233 10592
Site Area (ha)	0.1

<sup>1</sup> Freeths. (2020a). *The Habitats Regulations Assessment regime after 31 December 2020 – how will it look?* 22<sup>nd</sup> October 2020. Available at: <https://www.freeths.co.uk/2020/10/22/the-habitats-regulations-assessment-regime-after-31-december-2020-how-will-it-look/?cmpredirect>

Attribute	Description
Topography	Flat
Land Cover (on site)	The site is dominated by built environment, including an existing Co-operative supermarket, with offices, storage and accommodation above. A two-storey bank is present, separated from the supermarket by hard-standing. In addition, a three-storey maisonette is present to the rear of the supermarket. Overall, the site is largely devoid of vegetation, save for a small number of species growing through cracks in concrete.
Land Cover (site surrounds)	The site is bordered to the south, east and west by built environment. To the north, the site abuts Town Beach.

## 1.4 Development Description

A planning application will be submitted to the Isles of Scilly Council for the re-development of the existing Co-operative supermarket, adjacent storage units and disused bank facility. The proposed extension will be single storey. The re-development will not impact existing living accommodation or roof spaces above any of the operational areas.



## 2. Habitats Regulations Assessment Process

### 2.1 Stages of HRA

The current assessment is based on the best practice for HRA as outlined in The Habitats Regulations Handbook (DTA Publications, 2013<sup>2</sup> and subsequent updates). This document expands upon previous guidance published by the Impacts Assessment Unit at Oxford Brookes University (2001)<sup>3</sup> and the Department for Communities and Local Government (2006)<sup>4</sup>.

Guidance published by the Department for Environment, Food & Rural Affairs (DEFRA), Natural England, the Welsh Government and Natural Resources Wales (2021)<sup>5</sup> identifies that the HRA process is broadly divisible into three stages: Stage 1 (Screening), Stage 2 (Appropriate Assessment and Stage 3 (Derogation).

These stages are described in Table 2.1.

**Table 2.1: Stages of HRA (continues on page 7)**

Stage	Description
1 – Screening	Evidence is collected regarding those parts of the National Site Network (SACs and SPAs) that have the potential to be impacted by a project or plan, either alone or in combination with other projects or plans. Where no significant effects are perceived, sites may be screened out of the need for further assessment.
2 – Appropriate Assessment	<p>Where it is considered (or else cannot be discounted) that a European site may experience likely significant effects from a project or plan, directly or indirectly, either alone or in combination with other projects or plans, an Appropriate Assessment of the likelihood and severity of the perceived effect on the integrity of the European site and the National Site Network is undertaken. This is based on a detailed review of the proposed project or plan in conjunction with the structure, function and conservation objectives of the designated European site(s). This stage may also include a preliminary assessment regarding the potential for the identified impacts to be mitigated.</p> <p>The April 2018 decision by the Court of Justice of the European Union (CJEU) in the case of <i>People Over Wind and Sweetman v Coillte Teoranta</i> (C-323/17) ('People Over Wind') means that mitigation measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the HRA Screening stage when judging whether a proposed plan or project is likely to have a significant effect on the integrity of a European site. This is a reversal of a previously settled principle in English and Welsh law. As such, where a proposed development is proximate to a SAC or SPA and could give rise to likely significant effects, even if these effects can be effectively mitigated for, an Appropriate Assessment (Stage 2) is still required.</p>

<sup>2</sup> DTA Publications (2013 and subsequent updates). *The Habitat Regulations Assessment Handbook*. DTA Publications, Nottingham.

<sup>3</sup> Oxford Brookes University. (2001). 'Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the provisions of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC. European Commission DG Environment.'

<sup>4</sup> Department for Communities and Local Government (2006). *Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents*.

<sup>5</sup> Department for Environment, Food & Rural Affairs, Natural England, Welsh Government, and Natural Resources Wales (2021). *Guidance: Habitats regulations assessments: protecting a European site*. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site#follow-hra-principles>

Stage	Description
3 – Derogation	<p>Where adverse effects on the integrity of the European site and the National Site Network cannot be ruled out, the work can only proceed if three legal tests are passed and it is granted an exception, or 'derogation of the law'. These three legal tests are applied in the following order (DEFRA, Natural England, the Welsh Government and Natural Resources Wales, 2021)<sup>5</sup>:</p> <ol style="list-style-type: none"> <li>1. There are no feasible alternative solutions that would be less damaging or avoid damage to the site.</li> <li>2. The proposal needs to be carried out for imperative reasons of overriding public interest.</li> <li>3. The necessary compensatory measures can be secured.</li> </ol>

The need to complete each stage is determined by the results of the previous stage. This report focuses on Stages 1 and 2 of the HRA process.

## 2.2 The Precautionary Principle

Oxford Brooks (2001) Methodological Guidance on Articles 6(3) and 6(4) Habitats Directive states that “*Implicit in the habitats directive is the application of the **precautionary principle**, which requires that the conservation objectives of Natura 2000 should prevail where there is uncertainty*”. The European Commission’s Final Communication from the Commission on the Precautionary Principle (European Commission, 2000a<sup>6</sup>) states that the use of the precautionary principle presupposes:

- Identification of potentially negative effects resulting from a phenomenon, product or procedure; and
- A scientific evaluation of the risks which because of the insufficiency of the data, their inconclusive or imprecise nature, makes it impossible to determine with sufficient certainty the risk in question (CEC, 2000).

According to best practice guidance, this means that the emphasis for assessment should be on objectively demonstrating, with supporting evidence, that there will be no significant effects on a European site. The publication ‘Managing Natura 2000 Sites: The Provision of Article 6 of the ‘Habitats’ Directive 92/43/EEC’ (European Commission, 2000b<sup>7</sup>) provides explanatory guidance regarding this point, which is paraphrased below.

*It is clear from the context and from the purpose of the directive that the ‘integrity of the site’ relates to the site’s conservation objectives. For example, it is possible that a plan or project will adversely affect the integrity of a site only in a visual sense or only habitat types or species other than those listed in Annex I or Annex II. In such cases, the effects do not amount to an adverse effect for the purposes of Article 6(3), provided that the coherence of the network is not affected.*

*The expression ‘integrity of the site’ shows that focus is here on the specific site. Thus, it is not allowed to destroy a site or part of it on the basis that the conservation status of the*

<sup>6</sup> European Commission (2000a). *Final Communication from the Commission on the Precautionary Principle*.

<sup>7</sup> European Commission. (2000b). *Managing Natura 2000 Sites: The Provision of Article 6 of the ‘Habitats’ Directive 92/43/EEC*.

*habitat types and species it hosts will anyway remain favourable within the European territory of the Member State.*

*As regards the connotation or meaning of ‘integrity’, this can be considered as a quality or condition of being whole or complete. In a dynamic ecological context, it can also be considered as having the sense of resilience and ability to evolve in ways that are favourable to conservation. The ‘integrity of the site’ has been usefully defined as ‘the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or levels of populations of the species for which it was classified’ (IEEM, 2006).*

*The integrity of the site involves its ecological functions. The decision as to whether it is adversely affected should focus on and be limited to the site’s conservation objectives.*

Conservation objectives for the European sites considered in this assessment are presented in Chapter 3.

## 3. Stage 1: Relevant European Sites

### 3.1 Identification of European Sites

A search for European statutory sites within a 5km radius of the works area was completed, using Natural England's Multi-Agency Geographic Information for the Countryside (MAGIC) website. Given the nature of the proposed development, a radius of 5km was considered most appropriate.

An initial review of the proposals has been undertaken to determine whether the project has the potential to affect any European site. The assessment takes into account a range of factors including the location, proximity, type, scale, extent, duration, frequency, and timing of the proposals. The justification for scoping these European sites in or out for further consideration is provided in Table 3.1.

**Table 3.1: Summary of European Sites (continues on page 11)**

European site	Distance from Application Site	Justification for Scoping In/Out of Further Assessment
Isles of Scilly SPA and pSPA extension	Adjacent, north	<p>The SPA is designated for its seabird assemblage and breeding populations of storm petrel <i>Hydrobates pelagicus</i>, great black-backed gull <i>Larus marinus</i>, lesser black-backed gull <i>Larus fuscus</i> and shag <i>Phalacrocorax aristotelis</i>.</p> <p>No habitats within the site are suitable for the qualifying species of the SPA for shelter or breeding. This makes any direct impact to the qualifying species highly improbable. This impact pathway can therefore be scoped out from further consideration.</p> <p>The qualifying features of the SPA and pSPA are vulnerable to the impacts of water pollution. Given the proximity of the site to the SPA and pSPA, the potential for accidental pollution events during the construction phase of the development is scoped in for further consideration.</p>
Isles of Scilly Complex SAC	60m, north	<p>The SAC is designated for the presence of mudflats and sandflats, reefs, shore dock <i>Rumex rupestris</i> and grey seal <i>Halichoerus grypus</i>.</p> <p>No habitats within the site are suitable for, or could support, the qualifying species of the SAC, therefore this impact pathway can be scoped out from further consideration.</p> <p>The qualifying features of the SAC are vulnerable to the impacts of water pollution. Given the proximity of the site to the SAC, the potential for accidental pollution events during the construction phase of the development is scoped in for further consideration.</p>

European site	Distance from Application Site	Justification for Scoping In/Out of Further Assessment
Isles of Scilly Ramsar	2.3km, south-west	<p>The Ramsar is within the Isles of Scilly archipelago and mainly consists of many small uninhabited islands and parts of some inhabited islands, with habitats including coastal cliffs, boulder beaches, heathland, and some dune grassland. The site qualifies by virtue of Criterion 6, for during the breeding season some 2.9% of the population of Lesser Black-backed Gull <i>Larus fuscus</i> is supported. The sea cliffs, rocky islets, and boulder beaches are relatively devoid of plant communities except for a sparse crevice vegetation with <i>Crithmum maritimum</i> and <i>Armeria maritima</i>.</p> <p>No habitats within the site are suitable for the qualifying species of the Ramsar for foraging, shelter or breeding. This makes any direct impact to the qualifying species highly improbable. This impact pathway can therefore be scoped out from further consideration.</p> <p>Given the small and localised nature of the proposed development and the distance between the site and Ramsar, it is considered highly improbable that the proposed development will result in harm to the interest features of the Ramsar. Therefore, the Ramsar is scoped out from further consideration.</p>

The location of the proposed development site in relation to the Isles of Scilly SPA and pSPA, the Isles of Scilly Complex SAC and Isles of Scilly Ramsar is presented on plan C180243-01-01 in Appendix 1.

## 3.2 Isles of Scilly SPA and pSPA

The following information is taken from the Natural England's (no date)<sup>8</sup> Designated Sites website, the Natura 2000 Standard Data Form for the SPA<sup>9</sup>.

<b>Country:</b>	England
<b>Administrative Region:</b>	Cornwall and Isles of Scilly
<b>Latitude:</b>	49.55
<b>Longitude:</b>	-6.211
<b>Site Code:</b>	UK9020288
<b>Area (ha):</b>	13,332.68

### 3.2.1 Qualifying Features

The site qualifies under Article 4.1 of the Birds Directive (2009/147/EC) as it is used regularly by 1% or more of the Great Britain populations of the following species listed in Annex I in any season:

- European storm-petrel *Hydrobates pelagicus* (breeding) – 2,636 individuals (2015/2016) representing 5.07% of the GB population.

The site qualifies under Article 4.2 of the Directive (79/409/EEC) as it is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed in Annex I) in any season:

- Lesser black-backed gull *Larus fuscus graellsii* (breeding) – 4,922 individuals (2015/2016) representing 1.37% of the biogeographic population;
- European shag *Phalacrocorax aristotelis aristotelis* (breeding) – 2,028 individuals (2015/2016) representing 1.46% of the biogeographic population; and
- Great black-backed gull *Larus marinus* (breeding) – 1,882 individuals (2015/2016).

The site qualifies under SPA selection stage 1.3 as it is used regularly by over 20,000 seabirds in any season: In the breeding season, the site regularly supports at least 26,478 (1999) individual seabirds.

In February 2019 Natural England launched a formal consultation with owners, occupiers and interested parties on proposed amendments to the Isles of Scilly SPA. The proposed amendment recommended the extension of the SPA to extend protection for qualifying breeding seabirds while they are at sea. The pSPA will incorporate 12,900ha of inshore waters around the islands which the seabirds use for feeding and maintenance behaviours such as resting and preening.

The Minister approved the proposals, and the extended site was classified on 17<sup>th</sup> November 2020.

<sup>8</sup> Natural England (no date). *Designated Sites*. Available at: <https://designatedsites.naturalengland.org.uk>

<sup>9</sup> <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9020288.pdf>

### 3.2.2 Conservation Objectives

Conservation objectives for the Isles of Scilly SPA are detailed within the document ‘European Site Conservation Objectives for Isles of Scilly Special Protection Area)<sup>10</sup>. The conservation objectives for the SPA are as follows:

*With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the ‘Qualifying Features’...), and subject to natural change;*

*Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;*

- *The extent and distribution of the habitats of the qualifying features*
- *The structure and function of the habitats of the qualifying features*
- *The supporting processes on which the habitats of the qualifying features rely*
- *The population of each of the qualifying features, and*
- *The distribution of the qualifying features within the site.*

### 3.2.3 Issues Affecting the Qualifying Features

The Site Improvement Plan for the Isles of Scilly SPA and Isles of Scilly Complex SAC (Natural England, 2016)<sup>11</sup> highlights the following issues affecting the qualifying features:

- Invasive species;
- Fisheries: Commercial marine and estuarine;
- Habitat fragmentation;
- Public access/disturbance; and
- Water pollution.

## 3.3 Isles of Scilly Complex SAC

The following information is taken from Natural England’s (no date) Designated Sites website and the Natura 2000 Standard Data Form for the SAC (JNCC)<sup>12</sup>.

<b>Country:</b>	England
<b>Administrative Region:</b>	Cornwall and Isles of Scilly
<b>Latitude:</b>	49.91833333
<b>Longitude:</b>	-6.343055556
<b>Site Code:</b>	UK0013694
<b>Area (ha):</b>	26848.62

<sup>10</sup> <https://publications.naturalengland.org.uk/publication/5846031572926464>

<sup>11</sup> <https://publications.naturalengland.org.uk/publication/5804521016000512>

<sup>12</sup> <https://sac.jncc.gov.uk/site/UK0013694>



### 3.3.1 Qualifying Features

The following Annex I habitats are the primary reasons for selection of this site:

- 1110 - Sandbanks which are slightly covered by sea water all the time;
- 1140 - Mudflats and sandflats not covered by seawater at low tide; and
- 1170 – Reefs

The following Annex II species is a primary reason for the selection of this site:

- 1441 – Shore dock *Rumex rupestris*.

The following Annex II species is present as a qualifying feature, but is not a primary reason for site selection:

- 1364 – Grey seal *Halichoerus grypus*.

### 3.3.2 Conservation Objectives

Conservation objectives for the Isles of Scilly Complex SAC are detailed within the document 'European Site Conservation Objectives for Isles of Scilly Complex SAC (UK0013694) (Natural England, 2014)<sup>13</sup>.

The conservation objectives for the SAC are as follows:

*With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'...), and subject to natural change;*

*Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;*

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species*
- *The structure and function (including typical species) of qualifying natural habitats*
- *The structure and function of the habitats of qualifying species*
- *The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely*
- *The populations of qualifying species, and*
- *The distribution of qualifying species within the site.*

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<sup>13</sup> <https://publications.naturalengland.org.uk/publication/6399318084812800>

### 3.3.3 Factors affecting the Qualifying Features

The Site Improvement Plan for the Isles of Scilly Complex SAC and Isles of Scilly SPA (Natural England, 2016)<sup>14</sup> highlights the following issues affecting the qualifying features:

- Invasive species;
- Fisheries: Commercial marine and estuarine;
- Habitat fragmentation;
- Public access/disturbance; and
- Water pollution.

## 3.4 Isles of Scilly Ramsar

The following information is taken from the JNCC Information Sheet on Ramsar Wetlands for the Isles of Scilly Ramsar<sup>15</sup>.

<b>Country:</b>	England
<b>Administrative Region:</b>	Cornwall and Isles of Scilly
<b>Latitude:</b>	49 57 46
<b>Longitude:</b>	N 06 20 42
<b>Site Code:</b>	UK11033
<b>Area (ha):</b>	402

### 3.4.1 Qualifying Features

The site qualifies under Ramsar criterion 6, supporting species/populations at level of international importance.

Qualifying species/populations (as identified at designation)

Species regularly supported during the breeding season:

- European storm-petrel *Hydrobates pelagicus* - 71 apparently occupied sites, representing an average of 0.2% of the GB population (Seabird 2000 Census); and
- Lesser black-backed gull *Larus fuscus graellsii* – 3603 apparently occupied nests, representing an average of 2.4% of the breeding population (Seabird 2000 Census).

Species/populations identified subsequent to designation for possible future consideration under criterion 6

Species regularly supported during the breeding season:

- European shag *Phalacrocorax aristotelis* – 1091 apparently occupied nests, representing an average of 1.3% of the breeding population (Seabird 2000 Census).

<sup>14</sup> <https://publications.naturalengland.org.uk/publication/5804521016000512>

<sup>15</sup> <https://jncc.gov.uk/jncc-assets/RIS/UK11033.pdf>

### 3.4.2 Factors affecting the Qualifying Features

The Information Sheet on Ramsar Wetlands for the Isles of Scilly Ramsar does not report any specific factors adversely affecting the Ramsar.

## 4. Stage 1: Screening

### 4.1 Identification of Potential Impacts and Effects Alone and In-combination

Following a review of the proposed development and consideration of the wider issues which are recognised as affecting the Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC, the following potential impact pathway has been identified:

- Accidental water pollution during the construction phase.

The impact pathway above, by which the development could result in likely significant effects on the Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC, is discussed further in Section 4.2.

### 4.2 Construction Phase - Accidental water pollution

The Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC are noted to be vulnerable to the impacts of water pollution. Poor water quality can have a range of environmental impacts on the qualifying features of a European Site. At high levels, toxic chemicals and metals can result in immediate death of aquatic life and have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour. Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly occur due to eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further.

During the construction phase of the proposed development there is the potential for pollution events (e.g. via chemical spills, contaminated surface water run-off, and the improper storage of environmentally harmful materials), to occur which, in the absence of mitigation measures, could result in pollutants entering Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC.

In the absence of mitigation, the likelihood of harm to the qualifying features of the SAC cannot be ruled out, which could undermine the conservation objectives of the SPA and SAC and harm their overall integrity. As detailed within Section 2.1 of this report, mitigation measures intended to avoid the harmful effects of a project on the SPA, pSPA and SAC cannot be taken into account at this stage.

**It is therefore considered that this potential impact pathway cannot be screened-out by the Competent Authority at Stage 1 of their HRA, therefore an Appropriate Assessment must be undertaken.**

### 4.3 In-Combination Assessment

#### 4.3.1 Other Projects and Plans Considered In-Combination

In accordance with the legal requirement in the Habitats Regulations and best practice methodology, the potential for a project or plan to impact upon a European site must be considered '*either alone, or in combination with other projects or plans*'. As such, it is necessary to consider

the potential for the proposed development to impact upon the Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC, both alone and in combination with other plans and projects.

The scope of an in-combination assessment is restricted to plans and projects which are 'live' at the same time as the assessment being undertaken (Natural England, 2018)<sup>16</sup>. These types of plans include:

- The incomplete or non-implemented parts of plans or projects that have already commenced;
- Plans or projects given consent or given effect but not yet started;
- Plans or projects currently subject to an application for consent or proposed to be given effect;
- Projects that are the subject of an outstanding appeal;
- Ongoing plans or projects that are the subject of regular review and renewal;
- Any draft plans being prepared by any public body; and
- Any proposed plans or projects that are reasonably foreseeable and/or published for consultation prior to application.

Additionally, the guidance from Natural England makes it clear that plans or projects deemed to cause significant impact within their own right (and so have either incorporated methods of avoidance or proportional mitigation within the proposed plan or scheme) should be dealt with in isolation within their own individual Habitats Regulations Assessment and not be considered in combination with other schemes where impacts (individually) were considered insignificant. Likewise, where a plan or project is considered to result in an insignificant impact in isolation it should not be considered in combination with plans or projects already determined to be significant.

The evidence available demonstrates that the proposed development has the potential, in isolation, to result in a likely significant effect upon the qualifying features of the Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC as a result of accidental water pollution during the construction phase. As such, this impact pathway is not required to be considered in-combination with other plans or projects which are, by themselves, considered insignificant.

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<sup>16</sup> Natural England. (2018). *Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations*. Version 1.4. Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824>

## 4.4 Summary of Screening Assessment

Table 4.1 provides a summary of the potential impacts and effects arising from the project, either alone or in-combination with other projects and plans.

**Table 4.1: Screening Summary**

Site	Potential Impacts and Effects – Project Alone	Significance of Effects – Project Alone	Potential Impacts and Risk from In-Combination Effects	Appropriate Assessment Required?
<b>Construction Phase</b>				
Isles of Scilly SPA and pSPA	Accidental water pollution	Determined to result in a significant effect alone	Not appropriate to consider in combination as it has been determined beyond reasonable doubt to likely result in a significant effect alone.	Yes (mitigation measures need to be considered at the 'Appropriate Assessment' stage).
Isles of Scilly Complex SAC	Accidental water pollution	Determined to result in a significant effect alone	Not appropriate to consider in combination as it has been determined beyond reasonable doubt to likely result in a significant effect alone.	Yes (mitigation measures need to be considered at the 'Appropriate Assessment' stage).

## 5. Stage 2: Appropriate Assessment

The Stage 1 Screening exercise identified that the proposed development has the potential to, in the absence of mitigation, result in likely significant effects upon the interest features of the Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC as a result of water pollution.

### 5.1 Water Pollution - Construction Phase

As detailed in Section 4.2, the proposed works have the potential to result in harm to the qualifying features of the Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC as a result of accidental pollution events during the construction phase. Certain substances that may be used during the construction phase can be highly toxic to aquatic life and habitats and some (oils and other petrochemicals) can be readily transported on the surface of even small amounts of water, potentially being transported a significant distance within the SPA, pSPA and SAC.

Despite the temporal span of the construction phase being short and the likely scale of any accidental pollution event being both small and localised, it is still possible that, if even moderate amounts of these substances were to enter the local environment, they could significantly reduce the water quality and result in alterations to plant communities, impeding the delivery of the conservation objectives for the qualifying features of the SPA, pSPA and SAC. This could in turn lead to a reduction in the suitability of the watercourse to support the qualifying species, all of which rely on clean water for breeding and/or foraging. Animal mortalities due to ingestion of toxic substances and/or a reduction in breeding success due to a decline in water quality would likely lead to a reduction in the population size and distribution of qualifying species within the site, impeding the delivery of the conservation objectives for the European sites.

Therefore, mitigation measures must be put in place to address these potential significant impacts by:

- Reducing the likelihood of toxic substances being accidentally spilt or incorrectly stored and subsequently entering the waterbody;
- Reducing the likelihood of these substances (if accidentally released into the environment) from being transported to the European sites; and
- If an accidental pollution event were to occur ensuring that it is contained, and the contaminants are removed following best practice methodology.

These mitigation measures and best practice methods of working are outlined in Chapter 6. If adhered to, these mitigation measures are considered sufficient to reduce the scope of harm to no likely impact.



## 6. Stage 2: Mitigation Measures and Residual Effects

This section of the report presents the mitigation to be delivered to ensure that any adverse effects on the integrity of European sites which could occur as a result of the proposed development can be controlled to an acceptable level to allow the works to proceed.

It has been identified that the proposed development, in the absence of mitigation, could potentially impact on the integrity of the Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC as a result of water pollution during the construction phase of the development.

Mitigation measures to address potential effects on qualifying habitats and species as a result of pollution during construction are provided in the following section. These mitigation measures are considered sufficient for the Isles of Scilly Council to conclude that, if enacted, there is no reasonable likelihood that the proposed development will result in significant harm to the qualifying habitats or species of the Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC or impede the delivery of the conservation objectives for these European sites.

### 6.1 Outline Mitigation Proposals

#### 6.1.1 Construction Ecological Management Plan (CEMP)

Best practice measures will be implemented throughout the works avoid pollution of qualifying/supporting habitats during the construction phase of the proposed development. These measures should be incorporated into the Construction Ecological Management Plan (CEMP), which should be prepared with ecological input. This document should be agreed with Natural England and the Isles of Scilly Council prior to any works commencing.

As a minimum, the following measures will be implemented to reduce the risk of harm to qualifying features, including:

- Environment Agency's Pollution Prevention Guidelines will be adhered to by all site personnel, including:
  - PPG1: Basic good environmental practices.
  - PPG5: Works in, near or over watercourses.
  - PPG6: Construction and demolition sites.
- CIRIA C532 'Control of water pollution from construction sites. Guidance for consultants and contractors' will be adhered to by all site personnel;
- Measures to limit dust deposition will accord to the Institute of Air Quality Management (IAQM) guidance;
- Biosecurity measures and action plan with regards to Invasive Non-native Species (INNS), will be implemented to avoid the spread and/or the contamination of the site;
- All chemical/fuel storage areas and site offices are to be 20m from any waterbody;
- Storage of fuel, oils and any chemicals are to be in double-skinned containers, locked, clearly labelled as to contents, in a secure compound, stood in an impervious bund that is 110% of the volume of the tank and that all static plant should have a drip tray underneath;

- Re-fuelling should be carried out only at designated points with an absorb spill kit adjacent, at least 20m from any waterbody;
- Plant, equipment and wheel washing to be carried out in a designated area of hardstanding at least 20m from any waterbody, with no way of draining into waterbodies;
- Site personnel to ensure boots and equipment are dry and disinfected prior to entering the waterbody or areas in proximity to any waterbody;
- Spill kits are to be placed in strategic areas and be clearly visible. Operatives working close to the waterbodies are to be trained to use the spill kits;
- All substances to have full COSHH assessment. Operatives using these substances will be experienced in their use and fully briefed on the COSHH assessment;
- No piles of debris or sharp materials stored within 20m of any waterbody;
- Use of debris netting to catch debris blown during the works, with any tears, holes or damage noticed repaired immediately;
- A toolbox talk will be delivered by a Suitably Qualified Ecologist to all contractors prior to commencement of construction works to detail the required mitigation measures;
- Vehicles, equipment and materials to be stored in designated areas, agreed by the Ecologist and/or site manager;
- The Ecologist will be employed on watching brief/on call for the duration of work to ensure that the agreed mitigation and avoidance measures are carried out;
- Any open pipework with an outside diameter of greater than 150mm to be covered at the end of each work day to prevent animals entering/becoming trapped;
- Any open excavations will have ramps/battered edges to allow any animals to escape; and
- No works to result in the illumination of any waterbody during the night. If night working is required, then lighting to be directional to prevent illumination of the waterbody.

The CEMP will be agreed with the Isles of Scilly Council prior to works commencing. Should any issues be identified during the course of works, all works will cease temporarily, and the Isles of Scilly Council will be contacted for advice on how to proceed.

## 6.2 Residual Effects

Mitigation to address potential effects on qualifying habitats and species, as a result of accidental water pollution during the construction phase, on the Isles of Scilly SPA and pSPA and the Isles of Scilly Complex SAC is detailed above. The mitigation is considered sufficient for the Isles of Scilly Council to conclude that, if enacted, there is no reasonable likelihood that the proposed development will result in significant harm to the qualifying habitats or species of any European sites, nor impede the delivery of the conservation objectives for any European site.

## 7. Conclusions and Recommendations

### 7.1 Conclusions

Evidence has been collected and an assessment has been undertaken to assist the Competent Authority (Isles of Scilly Council) in conducting its Habitats Regulations Assessment as per the requirement placed upon it by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). The evidence provided is deemed sufficiently robust (being determined by use of the best scientific evidence available) to allow the authority to determine if it can be certain that there will be no adverse effect on the integrity of any European sites as a result of the proposed development.

Potential impacts on several different European sites have been detailed and considered. It has been displayed that, with appropriate mitigation, the proposed development will not result in a likely significant impact upon qualifying habitats and species, supporting habitats upon which qualifying species rely, or the delivery of the conservation objectives of the European sites under consideration.

Recommendations regarding the necessary actions to deliver mitigation proportional to the determined scope of impact are provided below in addition to appropriate mechanisms by which the mitigation can be secured by the competent authority.

### 7.2 Recommendations

#### **R1 Submission of the Construction Environmental Management Plan (CEMP)**

Prior to the commencement of works a Construction Environment Management Plan (CEMP) should be created for the proposed scheme and submitted to the Local Planning Authority. The avoidance and mitigation measures within the CEMP will adhere to appropriate national guidelines and best practice principles.

The submission of the CEMP to the Local Planning Authority prior to commencement and its enactment thereafter could be secured via an appropriately worded planning condition.

