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

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Our ref: P01597690

25 September 2025

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

**LAND AT BOROUGH, BOROUGH, TRESCO, TR24 0PX**  
**Application No. P/25/067/FUL**

Thank you for your letter of 4 September 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

Borough is a small and isolated rural settlement on the island of Tresco and within the Isles of Scilly Conservation Area (CA). Whilst some of the existing buildings on the application site fail to sustain or enhance the character and appearance of the CA, Borough Farmhouse offers a positive response, as an extant historic farm building on the site. The application proposes to demolish Borough Farmhouse, alongside other buildings, and replace them with three dwellings, staff accommodation buildings and associated structures and landscaping. Whilst we have no objection to the removal of the buildings that fail to sustain or enhance the CA, the demolition of Borough Farmhouse would cause harm to the character and appearance of the CA. The National Planning Policy Framework dictates that harm to significance should be avoided wherever possible and where development affects a CA, opportunities to provide enhancement or better reveal its significance should be sought. Your authority should work with the applicant to retain Borough Farmhouse as the anchor point of a revised scheme that provides a form, scale and character of development that defers hierarchical primacy to it and reflects the site's Scillonian agricultural past.

**Historic England Advice**



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### The significance of the application site

Borough, in the south-east of Tresco, is one of the island's numerically limited and sparsely distributed settlement areas. Situated at the foot of Middle Down Hill the sole historic building within the red line plan is Borough Farmhouse which is at the hierarchical apex and physical centre of the current buildings. Constructed of granite blocks beneath a pitched slate roof the exterior masonry shows varying sections of coursed/uncoursed stone and some clear lines of rebuilding and former extensions. It is suggested that some rebuilding took place following a fire in 1944 in which a young boy tragically died.

Historic map regression shows Borough Farmhouse as one of several buildings of modest scale on the site, the others likely for various agricultural uses. The building's form, scale and use of local materials (similar to the nearby grade II listed Borough Farm outbuildings [NHLE 1376771]) create a vernacular dwelling that represents the character and appearance of this part of the CA.

The same cannot be said for the rest of the buildings on the application site, which do not respond to the character and appearance of the CA. North Watch and Penolva are rendered bungalows, of overtly domestic character and neither positively respond to the agricultural character of the site. Eastern Watch and the Artists Chalets, which are also single storey, but clad in timber with felt roofs. These buildings seem to have developed without reference to the layout of the historic farmstead, lack quality and are at odds with their context.

The Isles of Scilly are designated as a Conservation Area due to their special architectural and historic interest, the character and appearance of which it is desirable to preserve or enhance.

### The impact of the proposals on the application site

The application seeks permission to demolish Borough Farmhouse, Eastern Watch, North Watch, Penolva and the Artists Chalets. The site would be redeveloped to accommodate three dwellings, two energy sheds and stores, two staff accommodation buildings alongside associated landscaping.

The application proposes to replace Borough Farmhouse with a replacement "farmhouse", at the centre of the new development and from which the other buildings



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would take their cue. The replacement farmhouse would be based on historic precedents Dolphin House [NHLE 1376770] and Blockhouse Cottages, which were built as a missionary house and lighthouse keeper's cottages respectively.

The demolition of Borough Farmhouse would neither preserve nor enhance the character and appearance of the conservation area. The removal of the sole surviving historic building within the red line plan would cause harm, by removing a remnant of the historic farmstead at Borough, eroding the conservation area's agricultural character and obscuring the historic use of this part of the island. The application cites the thick granite walls and lack of insulation as making the building difficult to heat. This does not constitute a robust justification for the loss of the building. We consider that there are options for retrofitting the building in line with its heritage values that could allow for its repurposing.

The distribution of buildings across the red line plan would fail to reflect the agricultural character of the locality. The number of new buildings, of such substantial scale and mass would be at odds with the modest agricultural character of the application site, subsuming the farmhouse. Furthermore, the form, scale and character of the replacement dwellings would seek to respond to the "Tresco Style", which seeks to respond to the vernacular.

The implementation of the "Tresco style" in this location would create a character of the development that would not respond to the rural location and modest settlement character. The buildings are domestic in character and do not respond to the rudimentary, accretive and vernacular character of the built heritage within the context..

