

Council of the Isles of Scilly Planning Application

Ref: P/25/067/FUL

Consultation Response

Date: 14th August 2025

Ref: [P/25/067/FUL](#)

Site: Land At Borough, Borough, Tresco, Isles of Scilly.

Proposal: Redevelopment of the area around Borough Farmhouse to include demolition of Borough Farmhouse and construction of replacement two storey dwelling, conversion of existing bungalow into sauna and studio and construction of associated energy shed and store; demolition of two bungalows (Penolva and North Watch) and construction of replacement single storey dwelling and construction of associated energy shed and store; demolition of chalet (Eastern Watch) and construction of replacement single storey dwelling; demolition of two chalets (Artists Chalets) and construction of new single storey dwelling; construction of two single storey staff accommodation units; and associated landscape work; (Affecting the setting of a Listed Building).

Comments:

The Site

Tresco lies within the Isles of Scilly Conservation Area and AONB. The site is adjacent to the Grade II listed Borough Farm outbuildings, a building of 18th century origins constructed of roughly coursed granite rubble. It is notable for its rare survival of internal historic features, and reportedly the best surviving example of a small dwelling on the Isles of Scilly, predating the rebuilding of the mid and late 19th century.

The site is also approximately 500m to the northeast of the Grade I Registered Park and Garden on Tresco, which is a designated heritage asset of the highest significance.

Tresco is the second-largest island in the Isles of Scilly, known for its diverse and dramatic scenery and rich and layered history. The landscape has been intensively managed since the 19th century, notably by the Dorrien-Smith family, who introduced Monterey pine shelterbelts, subtropical gardens, and larger field enclosures.

The existing site is in an elevated position on the island and comprises a small, dispersed cluster of existing buildings including historic farm buildings, modern single storey dwellings (North Watch and Penolva), 3 prefabricated chalets (Eastern Watch and Artists chalets) and outbuildings.

Council of the Isles of Scilly Planning Application

Ref: P/25/067/FUL

A historic map regression indicate- the survival of historic boundaries.

Duty, Policy and Guidance

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 – in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority 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.

Section 72(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 - Development must preserve or enhance the character or appearance of Conservation Areas.

Part 16 of the NPPF and the accompanying planning practice guidance –

Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 202).

Great weight should be given to the asset's conservation (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 (paragraph 212).

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 (paragraph 213)

Paragraph 203 states that in determining 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

Paragraph 216 states: *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*

Policy OE7 of the Isles of Scilly Local Plan, adopted in 2021, reinforces that any harm to the significance of a designated or non-designated heritage asset must be justified and that proposals causing harm

Council of the Isles of Scilly

Planning Application

Ref: P/25/067/FUL

will be weighed against the substantial public, not private, benefits of the proposal. Also, that it should be demonstrated that all reasonable efforts have been made to mitigate the extent of the harm to the significance of the asset.

The Historic England guidance on tackling climate changes says that in order to meet the government's target of being carbon neutral by 2050, we must recycle, reuse and responsibly adapt our existing historic buildings and states;

Sympathetically upgrading and reusing existing buildings, rather than demolishing and building new, could dramatically improve a building's energy efficiency and would make substantial energy savings because the CO₂ emissions already embodied within existing buildings would not be lost through demolition.

Existing buildings already embody significant CO₂ emissions in their materials. Early research in the Heritage Counts report shows that by not counting embodied carbon, we underestimate the entire carbon emissions of a new build by up to 31%.

Compared to refurbishing a traditional Victorian terrace, a new building of the same size produces up to thirteen times more embodied carbon. This equates to around 16.4 tonnes of CO₂, which is the equivalent of the emissions released by driving 60,000km, or 300 times round the M25, in a large petrol car.

Demolishing buildings also not only produces millions of tonnes of waste (one third of all the waste produced in the UK every year comes from construction and demolition), but building new has high energy costs, guzzles resources and accounts for 26% of the world's plastic consumption.

Source; <https://historicengland.org.uk/whats-new/news/recycle-buildings-tackle-climate-change/>

Advice

The application seeks permission for the replacement and repositioning of Borough Farmhouse, the replacement of the 3 prefabricated chalets with 2 new 3-bed holidays units, the replacement of the 2 modern bungalows with a larger single unit of holiday accommodation, two pairs of two-bedroom staff accommodation units, and the conversion and extension of the staff 'bungalow' to a gym and sauna. There will also be new outbuildings / cycles stores and new access and landscaping.