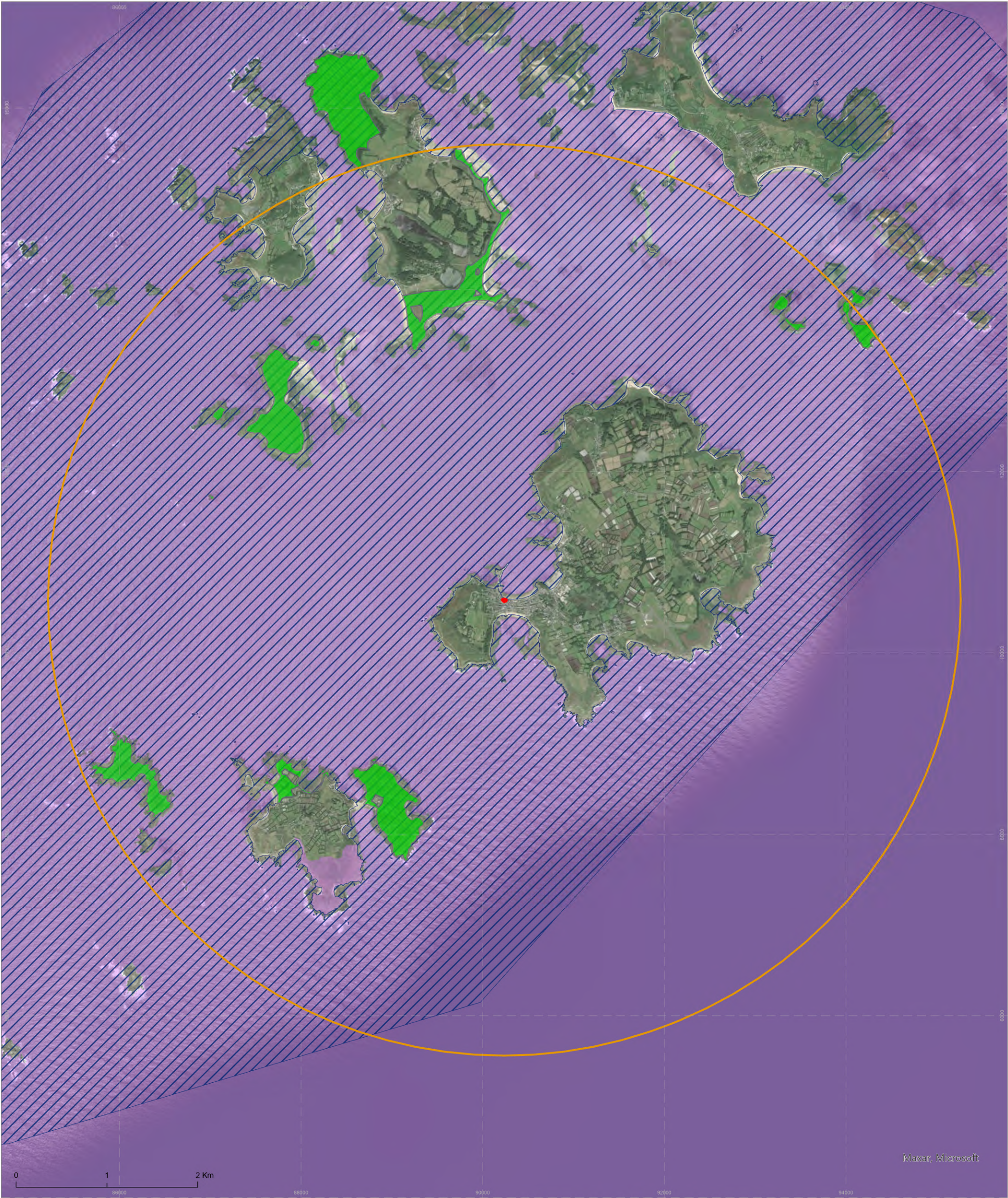
#### **R2 Re-Assessment if Material Change**

All future material revisions to the development proposals should be subject to an updated assessment to determine whether they could give rise to a likely significant effect on any European site, either alone or in-combination with other plans and projects.

## 8. Drawings

**Middlemarch Drawing C180243-01-01 – Location of European Sites**





Legend

Ramsar

SPA (Special Protection Areas)

SAC (Speacial Areas of Conservation)

Site boundary

5 Km radius from Site boundary

Project

4 Hugh Street, St Mary's, Isles of Scilly

Drawing

Location of European Sites Map

Client

Henry Riley

Drawing Number

C180243-01-01

Revision

00

Scale @ A3

1:40,000

Date

June 2024

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C180243-01-01



# Heritage Statement.

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

On behalf of The Co-Operative Estates.

Date: 01/05/2025 | Pegasus Ref: P20-1954

**APPROVED**

*By Lisa Walton at 2:49 pm, Jul 30, 2025*

**RECEIVED**

*By Tom.Anderton at 9:25 am, May 29, 2025*





## Document Management.

Version	Date	Author	Checked / Approved by:	Reason for revision
1	May 2025	JK / CH	HA / GS	-



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# 1. Introduction

- 1.1. Pegasus Group have been commissioned by The Co-Operative Estates to prepare a Heritage Statement to consider the proposed works at the Co-Operative Food Store, Hugh Street, St Mary's, Isles of Scilly, as shown on the Site Location Plan provided at Plate 1.
- 1.2. The Site comprises the existing Co-Operative Food Store (No. 4 Hugh Street), the adjacent former Barclays Bank and ancillary areas / buildings located to the rear (north) of both buildings. The built form within the Site is not statutorily designated, nor has it previously been identified by the Local Authority as a 'non-designated' heritage asset. The Site is located within the Isles of Scilly Conservation Area and there are a number of further designated heritage assets within the wider surrounds of the Site.
- 1.3. Planning Permission is sought for the reconfiguration (demolition and new construction) of built form within the rear of the Site, and the changes to the Hugh Street shopfront. The proposals are associated with the expansion of the sales floorspace and back of house areas of the Co-Operative Food Store, with the remainder of the required works (i.e., internal reconfiguration) not requiring Planning Permission.



Plate 1: Site Location Plan

- 1.4. This Assessment provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 207 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

***"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".<sup>1</sup>***

<sup>1</sup> Ministry of Housing, Communities & Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, December 2024), para. 207.

1.5. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment, following paragraphs 212 to 215 of the *NPPF*, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.

1.6. As required by paragraph 207 of the *NPPF*, the detail and assessment in this Report is considered to be "*proportionate to the assets' importance*".<sup>2</sup>

#### **Pre-Application Engagement**

1.7. A Pre-Application enquiry for the extension of the existing Co-Operative Food Store was submitted to the Isles of Scilly Council on 2<sup>nd</sup> May 2024, with a formal response received on 18<sup>th</sup> June 2024.

1.8. The response outlined that the Local Authority supported the reconfiguration and internal works to the buildings, recognising the important of the Co-Operative Food Store as the only supermarket on St Mary's. In this context it was recognised that the proposals would align with Policy SS4 which supports new, and protects existing, retail provision in Hugh Town.

1.9. With specific regard to heritage matters, the formal response did not identify the buildings within the Site as non-designated heritage assets; however, it confirmed that any future application would need to be accompanied by a 'Heritage Impact Assessment' which considered the Conservation Area and Listed Buildings within the surrounds of the Site. An 'Archaeological Assessment' was also requested.

1.10. This Report fulfils the requirement for an assessment of the historic environment, as identified within the Pre-Application response.

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<sup>2</sup> MHCLG, *NPPF*, para. 207.

## 2. Site Description and Planning History

### Site Description

- 2.1. The Site is located within the defined town centre of Hugh Town on the Island of St Mary's. St Mary's is the Isles of Scilly's largest island and Hugh Town represents the central hub of the island.
- 2.2. The 'Site' for the purposes of this assessment comprises the existing Co-Operative Food Store (No. 4 Hugh Street) and the adjacent former Barclays Bank, alongside a 3no. mixed commercial and residential use building, single storey ancillary store and modern infill to the rear, as shown at Plate 2.



Plate 2: Approximate plan of the Site identifying the different buildings and structures.

Table 1: Breakdown of the composition of the built form of the Site.

Building / Area	Summary Description	Presumed Date
A	Existing Co-Op Food Store.  The food store is restricted to the ground floor, with residential uses above.	19 <sup>th</sup> -century – based upon architectural detailing and archival sources.
B	Former Barclays Bank	Main building – 1930s.  Extension – mid-late 20 <sup>th</sup> century.
C	Three storey structure in mixed commercial and residential use.	Mid to late 20 <sup>th</sup> -century
D	Single storey store.	20 <sup>th</sup> -century. Evidence of an earlier 18 <sup>th</sup> - or 19 <sup>th</sup> -century sea wall is retained to the interior of the building.
E	Single storey 'infill' to the rear of the existing Co-Op Food Store utilised as 'back of house' areas.	Mid to late 20 <sup>th</sup> -century.

2.3. The following provides a proportionate overview of the built form within the Site, with further discussion on any intrinsic architectural and historic interest of the buildings, and any contribution which they make to the Conservation Area they lie within, provided in **Section 7**. It is highlighted that as the built form within the Site is not statutorily designated that there are no heritage related planning restrictions on works to their interior, with this reflected in the level and content of the assessment provided within this Report.

2.4. The historic development of the Site and its surrounds is explored further in **Sections 6** and **7**.

#### **Existing Co-Operative Food Store Building – Building A**

2.5. Based upon the physical fabric of the building, archival sources and data provided by the HER, it is considered that the existing Co-Operative Food Store building dates to the early-mid 19<sup>th</sup> century.

2.6. The building is two and a half storeys in height, with living accommodation within the roof space in part facilitated by 20<sup>th</sup>-century alterations, see further below.

2.7. The principal elevation is to the south, facing Hugh Street, and finished with white painted render. The ground floor has modern shop frontage, four large windows and a smaller one, with 'Co-Op' signage and two doorways. The second floor has five windows, with the two towards the northwestern end of the building positioned slightly higher than the other three. There is a roof extension with two windows and a flat roof on the southeastern end of the building above the second storey.

2.8. The Co-Operative Food Store occupies the ground floor of the premises, with the first floor and 'roof space' in separate residential use. The latter do not form part of the application.

2.9. The interior of the building has been subject to notable alteration in association with the establishment and operation of the current mixed uses. No features or elements of layout of interest were identified during the site visit.



*Plate 3: The principal elevations of the Co-Operative Food Store (green) and former Barclays Bank (yellow) as seen from Hugh Street.*



### Former Barclays Bank – Building B

- 2.10. The former bank is a two-storey brick and stone building with render and a pitched tile roof, constructed in the 1930s. The principal elevation, at ground floor, comprises a central doorway, with windows on either side. The doorway is flanked by white doric style pilasters, and the windows are set into concave arches. The first floor of the elevation includes a central window above the doorway and two smaller dormer windows either side. The former banking hall on the ground floor is currently unoccupied, with a residential units located on the first floor. The latter does not form part of the application.
- 2.11. As demonstrated by Plate 4 and 5, the rear of the building was subject to notable extension and change in the mid-late 20<sup>th</sup> century, with this change having eroded the intended design and form of the building.
- 2.12. The Isles of Scilly HER states that the building is “a nicely determined scale for its immediate context and incorporates design references to older buildings nearby” (MCO64379). This does not, however, take into account the rear extensions discussed above.
- 2.13. The interior of the building was not subject to inspection; however, it is reiterated that there are no heritage planning controls associated with the interior of the building.



Plate 4: 1938 Aerial photograph of 4 Hugh Street, with the Site highlighted in red (Historic England, EPWO59850).



Plate 5: Modern extension on the rear of the former bank, view from the Thoroughfare west towards the Site.

### Mixed Use Building– Building C

- 2.14. Situated along the northern boundary of the Site is a three-storey building, the ground floor of which is occupied by the Co-Operative Food Store as a 'back of house' area. The upper two floors are in separate residential use. The principal elevation faces northwards towards Town Beach and St Mary's Harbour. The ground floor of the north and west elevations are blank, with the first and second floors of these elevations incorporating evenly spaced window associated with the residential units in this part of the building.



*Plate 6: View of the northern edge of the Site from Town Beach, facing southwest. Building C is situated to the right of the pale blue ancillary warehouse.*



*Plate 7: View northwest within the rear ancillary yard. The gable of Building C is visible in the centre of the frame, with Building D to the right in the foreground..*

- 2.15. It was not possible to view the north and east elevations of Building C during the site visit; however, these areas will not be subject to change.

### Single Storey Ancillary Store – Building D

- 2.16. Building D is a single-storey ancillary structure (21m by 9m), oriented northwest-southeast, painted light blue and white (Plates 6–8). The structure is understood to be of a 20<sup>th</sup>-century date based upon its fabric and archival sources.



- 2.17. The beach-facing element of Building D extends beyond the building line of Building C to the northeast and built form along the shorefront to the southwest, indicating post-medieval/modern expansion of built form onto the foreshore. Additionally, the alignment of the south elevation extends further to the south than Building C, (Plate 8 and **Error! Reference source not found.**). This is further indicated by the previous interpretation of part of an internal wall as representing a section of the 18<sup>th</sup>- or 19<sup>th</sup>-century sea wall.



Plate 8: Building D as seen from within the rear ancillary yard.

## Mid to late 20<sup>th</sup> Century Infill – Area E

- 2.18. As demonstrated at Plate 2 and the site photographs above, the area between the historic rear elevation of Building A and the three-storey building in the northern part of the Site (Building C) comprise single storey 'infill' development. Such development has been established in an ad hoc manner during the 20<sup>th</sup> century and is currently utilised as part of the Co-Operative Food Store.



Plate 9: View southeast towards the Site (red) from The Quay.

## Planning History

### Existing Co-Operative Food Store

2.19. The planning history for the existing Co-Operative Food Store predominantly relates to alterations to the shop front, changes to accommodate the commercial functionality of the building and residential adaptations in the upper storeys. Applications of relevance to the consideration of the works which are the subject of this application are as follows:

- P/16/018 – Reconfiguration of existing doors – Granted 26<sup>th</sup> April 2016. The current existing doors are the result of this application.
- P/15/054 – Reconfiguration of plant unit and installation of new warehouse doors and roller shutter – Granted 17<sup>th</sup> September 2015 and implemented.
- P.4193 – Enlargement of ground floor retail area, transfer warehouse to first floor and alterations to shop frontage – Granted 18<sup>th</sup> March 1997.

- P.0644 – Erection of new shop front to shop – Granted 4<sup>th</sup> November 1966.
- P.0619 – Alterations and extensions to retail grocery shop and erection of new maisonettes – Granted 10<sup>th</sup> October 1966.

### Ancillary Area in the Northern Part of the Site

- P.5376 – Demolition of structure and rebuild warehouse and 4 no. flats over two storeys – Not Determined.

2.20. The 'warehouse' referred to above is Building D.

2.21. It is understood that this application was considered in the early 21<sup>st</sup> century. Liaison with the Local Authority has confirmed that the application was approved at committee, subject to a s.106; however this was not signed.

### 3. Proposed Development

- 3.1. Planning Permission is sought for the reconfiguration (demolition and new construction) of built form to the rear of the Hugh Street fronting properties, and the changes to the Hugh Street shopfront. The proposals are associated with the expansion of the sales floorspace and back of house areas of the Co-Operative Food Store, with the remainder of the required works (i.e., internal reconfiguration) not requiring Planning Permission.
- 3.2. As the buildings which comprise the Site are not Listed there are no heritage related planning controls regarding the internal works, nor is any detail known on the character and form of existing internal spaces. Thus, potential impacts arising from internal change are not considered as part of this assessment. This extends to the consideration of the section of the presumed 18<sup>th</sup>- or 19<sup>th</sup>-century sea wall within Building D. It is also understood that Planning Permission is not required for the proposed internal changes, and thus this does not form part of the 'description of development'
- 3.3. This Report considers works that have the potential to impact upon the understanding and experience of the existing Co-Operative Food Store building and former Barclays Banks, and in turn the contribution which they make to the Conservation Area, and aspects of the proposals that have the potential to alter how the Site is experienced from the wider surrounds. Accordingly, the assessment will focus upon changes to the Hugh Street elevations and the beach frontage only.
- 3.4. Changes proposed to the 'interior' of the Site, such as the 'infilling' of Area E, which are not readily experienced from beyond the Site boundary are not considered to result in a change that would alter the contribution which the Site as a whole makes to the Conservation Area. Thus, for proportionality, such works will not be considered in detail.
- 3.5. No changes are proposed to the principal elevation of the former Barclays bank buildings or the 'external' facing elevations of Building C.
- 3.6. On the basis of the above, the proposed physical works to the Site, identified for detailed assessment within this Report, are summarised as follows:
  - New proposed single DDA compliant entrance with bi-parting entrance doors to the Co-Operative Food store from Hugh Street. These works can be characterised as a change to the existing modern shop frontage.
  - A change to the enclosure of an existing opening on Hugh Street, situated between the built form of the Co-Operative Food store and the former Barclays Bank.
  - The demolition of Building D and construction of a new single storey ancillary extension.
  - The installation of roof mounted plant and railings on the new flat roof.

3.7. The proposals are detailed on the following plans which form the application package and which this assessment considers:

- Proposed Ground Floor Plan (extract from DWG No. A110-BOW-AO-ZZ-DR-A-0010 P3).
- A110-BOW-AO-ZZ-DR-A-0012 P3 - Proposed Elevations.
- A110-BOW-AO-ZZ-DR-A-0013 P3 - Proposed Elevations with Demolition.
- A110-BOW-AO-ZZ-DR-A-0017-P2- Existing and Proposed Block Plan



Plate 10: Existing ground floor plan.



Plate 11: Proposed Ground Floor Plan (extract from DWG No. A110-BOW-AO-ZZ-DR-A-0010 P3).



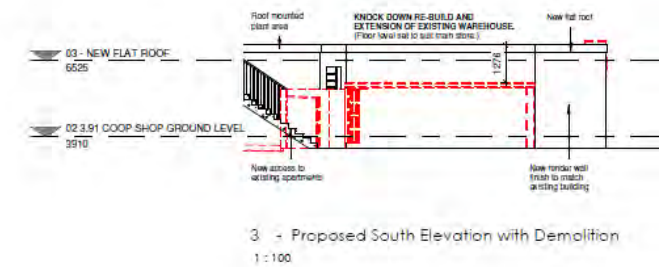
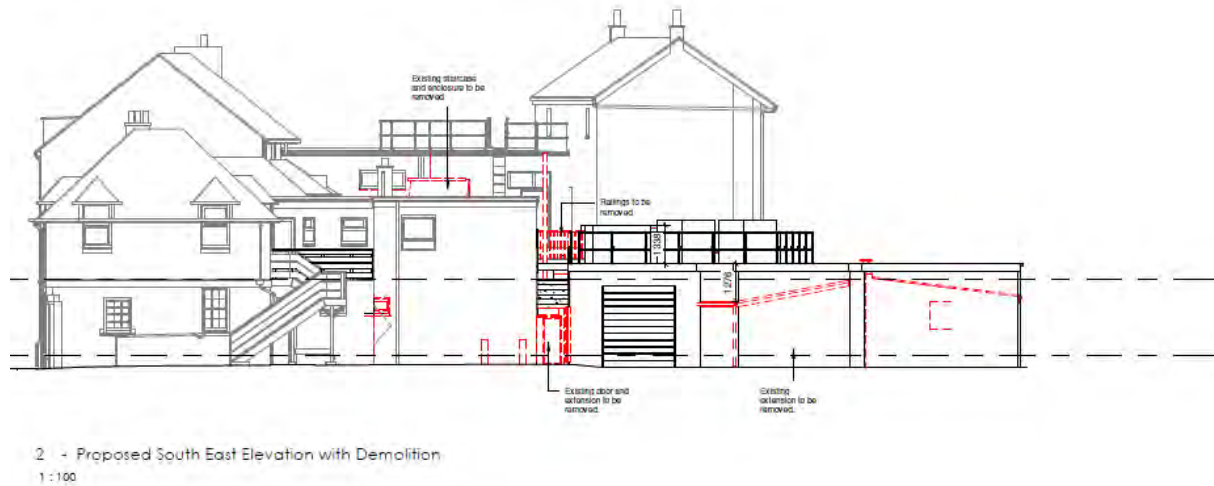
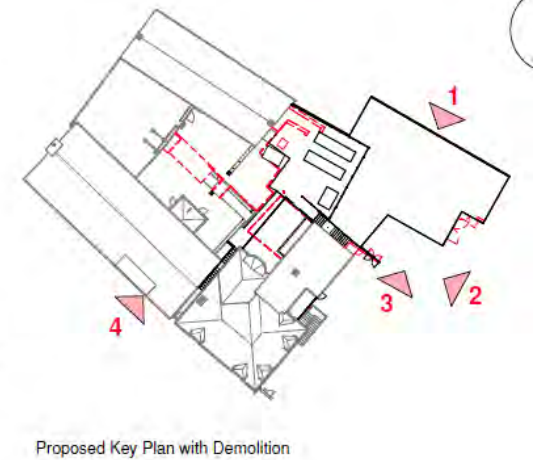
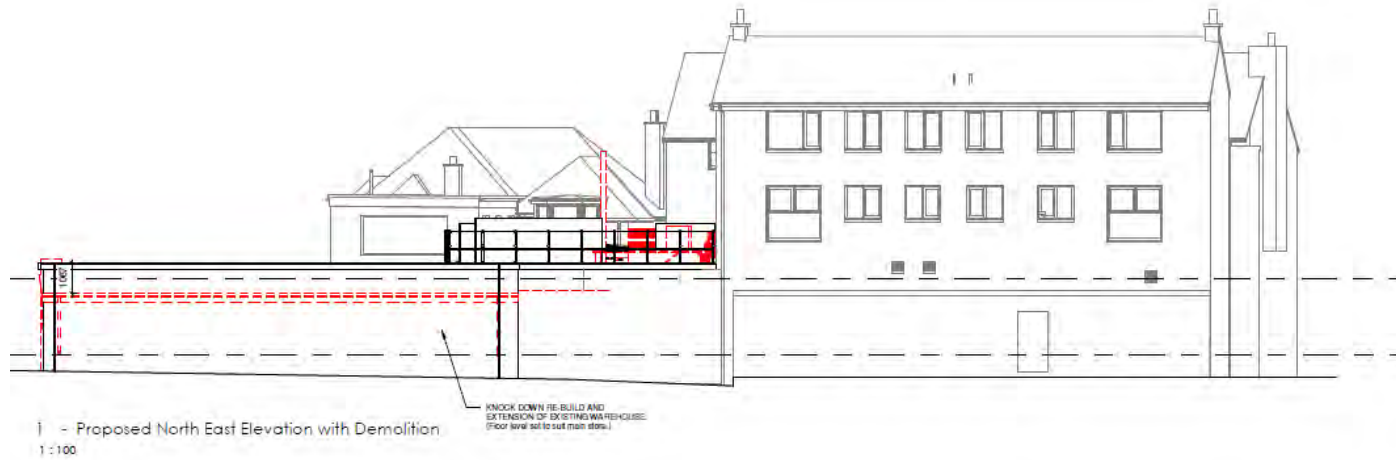


Plate 12: Extract from DWG No. A110-BOW-AO-ZZ-DR-A-0014 Rev. P3 – Proposed Elevations with Demolition – detailing demolition within the central and northern parts of the Site.

## 4. Methodology

4.1. The aims of this Report are to assess the significance of the heritage resource within the Site/study area, to assess any contribution that the Site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.

4.2. This assessment considers archaeology and built heritage.

### Sources

4.3. The following key sources have been consulted as part of this assessment:

- The Cornwall Historic Environment Record (HER) for information on the recorded heritage resource within the vicinity of the site;
- The National Heritage List for England for information on designated heritage assets;
- Historic England's National Marine Dataset;
- The UK Hydrographic Office (UKHO) records of known wrecks;
- The Receiver of Wreck records;
- The 'South West Peninsula' area of 'Historic Seascape Characterisation' project

- Historic maps available online;
- Aerial photographs available online via Historic England's Aerial Photo Explorer and Britain from Above;
- Historic England's Aerial Archaeology Mapping Explorer;
- Maps and other historic documents held by the Cornwall Archives; and,
- Other online resources, including Ordnance Survey Open Source data; geological data available from the British Geological Survey and Cranfield University's Soilscales Viewer; Google Earth satellite imagery; and LiDAR data from the Environment Agency.

4.4. For digital datasets, information was sourced for a minimum 2km study area measured from the boundaries of the site for designated heritage assets, and a 1km study area for non-designated heritage assets. It should be noted that these parameters cover much of St Mary's Island and thus information gathered is discussed within the text where it is of relevance to the potential heritage resource of the site. A gazetteer of recorded sites and findspots is included as Appendix 1 and maps illustrating the resource and study area are included as **Appendix 2**.

4.5. Historic cartographic sources and aerial photographs were reviewed for the site, and beyond this where professional judgement deemed necessary.

- 4.6. Designated heritage assets in the wider area were assessed as deemed appropriate (see **Section 7**).

#### Site Visit

- 4.7. A site visit was undertaken by a Heritage Consultant from Pegasus Group on 9<sup>th</sup> January 2025, during which the site and its surrounds were assessed.

#### Photographs

- 4.8. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the site or development proposals nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption.

#### Assessment Methodology

- 4.9. Full details of the assessment methodology used in the preparation of this Report are provided within **Appendix 3**. However, for clarity, this methodology has been informed by the following:

- ClfA's *Standard and Guidance for Historic Environment Desk-Based Assessment*;<sup>3</sup>
- *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (hereafter GPA:2);<sup>4</sup>
- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) – The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter GPA:3);<sup>5</sup>
- *Historic England Advice Note 1 (Second Edition) – Conservation Area Appraisal, Designation and Management* (hereafter HEAN:1).<sup>6</sup>
- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter HEAN:12);<sup>7</sup> and

<sup>3</sup> Chartered Institute for Archaeologists (ClfA), *Standard and Guidance for Historic Environment Desk-Based Assessment* (revised edition, October 2020).

<sup>4</sup> Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (GPA:2) (2<sup>nd</sup> edition, Swindon, July 2015).

<sup>5</sup> Historic England, *Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets* (GPA:3) (2<sup>nd</sup> edition, Swindon, December 2017).

<sup>6</sup> Historic England, *Historic England Advice Note 1 – Conservation Area Appraisal, Designation and Management* (HEAN:1) (2<sup>nd</sup> edition, Swindon, February 2019).

<sup>7</sup> Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (HEAN:12) (Swindon, October 2019).

- *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment.*<sup>8</sup>

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<sup>8</sup> English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

## 5. Policy Framework

### Legislation

- 5.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.<sup>9</sup>
- 5.2. Scheduled Monuments are protected by the provisions of the *Ancient Monuments and Archaeological Areas Act 1979* which relates to nationally important archaeological sites.<sup>10</sup> Whilst works to Scheduled Monuments are subject to a high level of protection, it is important to note that there is no duty within the 1979 Act to have regard to the desirability of preservation of the setting of a Scheduled Monument.
- 5.3. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.<sup>11</sup>
- 5.4. Full details of the relevant legislation are provided in **Appendix 4**.

### National Planning Policy Guidance

- 5.5. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework (NPPF)*, an updated version of which was published in December 2024. The NPPF is also supplemented by the national *Planning Policy Guidance (PPG)* which comprises a full and consolidated review of planning practice guidance documents to be read alongside the NPPF and which contains a section related to the Historic Environment.<sup>12</sup> The *PPG* also contains the *National Design Guide*.<sup>13</sup>
- 5.6. Full details of the relevant national policy guidance is provided within **Appendix 5**.

### The Development Plan

- 5.7. Applications for Planning Permission are currently considered against the policy and guidance set out within the Isles of Scilly Local Plan (2015–2030), adopted by the Council on 25th March 2021.
- 5.8. Details of the policy specific relevant to the application proposals are provided within **Appendix 6**.

<sup>9</sup> UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

<sup>10</sup> UK Public General Acts, *Ancient Monuments and Archaeological Areas Act 1979*.

<sup>11</sup> UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

<sup>12</sup> Ministry of Housing, Communities & Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 14<sup>th</sup> February 2024), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

<sup>13</sup> Ministry of Housing, Communities & Local Government (MHCLG), *National Design Guide* (London, January 2021).

## 6. Archaeology

- 6.1. This Section provides a review of the recorded heritage resource within the Site and its vicinity in order to identify any extant heritage assets within the Site and to assess the potential for below-ground archaeological remains.
- 6.2. Designated heritage assets are referenced using their seven-digit NHLE number, HER 'event' numbers have the prefix ECO and HER 'monument' numbers have the prefix MCO.
- 6.3. A gazetteer of relevant heritage data is included as **Appendix 1**. Designated heritage assets and HER records are illustrated on Figures 2–4 in **Appendix 2**. A set out in Section 4, the study area for which data was acquired and considered covers much of St Mary's Island and thus information gathered is discussed within the text where it is of relevance to the potential heritage resource of the Site.

### Previous Archaeological Works

- 6.4. Building C was subject to a 'building recording' in 2003.<sup>14</sup> It is understood that the recording was undertaken in association with LPA Ref. P.5376 (see **Section 2**). The findings of the recording are discussed below and in **Section 6** where relevant.

- 6.5. There are a further 91 recorded events within the study area, varying from large scale non-intrusive assessments to small watching briefs and archaeological excavations.
- 6.6. The results of these works are discussed below, where relevant to the potential archaeological resource of the site.

### Topography and Geology

- 6.7. The Site sits at a low point between two outcrops to the east and west, between 2m and 5m above Ordnance Datum (aOD).
- 6.8. The geology is mapped as Isles of Scilly Intrusion – Granite igneous bedrock formed between 358.9 and 252.2 million years ago during the Carboniferous and Permian periods, with superficial deposits of blown sand formed between 2.588 million years ago and the present during the Quaternary period.<sup>15</sup> The soil is recorded as Soilscape 13: freely draining acid loamy soils over rock.<sup>16</sup>

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<sup>14</sup> Cornwall Archaeology Unit. 2003. *Store Building, Thoroughfare, Hugh Town, Isles of Scilly: Historic Building Assessment*. Unpublished Client Report.