### Policy context

The Planning (Listed Buildings and Conservation Areas) Act 1990 states that conservation areas are designated due to their special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.

Para 207 sets out that all proposals need to be based a robust understanding of significance. The level of detail should be proportionate to the assets' importance and should be sufficient to understand the potential impact of the proposal on their significance.

Paras 208 and 213 identifies that opportunities should be sought to avoid and



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minimise conflict with the affected heritage asset. Only harm that has sought means to avoid and minimise can be considered as justified.

Para 210 (a & c) highlight that schemes should seek to sustain and enhance heritage assets as well as ensuring that new development makes a positive contribution to local character and distinctiveness.

Para 212 - highlights the importance of the historic environment, ensuring that great weight is given to the conservation of any affected heritage asset. The more important the asset the greater the weight should be.

Paragraph 213 stipulates that any harm to the significance of a designated heritage asset should require clear and convincing justification.

Para 219 sets out that development affecting the character and appearance of the conservation area or falls within the setting of a listed building should seek to enhance or better reveal the significance of the heritage asset.

## Historic England's Position

Historic England has concerns regarding the detrimental impact the proposals could have on the character and appearance of this part of the conservation area. (NPPF 208). We consider that there is scope for the redevelopment of the site that could be positive for the heritage values of the place. (NPPF 210a). We have no objection to the principle of the demolition of Eastern Watch, North Watch, Penolva and the Artists Chalets which presents an opportunity for any new buildings to enhance/better reveal the character of the conservation area. (NPPF 210a, 212, 219).

However, the demolition of Borough Farmhouse would meet none of these criteria, eradicating the built heritage within the application site. The supplied justification, that granite buildings are difficult to retrofit, is not a clear and convincing justification for this harm. (NPPF 208, 213). Subsequently, the replacement with a dwelling in the style of a farmhouse would be an unnecessarily inauthentic response to the conservation area.

Borough Farmhouse should be retained, and a whole building approach undertaken to retrofit that balances the heritage values of the building and sustains and/or enhance its contribution to the character and appearance of the conservation area. (NPPF 208,



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210a, 210c). Our established guidance should be used to consider options. <https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/> We consider that the building could accommodate some enlargement - the reinstatement of a subservient extension on the line of the demolished extension could be considered.

The location, quantum, scale and character of any new development should be led by the conservation of the Isles of Scilly Conservation Area. (NPPF 212). The proposals should seek to respond to the character and appearance of the locality, rather than other locations on the island to avoid a development that transplants an identity without precedent in this context.

The application should utilise our suite of farmstead guidance < <https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/> > to develop a revised scheme that retains the existing Borough Farmhouse as the anchor point of the settlement.

To achieve this, we recommend reducing the scale and mass of the new buildings, to respect that of the retained farmhouse. The form and overall character of any replacement buildings should respond to the agricultural heritage of the place. (NPPF 210a, 212, 219). The removal of cross-wings and entrance porches would help to reduce the domestic appearance of the proposed buildings and simplify their appearance. Further options to integrate the buildings within their context could include:

- Use of granite rubble for walls to reflect historic precedent and hierarchy
- More modulation of the designs to break up the massing.
- Use of differing roof coverings (slate and pantiles) to reflect hierarchy of structures.
- Setting back of glazing into openings to decrease impact.

This list is not exhaustive - overall the proposals should seek to create a character and appearance that positively responds to the modest and isolated agricultural context. (NPPF 210a, 210c, 219).

## Recommendation

Historic England has concerns regarding the application on heritage grounds.



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We cannot support the loss of Borough Farmhouse. Furthermore, the introduction of buildings that do not adequately respond to the historic character of the application site would neither sustain or enhance the conservation area.

Your authority should work with the applicant to develop a revised scheme with a retained Borough Farmhouse at its centre, and where any additional development takes its design cues from this building.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 207, 208, 210a, 210c, 212, 213 & 219 of the NPPF.

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

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

Yours sincerely

**Harish Sharma**

Assistant Inspector of Historic Buildings and Areas

[Redacted signature]

cc: Vic Robinson, Senior Development Officer (Historic Environment Planning)



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