

Land north of Ennor Castle

Old Town, St Mary's
Isles of Scilly

Heritage Review



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Portico Heritage Ltd

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1 Introduction

1.1 This Heritage Review was commissioned by the Council of the Isles of Scilly following objections raised by Historic England to proposed amendments to the wording of Local Plan Policy H3.

Purpose

1.2 The primary aims of this study are to assess the following:

- Review the evidence base provided
- Carry out a site visit
- Review the proposed changes to the policy wording
- Review the concerns raised by Historic England
- Conclusions

Author

1.3 The author of this report is Nick Collins BSc (Hons) MSc MRICS IHBC. He has been a Principal Inspector of Historic Buildings & Areas in the London Region of Historic En. Most recently he was a Director of Conservation at Alan Baxter & Associates. Nick spent nine years at Historic England as Principal Inspector of Historic Buildings & Areas where he led a specialist team of historic building inspectors, architects, and archaeologists on a wide range of heritage projects in East & South London. Previously Conservation Officer at the London Borough of Bromley, Nick began his career at international real estate consultancy Jones Lang LaSalle as a Chartered Surveyor. This experience has given Nick an in-depth understanding of the property industry, listed building and planning process, heritage policy and guidance and funding bodies.

2 The Site & Context

- 2.1 The site covers an area of approximately 1.25 acres and lies around 50m to the north of Castle Rocks – the rock outcrop upon which Ennor Castle was built.
- 2.2 Whilst the Isles of Scilly as a whole are covered by several designations; Conservation Area, Heritage Coast and Area of Outstanding Natural Beauty the key heritage designations in the immediate area in relation to this particular site are:

Ennor Castle: Scheduled Ancient Monument: List entry Number 1014994; a medieval shell-keep on Castle Rocks. The castle is ruined but upstanding and buried remains survive. These include earthworks and stone footings or revetments on the summit and sides of the rock; rubble stone walling of a sub-rectangular keep; best preserved on the north west and west where it rises up to 2m high above ground; and possible enclosure walling extending south east from the outcrop. The castle was first recorded in 1244. It fell into disuse in the 16th century, when the Star Castle artillery fort was built on the Garrison to the west.

Conservation Area: Whilst covering the whole of the Isles of Scilly, within the context of this site it relates to the evolution of Old Town as a settlement.

Archaeological Constraint Area: a non-statutory designation with the purpose of indicating the location of recorded archaeological and historic sites and structures in order that an initial assessment could be made of the impact of any proposed development on these remains, and if necessary, archaeological consultation carried out prior to the planning decision. The site is adjacent to an Archaeological Constraint Area, which extends from its south boundary including Ennor Castle and the south end of the field north of the Castle.

- 2.3 The site and these key designations are summarised in the plan below (Figure 1):



Figure 1: The site showing designations in the immediate vicinity © Council of the Isles of Scilly

3 Heritage Impact Assessment

- 3.1 Following identification of the site for potential housing delivery, the Council of the Isles of Scilly commissioned a Heritage Impact Assessment of the site on the advice of Historic England which was produced in August 2018 by Cornwall Archaeological Unit.
- 3.2 This report provides a comprehensive overview of the site, surrounding heritage assets, their significance and setting. It provides an assessment of potential impacts and a series of recommendations.
- 3.3 The report concludes that proposed development of the site would have a potential moderate adverse impact overall on the heritage resource, in particular, on the setting of the designated asset, Ennor Castle. This would comprise an adverse visual impact (less than substantial harm); and direct adverse impact (potentially amounting to substantial harm).
- 3.4 With regard to visual and other non-physical impacts it concludes:

Development of the HIA site would not be seen from the west-south approach to Ennor Castle with the historic core of Old Town and its church and landing.

To the north of the Castle, the rural interior of St Mary's featuring the tree-covered Lower Moors, stretches away to the other coast of the island.

On the northern skyline, a lesser rock outcrop, Carn Thomas, and another fortification, Harry's Walls, are discerned from Ennor Castle; these are considered too distant for significant visual impacts.