<sup>15</sup> British Geological Survey, *Geology of Britain Viewer*, <https://www.bgs.ac.uk/map-viewers/geology-of-britain-viewer/>.

<sup>16</sup> Cranfield University, *Soilscales*, <http://www.landis.org.uk/soilscales/>.



## Archaeological Baseline

### Early Prehistoric (pre c. 8000 – 700 BC)

- 6.9. There are no known Palaeolithic, Mesolithic, Neolithic or Bronze Age finds or features recorded within the Site itself. There are 40 HER records associated with these periods within the surrounding study area, with these summarised below
- 6.10. Several Neolithic or Bronze Age finds and features are recorded in the study area. A 2.5m standing stone near Harry's Walls, c.750m north-west of the Site, is associated with prehistoric activity and forms part of a Scheduled Monument (NHLE 1013274, MCO30848). A Neolithic peat deposits were identified at Porth Mellon, 400m north-east (MCO31155, MCO31156). Neolithic flints, including thumb-nail scrapers, were found at Pernold in 1963, c.700m north-east of the Site (MCO31081), and potentially Neolithic or Bronze Age worked flints, were recorded at Porth Cressa, c.500m south (MCO31129). A polished stone adze or rubber was recovered from Newfort House, c.850m north-west (MCO68182).
- 6.11. Bronze Age burial evidence includes a Scheduled entrance grave on Buzza Hill, c.400m south-east of the Site (NHLE 1010174, MCO30225), and a barrow located 600m to the south-east (NHLE 1009284, MCO30721). Further entrance graves recorded on Buzza Hill are no longer extant (MCO30226, MCO30227, MCO30990). A kerbed cairn containing a probable robbed cist is present on Taylor's Island, c.450m north-west of the Site (NHLE 1015666, MCO44707).

- 6.12. Remains of Bronze Age settlements are visible in the cliffs at Porth Cressa, c.600m south-east, where multiple hut circles have been recorded (MCO31123, MCO31121, MCO31122), some with pottery or middens, and human remains were found in a cist (MCO53362). A possible cist nearby was photographed in 1984 (MCO31163).
- 6.13. Prehistoric 'landscape features' include: earthworks c.300m west of the Site interpreted as a Bronze Age field system, although partly overlaid by later Garrison features (MCO55582, MCO75178) and linear boundaries at Peninnis Head, c.950m south-east of the Site which are thought to reflect an extensive land-division system associated with nearby settlements and cairns (NHLE 1015669, MCO44759).

### Iron Age (c. 700 BC – AD 43) and Romano-British (AD 43 – 410)

- 6.14. There are no Iron Age or Romano-British finds or features recorded on the HER within the Site. There are 16 HER records within the study area that date from these periods.
- 6.15. An excavation in 1949–50 ahead of a new housing estate, uncovered part of an Iron Age to Romano-British cemetery and related features within Parson's Field, c.150m to the south-west of the Site. The site revealed ten cist burials, one non-cist burial and a cultivation terrace retained by a coursed stone wall. The cists, constructed from granite boulders and slabs, were mostly oval in shape, with two larger rectangular cists. Human remains were found in only one cist, although there were together with brooches and beads in six of the graves. The terrace wall possibly predated the cemetery and contained fragments of Romano-British and earlier

- pottery, as well as flint flakes (ECO868, MCO31027, MCO31028, MCO31029)
- 6.16. Ten years later a retaining wall, possible hut circles, a field system and a cist cemetery were discovered during an excavation, c.60m south east of Parson's Field (MCO31167, MCO31168, MCO31169, MCO31170). Recovered artefacts dated the features to the Late Iron Age or Romano-British period.
- 6.17. In 1994 a cist was exposed in the in the cliff face, 1.3m above Porth Cressa beach, c.500m to the south-east of the site and 18m from the Bronze Age hut circles described above. It was excavated in 1994, and the fragmented remains of a human skull were recovered. It is classified as Romano-British in the HER but there is no explanation as to the basis of this, in particular when noting the Bronze Age date given to the other nearby features. It is, however, noted that Romano-British sherds had been recovered from the cliff face in the 1950s (MCO30229).
- 6.18. A *fogou* (an Iron Age or Romano-British underground, dry-stone structure found on defended settlement sites in Cornwall) was identified in 2000 on Peninnis Head, c.800m to the south-east of the Site. As well as demonstrating continuity with the Bronze Age activity on Peninnis Head it is particularly interesting as it adds to the known range of such structural features in this location (MCO58697).
- 6.19. In 1993 a Romano-British rimsherd was found at Star Castle, c.250m west of the Site, during a watching brief. It is the only material of this date to have been found at the castle (MCO31505). Other unstratified finds have been collected in the study area.
- 6.20. It has been speculated that the "old fort" at Mount Holles, c.100m to the west of the Site, described by the Antiquarian William Borlase in 1756, may be the remains of a much earlier Romano-British shrine. Ashbee suggested that remnants like a Roman altar (now in Tresco Abbey gardens) and granite columns in Hugh Town may have been part of that shrine. A.C. Thomas linked granite columns and stones from The Parade, Rocky Hill, and Porth Cressa, but also suggested they could come from the early medieval Saint Maudut's Chapel (MCO30137, MCO30849, MCO31593).<sup>171819</sup>
- Early medieval (410 AD – 1066) and Medieval (1066 – 1539)
- 6.21. By the early medieval period, the Isles of Scilly had become a place of Christian monastic activity, most likely influenced by Celtic missionaries.
- 6.22. St. Mary's, as the largest of the islands, may have had small chapels or religious communities. Monks on the islands led secluded lives devoted to prayer and farming.

<sup>17</sup> Ashbee, P. 1974. *Ancient Scilly*. p139, 219,

<sup>18</sup> Thomas, AC. 1985. *Exploration of a Drowned Landscape*

<sup>19</sup> Borlase, W. 1756. *Observations on the Ancient and Present State of the Islands of Scilly*.

- 6.23. After 1066 the Isles of Scilly were brought under the control of the English crown and included in the Earldom of Cornwall.
- 6.24. The Domesday Survey of 1086, records Scilly as part of Cornwall, although there are no entries for any of the islands.
- 6.25. There are no medieval finds or features recorded on the HER within the Site.
- 6.26. There are 24 HER records within the study area that date from the medieval period, although some of these relate to the later 16<sup>th</sup>-century period.
- 6.27. The aforementioned excavation at Parson's Field, c.150m to the south-west of the Site, recorded an extensive midden comprised almost entirely of limpet shells alongside and stratigraphically above the remains of the Iron Age to Romano-British terrace wall. An unstratified mace head was used to date it to the early medieval (MCO31030).
- 6.28. Documentary evidence suggests that the remains of a fortification stood on Mount Hollis, 100m west of the site, until the 18<sup>th</sup> century. The small, rounded mount stands above Hugh Town, below the Garrison walls, 100m west of the site, and probably predated the walls (MCO30850)
- 6.29. The Old Church of St Mary (NHLE 1141210, MCO30988), c.1km south-east of the Site, in Old Town has medieval origins (c.1130 – 1140 AD), although it appears to have been derelict by the 1820s, and rebuilt in the 1830s.
- 6.30. The remains of a stone window survive in a modern garden wall near Star Cottage, c.200m west of the Site. It is not clear whether the window is reused or *in situ*. If the latter, this could suggest that the wall formed part of a medieval building (MCO31517).
- 6.31. Documentary evidence suggests the medieval chapel of St Maudut may have been located at Mount Hollis, c.100m to the west of the Site (MCO31483). A number of crosses, cross shafts, lintels and pillars that have been reused around Hugh Town may have originated at St Maudut (Newman's house, 350m north-west of the Site MCO30881, a house on Bank Hill, c.100m to the north-west MCO30143, in a field c.200m to the south-east MCO31120, by the east gateway of The Parade, c.150m to the east MCO31589) together with some of the material connected with the possible Romano-British shrine, discussed above.
- 6.32. Three finds of pottery across the study area relate to this period (MCO31157, MCO31001, MCO31588).
- 6.33. Three areas of cropmarks identified by aerial photography – two sections of trackway, 35m and 20m in length located c.700m–800m south-west of the Site, and an extensive field boundary c.750m to the south-east of the Site– are thought to be of medieval origin (MCO41951, MCO41952, MCO41959).
- Post-Medieval (1540 – 1750), Early Modern (1750 – 1901), Modern (1901 – present)
- 6.34. For reference, the Cornwall HER provides a date range of 1540-1900 for the 'Post-Medieval' period, and thus encompasses what this Report identifies as the Post-

Medieval and Early Modern periods (see date ranges in sub-heading).

- 6.35. There are two 'monument' records on the HER within the Site pertaining to this period – one relates to the existing Co-Operative Food Store (MCO64420) and the other the former Barclays Bank (MCO64379). The entries for the two buildings read as follows:

*Co-Operative Food Store*

***“Extant Post Medieval building, one of the few larger historic buildings in the area. Now occupied by the Co-Operative store. It has been made uncharacteristically prominent in the streetscape by its stark external decoration, prominent signage and lack of detailing.”***

*Former Barclays Banks*

***“ Extant C20 bank built for Barclays Bank in the 1930s. The building is of a nicely determined scale for its immediate context and incorporates design references to older buildings nearbyThe building is of a nicely determined scale for its immediate context, and incorporates design references to older buildings nearby”***

- 6.36. A discussed above, a Historic Building Recording of Building C was undertaken in 2003.<sup>20</sup> The potential significance of this structure is discussed further in **Section 7**; however, it is noted that the recording

identified evidence of part of a sea wall incorporated into the building, which is primarily of a 20<sup>th</sup>-century date.

- 6.37. The majority of the HER records relating the Post-Medieval, Early Modern and Modern periods, a total of 555, are predominantly located within 'The Garrison' (see below) and the settlement of Hugh Town, and relate to the gradual development of these areas during the post-medieval and modern periods.
- 6.38. The Garrison is a large, fortified promontory situated to the south-west of Hugh Town, c.150m to the west of the Site at its closest. The complex (much of which is Scheduled) comprises a network of defensive walls, bastions, batteries, and other structures that have evolved since the complex was established in the 16<sup>th</sup> century (MCO31563). The Garrison went out of use in 1863 and saw limited use during the 20<sup>th</sup> century. The complex is now a visitor attraction.

#### **Undated**

- 6.39. There are no undated finds or features recorded on the HER within the Site.
- 6.40. There are 7 undated records within the study area:
- The findspot of a socketed stone found on Newford Island, c.750m to the north-east of the Site, now in the Isles of Scilly museum (MCO30879)

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<sup>20</sup> Cornwall Archaeology Unit. 2003. *Store Building, Thoroughfare, Hugh Town, Isles of Scilly: Historic Building Assessment*. Unpublished Client Report.

- Two small stone structures and ditches visible on aerial photographs in fields behind Harry's Walls Battery, c.800m to the north-east of the site. They are included in the Scheduled Monument (NHLE 1013274, MCO41958, MCO41962).
- Earthwork identified on aerial photographs near Star Castle, c.200m to the west of the Site (MCO74280).
- A wall in the cliff face at Porth Cressa, c.600m to the south-east of the Site is undated (MCO31125). Other features in the cliff face date to the Bronze Age and Romano-British period.
- A smooth rounded stone in The Parade 120m to the east of the site could be a repurposed part of the temple or the medieval church (MCO31590).
- The findspot of a fish bone needle found in a rock pool at Porth Mellon, c.600m east north east of the Site (MCO31153).

#### Site Development / Map Regression

- 6.41. The earliest cartographic sources identified as part of this assessment to depict the Site in detail is the 1890 Ordnance Survey Map. Earlier sources – including Abraham Ortelius' Map of 1592, Blau's Map of 1662 and the Tithe Map of 1847 – detail the form of St Mary's as an island but provide little detail as to its 'development'.

- 6.42. The 1890 Ordnance Survey (OS) map shows the area of Hugh Town, including the Site, as an established urban area. The Site at this date appears to have included a number of structures fronting onto Hugh Street, including what is likely to be the origins of the existing Co-Operative Food store building (Plate 13). No changes are identified on the 1908 Ordnance Survey Map. As discussed above, the former Barclays Bank building is known to have been constructed in the 1930s, with the development of this building, and wider parts of the Site discussed in **Section 2**.

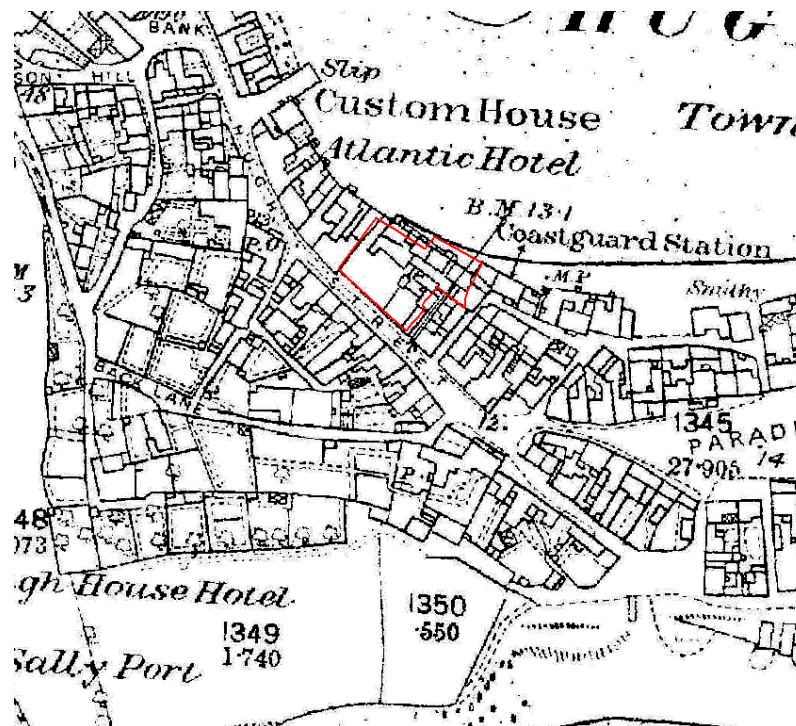


Plate 13 1890 Ordnance Survey Map



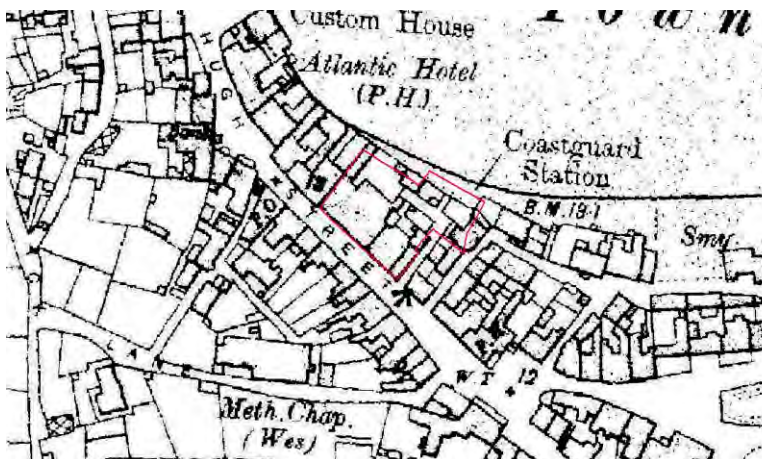


Plate 14 1908 Ordnance Survey Map

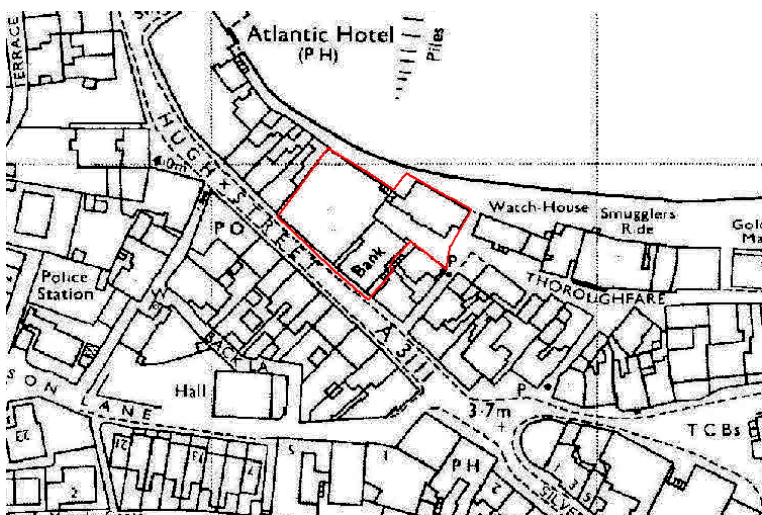


Plate 15 1980 Ordnance Survey Map

## Statement of Archaeological Potential and Significance

- 6.43. The developed nature of the Site from Post-Medieval period onwards would suggest that much of the earlier 'archaeological horizon' may have been removed or impacted. It is, however, noted the existing buildings do not contain cellars, and thus any potential impacts associated with the existing buildings would be associated with construction activities such as the establishment of foundations.
- 6.44. The Site itself does not contain any recorded archaeological finds or features dating to the prehistoric periods. While the broader area contains 40 records from these periods, many are unstratified flint finds. Features like standing stones and cairns, including the kerbed cairn on Taylor's Island and the standing stone near Harry's Walls Battery, are of interest but are not directly connected to the Site under consideration. These features represent general activity in the wider landscape rather than evidence of concentrated prehistoric occupation within the Site itself.
- 6.45. The Iron Age and Romano-British periods are represented by 16 records in the study area, though again, none relate directly to the Site. Nearby finds include cultivation terraces, field systems, and scattered settlement evidence such as pottery and fogous. Speculative features like the possible Romano-British shrine at Mount Holles are of note, but the lack of definitive archaeological remains in the immediate vicinity limits their relevance to the Site. These records primarily highlight activity across the broader landscape rather than providing specific insights into the Site.



- 6.46. During the early medieval period, the Isles of Scilly saw monastic and Christian influences, as evidenced by religious sites like the Old Church of St Mary and nearby chapels. Later medieval features, such as middens, crop marks, and structural remains, illustrate continued settlement and land use in the area, but again, there is no direct connection to the Site. The Medieval features in the surrounding area contribute to understanding the context but do not inform the archaeological potential of the Site.
  
- 6.47. The Post-Medieval and Modern periods saw the transformation of the area with the development of Hugh Town and The Garrison. Development within Site known to have occurred by at least the early 19<sup>th</sup> century, albeit an earlier date is likely. Historic maps and records indicate that urban development was concentrated around Hugh Town.
  
- 6.48. In summary, while the surrounding area holds archaeological significance across various periods, the Site itself does not contain any recorded archaeology, and the archaeological record suggests a low potential for buried remains from the medieval period or earlier.
  
- 6.49. There is the potential for the foundations of Post-Medieval buildings which pre-date the extant structures, to survive within the Site, with any such remains likely to be of low overall interest. It is, however, reiterated that the development of the Site from the Post-Medieval may have impacted on any surviving archaeology from earlier period, thus reducing their potential.

### Impact Assessment

- 6.50. Ground works associated with the proposed development are minimal, with works primarily associated with the reconfiguration of the existing built form.
  
- 6.51. The proposed new two storey warehouse and the enclosure to the service yard will occupy the same footprint as existing built form and would not impact on any 'undeveloped ground'. While new foundations may be deeper, the current foundations are likely to have removed the archaeological horizon. The plan to enclose part of the service yard does not include additional walls. There is already hardstanding in the yard which may have impacted the archaeological horizon, although it is noted that lifting and replacing this concrete base may reveal archaeological features, should they be present.
  
- 6.52. There is no current evidence to suggest that the archaeological potential of the Site should preclude development.

## 7. The Built Historic Environment

- 7.1. The following Section provides an assessment of elements of the built historic environment that have the potential to be sensitive to the proposed development.
- 7.2. Existing built form within the Site, as discussed further below, is not statutorily designated nor has it previously been identified by the Local Authority as non-designated heritage assets. For completeness, however, the individual elements of the Site will be discussed further below.
- 7.3. The Site is, however, located within the Isles of Scilly Conservation Area. Accordingly, the contribution which the Site, including built form within its bounds, makes to the Isles of Scilly Conservation Area is assessment below.
- 7.4. With regards to other built heritage assets within the surrounds of the site, Step 1 of the methodology recommended by the Historic England guidance *GPA:3* (see 'Methodology') is to identify which heritage assets might be affected by a proposed development.<sup>21</sup>
- 7.5. Development proposals may adversely impact heritage assets where they remove a feature that contributes to the significance of a heritage asset or where they interfere with an element of a heritage asset's setting that contributes to its significance, such as interrupting a key relationship or a designed view.
- 7.6. It is, however, widely accepted (Paragraph 220 of the NPPF) that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of the asset.
- 7.7. Significance can be derived from many elements, including the historic fabric of a building or elements of its surrounds.
- 7.8. Consideration, based upon professional judgement and on-site analysis, was therefore made as to whether any of the heritage assets present within the surrounding area may include the site as part of their setting, whether the site contributes to their overall heritage significance, and whether the assets may potentially be affected by the proposed scheme as a result.
- 7.9. This initial assessment, which takes into account the nature of the changes proposed, has concluded that no further designated built heritage assets would be sensitive to the proposed development. This includes Listed Buildings on Hugh Street, and the Listed Quay to the north-west. In particular, the changes would not alter the manner to which the Listed Buildings are experienced within the context of the existing street scene. Other heritage assets have therefore been excluded from further assessment within this Report.

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<sup>21</sup> Historic England, *GPA:3*, p. 4.

### Built Form Within the Site

- 7.10. The existing Co-Operative Food Store building (Building A on Plate 2) is considered to be of some architectural and historic interest as an example of a 19<sup>th</sup>-century building constructed as part of the development of Hugh Town during this period. The interest of the building is derived primarily from the form and massing of the building and the architectural treatment of the principal (Hugh Street) elevation. This building has not, however, been identified by the Local Authority as a non-designated heritage assets via the Pre-Application process.
- 7.11. The former Barclays Bank building (Building B on Plate 2) is also considered to be of some architectural and historic interest, with the building contributing to the understanding of the development and uses of Hugh Street during the 20<sup>th</sup> century. When taking into account the level of change that has occurred (see Section 2), any interest attributed to the building is now considered to derive primarily from the architectural detailing of the principal elevation. This building has not, however, been identified by the Local Authority as a non-designated heritage assets via the Pre-Application process.
- 7.12. The three-storey structure in the northern part of the Site (Building C) is of no architectural and historic interest.
- 7.13. The single storey ancillary structure to the east of Building C (Building D) is not considered to be of any intrinsic architectural or historic interest in its own right. Previous assessments of the building have interpreted

part of an internal wall as comprising a section of a 18<sup>th</sup> or 19<sup>th</sup> century sea wall. The wall may be deemed to be of some historic interest in regard to the understanding of the development of Hugh Street and the interaction with the beach beyond during the post-medieval period.

- 7.14. The mid-late 20<sup>th</sup> century infill situated between Building A and C is of no architectural and historic interest, and does not contribute to either the understanding of the 'host' building (the existing Co-Operative Food store building).

### Isles of Scilly Conservation Area

- 7.15. The Isles of Scilly Conservation Area was designated by the Local Authority in 1975. The designation "*recognised the integration of the buildings and landscapes in Scilly and how its inhabitants have shaped the land over a long period.*"<sup>22</sup> Since its designation in 1975 no comprehensive appraisal of the Isles of Scilly Conservation Area has been undertaken.
- 7.16. A Conservation Area Character Statement was drafted by the Local Authority for consultation in 2015. This draft currently serves as the primary document outlining the character of the Conservation Area. This document provides a detailed discussion on the relevant elements of the character and appearance of the Conservation Area which contribute to its heritage significance.

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<sup>22</sup> Council of the Isles of Scilly, 2024, 'Heritage, Conservation & Environment' (Available at: <https://www.scilly.gov.uk/planning/heritage-conservation-environment>)

7.17. The Appraisal provides the following introduction to the Conservation Area as a whole:

***“The Isles of Scilly are unusual in that the entire area under the jurisdiction of the Council of the Isles of Scilly is a single Conservation Area. The Conservation Area comprises an urban centre at Hugh Town within a rural and marine setting [...] The strength of the conservation area designation is in its recognition of the importance of context and setting for the islands.”<sup>23</sup>***

7.18. The Conservation Area comprises the whole of the Isles of Scilly and is subdivided into five character areas:

- Bryher;
- St Agnes;
- St Martin’s;
- St Mary’s; and
- Tresco

7.19. The Site is located in the St Mary’s Character Area, in Hugh Town, which is the largest settlement in the Isles of Scilly. The Character Statement provides the following discussion of Hugh Town:

***“The streets of Hugh Town, in common with many British towns and villages, have evolved in a largely piecemeal fashion. While this is an important part of the character of Hugh Town it also means that care and attention has not always been given to the visual aspect of prominent locations.”<sup>24</sup>***

7.20. Furthermore, the prominence of St Mary’s Harbour, of which the rear of No. 4 Hugh Street overlooks, is highlighted:

***“St Mary’s Harbour is an important entrance to St Mary’s and to Scilly [...] Development on Town Beach front has often been unsympathetic to the character of Hugh Town and the islands. Traditional buildings have been altered to cater for the tourist industry and new buildings have been erected without reference to the character of the area.”***

7.21. Hugh Street, as a whole, is described as follows:

***“Hugh Street has the greatest sense of enclosure, relieved by an informal ‘square’ to the east. The frontages are almost continuous with good 19th Century shop fronts and town houses.”<sup>25</sup>***

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<sup>23</sup> Isles of Scilly Conservation Character Statement Supplementary Planning Document, 2015, p.6.

<sup>24</sup> Ibid, p.46.

<sup>25</sup> Ibid, p. 42.

7.22. The architectural style of the principal elevations of the existing Co-Operative Food Store building (Building A) and former Barclays Bank (Building B) reflect the evolution of the street during the Post-Medieval period and early 20<sup>th</sup> century.

7.23. The Character Statement identifies key views and vistas within the Conservation Area. These views are defined as:

***“significant views and vistas that are considered important and worth protecting and enhancing through the positive management of the Conservation Area.”<sup>26</sup>***

7.24. The significant views relevant to this Assessment are views of the harbour and Town Beach from the water when arriving into St Mary’s Harbour by boat etc. These views encompass the rear the Site, characterised by the rear elevations of the existing Co-Operative Food Store and the former Barclays bank with Buildings C and D in the foreground (see Plate 9).

7.25. The Conservation Area Character Statement draws attention to the 2003 Cornwall and Scilly Urban Survey (‘CSUS’) of Hugh Town, stating that it ***“should be consulted as part of any new proposal.”<sup>27</sup>***

7.26. The 2003 CSUS provides a historic characterisation of Hugh Town for the purpose of regeneration, identifying Character Areas and themes for heritage-led regeneration.<sup>28</sup> The report subdivides Hugh Town into nine distinct Character Areas, with the Site identified located within Character Area 3 ‘Town Beach, Thoroughfare, and the Strand’, and Character Area 6 ‘The historic core – the Bank and Hugh Street.’

7.27. Town Beach, Thoroughfare and the Strand is defined within the historic characterisation report as:

***“An important visual ‘gateway’ to Hugh Town for arrivals by sea, this is the town’s historic working foreshore and related areas. Buildings and sites associated with maritime activity are set around a spectacular curving beach.”<sup>29</sup>***

7.28. For Town Beach, Thoroughfare and the Strand themes for heritage-led regeneration relevant to this Report are:

***“Enhance Town Beach ‘gateway’”***

***“Enhance the public realm”***

7.29. The Conservation Area Character Statement identifies unsympathetic development within the post-war period of the shoreline plots facing onto Town Beach Street (Plate 16). This portion of Character Area 3, between Mermaid Inn to Holgate’s Green, at the west end of Lower

<sup>26</sup> Bid, p. 12.

<sup>27</sup> Ibid, p.48.

<sup>28</sup> Kirkham, G., 2003, Historic characterisation for regeneration , Hugh Town,.

<sup>29</sup> Ibid, p.4

Strand Street, is identified as being subject to unsympathetic 20<sup>th</sup>-century development as:

***“Designs and materials make little reference to the local context or to the high visual sensitivity of the area as a gateway.”<sup>30</sup>***



Plate 16: Area targeted for action as part of the 1997 Conservation Area Partnership proposals, shown in yellow.<sup>31</sup> The location of the rear ancillary building is marked in red.

- 7.30. The historic core of Hugh Town is described within the report as follows:

***“The historic core of the settlement and still Hugh Town’s commercial focus. A narrow main street and several small irregular ‘squares’ are for the most part strongly enclosed by stone-fronted or plain rendered***

***buildings, creating a tight grained, strongly urban streetscape.”<sup>32</sup>***

- 7.31. The relevant theme for heritage-led regeneration for the historic core is:

***“Improvements to the external appearance of the Co-Operative building”***

- 7.32. The Conservation Area Character Statement reiterates the contribution of the existing Co-Operative Food Store building to Character Area 6:

***“Within this area buildings are predominantly two-storey and small in scale. One of the few larger historic buildings is that occupied by the Co-Operative, which is made uncharacteristically prominent in the streetscape by its stark external decoration, prominent signage and lack of detailing.”<sup>33</sup>***

### Statement of Significance

- 7.33. The significance of the Isles of Scilly Conservation Area, which covers the entirety of St Mary’s Island, is principally derived from the character and appearance of the Island as a whole.
- 7.34. Within Hugh Town, the significance of the Conservation Area derives from the character and appearance of the built form and spaces which it contains, and the understanding that this provides as the development of

<sup>30</sup>Ibid, p.46.