The majority of the modern buildings and chalets on the site are of low quality and do not contribute to the special historic or architectural interest of the conservation area. Their loss is not a concern in terms of impact on the Conservation Area or on the setting of the nearby listed building.

Council of the Isles of Scilly

Planning Application

Ref: P/25/067/FUL

It is likely that Borough Farmhouse pre-dates 1841 and this is a building of local significance (a non-designated heritage asset). It is a 2-storey linear building of traditional granite rubble construction with slate roof (possible scantle?) and 2-pane timber sash windows. From the available photos it appears to be a building of more than one phase, which has been extended and has evolved over time.

The HIA notes that Borough Farmhouse was badly damaged by fire in the 1920s or 1930s. No further evidence has been provided as to how this has affected the significance of the building or its integrity and authenticity. From available evidence to date the essential form and external appearance of the building does not appear much changed since the 19th century. It is currently let as a holiday unit and from the online photos it appears to be in a good state of repair.

It is considered the applicants' HIA has not properly assessed the buildings fabric, historic development or its significance in terms of its contribution to the character, appearance and significance of the Conservation Area, or its historic functional relationship to the nearby listed building. As such, the contribution it makes to the significance of the setting of the nearby Grade II listed Borough Farm outbuildings.

The HIA suggests the existing farmhouse would be difficult to retrofit to an acceptable energy performance standard and will be a more desirable holiday home relocated to the top of the hill. Historic buildings can be successfully upgraded and retrofitted to be more thermally efficient whilst maintaining their essential character.

Further guidance can be found at;

<https://www.cornwall.gov.uk/planning-and-building-control/conservation-and-planning/technical-conservation-advice-and-guidance/>

<https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/>

The settlement pattern of dispersed scattered farmsteads and hamlets is a key characteristic of the islands and of importance to the character and appearance of the Conservation Area as a whole. Borough Farmhouse forms part of the historic narrative of Tresco and forms a tangible link to the history of Borough as a farming hamlet. Its continued presence supports the interpretation of the site's historic function, and its architectural form helps maintain the historic character of the Conservation Area and its vernacular architecture.

In terms of heritage impact demolition or complete loss of the building as a NDHA comprises substantial harm. It is recommended that Borough Farmhouse be retained, sympathetically upgraded and extended if additional accommodation is required.

Council of the Isles of Scilly

Planning Application

Ref: P/25/067/FUL

Overall, there is an increase in the scale and amount of development across the site. Whilst mostly single storey in height, some of the new buildings are notably large in scale and footprint. The existing chalets and bungalows are diminutive, ancillary in character and sit low within the landscape. As such, the historic hierarchy of buildings across the site is maintained. The proposals would tend to erode this established hierarchy. It is important that any new buildings pay special attention to the hierarchy of buildings on the site in terms of scale, massing and siting in order to retain the sites character as a historic farming hamlet.

The loss of the small outbuilding, approximately 35m to the south of Borough Farmhouse has not been assessed in the applicants HIA. This is shown on the 1st edition OS plan and thus predates 1880. Additionally, the proposals indicate a loss of some historic boundaries to the south of Brough Farmhouse and this also, as not be properly assessed. The loss of late 19th-century boundaries would be undesirable and likely erode the character and appearance of the Conservation Area.

Summary

Borough Farmhouse is identified as a non-designated heritage asset (NDHA) of local historic and architectural interest. Its demolition would result in the complete loss of a heritage asset, which constitutes substantial harm under national policy. The building contributes to the historic character of the Conservation Area, the vernacular architecture of Tresco, and the setting of the adjacent Grade II listed Borough Farm outbuildings. The Heritage Impact Assessment (HIA) submitted by the applicant is considered inadequate, lacking a full assessment of the building's fabric, development, and significance. The proposal also risks eroding historic boundaries and settlement hierarchy, which are key to the area's character.

The proposal does not currently comply with Section 66(1) and Section 72(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Paragraphs 202–216 of the National Planning Policy Framework (NPPF), or Policy OE7 of the Isles of Scilly Local Plan, particularly regarding:

1. The need for clear and convincing justification for harm to heritage assets.
2. The importance of preserving and enhancing the character of Conservation Areas and the setting of listed buildings.
3. The reuse and retrofit of historic buildings in line with Historic England's climate guidance.

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Date: 11th September 2025