<sup>31</sup> Ibid, p.46.

<sup>32</sup> Kirkham, G., 2003, Historic characterisation for regeneration, Hugh Town, p.4.

<sup>33</sup> Isles of Scilly Conservation Character Statement Supplementary Planning Document, 2015, p.50.



the settlement from the 16<sup>th</sup> century onwards. Building and spaces are experienced and understood both from within the built environment of Hugh Town and on the approach to settlement by sea.

- 7.35. With specific reference to Hugh Street, as detailed above, the character of the street is defined by commercial buildings and townhouses of a post-medieval or early 20<sup>th</sup>-century date.
- 7.36. While there is currently no statutory protection for the 'settings' of Conservation Areas, it is evident that elements of the surrounds of the Conservation Area make some contribution to its significance, albeit less than the structures and spaces within its boundaries.
- 7.37. One has to be pragmatic when applying the concept of 'setting' to the Isles of Scilly Conservation Area considering the designation covers the entirety of the archipelago. The character areas (as identified above) provide a more accurate prism through which to consider 'setting' when discussing the Conservation Area. The important elements of the 'setting' of Character Areas 3 (Town Beach and Thoroughfare) and 6 (Historic Core) are the relationships between them and the rural hinterland and maritime environment surrounding Hugh Town.

#### Contribution Made by the Site

- 7.38. The built form of the existing Co-Operative Food Store (Building A) and the former Barclays Bank (Building B) are considered to make a minor contribution to the character and appearance of Hugh Street, and in turn the special interest of the Conservation Area in this location. The contribution made principally derives from the massing of the structures and the architectural composition of

their principal elevations. No particular contribution is considered to be associated with the rear elements of the building, or the experience of them on the approach to Hugh Town by boat.

- 7.39. Building C is of no architectural and historic interest in its own right, and does not contribute to the character and appearance of Hugh Street by virtue of being screened from this route by intervening built form. The building is, however, visible from the beach and forms part of the urban environment visible on the approach to Hugh Town by boat, and is understood an example of mid- to late-20<sup>th</sup> century development situated amongst other built form of a similar date and scale along the shorefront. As such, it makes a neutral contribution within the context of the current baseline to the character and appearance of the Conservation Area.
- 7.40. Building D equally is of no architectural and historic interest in its own right, and does not contribute to the character and appearance of Hugh Street by virtue of being screened from this route by intervening built form. When viewed from the beach, the structure is read as a dilapidated and unattractive element of the shorefront due to its poor condition. Within this context, views of the ancillary structure are negative, and the redevelopment of this part of the Site offers the opportunity to enhance the experience of the shorefront from Town Beach.
- 7.41. Whilst the presumed remains of the post-medieval sea wall within Building D contributes to the understanding of the historic development of the area it does not contribute to the character and appearance of the Conservation Area by virtue of being *inside* Building D.

- 7.42. The mid-late 20<sup>th</sup>-century infill situated between Building A and C does not contribute to the character and appearance of the Conservation Area.

### **Assessment of Impact**

- 7.43. As detailed above, the *Planning and Compulsory Purchase Act (2004)* requires that applications for Planning Permission, are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The policy guidance set out within the *NPPF* is considered to be a material consideration which attracts significant weight in the decision-making process.
- 7.44. Section 72(1) of the Act confirms that special attention should be paid to the desirability of preserving or enhancing the character or appearance of the asset, as well as the protection of the character and appearance of a Conservation Area.
- 7.45. In addition, the *NPPF* states that the impact of development proposals should be considered against the particular significance of heritage assets, such as Conservation Areas, and this needs to be the primary consideration when determining the acceptability of the proposals.

- 7.46. It is also important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "*substantial harm*" or "*less than substantial harm*" to the identified designated heritage assets, in the context of paragraphs 207 and 208 of the *NPPF*.<sup>34</sup>

- 7.47. The *PPG* clarifies that within each category of harm ("*less than substantial*" or "*substantial*"), the extent of the harm may vary and should be clearly articulated.<sup>35</sup>

- 7.48. The guidance set out within the *PPG* also clarifies that "*substantial harm*" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development, which is to be assessed.<sup>36</sup>

- 7.49. When considering potential impacts on the Isles of Scilly Conservation Area, it is important to remember to note that the Site forms only one small part of the asset which, as outlined above, covers the whole of the Isles of Scilly.

- 7.50. Paragraph 220 of the *NPPF* states that it is necessary to consider the relevant significance of the element of the Conservation Area which has the potential to be affected and its contribution to the significance of the designation as a whole, i.e., would the application proposals undermine the significance of the Conservation Area as a whole?<sup>37</sup>

<sup>34</sup> DLUHC, *NPPF*, paras. 207 and 208.

<sup>35</sup> DLUHC, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

<sup>36</sup> DLUHC, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

<sup>37</sup> MHCLG, *NPPF*, para. 220.

- 7.51. This approach, and its compliance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, is supported by Case Law, with a 2020 High Court Judgement confirming that:

***“Section 72 requires an overall assessment of the likely impact of a proposed development on the conservation area, and not just that part of it where the development site is located”.*<sup>38</sup> (our emphasis)**

- 7.52. Changes to the Hugh Street frontage are limited to alterations to the existing modern shopfront of the Co-Operative Food Store and changes to the detailing of an existing access opening (Plate 17, Plate 18). These very minor changes do not materially alter the overall architectural design or composition of the Hugh Street frontages and thus would not impact upon either the understanding of the built form within the Site nor the contribution which it makes to the character or appearance of the Conservation Area.



Plate 17: Existing Hugh Street elevation.



Plate 18: Proposed Hugh Street 'elevation'.

<sup>38</sup> Spitfire Bespoke Homes Ltd v Secretary of State for Housing Communities And Local Government [2020] EWHC 958 (Admin).

- 7.53. The demolition of Building D would not result in the loss of a building which, as a whole, positively contributes to the character and appearance of the Conservation Area. It is also noted that Planning Permission was granted for the demolition of Building D in the early 21<sup>st</sup> century under LPA Ref. P.5376.
- 7.54. The demolition of Building D would result in the loss of part of the presumed 18<sup>th</sup>- / 19<sup>th</sup>-century sea wall contained within the Building D; however, the sea wall does not contribute to the character and appearance of the Conservation Area as it is contained *within* the building. Furthermore, the sea wall has not been identified by the Local Authority as a non-designated, despite it being identified in relation to the recording of the building during the determination of LPA Ref P.5376. Should the LPA deem the wall to represent a non-designated heritage asset in the terms of the NPPF, its loss would require consideration under Paragraph 216 of the NPPF.
- 7.55. The proposed single storey rear extension would occupy the existing footprint of Building D and connect to the rear elevation of the former Barclays Bank (Building C). As demonstrated in **Section 2**, the rear of Building C has already been subject to notable change.
- 7.56. The proposed extension would be of a similar height to Building D, and the simple design approach would be to be reflective of the ancillary / industrial character of built form historically positioned along the shore front. The overall finish of the extension, in particular the south elevation, represents a betterment on the character and appearance of the existing structure when viewed from the beach and on the approach to Hugh Town by sea. This, in turn, has a positive impact on the character and appearance of the Conservation Area in this location.
- 7.57. Any harm that may be identified as arising from the demolition of the former sea wall in Building D would be outweighed by the public benefits of redeveloping an area of the shorefront, identified by the CSUS of Hugh Town and Conservation Area Character Statement, deemed to detract from the experience and appreciation of the historic nature of Hugh Town.
- 7.58. The general reconfiguration of the single storey rear extensions to the existing Co-Operative Food Store including the 'infilling' of Area E would not be readily experienced from beyond the Site boundary and thus would not result in a change that would alter the contribution which the Site as a whole makes to the surrounding Conservation Area. The limited change is demonstrated by the visualisation provided at Plate 21.
- 7.59. Required roof mounted plant equipment is proposed to be sited on the reconfigured single storey extension, enclosed by metal railings. (Plates 21-23). The roof mounted plant and railings would not break the skyline and would have a built backdrop. Views would be limited to oblique views from the eastern part of Town Beach, and views directly south from the centre of the beach. Restricted views would likely be obtainable from the Listed Quay. Where visible, the plant and railings would introduce an ancillary feature that is not currently present along the beach frontage. Whilst acknowledging this, when taking into account the extent of visibility, the impact upon the overall understanding and experience of existing Co-Operative Food Store as forming part of the 'important visual gateway' into Hugh Town via St Mary's Harbour (or in the context of the Conservation Area) is anticipated to be limited, at most, and would be at the very lower end of less than substantial. Any potential

impact could be mitigated via suitable screening, if deemed required.

- 7.60. The improvements to the shorefront facing elevation of Building D are considered to result in a beneficial impact on the overall presentation of the northern side of the Site, as viewed from the beach and St Mary's Harbour. In turn, this is considered to result in a beneficial impact on the character and appearance of the Conservation Area in this location, including the 'important visual gateway'. This beneficial impact is considered to outweigh any harm that may arise from the installation of the required roof mounted plant equipment and the loss of the presumed 18<sup>th</sup> / 19<sup>th</sup>-century sea wall, should the Local Authority consider this to represent a non-designated.



*Plate 19: Existing and proposed 3D views of the 'interior' of the Site.*

## 8. Conclusions

### Archaeology

- 8.1. The Site does not contain any recorded archaeological finds or features from prehistoric periods. The Iron Age and Romano-British periods are represented by 16 records in the study area, but none directly relate to the site. Early medieval and later medieval features in the surrounding area illustrate continued settlement and land use but do not inform the archaeological potential of the site. The post-medieval and modern periods saw significant development in Hugh Town, but no notable archaeological remains are within the site boundaries.
- 8.2. While the surrounding area holds archaeological significance across various periods, the Site itself does not contain any recorded archaeology, and the archaeological record suggests a low potential for buried remains from the medieval period or earlier.
- 8.3. There is the potential for the foundations of Post-Medieval buildings which pre-date the extant structures, to survive within the Site, with any such remains likely to be of low overall interest. It is, however, likely that the development of the Site from the Post-Medieval may have impacted on any surviving archaeology from earlier period, thus reducing their potential.
- 8.4. There is no current evidence to suggest that the archaeological potential of the Site should preclude development.

### Built Heritage

- 8.5. The Site comprises the existing Co-Op Food Store (No. 4 Hugh Street), the adjacent former Barclays Bank and ancillary areas / buildings located to the rear (north) of both buildings. The built form within the Site is not statutorily designated, nor have they previously been identified by the Local Authority as non-designated heritage assets.
- 8.6. The Site as a whole is located within the Isles of Scilly Conservation Area, with this having been identified as the only built heritage asset sensitive to the proposed developments.
- 8.7. The proposals are anticipated to result in a limited degree of harm, at most, to the overall character and appearance of the Conservation Area, with this derived from the change resulting from the installation of required roof mounted plant equipment. Any harm would be at the very lower end of less than substantial, and could be mitigated via suitable screening, if deemed required.
- 8.8. The improvements to the shorefront facing elevation of Building D are considered to result in a beneficial impact on the overall presentation of the northern side of the Site, as viewed from the beach and St Mary's Harbour. In turn, this is considered to result in a beneficial impact on the character and appearance of the Conservation Area in this location, including the 'important visual gateway'. This beneficial impact is considered to outweigh any harm that may arise from the installation of the required roof mounted plant equipment and the loss of the



presumed 18<sup>th</sup>- / 19<sup>th</sup>-century sea wall, should the Local Authority consider this to represent a non-designated.

- 8.9. Therefore, the proposals accord with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act, Section 16 of the NPPF and relevant Local Policy.

## Sources

Legislation
UK Public General Acts, Ancient Monuments and Archaeological Areas Act 1979.
UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
UK Public General Acts, Planning and Compulsory Purchase Act 2004.
UK Public General Acts, Town and Country Planning Act 1990.

Policy and Guidance
Chartered Institute for Archaeologists (CIfA), <i>Standard and Guidance for Historic Environment Desk-Based Assessment</i> (revised edition, October 2020).
Ministry of Housing, Communities & Local Government (MHCLG), <i>National Planning Policy Framework (NPPF)</i> (London, December 2024).
Ministry of Housing, Communities & Local Government (MHCLG), <i>Planning Practice Guidance (PPG)</i> (revised February 2024).
English Heritage, <i>Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment</i> (London, April 2008).
Historic England, <i>Conservation Area Appraisal, Designation and Management, Historic England Advice Note 1</i> (2 <sup>nd</sup> edition, Swindon, February 2019).

Historic England, <i>Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning</i> : 2 (2 <sup>nd</sup> edition, Swindon, July 2015).
Historic England, <i>Statements of Heritage Significance: Analysing Significance in Heritage Assets</i> , Historic England Advice Note 12 (Swindon, October 2019).
Historic England, <i>The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3</i> (2 <sup>nd</sup> edition, Swindon, December 2017).

Court and Appeal Decisions
Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137.
Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin).
Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697.
Jones v Mordue [2015] EWCA Civ 1243.
Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin).
Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.
R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

Aerial Photography References	
1938	EPW059850

Secondary Sources and Grey Literature	
Cornwall Archaeological Unit, 2003, 'Store building, Thoroughfare, Hugh Town, Isles of Scilly', Report No: 2003R061.	

# Appendix 1: Gazetteer

## Heritage Data

### HER Event Data

Ev UID	Name	Event Type
ECO3445	Cornwall Aerial Photograph Reconnaissance Project: Flight 92	Aerial Photograph Survey
ECO1031	Co-Op Store, Hugh Town, Scilly	Assessment
ECO1118	Isles of Scilly habitat and biotope	Ecological Survey
ECO1164	Gunners Well, The Garrison, St Marys: Watching Brief, 2005	Watching Brief
ECO1190	Porth Minick, St Marys, Isles of Scilly	Assessment
ECO1193	Isles of Scilly Environmental Management Plan	Environmental Impact Assessment; Management Recommendations
ECO1262	Little Arthur, Isles of Scilly: Excavation, 1951	Excavation
ECO1300	Isles of Scilly: Rapid Coastal Zone Assessment, 2003	Assessment
ECO1479	Geomorphology of the Isles of Scilly	Area Survey – Measured; Environmental Sampling
ECO1504	Lower Benham Battery, St Marys: Maintenance, 2005	Watching Brief

ECO1584	Old Town Bay, St Mary's IoS	Environmental Impact Assessment
ECO1591	Garrison, Isles of Scilly – SWEB	Watching Brief
ECO1762	Star Castle, St Mary's, Isles of Scilly	Archive Assessment; Building Record; Site Survey – Measured
ECO1833	Star Castle, St Marys: Watching Brief, 1993	Watching Brief
ECO1842	Isles of Scilly Management, 1989–1994: Environmental report	Presentation
ECO1842	Isles of Scilly Management, 1989–1994: Environmental report	Presentation
ECO1842	Isles of Scilly Management, 1989–1994: Environmental report	Presentation
ECO2042	Isles of Scilly Historic Landscape Assessment and Management Strategy	Assessment; Historic Landscape Characterisation; Management Recommendations
ECO2168	The Garrison, St Marys: Evaluation, 2007	Evaluation; Minor Excavation
ECO2168	The Garrison, St Marys: Evaluation, 2007	Evaluation; Minor Excavation
ECO2182	Carn Thomas Children's Centre, St Marys: Watching Brief, 2008	Watching Brief
ECO2437	Isles of Scilly Management 1989–1994: Finds report	Artefact Analysis
ECO2437	Isles of Scilly Management 1989–1994: Finds report	Artefact Analysis



ECO2442	Woolpack & Steval Batteries, IoS	Building Record; Management Recommendations
ECO2559	Branksea House , St Mary's, IoS	Watching Brief
ECO2645	Garrison, St Mary's IoS	Management Recommendations; Presentation
ECO3010	Five Islands School, St Marys: Geophysical Survey, 2010	Geophysical Survey
ECO3107	Steval Battery, The Garrison: Watching Brief, 2010	Watching Brief
ECO3116	Isles of Scilly field boundaries feasibility study, desk study	Assessment; Management Recommendations
ECO3127	Isles of Scilly Booklet	Presentation
ECO3128	Garrison Walls, Isles of Scilly, conservation plan	Management Recommendations
ECO3129	Bay View Terrace, St Mary's, Isles of Scilly	Watching Brief
ECO3152	Five Islands School, St Mary's, Isles of Scilly	Building Survey; Evaluation
ECO3225	Mount Flagon House, St Marys: Watching Brief, 2010–2011	Watching Brief
ECO3235	Harry's Walls, Scilly	Watching Brief
ECO3316	Porthcressa, St Mary's, Scilly, historic environment audit	Assessment

ECO3357	Porthcressa Play Area, St Marys: Watching Brief, 2011	Watching Brief
ECO3363	The Garrison, St Marys: Survey, 2006–2011	Site Survey
ECO3503	Harry's Walls, St Mary's, Isles of Scilly – Archaeological Recording	Watching Brief
ECO3682	The Lyonesse Project	Environmental Sampling; Geophysical Survey
ECO3690	Standing Stone, Mount Flagon, St Mary's, Isles of Scilly	Assessment; Management Recommendations
ECO3784	Isles of Scilly Historic Environment Research Framework	Assessment
ECO3818	Harry's Walls, St Mary's, Isles of Scilly: Watching Brief	Watching Brief
ECO3819	Isles of Scilly Military Defences, 1540–1951	Area Survey – Measured; Assessment; Walkover Survey; Management Recommendations
ECO3853	Porthcressa Regeneration Project, St Marys: Building Recording, 2013	Building Record; Watching Brief
ECO3853	Porthcressa Regeneration Project, St Marys: Building Recording, 2013	Building Record; Watching Brief
ECO3853	Porthcressa Regeneration Project, St Marys: Building Recording, 2013	Building Record; Watching Brief
ECO3853	Porthcressa Regeneration Project, St Marys: Building Recording, 2013	Building Record; Watching Brief
ECO3932	Peninnis Farm, St Marys: Watching Brief, 2012–2013	Watching Brief

ECO3944	Harry's Walls, St Mary's, Isles of Scilly: Desk-Based Assessment, 1962	Assessment
ECO3997	Buzza Tower Historic Building Survey, St Mary's, Isles of Scilly	Building Survey
ECO4087	Buzza Hill Water Pipe	Watching Brief
ECO4104	Lyonesse Project	Evaluation; Environmental Sampling
ECO4141	Isles of Scilly Superfast Broadband Project	Watching Brief
ECO4195	Isles of Scilly: Optically Stimulated Luminescence Dating of Coastal and Intertidal Sediments: Scientific Dating Report	Environmental Sampling
ECO4318	Palaeoecological analyses from Porthloo beach, St Mary's, Isles of Scilly	Environmental Sampling
ECO4426	Well Cross Yard, Hugh Town: Building Recording and Watching Brief, 2015	Building Record; Watching Brief
ECO4552	St Mary's Harbour Works, St Marys: Watching Brief, 2016	Building Record; Watching Brief
ECO4666	Bartholomew Ledges, St Mary's Sound, Isles of Scilly	Management Recommendations
ECO4716	Powder House, The Garrison, St Marys: Watching Brief, 2017	Watching Brief
ECO4734	Porthloo Boat Park Improvement Scheme, St Marys: Watching Brief, 2013–2014	Watching Brief
ECO4734	Porthloo Boat Park Improvement Scheme, St Marys: Watching Brief, 2013–2014	Watching Brief
ECO535	Isles of Scilly Management, March 1990	Assessment

ECO535	Isles of Scilly Management, March 1990	Assessment
ECO537	Isles of Scilly Management, 1991-1992	Environmental Sampling; Management Works; Site Survey – Measured
ECO537	Isles of Scilly Management, 1991-1992	Environmental Sampling; Management Works; Site Survey – Measured
ECO538	Isles of Scilly Management, 1993-1994	Environmental Sampling; Management Recommendations; Management Works
ECO867	Hugh Town, St Marys: Desk-Based Assessment, 2003	Management Recommendations
ECO868	Parson's Field, Hugh Town: Excavation, 1949-50	Excavation
ECO869	Poynter's Garden, St Marys: Excavation, 1960	Excavation
ECO957	Isles of Scilly Management	Field Observation; Management Recommendations
ECO978	Scilly Coastal Defences	Environmental Impact Assessment
ECO4952	New House at Sunholme, Porthloo, St Marys: Watching Brief, 2017	Watching Brief
ECO5116	Historic Report: Porthcressa	Assessment
ECO5141	Historic Building Report: Former Lifeboat Station/Bulb Treating Station	Building Record
ECO5210	New House at Peninnis Farm, St Marys: Watching Brief, 2018	Watching Brief

ECO5211	'Colossus', 2 Pilots Retreat, St Marys: Desk-Based Assessment, 2018	Assessment
ECO5248	Isles of Scilly Historic Environment Research Framework	
ECO5328	Geoarchaeological Regional Review of Marine Deposits along the Coastline of Southern England	
ECO5451	Isles of Scilly	
ECO5908	Buzza Garage, Porthcressa	Watching Brief
ECO5909	Vine Cottage, No 6 Higher Strand	Building Record
ECO6265	NHPP 3AI: Unknown Marine Assets and Landscapes, The social context of submerged prehistoric landscapes	Management Recommendations; Assessment; Presentation
ECO6383	Five Islands School, St Marys: Environmental Impact Assessment, 2009	Environmental Impact Assessment
ECO6385	Peninnis Farm, St Marys: Environmental Impact Assessment, 2006	
ECO6391	Tamarisk, The Garrison, St Marys: Excavation, 2017	Watching Brief
ECO6390	Star Castle, St Marys: Measured Survey, 1948	Building Survey
ECO4747	Cornish Ports and Harbours Project	Assessment
ECO6417	Cornish Ports and Harbours (Phase II): St Mary's	Management Recommendations; Assessment

ECO6554	Higher Battery Sentry Turret	Watching Brief
ECO6600	Archaeological monitoring and recording at Tregarthen's Hotel, Hugh Town, Isles of Scilly	Watching Brief
ECO6806	Carn Gwavel Wellbeing Centre, St Mary's, Isles of Scilly	Watching Brief
ECO6814	Porthloo Beach, Porthloo	Watching Brief

#### HER Monument Data

Mon UID	Pref Ref	Name	Mon Type	Period
MCO30137	MCO30137	HUGH TOWN – Early Medieval findspot	FINDSPOT; FINDSPOT	Romano British to 19th Century
MCO30138	MCO30138	ATLANTIC HOTEL – Post Medieval houses; C19 custom house; C19 hotel	HOUSE; HOTEL; CUSTOM HOUSE	Post Medieval
MCO30139	MCO30139	THE GARRISON – Post Medieval guardhouse	GUARDHOUSE; PRISON	Post Medieval
MCO30143	MCO30143	HUGH TOWN – Medieval findspot	FINDSPOT	Medieval
MCO30161	MCO30161	BARN PLATFORM – Post Medieval battery	COASTAL BATTERY	17th Century to 18th Century



MCO30169	MCO30169	BARTHOLOMEW BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century to 18th Century
MCO30170	MCO30170	BARTHOLOMEW BATTERY – Post Medieval quarry	QUARRY	18th Century
MCO30171	MCO30171	BARTHOLOMEW BATTERY – Post Medieval battery	BATTERY	18th Century
MCO30172	MCO30172	BARTHOLOMEW BATTERY – Modern building	BUILDING	20th Century
MCO30173	MCO30173	BARTHOLOMEW BATTERY – Modern well	WELL	20th Century
MCO30225	MCO30225	BUZZA HILL – Bronze Age entrance grave	ENTRANCE GRAVE	Bronze Age
MCO30226	MCO30226	BUZZA HILL – Bronze Age entrance grave	ENTRANCE GRAVE	Bronze Age
MCO30227	MCO30227	BUZZA HILL – Bronze Age entrance grave	ENTRANCE GRAVE	Bronze Age
MCO30228	MCO30228	BUZZA HILL – Prehistoric findspot	FINDSPOT	Prehistoric
MCO30229	MCO30229	BUZZA HILL – Romano British findspot	FINDSPOT	Romano British
MCO30230	MCO30230	BUZZA TOWER – Post Medieval windmill	WINDMILL	19th Century to Unknown
MCO30268	MCO30268	CARN THOMAS – Post Medieval cemetery	CEMETERY	Post Medieval
MCO30269	MCO30269	CARN THOMAS – Post Medieval school	SCHOOL	19th Century

MCO30270	MCO30270	CARN THOMAS – Post Medieval lifeboat station	LIFEBOAT STATION	19th Century to 20th Century
MCO30273	MCO30273	CARN GWAVEL – Prehistoric findspot	FINDSPOT	Prehistoric
MCO30414	MCO30414	CHURCH STREET – Post Medieval building	CHURCH HALL; BIBLE CHRISTIAN CHAPEL; SCHOOL; FREEMASONS HALL	19th Century to Modern
MCO30437	MCO30437	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO30438	MCO30438	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval quarry	QUARRY	18th Century
MCO30439	MCO30439	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval quarry	QUARRY	Post Medieval
MCO30440	MCO30440	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval postern	POSTERN	18th Century
MCO30441	MCO30441	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval battery	BATTERY	18th Century
MCO30442	MCO30442	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval engine house	ENGINE HOUSE; GENERATOR HOUSE	19th Century
MCO30468	MCO30468	ST MARYS – C19 house; C20 custom house	HOUSE; CUSTOM HOUSE	19th Century

MCO30483	MCO30483	DOCTORS KEYS – Post Medieval bastion outwork	BASTION OUTWORK	17th Century
MCO30484	MCO30484	DOCTORS KEYS – Post Medieval bastion outwork	BASTION OUTWORK	17th Century
MCO30491	MCO30491	DUKE OF LEEDS BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO30530	MCO30530	GARRISON BELL – Prehistoric findspot	FINDSPOT	Prehistoric
MCO30531	MCO30531	GARRISON FARM – Post Medieval workshop	WORKSHOP	19th Century
MCO30532	MCO30532	GARRISON GATE – Modern pillbox	PILLBOX	World War Two
MCO30533	MCO30533	GARRISON – Neolithic findspot	FINDSPOT	Neolithic
MCO30534	MCO30534	GARRISON HOUSE – Post Medieval storehouse	STOREHOUSE	18th Century
MCO30535	MCO30535	GARRISON LANE – Iron Age findspot, Romano British findspot	FINDSPOT; FINDSPOT	Early Iron Age to Romano British
MCO30536	MCO30536	GARRISON LANE – Post Medieval nonconformist chapel	WESLEYAN METHODIST CHAPEL	19th Century to Unknown
MCO30537	MCO30537	GATEHOUSE COTTAGE – Post Medieval barracks	BARRACKS	Post Medieval
MCO30603	MCO30603	GREYSTONES – Post Medieval barracks	BARRACKS; RADAR STATION	19th Century to 20th Century
MCO30611	MCO30611	GUNNERS WELL – Post Medieval well	WELL	Post Medieval

MCO30632	MCO30632	HARRYS WALLS – Post-Medieval fort	ARTILLERY CASTLE; REFUSE DISPOSAL SITE	16th Century to 18th Century
MCO30645	MCO30645	HIGH DOWN – Post Medieval house	HOUSE	17th Century
MCO30676	MCO30676	HUGH HOUSE – Post Medieval barracks	BARRACKS	18th Century
MCO30677	MCO30677	HUGH HOUSE – Post Medieval barracks	BARRACKS	18th Century to Unknown
MCO30678	MCO30678	HUGH TOWN – Post Medieval town hall	TOWN HALL	19th Century to Unknown
MCO30679	MCO30679	HUGH TOWN – C19 post office	POST OFFICE	19th Century to Unknown
MCO30700	MCO30700	JEFFERSONS BATTERY – Post Medieval battery	COASTAL BATTERY	18th Century
MCO30707	MCO30707	JOY HALL – Post Medieval building	BUILDING	18th Century
MCO30712	MCO30712	KING CHARLES BATTERY – Post Medieval bastion outwork	BASTION OUTWORK	17th Century
MCO30713	MCO30713	KING CHARLES BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO30715	MCO30715	KING CHARLES BATTERY – Post Medieval battery	BATTERY	18th Century
MCO30716	MCO30716	KING CHARLES BATTERY – Post Medieval garden	GARDEN	19th Century
MCO30721	MCO30721	KING EDWARDS ROAD – Bronze Age cairn	CAIRN; BARROW	Bronze Age

MCO30722	MCO30722	KING GEORGES BATTERY – Post Medieval lime kiln	LIME KILN	18th Century
MCO30723	MCO30723	KING GEORGES BATTERY – Post Medieval postern	POSTERN	17th Century
MCO30724	MCO30724	KING GEORGES BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO30798	MCO30798	LOWER BENHAM BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO30799	MCO30799	LOWER BROOM BATTERY – Medieval quarry, Post Medieval quarry	QUARRY?; QUARRY?	Unknown to 18th Century
MCO30800	MCO30800	LOWER BROOM BATTERY – Medieval battery	COASTAL BATTERY	16th Century
MCO30801	MCO30801	LOWER BROOM BATTERY – Post Medieval breastwork	BREASTWORK	Civil War (1642 to 1651)
MCO30802	MCO30802	LOWER BROOM BATTERY – Post Medieval battery	COASTAL BATTERY	18th Century
MCO30803	MCO30803	LOWER BROOM BATTERY – Post Medieval curtain wall	CURTAIN WALL	18th Century
MCO30805	MCO30805	LOWER MOORS – Prehistoric site, Early Medieval site	SITE; SITE	Palaeolithic to Modern
MCO30839	MCO30839	MORNING POINT – Post Medieval bastion outwork	BASTION OUTWORK	17th Century
MCO30840	MCO30840	MORNING POINT – Post Medieval bastion outwork	BASTION OUTWORK	17th Century to 18th Century
MCO30841	MCO30841	MORNING POINT – Post Medieval battery	BATTERY	17th Century

MCO30842	MCO30842	MORNING POINT BATTERY – Modern garden plot, Post Medieval battery	BATTERY; FIELD BOUNDARY	Civil War (1642 to 1651) to Modern
MCO30843	MCO30843	MORNING POINT BATTERY – Post Medieval sentry box	SENTRY BOX	18th Century
MCO30844	MCO30844	MORNING POINT BATTERY – Post Medieval bastion outwork	BASTION OUTWORK	18th Century
MCO30845	MCO30845	MORNING POINT BATTERY – Post Medieval battery	COASTAL BATTERY	18th Century
MCO30846	MCO30846	MORNING POINT BATTERY – Modern pillbox	PILLBOX	World War Two
MCO30847	MCO30847	MORNING POINT – Post Medieval quarry	QUARRY	18th Century
MCO30848	MCO30848	MOUNT FLAGON – Neolithic standing stone, Bronze Age standing stone	STANDING STONE; STANDING STONE	Early Neolithic to Late Bronze Age
MCO30849	MCO30849	MOUNT HOLLES – Romano British shrine	SHRINE?	Romano British
MCO30850	MCO30850	MOUNT HOLLES – Medieval fort, Post Medieval fort	FORT	Medieval to 18th Century
MCO30877	MCO30877	NEWFORD ISLAND – Post Medieval breastwork	BREASTWORK?	Civil War (1642 to 1651)
MCO30878	MCO30878	NEWFORD ISLAND – Post Medieval house	HOUSE	Post Medieval
MCO30879	MCO30879	NEWFORD ISLAND – Undated findspot	FINDSPOT	Unknown
MCO30880	MCO30880	NEWFORD ISLAND – Prehistoric findspot	FINDSPOT	Prehistoric



MCO30881	MCO30881	NEWMAN HOUSE – Early Medieval findspot, Medieval findspot	FINDSPOT; FINDSPOT	Early Medieval to Medieval
MCO30882	MCO30882	NEWMAN HOUSE – Post Medieval storehouse	STOREHOUSE	17th Century
MCO30883	MCO30883	NEWMAN HOUSE – Post Medieval house	HOUSE	17th Century
MCO30884	MCO30884	NEWMAN HOUSE – Post Medieval storehouse	STOREHOUSE	18th Century
MCO30885	MCO30885	NEWMAN POINT – Post Medieval battery	COASTAL BATTERY	17th Century
MCO30982	MCO30982	HUGH TOWN – Post Medieval quay	QUAY	17th Century
MCO30989	MCO30989	OLD TOWN – Medieval chapel	CHAPEL	Medieval
MCO30990	MCO30990	OLD TOWN – Bronze Age entrance grave	ENTRANCE GRAVE	Bronze Age
MCO30999	MCO30999	OLD TOWN – Prehistoric findspot	FINDSPOT	Prehistoric
MCO31000	MCO31000	OLD TOWN – Iron Age findspot, Romano British findspot	FINDSPOT; FINDSPOT	Early Iron Age to Romano British
MCO31001	MCO31001	OLD TOWN – Medieval findspot, Post Medieval findspot	FINDSPOT; FINDSPOT	Medieval to 19th Century
MCO31004	MCO31004	HUGH TOWN – Post Medieval windmill	WINDMILL	16th Century to 17th Century
MCO31005	MCO31005	THE GARRISON – Post Medieval bowling green	BOWLING GREEN	17th Century

MCO31027	MCO31027	PARSONS FIELD – Iron Age field system, Romano British field system, Early Medieval midden	FIELD SYSTEM; FIELD SYSTEM; MIDDEN	Early Iron Age to Early Medieval
MCO31028	MCO31028	PARSONS FIELD – Iron Age field system, Romano British field system	FIELD SYSTEM; FIELD SYSTEM	Early Iron Age to Romano British
MCO31029	MCO31029	PARSONS FIELD – Iron Age to Romano–British cist cemetery	CIST; GRAVE; CEMETERY	Early Iron Age to Romano British
MCO31030	MCO31030	PARSONS FIELD – Early Medieval midden	MIDDEN	Early Medieval
MCO31081	MCO31081	PERNOLD – Neolithic findspot, Bronze Age findspot	FINDSPOT; FINDSPOT	Early Neolithic to Late Bronze Age
MCO31088	MCO31088	PILOTS RETREAT – Bronze Age findspot	FINDSPOT	Bronze Age
MCO31120	MCO31120	PORTH CRESSA – Early Medieval findspot	FINDSPOT	Medieval
MCO31121	MCO31121	PORTH CRESSA – Bronze Age hut circle	HUT CIRCLE; MIDDEN	Bronze Age
MCO31122	MCO31122	PORTH CRESSA – Bronze Age wall	WALL	Bronze Age
MCO31123	MCO31123	PORTH CRESSA – Bronze Age hut circle settlement	HUT CIRCLE SETTLEMENT	Bronze Age
MCO31124	MCO31124	PORTH CRESSA – Medieval findspot, Post Medieval findspot	FINDSPOT; FINDSPOT	Medieval to 18th Century
MCO31125	MCO31125	PORTH CRESSA – Undated wall	WALL	Unknown

MCO31126	MCO31126	PORTH CRESSA – Prehistoric findspot	FINDSPOT	Prehistoric
MCO31127	MCO31127	PORTH CRESSA – Romano British cist	CIST	Romano British
MCO31128	MCO31128	PORTH CRESSA – Prehistoric findspot	FINDSPOT	Prehistoric
MCO31129	MCO31129	PORTHCRESSA – Neolithic findspot, Bronze Age findspot	FINDSPOT; FINDSPOT	Early Neolithic to Late Bronze Age
MCO31130	MCO31130	PORTH CRESSA – Post Medieval slipway	SLIPWAY	Post Medieval
MCO31131	MCO31131	PORTH CRESSA – Post Medieval shipyard	SHIPYARD	Post Medieval
MCO31152	MCO31152	PORTH MELLON – Post Medieval smugglers cache	SMUGGLERS CACHE	18th Century
MCO31153	MCO31153	PORTH MELLON – Undated findspot	FINDSPOT	Unknown
MCO31154	MCO31154	PORTH MELLON – Prehistoric hut circle, Prehistoric field system	FIELD SYSTEM; HUT CIRCLE	Prehistoric
MCO31155	MCO31155	PORTH MELLON – Prehistoric peat deposit	Peat Deposit	Prehistoric
MCO31156	MCO31156	PORTH MELLON – Prehistoric peat deposit	Peat Deposit	Prehistoric
MCO31157	MCO31157	PORTH MELLON – Early Medieval findspot	FINDSPOT	Early Medieval
MCO31158	MCO31158	PORTH MELLON – Modern flying boat station	FLYING BOAT STATION	World War One

MCO31163	MCO31163	PORTHCRESSA – Bronze Age cist	CIST?	Bronze Age
MCO31165	MCO31165	PORTHLOO – Prehistoric findspot	FINDSPOT	Prehistoric
MCO31166	MCO31166	PORTHLOO – Prehistoric findspot	FINDSPOT	Prehistoric
MCO31167	MCO31167	POYNTERS GARDEN – Iron Age settlement, Romano British settlement	SETTLEMENT; SETTLEMENT	Early Iron Age to Romano British
MCO31168	MCO31168	POYNTERS GARDEN – Iron Age hut circle, Romano British hut circle	HUT CIRCLE; HUT CIRCLE	Early Iron Age to Romano British
MCO31169	MCO31169	POYNTERS GARDEN – Iron Age field system, Romano British field system	FIELD SYSTEM; FIELD SYSTEM	Early Iron Age to Romano British
MCO31170	MCO31170	POYNTERS GARDEN – Iron Age cist, Romano British cist	CIST; CEMETERY; CIST	Early Iron Age to Romano British
MCO31177	MCO31177	RAT ISLAND – Post Medieval blockhouse	BLOCKHOUSE	17th Century
MCO31178	MCO31178	THE GARRISON – Post Medieval prison	PRISON	17th Century
MCO31223	MCO31223	SALLY PORT – Post Medieval postern	POSTERN	17th Century
MCO31478	MCO31478	ST MARYS – Post Medieval church	CHURCH	19th Century to Unknown
MCO31479	MCO31479	ST MARYS – Post Medieval findspot	FINDSPOT	Post Medieval

MCO31480	MCO31480	ST MARYS – Post Medieval nonconformist chapel	NONCONFORMIST CHAPEL	19th Century to Unknown
MCO31481	MCO31481	ST MARYS – Post Medieval cistern	CISTERN	18th Century to Unknown
MCO31483	MCO31483	HUGH TOWN – Early Medieval chapel, Medieval chapel	CHAPEL; CHAPEL	Early Medieval to Medieval
MCO31505	MCO31505	STAR CASTLE – Romano British findspot	FINDSPOT	Romano British
MCO31506	MCO31506	STAR CASTLE – Post Medieval quarry	QUARRY	Post Medieval
MCO31507	MCO31507	STAR CASTLE – Post Medieval fort	FORT	16th Century to Unknown
MCO31508	MCO31508	STAR CASTLE – Medieval keep	KEEP	16th Century
MCO31509	MCO31509	STAR CASTLE – Medieval curtain wall	CURTAIN WALL	16th Century
MCO31510	MCO31510	STAR CASTLE – Medieval castle	CASTLE	16th Century
MCO31511	MCO31511	STAR CASTLE – Post Medieval barracks	BARRACKS	18th Century
MCO31512	MCO31512	STAR CASTLE – Post Medieval cistern	CISTERN	18th Century
MCO31513	MCO31513	STAR CASTLE – Post Medieval dewpond	DEWPOND	18th Century
MCO31514	MCO31514	STAR CASTLE – Post Medieval flagpole	FLAGPOLE	Post Medieval

MCO31515	MCO31515	STAR CASTLE – Post Medieval building	BUILDING	19th Century
MCO31516	MCO31516	STAR CASTLE – Post Medieval vault	VAULT	Post Medieval
MCO31517	MCO31517	STAR COTTAGE – Early Medieval architectural fragment, Medieval building, Post Medieval building	ARCHITECTURAL FRAGMENT; BUILDING?	Early Medieval to Modern
MCO31518	MCO31518	STEVAL BATTERY – Post Medieval battery	COASTAL BATTERY	18th Century
MCO31519	MCO31519	STEVAL BATTERY – Post Medieval battery	COASTAL BATTERY	16th Century to 19th Century
MCO31520	MCO31520	STEVAL BATTERY – Post Medieval bastion outwork	BASTION OUTWORK	18th Century
MCO31521	MCO31521	STEVAL BATTERY – Post Medieval battery	BATTERY	19th Century
MCO31522	MCO31522	STEVAL POINT BATTERY – Post Medieval building	BUILDING	19th Century
MCO31523	MCO31523	STEVAL POINT – Post Medieval quarry	QUARRY	Civil War (1642 to 1651)
MCO31524	MCO31524	STEVAL POINT – Post Medieval barracks	BARRACKS	17th Century
MCO31525	MCO31525	STEVAL POINT – Post Medieval extractive pit	QUARRY; EXTRACTIVE PIT	Post Medieval
MCO31527	MCO31527	STEVAL POINT BATTERY – Post Medieval battery	BATTERY	19th Century
MCO31528	MCO31528	STEVAL POINT – Post Medieval searchlight battery	SEARCHLIGHT BATTERY	19th Century



MCO31529	MCO31529	STEVAL POINT BATTERY – Modern pillbox	PILLBOX	World War Two
MCO31532	MCO31532	STORE HOUSE BATTERY – Post Medieval battery	BATTERY	18th Century
MCO31533	MCO31533	STORE HOUSE WELL – Early Medieval well	WELL	Early Medieval to Modern
MCO31537	MCO31537	TAMARISK – Post Medieval garden	GARDEN	17th Century
MCO31538	MCO31538	TAYLORS ISLAND – Post Medieval building	BUILDING	Post Medieval
MCO31539	MCO31539	TAYLORS ISLAND – Prehistoric findspot	FINDSPOT	Prehistoric
MCO31550	MCO31550	ST MARYS – Post Medieval quarry	QUARRY	Post Medieval
MCO31558	MCO31558	THE FOLLY – Post Medieval fort	ARTILLERY FORT; FORTIFIED BUILDING	Post Medieval
MCO31559	MCO31559	THE FOLLY – Post Medieval bastion outwork	BASTION OUTWORK	17th Century to 18th Century
MCO31560	MCO31560	THE FOLLY – Post Medieval bastion outwork	BASTION OUTWORK	18th Century
MCO31563	MCO31563	THE GARRISON – Post Medieval fortification	FORTIFICATION	Post Medieval
MCO31564	MCO31564	THE GARRISON – Post Medieval trackway	TRACKWAY	Post Medieval
MCO31565	MCO31565	THE GARRISON – Post Medieval trackway	TRACKWAY	Post Medieval

MCO31566	MCO31566	THE GARRISON – Post Medieval trackway	TRACKWAY	Post Medieval
MCO31567	MCO31567	THE GARRISON – Post Medieval field system	FIELD SYSTEM	Post Medieval
MCO31570	MCO31570	THE GARRISON – Post Medieval buildings	FISH CELLAR; BLACKSMITHS WORKSHOP; BARN; STABLE	17th Century
MCO31575	MCO31575	THE GARRISON – Post Medieval weather vane	WEATHER VANE	Post Medieval
MCO31578	MCO31578	THE GARRISON – Modern barbed wire obstruction	BARBED WIRE OBSTRUCTION	World War Two
MCO31579	MCO31579	THE GARRISON – Modern siegework	SIEGEWORK	World War Two
MCO31580	MCO31580	THE GARRISON – Post Medieval watch tower	WATCH TOWER	17th Century
MCO31581	MCO31581	THE GARRISON – Modern observation post	OBSERVATION POST	World War One
MCO31582	MCO31582	THE GARRISON – Post Medieval gate	GATE	17th Century
MCO31583	MCO31583	THE GARRISON – Post Medieval curtain wall	CURTAIN WALL	17th Century
MCO31584	MCO31584	THE GARRISON – Post Medieval curtain wall	CURTAIN WALL	17th Century
MCO31586	MCO31586	THE GUARDHOUSE – Post Medieval guardhouse	GUARDHOUSE	17th Century
MCO31588	MCO31588	HUGH TOWN – Medieval findspot	FINDSPOT	16th Century

MCO31589	MCO31589	THE PARADE – Medieval cross	CROSS	Medieval
MCO31590	MCO31590	THE PARADE – Undated findspot	FINDSPOT	Unknown
MCO31591	MCO31591	THE PARADE – Post Medieval findspot	FINDSPOT	Post Medieval
MCO31592	MCO31592	THE PARADE – Prehistoric findspot	FINDSPOT	Prehistoric
MCO31593	MCO31593	THE PARADE – Romano British findspot	FINDSPOT	Romano British
MCO31594	MCO31594	THE PARADE – Post Medieval parade ground	PARADE GROUND	19th Century
MCO31595	MCO31595	THE GARRISON – Post Medieval fortification	FORTIFICATION	18th Century
MCO31596	MCO31596	THE GARRISON – Post Medieval parade ground	PARADE GROUND	18th Century
MCO31599	MCO31599	THE GARRISON – Post Medieval powder magazine	POWDER MAGAZINE	17th Century
MCO31604	MCO31604	THE WHITE HOUSE – Post Medieval house	HOUSE	18th Century
MCO31605	MCO31605	THE WHITE HOUSE – Post Medieval house	HOUSE	18th Century
MCO31606	MCO31606	THOMAS PORTH – Prehistoric findspot, Early Medieval findspot, Post Medieval findspot	FINDSPOT; FINDSPOT; FINDSPOT	Palaeolithic to Modern
MCO31670	MCO31670	TOWN BEACH – Post Medieval shipyard	SHIPYARD	Post Medieval
MCO31695	MCO31695	OLD QUAY – Post Medieval battery	BATTERY	17th Century

MCO31728	MCO31728	ST MARYS – Post Medieval house	HOUSE	19th Century to Unknown
MCO31743	MCO31743	UPPER BENHAM BATTERY – Medieval quarry	QUARRY	16th Century
MCO31744	MCO31744	UPPER BENHAM BATTERY – Post Medieval barracks	BARRACKS	Post Medieval
MCO31745	MCO31745	UPPER BENHAM BATTERY – Post Medieval postern	POSTERN	17th Century
MCO31746	MCO31746	UPPER BENHAM BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO31747	MCO31747	UPPER BENHAM BATTERY – Post Medieval curtain wall	CURTAIN WALL	18th Century
MCO31748	MCO31748	UPPER BENHAM BATTERY – Modern pillbox	PILLBOX	World War Two
MCO31749	MCO31749	UPPER BROOM BATTERY – Post Medieval breastwork	BREASTWORK	Civil War (1642 to 1651)
MCO31750	MCO31750	UPPER BROOM BATTERY – Medieval battery	BATTERY	16th Century
MCO31751	MCO31751	UPPER BROOM BATTERY – Post Medieval battery	COASTAL BATTERY	18th Century
MCO31761	MCO31761	VERONICA LODGE – Post Medieval barracks	BARRACKS	18th Century
MCO31762	MCO31762	VERONICA LODGE – Post Medieval house	HOUSE	18th Century
MCO31770	MCO31770	WELL BATTERY – Post Medieval battery	BATTERY	17th Century
MCO31771	MCO31771	WELLFORD – Post Medieval barracks	BARRACKS	19th Century

MCO31799	MCO31799	WINDMILL – Medieval windmill	WINDMILL	16th Century
MCO31833	MCO31833	WOOLPACK BATTERY – Post Medieval quarry	QUARRY	Post Medieval
MCO31834	MCO31834	WOOLPACK BATTERY – Post Medieval quarry	QUARRY	Post Medieval
MCO31835	MCO31835	WOOLPACK BATTERY – Post Medieval bastion outwork	BASTION OUTWORK	17th Century
MCO31836	MCO31836	WOOLPACK BATTERY – Post Medieval garden	GARDEN	18th Century
MCO31837	MCO31837	WOOLPACK BATTERY – Post Medieval postern	POSTERN	Post Medieval
MCO31838	MCO31838	WOOLPACK BATTERY – Post Medieval bastion outwork	BASTION OUTWORK	18th Century
MCO31839	MCO31839	WOOLPACK BATTERY – Post Medieval bastion outwork	BASTION OUTWORK	18th Century
MCO31840	MCO31840	WOOLPACK POINT BATTERY – Post Medieval battery	BATTERY	18th Century
MCO31841	MCO31841	WOOLPACK BATTERY – Post Medieval battery	BATTERY	19th Century
MCO31842	MCO31842	WOOLPACK BATTERY – Modern searchlight battery	SEARCHLIGHT BATTERY	20th Century
MCO31843	MCO31843	WOOLPACK BATTERY – Post Medieval building	BUILDING	Post Medieval
MCO31844	MCO31844	WOOLPACK BATTERY – Modern pillbox	PILLBOX	World War Two

MCO31845	MCO31845	WOOLPACK POINT – Post Medieval bastion outwork	BASTION OUTWORK	17th Century
MCO31846	MCO31846	WOOLPACK POINT – Post Medieval battery	COASTAL BATTERY	Civil War (1642 to 1651)
MCO31847	MCO31847	WOOLPACK POINT – Modern searchlight battery	SEARCHLIGHT BATTERY	20th Century
MCO31848	MCO31848	WOOLPACK QUARRY – Post Medieval bastion outwork	BASTION OUTWORK	17th Century to 18th Century
MCO31849	MCO31849	WOOLPACK QUARRY – Post Medieval quarry	QUARRY	18th Century
MCO31850	MCO31850	WOOLPACK QUARRY – Post Medieval quarry	QUARRY	18th Century
MCO41951	MCO41951	THE GARRISON – Early Medieval trackway	TRACKWAY	Early Medieval to Modern
MCO41952	MCO41952	THE GARRISON – Early Medieval trackway	TRACKWAY	Early Medieval to Modern
MCO41956	MCO41956	PORTH CRESSA – Modern structure	STRUCTURE?	20th Century
MCO41957	MCO41957	LOWER MOORS – Post Medieval field system	FIELD SYSTEM	Post Medieval
MCO41958	MCO41958	MOUNT FLAGON – Undated structure	STRUCTURE	Unknown
MCO41962	MCO41962	MOUNT FLAGON – Undated ditch	DITCH	Unknown
MCO41963	MCO41963	PORTHLOO – Modern field system	FIELD SYSTEM?	20th Century
MCO41965	MCO41965	NEWFORD ISLAND – Post Medieval quay	QUAY	Post Medieval



MCO41966	MCO41966	NEWFORD ISLAND – Post Medieval quay	QUAY?	Post Medieval
MCO42798	MCO42798	RAT ISLAND – Modern pillbox	PILLBOX?	World War Two to Unknown
MCO42801	MCO42801	OLD QUAY – Modern pillbox	PILLBOX	World War Two to Unknown
MCO42804	MCO42804	WOOLPACK POINT: BRITANNIA – Post Medieval wreck	WRECK	16th Century to 18th Century
MCO42805	MCO42805	HUGH TOWN – Modern pillbox	PILLBOX	World War Two to Unknown
MCO42806	MCO42806	HUGH TOWN – Modern pillbox	PILLBOX	World War Two to Unknown
MCO42807	MCO42807	CARN THOMAS – Modern pillbox	PILLBOX	World War Two to Unknown
MCO42808	MCO42808	CARN THOMAS – Modern pillbox	PILLBOX	World War Two to Unknown
MCO42811	MCO42811	PORTH MELLON – Modern pillbox	PILLBOX	World War Two to Unknown
MCO42813	MCO42813	THOMAS PORTH – Modern pillbox	PILLBOX	World War Two to Unknown

MCO42814	MCO42814	PORTHLOO – Modern pillbox	PILLBOX	World War Two to Unknown
MCO42835	MCO42835	PORTHCRESSA – Modern pillbox	PILLBOX	World War Two to Unknown
MCO42837	MCO42837	PORTHCRESSA – Modern pillbox	PILLBOX	World War Two to Unknown
MCO43456	MCO43456	PORTHMELLON COVE: NEW YORK – Post Medieval wreck	WRECK	Post Medieval
MCO43457	MCO43457	PORTH CRESSA COVE: SALLY – Post Medieval wreck	WRECK	Post Medieval
MCO43458	MCO43458	ST MARYS POOL – Post Medieval wreck	WRECK	Post Medieval
MCO43459	MCO43459	ST MARYS: RECOVERY – Post Medieval wreck	WRECK	Post Medieval
MCO43464	MCO43464	ST MARYS POOL: OSIRIS – Post Medieval wreck	WRECK	Post Medieval
MCO43465	MCO43465	PORTH MINICK – Post Medieval wreck	WRECK	Post Medieval
MCO43467	MCO43467	PORTHLOO: GEM (Built 1858) – Post Medieval wreck	WRECK	19th Century
MCO43468	MCO43468	ST MARYS ISLAND – Post Medieval wreck	WRECK	16th Century to 18th Century
MCO43469	MCO43469	ST MARYS – Post Medieval wreck	WRECK	16th Century to 18th Century

MCO43471	MCO43471	ST MARYS: SUNDERLAND MK III DD836 – WWII aircraft	AIRCRAFT	20th Century
MCO43472	MCO43472	ST MARYS: TIGER MOTH MK II N6598 (Built 1938) – Modern wreck	WRECK	20th Century
MCO43473	MCO43473	ST MARYS ISLAND: NANNY – Post Medieval wreck	WRECK	Post Medieval
MCO43635	MCO43635	STEVAL ROCK: TRIUMPH – Post Medieval wreck	WRECK	16th Century to 18th Century
MCO43637	MCO43637	NICHOLLS ROCK – Post Medieval wreck	WRECK	Post Medieval
MCO43645	MCO43645	ST MARYS: FELICITY – Post Medieval wreck	WRECK	Post Medieval
MCO43650	MCO43650	ST MARYS: THOMAS – Post Medieval wreck	WRECK	16th Century to 18th Century
MCO43653	MCO43653	TAYLORS ISLAND: LYON – Post Medieval wreck	WRECK	Post Medieval
MCO43656	MCO43656	ST MARYS: HUNTER – Post Medieval wreck	WRECK	Post Medieval
MCO43659	MCO43659	CARN MORVAL POINT: MARIA CLARA – Post Medieval wreck	WRECK	Post Medieval
MCO43937	MCO43937	RAT ISLAND – Post Medieval lime kiln	LIME KILN	19th Century
MCO44706	MCO44706	NEWFORD ISLAND – Doubtful Post Medieval battery	BATTERY?	Civil War (1642 to 1651)
MCO44707	MCO44707	TAYLORS ISLAND – Bronze Age cairn	CAIRN	Bronze Age

MCO44708	MCO44708	STORE HOUSE BATTERY – Post Medieval privy house	PRIVY HOUSE	19th Century
MCO44750	MCO44750	GARRISON – Post Medieval quarry	QUARRY	18th Century
MCO44759	MCO44759	PENNINIS HEAD – Prehistoric field boundary	FIELD BOUNDARY	Prehistoric
MCO53358	MCO53358	OLD TOWN – Prehistoric findspot, Iron Age findspot, Romano British findspot, Medieval findspot, Post Medieval findspot	FINDSPOT; FINDSPOT; FINDSPOT; FINDSPOT; FINDSPOT	Palaeolithic to 19th Century
MCO53362	MCO53362	PORTH CRESSA – Bronze Age hut circle settlement, Romano British cist, Medieval findspot, Post Medieval findspot	HUT CIRCLE SETTLEMENT; CIST; FINDSPOT; FINDSPOT	Bronze Age to 18th Century
MCO53363	MCO53363	BUZZA HILL – Prehistoric findspot, Romano British findspot	FINDSPOT; FINDSPOT	Palaeolithic to Romano British
MCO54347	MCO54347	HUGH TOWN – Modern fire station	FIRE STATION	20th Century
MCO55581	MCO55581	WOOLPACK BATTERY – C19th Electric Light Directing Station	COAST ARTILLERY SEARCHLIGHT; PILLBOX; TRENCH	19th Century to World War Two
MCO55582	MCO55582	THE GARRISON – Prehistoric or Medieval field system	BANK (EARTHWORK); FIELD BOUNDARY?; FIELD SYSTEM?	Palaeolithic to Medieval
MCO58008	MCO58008	OLD TOWN – C18 memorial	COMMEMORATIVE STONE	18th Century to Unknown

MCO58040	MCO58040	ST MARYS - C17 house	HOUSE	17th Century to 19th Century
MCO58041	MCO58041	ST MARYS - C18 house	HOUSE	18th Century
MCO58046	MCO58046	TOWN BEACH - Post Medieval Slipway	SLIPWAY	18th Century to 19th Century
MCO58697	MCO58697	PENINNIS HEAD - Iron Age/Romano British fogou	FOGOU	Early Iron Age to Romano British
MCO64349	MCO64349	HUGH TOWN - Post Medieval slipway	SLIPWAY	Post Medieval
MCO64350	MCO64350	HUGH TOWN - Post Medieval street	ROAD	Post Medieval
MCO64351	MCO64351	HUGH TOWN - Post Medieval road	ROAD	Post Medieval
MCO64352	MCO64352	HUGH TOWN - Post Medieval house	HOUSE; HOUSE	Post Medieval
MCO64353	MCO64353	HUGH TOWN - Post Medieval alley	ALLEY	Post Medieval
MCO30714	MCO30714	KING CHARLES BATTERY - C18 curtain wall	CURTAIN WALL	18th Century
MCO64354	MCO64354	HUGH TOWN - Post Medieval road	ROAD	Post Medieval
MCO64355	MCO64355	HUGH TOWN - C18 house	HOUSE	18th Century
MCO64356	MCO64356	HUGH TOWN - C18 row	ROW	18th Century

MCO64357	MCO64357	HUGH TOWN - Late C18 terrace	TERRACE	18th Century
MCO64358	MCO64358	HUGH TOWN - C19 row	ROW	19th Century
MCO64359	MCO64359	HUGH TOWN - C19 house	HOUSE	19th Century
MCO64360	MCO64360	HUGH TOWN - C19 house	HOUSE	19th Century
MCO64361	MCO64361	HUGH TOWN - C19 house	HOUSE	19th Century
MCO31600	MCO31600	THE STRAND - Post Medieval school	SCHOOL	19th Century to Unknown
MCO64362	MCO64362	HUGH TOWN - Post Medieval timber yard	TIMBER YARD	Post Medieval
MCO64363	MCO64363	HUGH TOWN - C20 terrace	TERRACE	20th Century
MCO64364	MCO64364	HUGH TOWN - C20 house	HOUSE	20th Century
MCO64365	MCO64365	HUGH TOWN - C19 terrace	TERRACE	19th Century
MCO64366	MCO64366	HUGH TOWN - C19 terrace	TERRACE	19th Century
MCO64367	MCO64367	HUGH TOWN - Late C19 park	PUBLIC PARK	19th Century
MCO64368	MCO64368	HUGH TOWN - C19 house	HOUSE	19th Century
MCO64369	MCO64369	HUGH TOWN - Mid C19 house	HOUSE	19th Century

MCO64370	MCO64370	HUGH TOWN - Post Medieval saw pit	SAW PIT	Post Medieval
MCO64371	MCO64371	HUGH TOWN - Post Medieval slipways	SLIPWAY	Post Medieval
MCO64371	MCO64371	HUGH TOWN - Post Medieval slipways	SLIPWAY	Post Medieval
MCO64371	MCO64371	HUGH TOWN - Post Medieval slipways	SLIPWAY	Post Medieval
MCO64371	MCO64371	HUGH TOWN - Post Medieval slipways	SLIPWAY	Post Medieval
MCO64371	MCO64371	HUGH TOWN - Post Medieval slipways	SLIPWAY	Post Medieval
MCO64372	MCO64372	HUGH TOWN - Post Medieval saw pit	SAW PIT	Post Medieval
MCO64373	MCO64373	HUGH TOWN - Post Medieval smithy	BLACKSMITHS WORKSHOP	Post Medieval
MCO64374	MCO64374	HUGH TOWN - Mid C19 terrace	TERRACE	19th Century
MCO64375	MCO64375	HUGH TOWN - Mid C19 terrace	TERRACE	19th Century
MCO64376	MCO64376	HUGH TOWN - C20 terrace	TERRACE	20th Century
MCO64377	MCO64377	HUGH TOWN - Late C19 hotel	HOTEL	19th Century
MCO64378	MCO64378	HUGH TOWN - C20 terrace	TERRACE	20th Century
MCO64379	MCO64379	HUGH TOWN - C20 bank	BANK (FINANCIAL)	20th Century



MCO64380	MCO64380	HUGH TOWN – C20 office	OFFICE	20th Century
MCO64381	MCO64381	HUGH TOWN – C18 market house	MARKET HOUSE	18th Century
MCO64382	MCO64382	HUGH TOWN – Post Medieval quarry	QUARRY	Post Medieval
MCO64382	MCO64382	HUGH TOWN – Post Medieval quarry	QUARRY	Post Medieval
MCO64383	MCO64383	HUGH TOWN – C20 electricity generating plant	POWER STATION	20th Century
MCO64384	MCO64384	HUGH TOWN – C20 hospital	HOSPITAL	20th Century
MCO64385	MCO64385	HUGH TOWN – C20 museum	MUSEUM	20th Century
MCO64386	MCO64386	HUGH TOWN – C20 residential accommodation	NURSING HOME	20th Century
MCO64387	MCO64387	CARN GWAVAL – C20 school	PRIMARY SCHOOL	20th Century to Unknown
MCO64388	MCO64388	PORTHMELLON – C20 industrial estate	INDUSTRIAL ESTATE	20th Century
MCO64389	MCO64389	HUGH TOWN – C20 health centre	CLINIC	20th Century
MCO64390	MCO64390	HUGH TOWN – C20 promenade	PROMENADE	20th Century
MCO64391	MCO64391	HUGH TOWN – Post Medieval lane	ROAD	Post Medieval
MCO64395	MCO64395	HUGH TOWN – Post Medieval railings	RAILINGS	Post Medieval

MCO64398	MCO64398	HUGH TOWN - Late C18/Early C19 house	HOUSE	18th Century to 19th Century
MCO64399	MCO64399	HUGH TOWN - Late C18/Early C19 house	HOUSE	18th Century to 19th Century
MCO64401	MCO64401	HUGH TOWN - Early C19 houses	HOUSE	19th Century
MCO64402	MCO64402	HUGH TOWN - C18 house	HOUSE	18th Century
MCO64403	MCO64403	HUGH TOWN - C18 row	ROW	18th Century
MCO64405	MCO64405	HUGH TOWN - Late C19 villa	VILLA	19th Century
MCO64406	MCO64406	HUGH TOWN - Early C19 house	HOUSE	19th Century
MCO64407	MCO64407	HUGH TOWN - C19 terrace	TERRACE	19th Century
MCO64408	MCO64408	HUGH TOWN - Post Medieval pavement	PAVEMENT	Post Medieval
MCO64410	MCO64410	HUGH TOWN - C19 house	HOUSE	19th Century
MCO64411	MCO64411	HUGH TOWN - C19 gate	GATE	19th Century
MCO64412	MCO64412	HUGH TOWN - C19 wall	WALL	19th Century
MCO64413	MCO64413	DOWN DERRY - Post Medieval village	VILLAGE	Post Medieval

MCO64414	MCO64414	HUGH TOWN - Early C19 house	HOUSE	19th Century
MCO64415	MCO64415	HUGH TOWN - Early C19 shop	SHOP	19th Century
MCO64416	MCO64416	HUGH TOWN - Late C18 cottage	HOUSE	18th Century
MCO64417	MCO64417	HUGH TOWN - Post Medieval row	ROW	Post Medieval
MCO64418	MCO64418	HUGH TOWN - Post Medieval lifeboat shed	LIFEBOAT STATION	Post Medieval
MCO64419	MCO64419	HUGH TOWN - C20 council flats	COUNCIL FLATS	20th Century
MCO64420	MCO64420	HUGH TOWN - Post Medieval building	BUILDING	Post Medieval
MCO64421	MCO64421	HUGH TOWN - C19 house	HOUSE	19th Century
MCO64423	MCO64423	HUGH TOWN - Post Medieval lane	ROAD	Post Medieval
MCO64424	MCO64424	HUGH TOWN - Post Medieval lane	ROAD	Post Medieval
MCO64425	MCO64425	HUGH TOWN - C20 council houses	COUNCIL HOUSE	20th Century
MCO64426	MCO64426	HUGH TOWN - Post Medieval steps	STEPS	Post Medieval
MCO64427	MCO64427	HUGH TOWN - Post Medieval water spout	WATER TAP	Post Medieval
MCO64428	MCO64428	HUGH TOWN - C19 piers	COLUMN	19th Century

MCO64428	MCO64428	HUGH TOWN – C19 piers	COLUMN	19th Century
MCO64429	MCO64429	HUGH TOWN – Post Medieval building	BUILDING	Post Medieval to World War Two
MCO64493	MCO64493	STEVAL POINT – Post Medieval wall; Post Medieval midden	WALL; MIDDEN	Post Medieval
MCO66807	MCO66807	ST MARYS – Unstratified find	FINDSPOT	Prehistoric
MCO68182	MCO68182	PORTHLOW – Unstratified find	FINDSPOT	Early Neolithic to Late Bronze Age
MCO68443	MCO68443	HUGH TOWN – Early C19 house; C19 inn	HOUSE; INN	19th Century
MCO74252	MCO74252	THE GARRISON – Post Medieval bastion outworks	BASTION OUTWORK	17th Century to 18th Century
MCO74269	MCO74269	THE GARRISON – Modern Mast bracket and guy pegs	RADIO STATION	20th Century
MCO74276	MCO74276	THE GARRISON – Modern earthworks	MILITARY INSTALLATION	20th Century
MCO74280	MCO74280	THE GARRISON – Undated earthworks	EARTHWORK	Unknown
MCO75033	MCO75033	PENINNIS – Modern radio station	RADAR STATION	World War Two
MCO75036	MCO75036	RAT ISLAND – Possible post medieval breastwork	BREASTWORK?; BATTERY?	Civil War (1642 to 1651)

MCO75078	MCO75078	THE GARRISON – Undated earthworks	FIELD SYSTEM?; PIT; ENCLOSURE	Prehistoric
MCO31526	MCO31526	STEVAL POINT – Modern searchlight battery	SEARCHLIGHT BATTERY	20th Century
MCO31568	MCO31568	WOOLPACK BATTERY – Modern Radar Station	RADAR STATION	World War Two
MCO31569	MCO31569	THE GARRISON – Post medieval ship wreck	WRECK	Civil War (1642 to 1651)
MonUID	PrefRef	Name	MonType	Period
MCO58046	MCO58046	TOWN BEACH – Post Medieval Slipway	SLIPWAY	18th Century to 19th Century
MCO30230	MCO30230	BUZZA TOWER – Post Medieval windmill	WINDMILL	19th Century to Unknown
MCO30988	MCO30988	OLD TOWN – Medieval church	CHURCH	Medieval to 19th Century
MCO31507	MCO31507	STAR CASTLE – Post Medieval fort	FORT	16th Century to Unknown
MCO31583	MCO31583	THE GARRISON – Post Medieval curtain wall	CURTAIN WALL	17th Century
MCO31583	MCO31583	THE GARRISON – Post Medieval curtain wall	CURTAIN WALL	17th Century
MCO30537	MCO30537	GATEHOUSE COTTAGE – Post Medieval barracks	BARRACKS	Post Medieval

MCO31599	MCO31599	THE GARRISON – Post Medieval powder magazine	POWDER MAGAZINE	17th Century
MCO31586	MCO31586	THE GUARDHOUSE – Post Medieval guardhouse	GUARDHOUSE	17th Century
MCO30534	MCO30534	GARRISON HOUSE – Post Medieval storehouse	STOREHOUSE	18th Century
MCO30982	MCO30982	HUGH TOWN – Post Medieval quay	QUAY	17th Century
MCO30798	MCO30798	LOWER BENHAM BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO30801	MCO30801	LOWER BROOM BATTERY – Post Medieval breastwork	BREASTWORK	Civil War (1642 to 1651)
MCO30801	MCO30801	LOWER BROOM BATTERY – Post Medieval breastwork	BREASTWORK	Civil War (1642 to 1651)
MCO64349	MCO64349	HUGH TOWN – Post Medieval slipway	SLIPWAY	Post Medieval
MCO64350	MCO64350	HUGH TOWN – Post Medieval street	ROAD	Post Medieval
MCO64351	MCO64351	HUGH TOWN – Post Medieval road	ROAD	Post Medieval
MCO64352	MCO64352	HUGH TOWN – Post Medieval house	HOUSE; HOUSE	Post Medieval
MCO64353	MCO64353	HUGH TOWN – Post Medieval alley	ALLEY	Post Medieval
MCO30714	MCO30714	KING CHARLES BATTERY – C18 curtain wall	CURTAIN WALL	18th Century
MCO30803	MCO30803	LOWER BROOM BATTERY – Post Medieval curtain wall	CURTAIN WALL	18th Century

MCO64354	MCO64354	HUGH TOWN – Post Medieval road	ROAD	Post Medieval
MCO64354	MCO64354	HUGH TOWN – Post Medieval road	ROAD	Post Medieval
MCO64355	MCO64355	HUGH TOWN – C18 house	HOUSE	18th Century
MCO30677	MCO30677	HUGH HOUSE – Post Medieval barracks	BARRACKS	18th Century to Unknown
MCO64356	MCO64356	HUGH TOWN – C18 row	ROW	18th Century
MCO64357	MCO64357	HUGH TOWN – Late C18 terrace	TERRACE	18th Century
MCO64358	MCO64358	HUGH TOWN – C19 row	ROW	19th Century
MCO64358	MCO64358	HUGH TOWN – C19 row	ROW	19th Century
MCO31478	MCO31478	ST MARYS – Post Medieval church	CHURCH	19th Century to Unknown
MCO64359	MCO64359	HUGH TOWN – C19 house	HOUSE	19th Century
MCO31480	MCO31480	ST MARYS – Post Medieval nonconformist chapel	NONCONFORMIST CHAPEL	19th Century to Unknown
MCO64360	MCO64360	HUGH TOWN – C19 house	HOUSE	19th Century
MCO30468	MCO30468	ST MARYS – C19 house; C20 custom house	HOUSE; CUSTOM HOUSE	19th Century
MCO64361	MCO64361	HUGH TOWN – C19 house	HOUSE	19th Century



MCO30414	MCO30414	CHURCH STREET – Post Medieval building	CHURCH HALL; BIBLE CHRISTIAN CHAPEL; SCHOOL; FREEMASONS HALL	19th Century to Modern
MCO30269	MCO30269	CARN THOMAS – Post Medieval school	SCHOOL	19th Century
MCO31600	MCO31600	THE STRAND – Post Medieval school	SCHOOL	19th Century to Unknown
MCO64362	MCO64362	HUGH TOWN – Post Medieval timber yard	TIMBER YARD	Post Medieval
MCO64363	MCO64363	HUGH TOWN – C20 terrace	TERRACE	20th Century
MCO64364	MCO64364	HUGH TOWN – C20 house	HOUSE	20th Century
MCO64365	MCO64365	HUGH TOWN – C19 terrace	TERRACE	19th Century
MCO64366	MCO64366	HUGH TOWN – C19 terrace	TERRACE	19th Century
MCO30678	MCO30678	HUGH TOWN – Post Medieval town hall	TOWN HALL	19th Century to Unknown
MCO64367	MCO64367	HUGH TOWN – Late C19 park	PUBLIC PARK	19th Century
MCO64368	MCO64368	HUGH TOWN – C19 house	HOUSE	19th Century
MCO64369	MCO64369	HUGH TOWN – Mid C19 house	HOUSE	19th Century
MCO30679	MCO30679	HUGH TOWN – C19 post office	POST OFFICE	19th Century to Unknown

MCO64373	MCO64373	HUGH TOWN – Post Medieval smithy	BLACKSMITHS WORKSHOP	Post Medieval
MCO64374	MCO64374	HUGH TOWN – Mid C19 terrace	TERRACE	19th Century
MCO64374	MCO64374	HUGH TOWN – Mid C19 terrace	TERRACE	19th Century
MCO64375	MCO64375	HUGH TOWN – Mid C19 terrace	TERRACE	19th Century
MCO64375	MCO64375	HUGH TOWN – Mid C19 terrace	TERRACE	19th Century
MCO64376	MCO64376	HUGH TOWN – C20 terrace	TERRACE	20th Century
MCO64377	MCO64377	HUGH TOWN – Late C19 hotel	HOTEL	19th Century
MCO30884	MCO30884	NEWMAN HOUSE – Post Medieval storehouse	STOREHOUSE	18th Century
MCO30138	MCO30138	ATLANTIC HOTEL – Post Medieval houses; C19 custom house; C19 hotel	HOUSE; HOTEL; CUSTOM HOUSE	Post Medieval
MCO64378	MCO64378	HUGH TOWN – C20 terrace	TERRACE	20th Century
MCO64379	MCO64379	HUGH TOWN – C20 bank	BANK (FINANCIAL)	20th Century
MCO64380	MCO64380	HUGH TOWN – C20 office	OFFICE	20th Century
MCO64382	MCO64382	HUGH TOWN – Post Medieval quarry	QUARRY	Post Medieval

MCO64383	MCO64383	HUGH TOWN – C20 electricity generating plant	POWER STATION	20th Century
MCO64384	MCO64384	HUGH TOWN – C20 hospital	HOSPITAL	20th Century
MCO64385	MCO64385	HUGH TOWN – C20 museum	MUSEUM	20th Century
MCO64386	MCO64386	HUGH TOWN – C20 residential accommodation	NURSING HOME	20th Century
MCO64387	MCO64387	CARN GWAVAL – C20 school	PRIMARY SCHOOL	20th Century to Unknown
MCO64388	MCO64388	PORTHMELLON – C20 industrial estate	INDUSTRIAL ESTATE	20th Century
MCO64389	MCO64389	HUGH TOWN – C20 health centre	CLINIC	20th Century
MCO64390	MCO64390	HUGH TOWN – C20 promenade	PROMENADE	20th Century
MCO64391	MCO64391	HUGH TOWN – Post Medieval lane	ROAD	Post Medieval
MCO64395	MCO64395	HUGH TOWN – Post Medieval railings	RAILINGS	Post Medieval
MCO64395	MCO64395	HUGH TOWN – Post Medieval railings	RAILINGS	Post Medieval
MCO64395	MCO64395	HUGH TOWN – Post Medieval railings	RAILINGS	Post Medieval
MCO64395	MCO64395	HUGH TOWN – Post Medieval railings	RAILINGS	Post Medieval
MCO64395	MCO64395	HUGH TOWN – Post Medieval railings	RAILINGS	Post Medieval

MCO64395	MCO64395	HUGH TOWN - Post Medieval railings	RAILINGS	Post Medieval
MCO64398	MCO64398	HUGH TOWN - Late C18/Early C19 house	HOUSE	18th Century to 19th Century
MCO64399	MCO64399	HUGH TOWN - Late C18/Early C19 house	HOUSE	18th Century to 19th Century
MCO64401	MCO64401	HUGH TOWN - Early C19 houses	HOUSE	19th Century
MCO64402	MCO64402	HUGH TOWN - C18 house	HOUSE	18th Century
MCO64403	MCO64403	HUGH TOWN - C18 row	ROW	18th Century
MCO64405	MCO64405	HUGH TOWN - Late C19 villa	VILLA	19th Century
MCO64405	MCO64405	HUGH TOWN - Late C19 villa	VILLA	19th Century
MCO64406	MCO64406	HUGH TOWN - Early C19 house	HOUSE	19th Century
MCO64407	MCO64407	HUGH TOWN - C19 terrace	TERRACE	19th Century
MCO64408	MCO64408	HUGH TOWN - Post Medieval pavement	PAVEMENT	Post Medieval
MCO30536	MCO30536	GARRISON LANE - Post Medieval nonconformist chapel	WESLEYAN METHODIST CHAPEL	19th Century to Unknown
MCO31762	MCO31762	VERONICA LODGE - Post Medieval house	HOUSE	18th Century

MCO30270	MCO30270	CARN THOMAS – Post Medieval lifeboat station	LIFEBOAT STATION	19th Century to 20th Century
MCO64410	MCO64410	HUGH TOWN – C19 house	HOUSE	19th Century
MCO64412	MCO64412	HUGH TOWN – C19 wall	WALL	19th Century
MCO64414	MCO64414	HUGH TOWN – Early C19 house	HOUSE	19th Century
MCO64415	MCO64415	HUGH TOWN – Early C19 shop	SHOP	19th Century
MCO64416	MCO64416	HUGH TOWN – Late C18 cottage	HOUSE	18th Century
MCO64417	MCO64417	HUGH TOWN – Post Medieval row	ROW	Post Medieval
MCO64418	MCO64418	HUGH TOWN – Post Medieval lifeboat shed	LIFEBOAT STATION	Post Medieval
MCO64419	MCO64419	HUGH TOWN – C20 council flats	COUNCIL FLATS	20th Century
MCO64420	MCO64420	HUGH TOWN – Post Medieval building	BUILDING	Post Medieval
MCO64421	MCO64421	HUGH TOWN – C19 house	HOUSE	19th Century
MCO58040	MCO58040	ST MARYS – C17 house	HOUSE	17th Century to 19th Century
MCO64423	MCO64423	HUGH TOWN – Post Medieval lane	ROAD	Post Medieval

MCO64424	MCO64424	HUGH TOWN - Post Medieval lane	ROAD	Post Medieval
MCO64425	MCO64425	HUGH TOWN - C20 council houses	COUNCIL HOUSE	20th Century
MCO64426	MCO64426	HUGH TOWN - Post Medieval steps	STEPS	Post Medieval
MCO64428	MCO64428	HUGH TOWN - C19 piers	COLUMN	19th Century
MCO64429	MCO64429	HUGH TOWN - Post Medieval building	BUILDING	Post Medieval to World War Two
MCO64429	MCO64429	HUGH TOWN - Post Medieval building	BUILDING	Post Medieval to World War Two
MCO64429	MCO64429	HUGH TOWN - Post Medieval building	BUILDING	Post Medieval to World War Two
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MCO64429	MCO64429	HUGH TOWN – Post Medieval building	BUILDING	Post Medieval to World War Two
MCO31771	MCO31771	WELLFORD – Post Medieval barracks	BARRACKS	19th Century

MCO64429	MCO64429	HUGH TOWN – Post Medieval building	BUILDING	Post Medieval to World War Two
MCO64429	MCO64429	HUGH TOWN – Post Medieval building	BUILDING	Post Medieval to World War Two
MCO64429	MCO64429	HUGH TOWN – Post Medieval building	BUILDING	Post Medieval to World War Two
MCO64429	MCO64429	HUGH TOWN – Post Medieval building	BUILDING	Post Medieval to World War Two
MCO68443	MCO68443	HUGH TOWN – Early C19 house; C19 inn	HOUSE; INN	19th Century
MCO41956	MCO41956	PORTH CRESSA – Modern structure	STRUCTURE?	20th Century
MCO41958	MCO41958	MOUNT FLAGON – Undated structure	STRUCTURE	Unknown
MCO41966	MCO41966	NEWFORD ISLAND – Post Medieval quay	QUAY?	Post Medieval
MCO41965	MCO41965	NEWFORD ISLAND – Post Medieval quay	QUAY	Post Medieval
MCO41963	MCO41963	PORTHLOO – Modern field system	FIELD SYSTEM?	20th Century
MCO41962	MCO41962	MOUNT FLAGON – Undated ditch	DITCH	Unknown
MCO41959	MCO41959	LOWER MOORS – Medieval field boundary	FIELD BOUNDARY?	Medieval
MCO41957	MCO41957	LOWER MOORS – Post Medieval field system	FIELD SYSTEM	Post Medieval

MCO41956	MCO41956	PORTH CRESSA – Modern structure	STRUCTURE?	20th Century
MCO41952	MCO41952	THE GARRISON – Early Medieval trackway	TRACKWAY	Early Medieval to Modern
MCO41956	MCO41956	PORTH CRESSA – Modern structure	STRUCTURE?	20th Century
MCO41965	MCO41965	NEWFORD ISLAND – Post Medieval quay	QUAY	Post Medieval
MCO41966	MCO41966	NEWFORD ISLAND – Post Medieval quay	QUAY?	Post Medieval
MCO41957	MCO41957	LOWER MOORS – Post Medieval field system	FIELD SYSTEM	Post Medieval
MCO41957	MCO41957	LOWER MOORS – Post Medieval field system	FIELD SYSTEM	Post Medieval
MCO41957	MCO41957	LOWER MOORS – Post Medieval field system	FIELD SYSTEM	Post Medieval
MCO41958	MCO41958	MOUNT FLAGON – Undated structure	STRUCTURE	Unknown
MCO41959	MCO41959	LOWER MOORS – Medieval field boundary	FIELD BOUNDARY?	Medieval
MCO41962	MCO41962	MOUNT FLAGON – Undated ditch	DITCH	Unknown
MCO41963	MCO41963	PORTHLOO – Modern field system	FIELD SYSTEM?	20th Century
MCO30173	MCO30173	BARTHOLOMEW BATTERY – Modern well	WELL	20th Century
MCO74280	MCO74280	THE GARRISON – Undated earthworks	EARTHWORK	Unknown

MCO74280	MCO74280	THE GARRISON – Undated earthworks	EARTHWORK	Unknown
MCO30632	MCO30632	HARRYS WALLS – Post-Medieval fort	ARTILLERY CASTLE; REFUSE DISPOSAL SITE	16th Century to 18th Century
MCO30877	MCO30877	NEWFORD ISLAND – Post Medieval breastwork	BREASTWORK?	Civil War (1642 to 1651)
MCO30225	MCO30225	BUZZA HILL – Bronze Age entrance grave	ENTRANCE GRAVE	Bronze Age
MCO31164	MCO31164	PORTHLOO – Modern Foundation	CONSTRUCTION TRENCH; EARTHWORK?	20th Century
MCO31841	MCO31841	WOOLPACK BATTERY – Post Medieval battery	BATTERY	19th Century
MCO31841	MCO31841	WOOLPACK BATTERY – Post Medieval battery	BATTERY	19th Century
MCO31841	MCO31841	WOOLPACK BATTERY – Post Medieval battery	BATTERY	19th Century
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MCO31841	MCO31841	WOOLPACK BATTERY – Post Medieval battery	BATTERY	19th Century
MCO31532	MCO31532	STORE HOUSE BATTERY – Post Medieval battery	BATTERY	18th Century
MCO31521	MCO31521	STEVAL BATTERY – Post Medieval battery	BATTERY	19th Century
MCO31521	MCO31521	STEVAL BATTERY – Post Medieval battery	BATTERY	19th Century
MCO31521	MCO31521	STEVAL BATTERY – Post Medieval battery	BATTERY	19th Century
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MCO31521	MCO31521	STEVAL BATTERY – Post Medieval battery	BATTERY	19th Century
MCO31519	MCO31519	STEVAL BATTERY – Post Medieval battery	COASTAL BATTERY	16th Century to 19th Century

MCO31584	MCO31584	THE GARRISON – Post Medieval curtain wall	CURTAIN WALL	17th Century
MCO30715	MCO30715	KING CHARLES BATTERY – Post Medieval battery	BATTERY	18th Century
MCO31527	MCO31527	STEVAL POINT BATTERY – Post Medieval battery	BATTERY	19th Century
MCO30845	MCO30845	MORNING POINT BATTERY – Post Medieval battery	COASTAL BATTERY	18th Century
MCO31840	MCO31840	WOOLPACK POINT BATTERY – Post Medieval battery	BATTERY	18th Century
MCO31522	MCO31522	STEVAL POINT BATTERY – Post Medieval building	BUILDING	19th Century
MCO41951	MCO41951	THE GARRISON – Early Medieval trackway	TRACKWAY	Early Medieval to Modern
MCO30441	MCO30441	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval battery	BATTERY	18th Century
MCO30171	MCO30171	BARTHOLOMEW BATTERY – Post Medieval battery	BATTERY	18th Century
MCO31839	MCO31839	WOOLPACK BATTERY – Post Medieval bastion outwork	BASTION OUTWORK	18th Century
MCO31850	MCO31850	WOOLPACK QUARRY – Post Medieval quarry	QUARRY	18th Century
MCO31843	MCO31843	WOOLPACK BATTERY – Post Medieval building	BUILDING	Post Medieval
MCO31849	MCO31849	WOOLPACK QUARRY – Post Medieval quarry	QUARRY	18th Century

MCO55581	MCO55581	WOOLPACK BATTERY – C19th Electric Light Directing Station	COAST ARTILLERY SEARCHLIGHT; PILLBOX; TRENCH	19th Century to World War Two
MCO31837	MCO31837	WOOLPACK BATTERY – Post Medieval postern	POSTERN	Post Medieval
MCO31838	MCO31838	WOOLPACK BATTERY – Post Medieval bastion outwork	BASTION OUTWORK	18th Century
MCO31560	MCO31560	THE FOLLY – Post Medieval bastion outwork	BASTION OUTWORK	18th Century
MCO30844	MCO30844	MORNING POINT BATTERY – Post Medieval bastion outwork	BASTION OUTWORK	18th Century
MCO31844	MCO31844	WOOLPACK BATTERY – Modern pillbox	PILLBOX	World War Two
MCO31526	MCO31526	STEVAL POINT – Modern searchlight battery	SEARCHLIGHT BATTERY	20th Century
MCO31529	MCO31529	STEVAL POINT BATTERY – Modern pillbox	PILLBOX	World War Two
MCO31528	MCO31528	STEVAL POINT – Post Medieval searchlight battery	SEARCHLIGHT BATTERY	19th Century
MCO31523	MCO31523	STEVAL POINT – Post Medieval quarry	QUARRY	Civil War (1642 to 1651)
MCO31520	MCO31520	STEVAL BATTERY – Post Medieval bastion outwork	BASTION OUTWORK	18th Century
MCO31518	MCO31518	STEVAL BATTERY – Post Medieval battery	COASTAL BATTERY	18th Century
MCO30847	MCO30847	MORNING POINT – Post Medieval quarry	QUARRY	18th Century

MCO30841	MCO30841	MORNING POINT – Post Medieval battery	BATTERY	17th Century
MCO30799	MCO30799	LOWER BROOM BATTERY – Medieval quarry, Post Medieval quarry	QUARRY?; QUARRY?	Unknown to 18th Century
MCO30802	MCO30802	LOWER BROOM BATTERY – Post Medieval battery	COASTAL BATTERY	18th Century
MCO30170	MCO30170	BARTHOLOMEW BATTERY – Post Medieval quarry	QUARRY	18th Century
MCO30172	MCO30172	BARTHOLOMEW BATTERY – Modern building	BUILDING	20th Century
MCO31513	MCO31513	STAR CASTLE – Post Medieval dewpond	DEWPOND	18th Century
MCO31506	MCO31506	STAR CASTLE – Post Medieval quarry	QUARRY	Post Medieval
MCO31746	MCO31746	UPPER BENHAM BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO31746	MCO31746	UPPER BENHAM BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO31748	MCO31748	UPPER BENHAM BATTERY – Modern pillbox	PILLBOX	World War Two
MCO30491	MCO30491	DUKE OF LEEDS BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO30724	MCO30724	KING GEORGES BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO31770	MCO31770	WELL BATTERY – Post Medieval battery	BATTERY	17th Century
MCO30611	MCO30611	GUNNERS WELL – Post Medieval well	WELL	Post Medieval

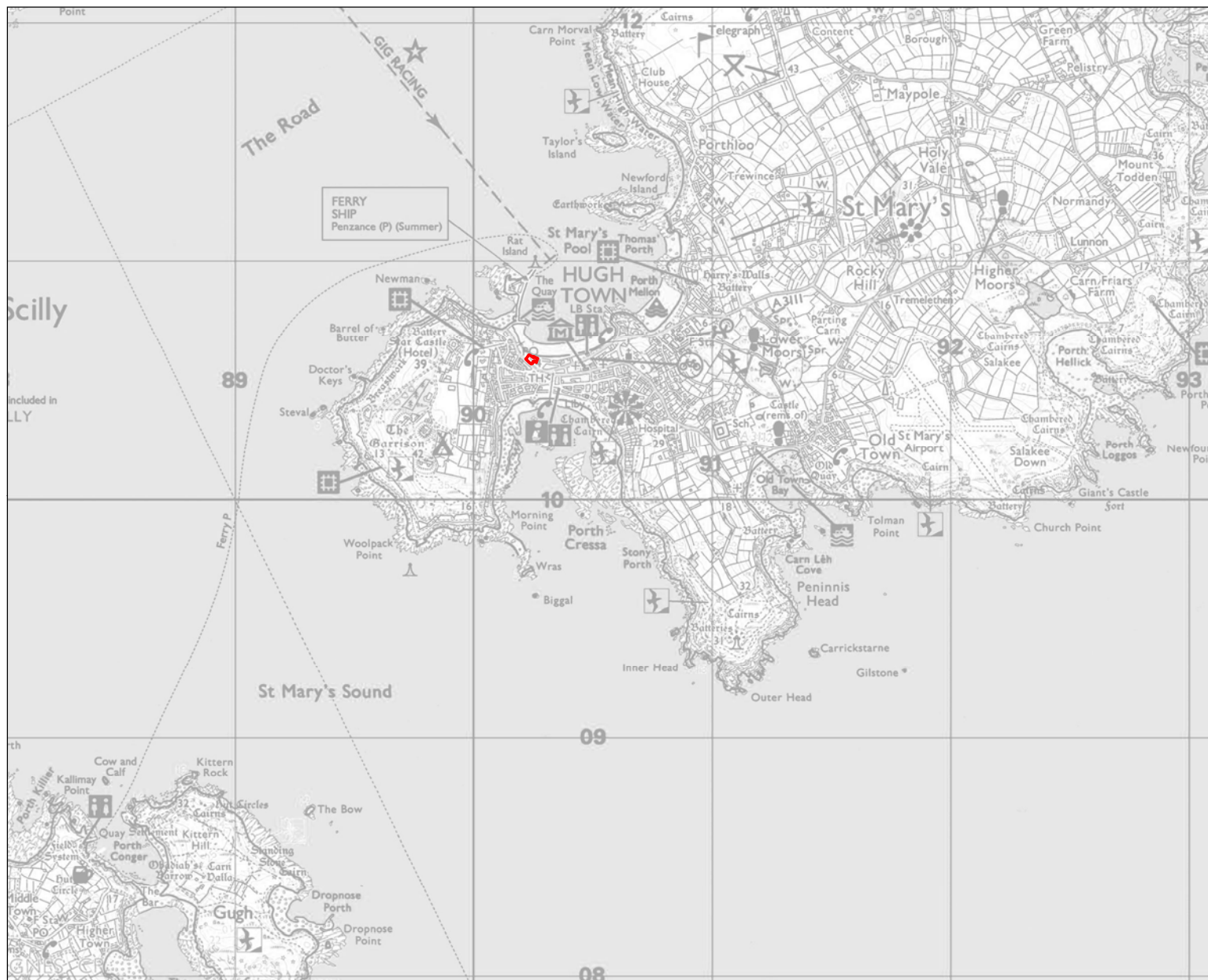
MCO55582	MCO55582	THE GARRISON – Prehistoric or Medieval field system	BANK (EARTHWORK); FIELD BOUNDARY?; FIELD SYSTEM?	Palaeolithic to Medieval
MCO31004	MCO31004	HUGH TOWN – Post Medieval windmill	WINDMILL	16th Century to 17th Century
MCO31836	MCO31836	WOOLPACK BATTERY – Post Medieval garden	GARDEN	18th Century
MCO31550	MCO31550	ST MARYS – Post Medieval quarry	QUARRY	Post Medieval
MCO31575	MCO31575	THE GARRISON – Post Medieval weather vane	WEATHER VANE	Post Medieval
MCO30437	MCO30437	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval battery	COASTAL BATTERY	17th Century
MCO30439	MCO30439	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval quarry	QUARRY	Post Medieval
MCO30440	MCO30440	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval postern	POSTERN	18th Century
MCO30442	MCO30442	COLONEL GEORGE BOSCAWENS BATTERY – Post Medieval engine house	ENGINE HOUSE; GENERATOR HOUSE	19th Century
MCO31833	MCO31833	WOOLPACK BATTERY – Post Medieval quarry	QUARRY	Post Medieval
MCO31533	MCO31533	STORE HOUSE WELL – Early Medieval well	WELL	Early Medieval to Modern

MCO44708	MCO44708	STORE HOUSE BATTERY – Post Medieval privy house	PRIVY HOUSE	19th Century
MCO31563	MCO31563	THE GARRISON – Post Medieval fortification	FORTIFICATION	Post Medieval
MCO30603	MCO30603	GREYSTONES – Post Medieval barracks	BARRACKS; RADAR STATION	19th Century to 20th Century
MCO30603	MCO30603	GREYSTONES – Post Medieval barracks	BARRACKS; RADAR STATION	19th Century to 20th Century
MCO30603	MCO30603	GREYSTONES – Post Medieval barracks	BARRACKS; RADAR STATION	19th Century to 20th Century
MCO30603	MCO30603	GREYSTONES – Post Medieval barracks	BARRACKS; RADAR STATION	19th Century to 20th Century
MCO30603	MCO30603	GREYSTONES – Post Medieval barracks	BARRACKS; RADAR STATION	19th Century to 20th Century
MCO31582	MCO31582	THE GARRISON – Post Medieval gate	GATE	17th Century



## Appendix 2: Figures





## KEY

Red Line Boundary

Courtesy of Emapsite

## Figure 1: Site Location

Co-op, 4 Hugh Street,  
St Mary's, Isles of Scilly

Client: The Co-Operative Estates

DRWG No: P20-1954

Drawn by: JK

Date: 04/03/2025

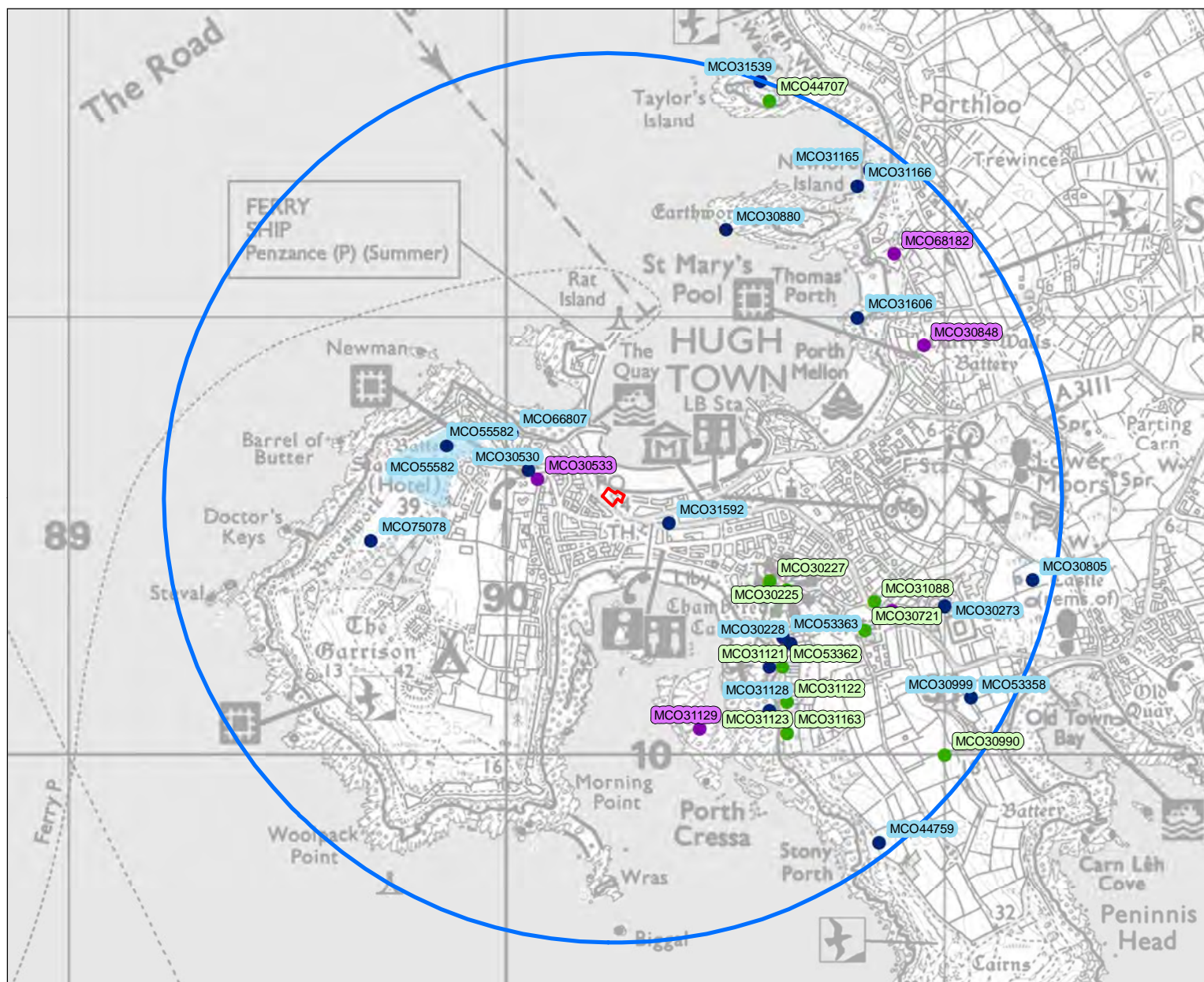
Scale: 1:25,000 @ A4

Approved by: GS









## KEY

- 1km Study Area
- Red Line Boundary
- Prehistoric points
- Prehistoric polygons
- Neolithic points
- Bronze Age Points
- Bronze Age polygon

Contains Cornwall HER data. Records labelled by their MonUID: please cross reference to Appendix 1 of the Heritage Desk-Based Assessment.

## Figure 3: HER Monuments Early Prehistoric

Co-op, 4 Hugh Street,  
St Mary's, Isles of Scilly

Client: The Co-Operative Estates

DRWG No: P20-1954

Drawn by: JK

Date: 04/03/2025

Scale: 1:13,633 @ A4

Approved by: GS



## KEY

- 1km Study Area
- Red Line Boundary
- Iron Age
- Romano- British

Contains Cornwall HER data. Records labelled by their MonUID: please cross reference to Appendix 1 of the Heritage Desk-Based Assessment.

## Figure 4: HER Monuments Iron Age and Romano- British

Co-op, 4 Hugh Street,  
St Mary's, Isles of Scilly

Client: The Co-Operative Estates

DRWG No: P20-1954

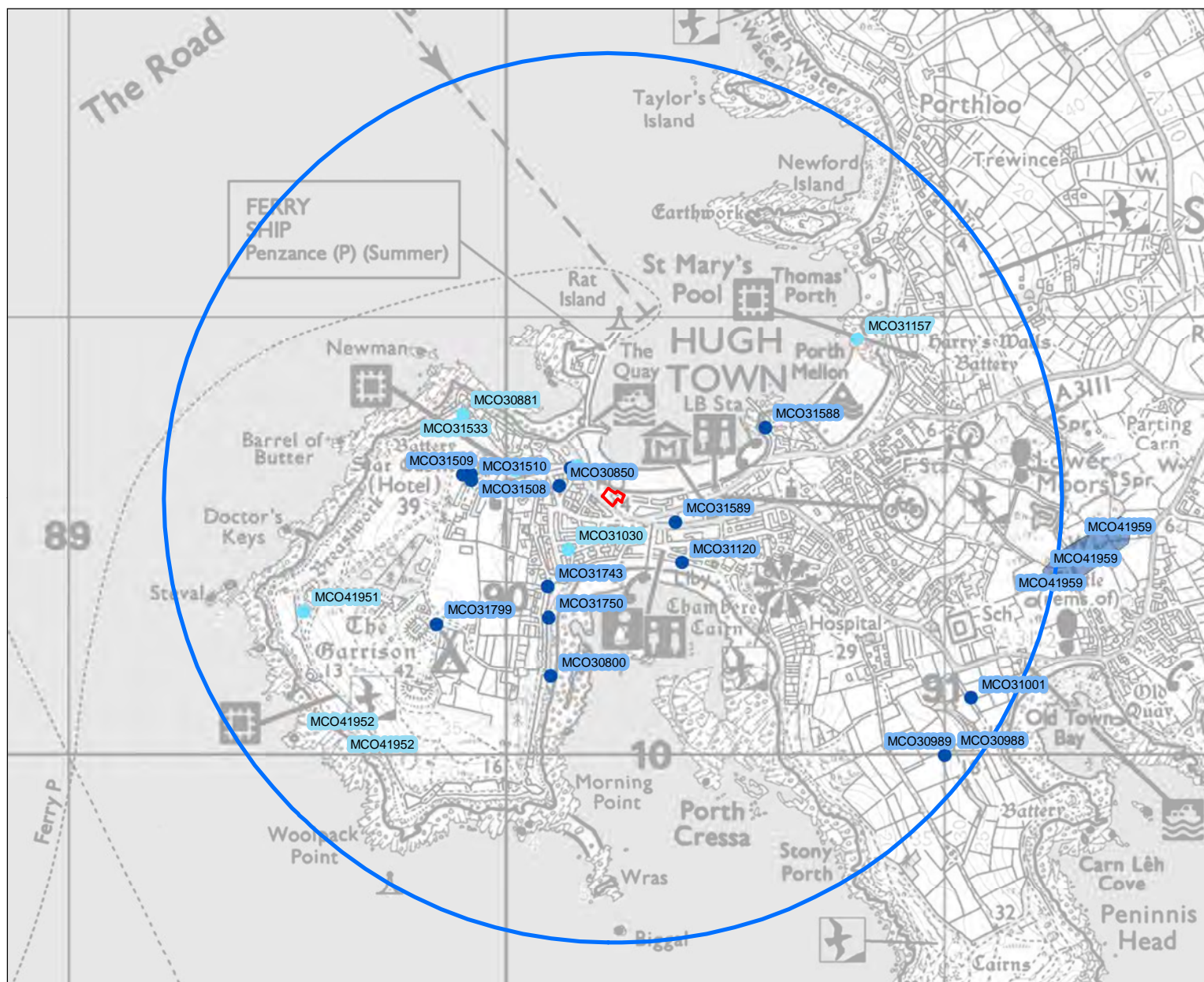
Drawn by: JK

Date: 04/03/2025

Scale: 1:13,633 @ A4

Approved by: GS





## KEY

- 1km Study Area
- Red Line Boundary
- Early Medieval points
- Early Medieval polygons
- Medieval points
- Medieval polygons

Contains Cornwall HER data. Records labelled by their MonUID: please cross reference to Appendix 1 of the Heritage Desk-Based Assessment.

## Figure 5: HER Monuments Medieval

Co-op, 4 Hugh Street,  
St Mary's, Isles of Scilly

Client: The Co-Operative Estates

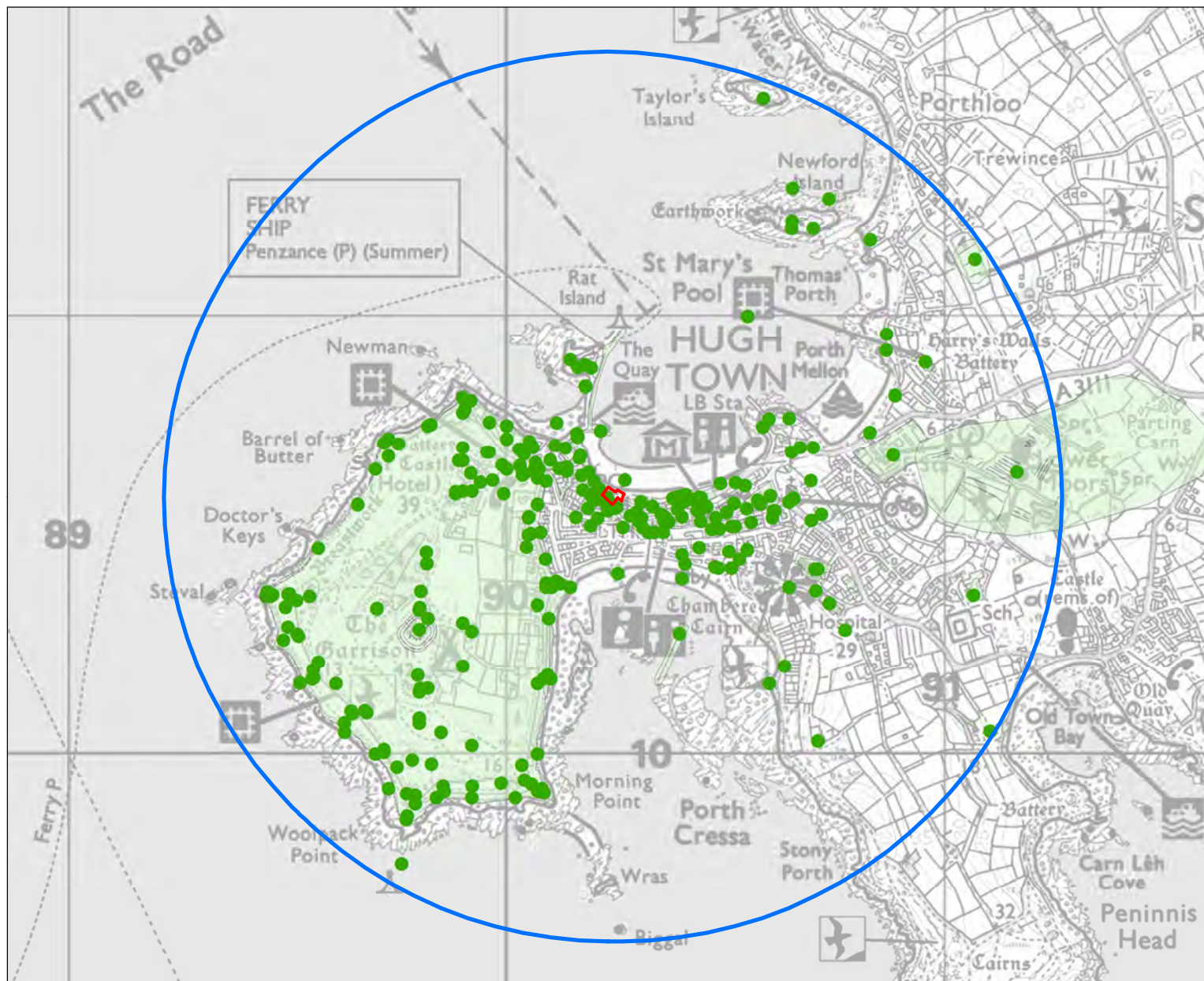
DRWG No: P20-1954

Drawn by: JK

Date: 04/03/2025

Scale: 1:13,633 @ A4

Approved by: GS



## KEY

- 1km Study Area
- Red Line Boundary
- PM and Modern points
- PM and Modern polygons

Contains Cornwall HER data. Records labelled by their MonUID: please cross reference to Appendix 1 of the Heritage Desk-Based Assessment.

## Figure 6: HER Monuments Post Medieval and Modern

Co-op, 4 Hugh Street,  
St Mary's, Isles of Scilly

Client: The Co-Operative Estates

DRWG No: P20-1954

Drawn by: JK

Date: 04/03/2025

Scale: 1:13,633 @ A4

Approved by: GS





## KEY

- 1km Study Area
- Red Line Boundary
- Undated points
- Undated polygons

Contains Cornwall HER data. Records labelled by their MonUID: please cross reference to Appendix 1 of the Heritage Desk-Based Assessment.

## Figure 7: HER Monuments Undated

Co-op, 4 Hugh Street,  
St Mary's, Isles of Scilly

Client: The Co-Operative Estates

DRWG No: P20-1954

Drawn by: JK

Date: 04/03/2025

Scale: 1:13,633 @ A4

Approved by: GS

0 500 Metres





## Appendix 3: Assessment Methodology

### Assessment of significance

In the *NPPF*, heritage significance is defined 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 presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”*<sup>39</sup>

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.<sup>40</sup>

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.<sup>41</sup> These essentially cover the heritage ‘interests’ given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.<sup>42</sup>

The *PPG* provides further information on the interests it identifies:

- **Archaeological interest:** *As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective

<sup>39</sup> MHCLG, *NPPF*, Annex 2.

<sup>40</sup> Historic England, *GPA:2*.

<sup>41</sup> Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values

are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

<sup>42</sup> MHCLG, *NPPF*, Annex 2; DLUHC, *PPG*, paragraph 006, reference ID: 18a-006-2019072.

experience of a place and can symbolise wider values such as faith and cultural identity.<sup>43</sup>

Significance results from a combination of any, some, or all of the interests described above.

Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.<sup>44</sup>

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

### Setting and significance

As defined in the *NPPF*:

***“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”<sup>45</sup>***

Setting is defined as:

***“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”<sup>46</sup>***

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

### Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.<sup>47</sup>

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

<sup>43</sup> MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

<sup>44</sup> Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).

<sup>45</sup> MHCLG, *NPPF*, Annex 2.

<sup>46</sup> MHCLG, *NPPF*, Annex 2.

<sup>47</sup> Historic England, *GPA:3*, pp. 8, 11.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

***Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.***

***Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may***

***include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”<sup>48</sup>***

## Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance**, as identified in paragraph 213 of the *NPPF*, comprising Grade I and II\* Listed Buildings, Grade I and II\* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 75 of the *NPPF*;<sup>49</sup>
- **Designated heritage assets of less than the highest significance**, as identified in paragraph 213 of the *NPPF*, comprising Grade II Listed Buildings and

<sup>48</sup> Catesby Estates Ltd. v. Steer [2018] EWCA Civ 1697, paras. 25 and 26.

<sup>49</sup> MHCLG, *NPPF*, para. 213 and fn. 75.

Grade II Registered Parks and Gardens (and also some Conservation Areas);<sup>50</sup> and

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as *“buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”*.<sup>51</sup>

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

### Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would *“have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”*;<sup>52</sup> and
- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the PPG states:

***“Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”***<sup>53</sup>

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm

<sup>50</sup> MHCLG, NPPF, para. 213.

<sup>51</sup> MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

<sup>52</sup> Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

<sup>53</sup> MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, "preserving" means doing "no harm".<sup>54</sup>

Preservation does not mean no change, it specifically means no harm. GPA:2 states that "Change to heritage assets is inevitable but it is only harmful when significance is damaged".<sup>55</sup> Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in GPA:3, described above. Fundamental to this methodology is a consideration of "what matters and why".<sup>56</sup> Of particular relevance is the checklist given on page 13 of GPA:3.<sup>57</sup>

It should be noted that this key document also states:

***"Setting is not itself a heritage asset, nor a heritage designation..."***<sup>58</sup>

<sup>54</sup> R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

<sup>55</sup> Historic England, GPA:2, p. 9.

<sup>56</sup> Historic England, GPA:3, p. 8.

<sup>57</sup> Historic England, GPA:3, p. 13.

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, GPA:3 states that:

***"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".***<sup>59</sup>

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.<sup>60</sup>

## Benefits

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

As detailed further in **Appendix 5**, the NPPF (at Paragraphs 214 and 215) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.<sup>61</sup>

<sup>58</sup> Historic England, GPA:3, p. 4.

<sup>59</sup> Historic England, GPA 3., p. 8.

<sup>60</sup> Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.

<sup>61</sup> MHCLG, NPPF, paras. 214 and 215.

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 214 to 216.<sup>62</sup>

The *PPG* provides further clarity on what is meant by the term ‘public benefit’, including how these may be derived from enhancement to the historic environment (‘heritage benefits’), as follows:

***“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.***

***Examples of heritage benefits may include:***

- ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***

- ***reducing or removing risks to a heritage asset***
- ***securing the optimum viable use of a heritage asset in support of its long term conservation.”***<sup>63</sup>

Any “*heritage benefits*” arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

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<sup>62</sup> Including – *Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor* [2020] EWHC 2292 (Admin); *DLUHC, NPPF*, paras. 207 and 209.

<sup>63</sup> MHCLG, *PPG*, paragraph 020, reference ID: 18a-020-20190723.

## Appendix 4: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.<sup>64</sup> It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 66(1) of the Act goes on to state that:

***“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority 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 which it possesses.”***<sup>65</sup>

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

***“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight”***

***when the decision-maker carries out the balancing exercise.”***<sup>66</sup>

A judgement in the Court of Appeal (‘Mordue’) has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 215 of the current, revised NPPF, see **Appendix 5**), this is in keeping with the requirements of the 1990 Act.<sup>67</sup>

With regards to development within Conservation Areas, Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states:

***“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”***<sup>68</sup>

Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.

<sup>64</sup> UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

<sup>65</sup> UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

<sup>66</sup> Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.

<sup>67</sup> Jones v Mordue [2015] EWCA Civ 1243.

<sup>68</sup> UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).



In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.<sup>69</sup>

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<sup>69</sup> UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

## Appendix 5: National Policy Guidance

### The National Planning Policy Framework (December 2024)

National policy and guidance is set out in the Government's *National Planning Policy Framework (NPPF)* published in December 2024. This replaced and updated the previous *NPPF* (December 2023). The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

***"Plans and decisions should apply a presumption in favour of sustainable development.***

...

***For decision-taking this means:***

- a. approving development proposals that accord with an up-to-date development plan without delay; or***
- b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:***
  - i. the application policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or***

- ii. ***any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.***<sup>70</sup>

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

***“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”***<sup>71</sup> (our emphasis)

The NPPF continues to recognise that the planning system is planned and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the NPPF 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. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”***<sup>72</sup>

The NPPF goes on to define a Designated Heritage Asset as a:

***“World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation.”***<sup>73</sup>

As set out above, significance is also defined as:

***“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value***

<sup>70</sup> MHCLG, NPPF, para. 11.

<sup>71</sup> MHCLG, NPPF, para. 11, fn. 7.

<sup>72</sup> MHCLG, NPPF, Annex 2.

<sup>73</sup> MHCLG, NPPF, Annex 2.

***described within each site's Statement of Outstanding Universal Value forms part of its significance."***<sup>74</sup>

Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 208 that:

***"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."***<sup>75</sup>

Paragraph 210 goes on to state that:

***"In determining planning applications, local planning authorities should take account of:***

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;***
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and***

- c. the desirability of new development making a positive contribution to local character and distinctiveness."***<sup>76</sup>

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 212 and 213 are relevant and read as follows:

***"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."***<sup>77</sup>

***"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:***

- a. grade II listed buildings, or grade II registered parks or gardens, should be exceptional;***
- b. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and***

<sup>74</sup> MHCLG, NPPF, Annex 2.

<sup>75</sup> MHCLG, NPPF, para. 208.

<sup>76</sup> MHCLG, NPPF, para. 210.

<sup>77</sup> MHCLG, NPPF, para. 212.

***gardens, and World Heritage Sites, should be wholly exceptional.”<sup>78</sup>***

In the context of the above, it should be noted that paragraph 214 reads as follows:

***“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 total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:***

- a. the nature of the heritage asset prevents all reasonable uses of the site; and***
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and***
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and***
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.”<sup>79</sup>***

Paragraph 215 goes on to state:

***“Where a development proposal will lead to less than substantial harm to the significance of a designated***

***heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”<sup>80</sup>***

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 219 that:

***“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. 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.”<sup>81</sup>***

Paragraph 220 goes on to recognise that “not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance” and with regard to the potential harm from a proposed development states:

***“Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation***

<sup>78</sup> MHCLG, NPPF, para. 213.

<sup>79</sup> MHCLG, NPPF, para. 214.

<sup>80</sup> MHCLG, NPPF, para. 215.

<sup>81</sup> MHCLG, NPPF, para 219.

***Area or World Heritage Site as a whole.***<sup>82</sup> (our emphasis)

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

### **National Planning Practice Guidance**

The then Department for Communities and Local Government (now the Ministry of Housing, Communities & Local Government (MHCLG)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of ‘significance’ in decision taking is important and states:

***“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the***

***contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.***<sup>83</sup>

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

***“In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.***

***While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even***

<sup>82</sup> MHCLG, NPPF, para. 220.

<sup>83</sup> MHCLG, PPG, paragraph 007, reference ID: 18a-007-20190723.

***minor works have the potential to cause substantial harm.***<sup>84</sup> (our emphasis)

#### National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

***"When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape."***<sup>85</sup>

***"Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way."***<sup>86</sup>

It goes on to state that:

***"Well-designed places and buildings are influenced positively by:***

- ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***
- ***the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;***
- ***the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity.***

***Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21<sup>st</sup> century."***<sup>87</sup>

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<sup>84</sup> MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

<sup>85</sup> MHCLG, NDG, para. 46.

<sup>86</sup> MHCLG, NDG, para. 47.

<sup>87</sup> MHCLG, NDG, paras. 48-49.



## Appendix 6: Relevant Development Plan Policies

Applications for Planning Permission and Listed Building are currently considered against the policy and guidance set out within the Isles of Scilly Local Plan (2015–2030), adopted by the Council on 25th March 2021.

The planning policies pertinent to the proposed site are summarised below.

### **Policy OE7 – Development Affecting Heritage**

Great weight is attributed towards the conservation of heritage assets and any potential harm to the significance of either a designated or non-designated assets must be justified.

Where development is proposed within the Isles of Scilly Conservation Area (which covers all islands including St. Mary's) applications will be permitted provided they preserve or enhance the character or appearance of the area and its setting. This is in addition to ensuring the design and location of the proposal has taken into account: 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.

In addition to the above, all development proposals should be informed by proportionate historic environment assessments and evaluations. The buildings or significant cultural and heritage features; ii) safeguarding the amenity of individuals and properties by creating a high-quality environment that addresses issues of privacy, overlooking, overshadowing, overbearing impacts and purpose of which is to identify the significance of all heritage assets that would be affected by the proposal; the nature and degree of

any affects; and demonstrate how any harm would be avoided, minimised and / or mitigated.

### **Supplementary Planning Documents**

Supplementary Planning Documents (SPDs) provide further guidance regarding the implementation of adopted planning policies. According to the Council's website although all SPDs are due to be updated in line with the new Local Plan, those which supported the previous Local Plan are still material considerations in the determination of planning applications.

Given the nature of the proposals being considered, the Isles of Scilly Design Guide (adopted 2006) is of most relevance. The document aims to ensure the highest standard of development are achieved by identifying key character areas and design principles to inform planning applications. The SPD provides an assessment of the character of Hugh Street and this assessment and the impact of development proposals upon it would be a consideration in the determination of a planning application.

Planning (Listed Buildings and Conservation Areas) Act 1990  
Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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By Lisa Walton at 2:49 pm, Jul 30, 2025

# The Co-operative

Hugh Street,  
Hugh Town,  
Saint Mary's,  
Isles of Scilly

## Plant Noise Impact Assessment

On behalf of



Project Reference: 86738 | Revision: - | Date: 20<sup>th</sup> February 2025

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For and on behalf of Noise Solutions Ltd				

Revision	Date	Description	Prepared	Reviewed/ Approved

Noise Solutions Ltd (NSL) disclaims any responsibility to the Client and others in respect of any matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence within the terms of the Contract with the Client and generally in accordance with the appropriate ACE Agreement and taking account of the manpower, resources, investigations and testing devoted to it by agreement with the Client. This report is confidential to the Client and NSL (Noise Solutions Ltd) accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

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## **Executive Summary**

Noise Solutions Limited has been appointed to undertake a noise impact assessment of proposed replacement plant to be installed at a Co-operative store at Hugh Street, Saint Mary's, Isles of Scilly.

The assessment shows that noise from the proposed plant will comply with the local authority's usual requirements and should therefore be acceptable.

---

## 1.0 Introduction

- 1.1. Noise Solutions Ltd (NSL) has been commissioned to undertake a noise impact assessment of proposed replacement plant at the Co-operative store on Hugh Street, St Mary's, Isles of Scilly.
- 1.2. An environmental sound survey has been undertaken to establish the prevailing background sound pressure levels at a location representative of the sound levels outside the nearest noise sensitive receptors to the site.
- 1.3. Plant noise levels have been predicted at the nearest noise-sensitive receptors and assessed against the local authority's usual requirements..
- 1.4. To assist with the understanding of this report a glossary of acoustic terms can be found in [Appendix A](#). An in-depth glossary of acoustic terms can be viewed online at [www.acoustic-glossary.co.uk](http://www.acoustic-glossary.co.uk).

## 2.0 Details of development proposals

- 2.1. It is proposed to replace the existing plant serving the Co-operative store on Hugh Street, St Mary's, Isles of Scilly.
- 2.2. Plant is to comprise two combined gas cooler and compressor packs along with two external air conditioning (AC) condensers. The AC units will be installed within acoustic enclosures. The AC plant will operate only when the store is open; the refrigeration plant will operate at all times but will typically run at reduced duty at night.
- 2.3. A site plan showing the site and surrounding area and the noise monitoring location used in this assessment is presented in [Appendix B](#). A proposed layout is shown in [Appendix D](#).
- 2.4. Manufacturer noise data for the equipment is given in [Appendix E](#).

## 3.0 Nearest noise sensitive receptors

- 3.1. The area surrounding the site is a mixture of commercial and residential properties and is adjacent to a beach.
- 3.2. The nearest noise sensitive properties to the potential noise sources are the flats above the Co-op store (R1). These properties are likely to have full line of sight of the plant area, with the nearest window being around 4m from the plant.
- 3.3. [Appendix B](#) shows the locations of the receptors.



## 4.0 Existing noise climate

4.1. An environmental noise survey was undertaken to establish the typical background sound levels at a location representative of the noise climate outside the façades of the nearest noise sensitive receptors to the proposed plant area during the quietest times at which the plant will operate. Measurements were taken at two locations:

- NMP1 – on the beach behind the store;
- NMP2 – on Thorofare at ground level.

4.2. The results of the environmental sound survey are summarised in Table 1 below. The full details of the survey methodology are presented in [Appendix C](#).

*Table 1 Summary of survey results*

Location	Measurement times	Range of recorded sound pressure levels (dB)			
		L <sub>Aeq</sub> (15mins)	L <sub>Amax</sub> (15mins)	L <sub>A10</sub> (15mins)	L <sub>A90</sub> (15mins)
Daytime (07.00 – 23.00 hours)					
NMP2	11/2/2025 21.00 to 22.00	44-45	63-70	45-46	41-41
NMP1	11/2/2025 22.30 to 23.00	42-43	60-68	44-45	39-39
Night-time (23.00 – 07.00 hours)					
NMP2	12/2/2025 02.00 to 03.15	42-44	53-63	44-45	40-41

4.3. Measurements at NMP2 are broadly similar to those at NMP1 on the beach. Measurements at NMP1 are used for all assessments in order to be maximally robust. 39dBA has therefore been selected to be a robust representation of the background noise level during the daytime period.

4.4. Similarly for the night-time period, 39dBA has been selected to be a robust representation of the background sound level, so as not to give rise to higher limits at night.

## 5.0 Plant noise design criteria

### Council of the Isles of Scilly

5.1. In the absence of specific confirmed criteria, it is proposed to assess noise from the plant against the methodology set out in BS4142:2014+A1:2019.

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## **BS 4142:2014 Methods for rating and assessing industrial and commercial sound**

- 5.2. BS 4142:2014 is intended to be used to assess the likely effects of sound on people residing in nearby dwellings. The scope of BS 4142:2014 includes "sound from fixed plant installations which comprise mechanical and electrical plant and equipment".
- 5.3. The procedure contained in BS 4142:2014 is to quantify the "specific sound level", which is the measured or predicted level of sound from the source in question over a one hour period for the daytime and a 15 minute period for the night-time. Daytime is defined in the standard as 07:00 to 23:00 hours, and night-time as 23:00 to 07:00 hours.
- 5.4. The specific sound level is converted to a rating level by adding penalties on a sliding scale to account for either potentially tonal or impulsive elements. The standard sets out objective methods for determining the presence of tones or impulsive elements, but notes that it is acceptable to subjectively determine these effects.
- 5.5. The penalty for tonal elements is between 0dB and 6dB, and the standard notes: "Subjectively, this can be converted to a penalty of 2 dB for a tone which is just perceptible at the noise receptor, 4 dB where it is clearly perceptible, and 6 dB where it is highly perceptible."
- 5.6. The penalty for impulsive elements is between 0dB and 9dB, and the standard notes: "Subjectively, this can be converted to a penalty of 3 dB for impulsivity which is just perceptible at the noise receptor, 6 dB where it is clearly perceptible, and 9 dB where it is highly perceptible."
- 5.7. The assessment outcome results from a comparison of the rating level with the background sound level. The standard states:
- Typically, the greater this difference, the greater the magnitude of the impact.
  - A difference of around +10 dB or more is likely to be an indication of a significant adverse impact, depending on the context;
  - A difference of around +5 dB is likely to be an indication of an adverse impact, depending on the context;
  - The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.

- 5.8. The standard does state that "adverse impacts include, but are not limited to, annoyance and sleep disturbance. Not all adverse impacts will lead to complaints and not every complaint is proof of an adverse impact."
- 5.9. The standard goes on to note that: "Where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background. This is especially true at night."
- 5.10. In addition to the margin by which the Rating Level of the specific sound source exceeds the Background Sound Level, the 2014 edition places emphasis upon an appreciation of the context, as follows:

*"An effective assessment cannot be conducted without an understanding of the reason(s) for the assessment and the context in which the sound occurs/will occur. When making assessments and arriving at decisions, therefore, it is essential to place the sound in context."*

- 5.11. BS 4142:2014 requires uncertainties in the assessment to be considered, and where the uncertainty is likely to affect the outcome of the assessment, steps should be taken to reduce the uncertainty.

### Proposed criteria

- 5.12. For design purposes, it is considered appropriate to use the strictest criterion of BS 4142:2014, that the rating level at the nearest residential receptors is no higher than the existing representative background sound level.
- 5.13. The cumulative noise level for the proposed plant at the nearest residential receptors should not therefore exceed the limits shown in Table 2 below:

*Table 2 Proposed plant noise rating level limits at noise sensitive residential receptors*

Period	Cumulative plant rating level, dB(A)
Daytime (07.00 – 23.00 hours)	39
Night-time (23.00 – 07.00 hours)	39

## 6.0 Plant noise impact assessment

- 6.1. Plant noise levels at the nearest noise sensitive receptors have been predicted based on manufacturer's noise data for the proposed equipment. The assessment has taken into consideration distance attenuation and directivity.

- 6.2. The proposed plant is not anticipated to exhibit any tonal or impulsive characteristics provided it is well maintained. All proposed external plant will be inverter driven and, therefore, will gently ramp up and down depending on the demands on the various systems. To provide a robust assessment, a 3dB acoustic feature correction as described in BS 4142:2014+A1:2019 for the possible presence of "...characteristics that are neither tonal nor impulsive, though otherwise are readily distinctive against the residual acoustic environment..." has been applied.
- 6.3. Table 3 summarises the results of the assessment at the most affected properties. All other nearby receptors benefit from increased distance and / or screening to the plant such that resulting noise levels will be lower than at the receptors considered. The full set of calculations can be found in **Appendix F**.

*Table 3 Guidance on maximum plant noise emission limits*

Receptor	Period	Predicted rating level at receptor, $L_{A,r,Tr}$ dB	Criterion dB, $L_{A,r,Tr}$	Excess, dB
R1	Daytime (07.00 – 23.00 hours)	39	39	0
	Night-time (23.00 – 07.00 hours)	32	39	-7

### Assessment of uncertainties

- 6.4. Where possible uncertainty in this assessment has been minimised by taking the following steps:
- The measurement of the background sound levels was undertaken over a period including the quietest times of the day and night.
  - The sound level meter and calibrator used have a traceable laboratory calibration and the meter was field calibrated before and after the measurements.
  - Uncertainty in the calculated impact has been reduced by the use of a well-established calculation method.
  - Care was taken to ensure that the measurement position was representative of the noise climate outside the nearby residential dwellings and not at a position where higher noise levels are present.

## 7.0 Summary

- 7.1. Noise Solutions Ltd has been commissioned to provide a noise impact assessment of proposed replacement plant to serve the Co-operative store on Hugh Street, St Marys, Isles of Scilly.

- 
- 7.2. An environmental noise survey has been undertaken to establish the existing prevailing noise levels at a location representative of the noise climate outside the nearest noise sensitive receptors to the site.
- 7.3. Plant noise levels have been predicted at the nearest noise-sensitive receptors. The assessment shows that noise from the proposed plant will comply with the local authority's usual requirements and other recognised guidance and should therefore be acceptable

## Appendix A Acoustic terminology

Parameter	Description
Ambient Noise Level	The totally encompassing sound in a given situation at a given time, usually composed of a sound from many sources both distant and near ( $L_{Aeq,T}$ ).
Decibel (dB)	A scale for comparing the ratios of two quantities, including sound pressure and sound power. The difference in level between two sounds $s_1$ and $s_2$ is given by $20 \log_{10} (s_1/s_2)$ . The decibel can also be used to measure absolute quantities by specifying a reference value that fixes one point on the scale. For sound pressure, the reference value is $20\mu\text{Pa}$ . The threshold of normal hearing is in the region of 0 dB and 140 dB is the threshold of pain. A change of 1 dB is only perceptible under controlled conditions.
dB(A), $L_{Ax}$	Decibels measured on a sound level meter incorporating a frequency weighting (A weighting) which differentiates between sounds of different frequency (pitch) in a similar way to the human ear. Measurements in dB(A) broadly agree with people's assessment of loudness. A change of 3 dB(A) is the minimum perceptible under normal conditions, and a change of 10 dB(A) corresponds roughly to halving or doubling the loudness of a sound. The background noise in a living room may be about 30 dB(A); normal conversation about 60 dB(A) at 1 metre; heavy road traffic about 80 dB(A) at 10 metres; the level near a pneumatic drill about 100 dB(A).
Fast Time Weighting	Setting on sound level meter, denoted by a subscript F, that determines the speed at which the instrument responds to changes in the amplitude of any measured signal. The fast time weighting can lead to higher values than the slow time weighting when rapidly changing signals are measured. The average time constant for the fast response setting is 0.125 (1/8) seconds.
Free-field	Sound pressure level measured outside, far away from reflecting surfaces (except the ground), usually taken to mean at least 3.5 metres
Façade	Sound pressure level measured at a distance of 1 metre in front of a large sound reflecting object such as a building façade.
$L_{Aeq,T}$	A noise level index called the equivalent continuous noise level over the time period T. This is the level of a notional steady sound that would contain the same amount of sound energy as the actual, possibly fluctuating, sound that was recorded.
$L_{max,T}$	A noise level index defined as the maximum noise level recorded during a noise event with a period T. $L_{max}$ is sometimes used for the assessment of occasional loud noises, which may have little effect on the overall $L_{eq}$ noise level but will still affect the noise environment. Unless described otherwise, it is measured using the 'fast' sound level meter response.
$L_{10,T}$	A noise level index. The noise level exceeded for 10% of the time over the period T. $L_{10}$ can be considered to be the "average maximum" noise level. Generally used to describe road traffic noise. $L_{A10,18h}$ is the A-weighted arithmetic average of the 18 hourly $L_{A10,1h}$ values from 06:00-24:00.
$L_{90,T}$	A noise level index. The noise level exceeded for 90% of the time over the period T. Generally used to describe background noise level.

## Appendix B      Photograph of site showing Receptors and Noise Monitoring Positions





## Appendix C Environmental sound survey

### Details of environmental sound survey

- C.1 Measurements of the existing background and ambient sound levels were undertaken between the times tabulated.
- C.2 The sound level meter was programmed to record the A-weighted  $L_{eq}$ ,  $L_{90}$ ,  $L_{10}$  and  $L_{max}$  noise indices for consecutive fifteen-minute sample periods for the duration of the survey.

### Measurement position

- C.3 The approximate measurement locations are indicated on the plan in [Appendix B](#).
- C.4 In accordance with BS 7445-2:1991 'Description and measurement of environmental noise – Part 2: Guide to the acquisition of data pertinent to land use', the measurements were undertaken under free-field conditions.

### Equipment

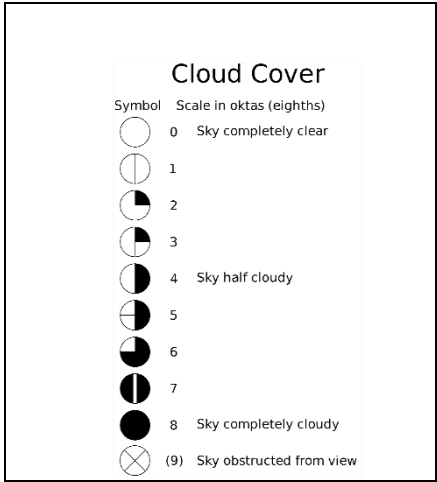
- C.5 Details of the equipment used during the survey are provided in the table below. The sound level meter was calibrated before and after the survey; no significant change ( $\pm 0.2$  dB) in the calibration level was noted.

#### *Environmental noise survey*

Description	Model / serial no.	Calibration date	Calibration certificate no.
Type 1 Sound level meter	Rion NL-52 / 00654035	06/07/2023	TCRT23/1489
Condenser microphone	Rion UC-59 / 14826		
Preamplifier	Rion NH-25 / 87474		
Calibrator	Rion NC-74 / 34235932	09/10/2024	1509847-1

### Weather conditions

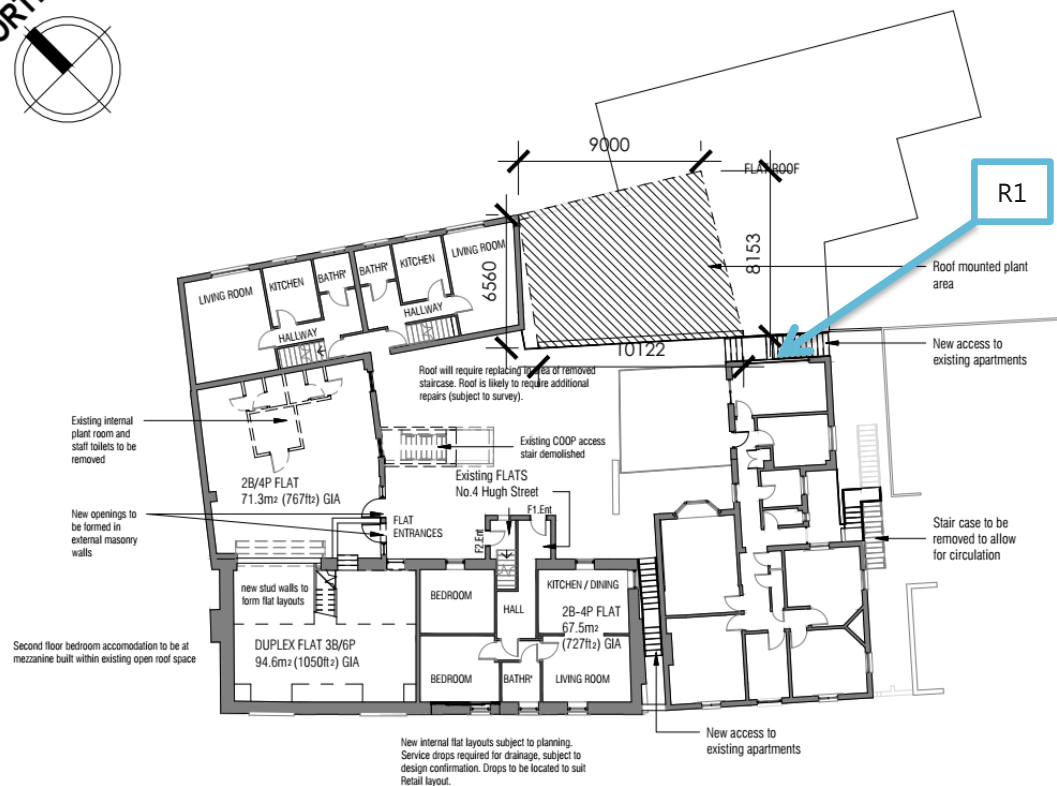
- C.6 Weather conditions were determined both at the start and on completion of the survey. It is considered that the meteorological conditions were appropriate for environmental noise measurements. The table below presents the weather conditions recorded on site at the beginning and end of the survey.

Weather Conditions				
Measurement Location	Date/Time	Description	Beginning of Survey	End of Survey
As indicated on Appendix B	21.00 11/2/2025 - 03.00 12/2/2025	Temperature (°C)	8	8
		Precipitation:	No	No
		Cloud cover (oktas - see guide)	8	0
		Presence of fog/snow/ice	No	No
		Presence of damp roads/wet ground	Damp	No
		Wind Speed (m/s)	2	3
		Wind Direction	E	SE
		Conditions that may cause temperature inversion (i.e. calm nights with no cloud)	No	No

## Results

- C.7 The results of the environmental survey are considered to be representative of the background sound pressure levels at the façades of the nearest noise sensitive receptors during the quietest times at which the plant will operate.
- C.8 The predominant noise sources noted throughout the surveys were waves breaking at close range on the beach and, at a similar level, from large distances outside the harbour area.

## Appendix D Proposed development plans



Proposed first floor plan @ 1 : 200



SCHEME INFORMATION NOTES:  
Stage: Stage 1  
Acquisition Exec: JAMES CARTER  
Project Manager: JACK MIDDLETON  
Red Edge Site Area: 0.096Ha (Title Plan)  
Build Type: New Build

Developer Shell  
Non-retail Conversion  
In-demise Extension  
Out-of-demise Extension  
Fit Out

Proposed delivery pull distance: n/a - Fork lift  
Proposed shop front length: 10.8m

Store Type: Pop-In  
On the Go  
Everyday Convenience  
Everyday Convenience+

Development Type: Existing Retail  
Standalone  
Mixed with other Retail  
Mixed with Commercial  
Mixed with Residential

Locate: Retail  
Commercial  
Residential  
Industrial

EXISTING AREAS:  
Sales Floor Gross internal Area = 2,860sqft  
Back of House Gross internal Area = 4,227sqft  
Gross internal Area = 7,078sqft

PROPOSED AREAS:  
Sales Floor Gross internal Area = 4,757sqft  
Back of House Gross internal Area = 3,800sqft  
Proposed extension Gross internal Area = 1,479sqft  
Total Gross internal Area = 8,557sqft  
Sales / B.O.H ratio as % of GIA = 55/45  
Expected Format Sales / B.O.H ratio % = 67/33

PARKING ALLOCATION:  
Shared Customer Spaces = N/A  
Allocated Customer Spaces = N/A  
Full Accessible Spaces = N/A  
Parent and Child Spaces = N/A  
TOTAL Spaces = N/A

Cooperative Sales Area  
Cooperative BOH Area  
Proposed Plant Area

RISK RATINGS:  
DELIVERIES: RAG

Acceptability subject to TCG distribution review

PLANT SOLUTION:

Acceptability subject to engineering review

Location subject to Acoustic requirements

MEANS OF ESCAPE:

Adequate number / location MOE

PLANNING - Consents required:

Building Conservation Shop front Listed Building Signage TPO's ATM

Plant Front Satellite

STRUCTURAL SOLUTIONS

CHECKLIST OF ABNORMAL ITEMS

Refer to abnormal checklist produced by PH.



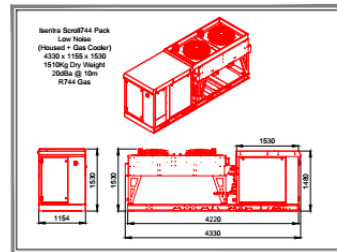
Project Address  
4 Hugh Street, St Mary's  
Isles of Scilly, TR21 0LL

Drawing Title  
STAGE 1: FEASIBILITY (PALLET OPTION)

PROPOSED FIRST FLOOR LAYOUT

Date 16/10/2024 Scale 1:200 @ A3 Drawn MF Checked AA

6704 (FS)109

[illegible]

- [illegible]

## Appendix E      Manufacturer plant noise levels

Plant Item	Make/Model	Quantity	Operating period	Sound pressure level (dBA)
AC1-2	Mitsubishi PUZ-ZM250	2	Daytime only	62dBA at 1m
DA1-2 Gas cooler; compressor pack	GFHD1.2-126AMg-FN063.H3; Copeland compressors	2	24hr	23dBA at 10m

## Appendix F Calculations

### Receptor R1 – Daytime

Plant	Plant noise level at source		DISTANCE		Directivity (dB)	Attenuation (dB)	BS 4142:2014 feature correction	Plant rating noise level at receptor (dBA)
	L <sub>p</sub> (dBA)	Distance (m)	Distance (m)	Correction (dB)				
DA1	23	10	9	1	0	0	3	27
DA2	23	10	6.5	4	0	0	3	30
AC1	62	1	3	-10	0	-18*	3	37
AC2	62	1	9	-19	0	-18*	3	28
							<b>Cumulative</b>	<b>39</b>

*\*AC units in acoustic enclosures giving minimum reduction of 18dB*

### Receptor R1 – Night-time

Plant	Plant noise level at source		DISTANCE		Directivity (dB)	Screening (dB)	BS 4142:2014 feature correction	Plant rating noise level at receptor (dBA)
	L <sub>p</sub> (dBA)	Distance (m)	Distance (m)	Correction (dB)				
DA1	23	10	9	1	0	0	3	27
DA2	23	10	6.5	4	0	0	3	30
							<b>Cumulative</b>	<b>32</b>

## **COOP FOOD - REFURBISHMENT ISLES OF SCILLY**

### **SITE WASTE MANAGEMENT PLAN**

#### **1. INTRODUCON**

Dealing with and minimising waste on the Isle of Scilly is an important consideration with any proposal. It is difficult to dispose of waste locally as, if it is not re-used on site, it needs to be shipped to land fill sites on the mainland.

The Council of the Isles of Scilly aims to work with local businesses and the community to reduce, reuse and recycle as much of the Islands' waste as possible. The Council currently cannot accept construction and demolition waste (including mixed construction skips, tiles and ceramics, excavated soils and aggregate, mixed rubble and plasterboard) due to site space restrictions and resources.

#### **2. RESPONSIBILITIES**

The CDM Client / Principal Designer is responsible for:

- Producing the initial SWMP before construction work begins
- Appointing the Principal Contractor
- Passing the SWMP to the Principal Contractor
- Updating the SWMP at least every three months.

Weatherhead Shop Designers Ltd have been appointed in the capacity of CDM Principal Contractor, Weatherhead Shop Designers Ltd are therefore responsible for:

- Obtaining relevant information from sub-contractors.
- Updating the SWMP at least every three months as the project progresses.
- Keeping the SWMP on site during the project.
- Ensuring that other contractors know where the SWMP is kept.
- Allowing other contractors and the client access to the SWMP during the project.
- Handing the completed SWMP back to the client at the end of the project.
- Keeping a copy of the SWMP for two years.

Contents of Site Waste Management Plan.

- Types of waste removed from the site.
- Identity of the person who removed the waste.
- Site that the waste is taken to.

SWMP should contain details of the:

- Types of waste removed from the site.
- Identity of the person who removed the waste and their waste carrier registration number.



- A description of the waste including EWC Code.

	Role	Name	Contact	Email
1.	COOP Project Manager	Jamie Agnew	07753307614	Jamie.agnew2@coop.co.uk
2.	Principal Designer Bowman Riley	Chris Snowden	07590776748	Chris.snowden@bowmanriley.com
3.	Principal Contractor Weatherhead PM	Phil Johns	07970788123	Phil.johns@weatherheadshopdesigners.com
4.	Weatherhead HSEQ Lead	David Wilson	07527650676	Dave.wilson@weatherheadshopdesigners.com
5.	Weatherhead Site Manager	TBC		
6.				

Project Name:		Refit of the COOP Food Store on the Isles of Scilly-	
Stage of project (eg planning stage, during project delivery, end of project):		Planning Stage	Project Delivery
Project address/location:		St Marys 4 Hugh Street Isles of Scilly TR21 0LL	
Estimated cost of the project:			
Client:		COOP Property	
Principal Designer		Bowman Riley	
Principal Contractor:		Weatherhead Shop Designers	
Person responsible for waste management on site (name and job title):		Site Manager (Name TBC)	
Person and company completing this form, if different from above:		David Wilson HSEQ Weatherhead Shop Designers	
Sites the waste is going to (including permit, licence or registered exemption reference number and details):			
Details of the Waste Contractor removing the waste from site (including their waste carrier registration number):			

[illegible]



**RECEIVED**

By Tom.Anderton at 9:25 am, May 29, 2025

**APPROVED**

By Lisa Walton at 2:56 pm, Jul 30, 2025

## Sustainable Design and Construction Statement

As part of the proposals to re-build and extend the existing co-op store on Hugh Street. The Co-Operative Group (the applicant) are committed to improving the sustainability of the store. The two main areas being addressed are energy demand and energy efficiency.

### Sustainable Design

As part of the extension and refit of the store we are actively reducing the energy demand of the store. Measures taken to do this include the replacement of all light fittings throughout the store with a new LED lighting system, vastly reducing the energy consumption.

The existing refrigeration system is currently a mixture of electrically powered “plug in” integral units and units running off a synthetic refrigerant. As part of the refurbishment works the refrigeration system will be replaced with a CO2 system. The advantage of the CO2 system is that it requires much less power to operate. The removal of the integral refrigeration will also reduce heat build up in the store, which will in turn reduce the duty on the buildings cooling system. Therefore, reducing the overall energy demand.

The Isles of Scilly’s remote location has also been considered as part of the proposals. The Co-op fully appreciate that the store is a lifeline to people living on the islands. The store has recently suffered from some major refrigeration issues which has resulted in a loss of range for customers. It can often take a long time for replacement parts to be delivered from the mainland. The new refrigeration design will utilize a dual system, building in resilience to the stores operation.

Where possible all new refrigeration cases will now be fitted with doors to reduce cooling and energy demand.

### Sustainable Construction

As part of this application it proposed that the single storey rear warehouse is to be demolished and re-constructed. The warehouse is currently constructed on single skin masonry and un-insulated roof. The warehouse will be fully re-built in line with current building regulations and Part L requirements. Reducing the heating and cooling loads on the store.

A full re-wire and replacement of all mechanical and electrical installations will be carried out as part of the project. Making the store compliant with all current building regulations.