However, closer, in, around the north side of Castle Rock there is little modern development. Between the HIA site and Ennor Castle area a small low cluster of solar panels at ground level, the converted barn, small and relatively little changed and further from the Castle, outlying houses of Old Town including a converted roadside chapel opposite the HIA site.

From the summit of the outcrop, the HIA site is clearly seen (the nearest corner of the field is screened by some hedgerow trees).

Development of the site, therefore, could potentially have a moderate adverse visual effect (less than substantial harm) on the historic landscape setting of the Scheduled Monument, Ennor Castle. It would extend modern settlement towards Lower Moors, and intervene (potentially introducing new patterns of housing layout, and density, with new traffic and other movement, noise, and light effects) between the Castle and the road leading inland from it to the north.

Physical (direct) impacts

- 3.5 The assessment indicates *'significant potential for disturbance, truncation or loss of buried medieval or earlier features and deposits at the site, in the setting of a Scheduled Ancient Monument. This assessment is based on the proximity of the site to castle Rocks, Ennor Castle, the associated settlement of Old Town known to have been more extensive in medieval times, and the ancient landing beyond; rather than on specific field evidence of earthworks or structures, or on recorded discoveries or indications of buried remains'*.
- 3.6 The Assessment provides a series of recommendations to reduce and mitigate for potential visual impact as well as scoping and mitigation of potential archaeological impact:
- Design and access measures could protect or enhance the setting of Ennor Castle;*
- *Limit and screen proposed site. Development could be limited to the eastern, 'road' side of the HIA site. It could be bounded on the western, 'castle' side, by a boundary on the former line of one running north-south parallel with the road, removed in the 20th century.*
- This lost boundary is marked on the OS map of c1907. It marked a field of the type prevalent (together with smaller plots) in the area at that time, commonly used for growing bulbs or other crops benefitting from sheltering hedges. It could be re-built as a hedge bank, with earth core and local facing stone and topped with traditional Scillonian hedging*

trees, of the kind existing around the site. This would define a roadside strip for containing the proposed development, some 20m wide.

Within this roadside strip, density and positioning of housing could be designed to avoid uniform ribbon development lining the approach to Old Town.

Such restriction and screening of the development would reduce the potential adverse effect of intervisibility between the development site and Ennor Castle. From the summit of the SM, the development would not then greatly increase the existing visual impact on the Castle of existing houses. New housing would be further screened from the Castle by the suggested new boundary, and in the medium to longer term, by the growth of hedgerow trees there.

This measure would also effectively maintain the existing visual connection between the farmland at the HIA site and the Lower Moors beyond, helping preserve the present strong sense of the historic setting of the Castle and of Old Town between these marshes and the coast.

- *Maintain or enhance Historic Landscape Character, through careful design of density, style, fabric and variety for new houses and garden boundaries, informed by those existing in the historic core of Old Town; and through retention of existing boundary banks and trees.*
- *Retain the existing trackway on the south as a route to any access provided to the rear (west side) of the development, if possible.*
- *Consider the feasibility of providing access to Ennor Castle, potentially highly beneficial for the community and local economy, should the opportunity arise.*

3.7 Scoping and mitigation of potential archaeological impact

- *Further archaeological work could address the high potential for buried archaeology (indicated at present by factors including the HLC type, and proximity to Ennor Castle, to its north approach, and to the shrunken medieval settlement of Old Town). This would allow the scale of overall potential impact to be understood as fully as possible, and weighed against the public benefits, as*

required by Historic England. Should the proposal progress, this may require;

- *Further HIA for any detailed proposals, to assess potential impact in detail.*
- *Geophysical survey could identify key elements of buried features, although it is unlikely to identify smaller features such as pits and postholes.*
- *Archaeological evaluation may be required to characterise the results of the geophysical survey and help inform further assessment. This would include assessment of the potential for palaeoenvironmental sampling.*
- *Archaeological excavation may be required for key features with buried remains considered potentially early, complex, or otherwise highly significant, with palaeoenvironmental sampling as appropriate. This should be undertaken before any other groundworks on the affected part of the site.*
- *Watching brief, or archaeological monitoring of groundworks as they proceed, may be specified to allow the archaeologist to carry out excavation, recording (at an appropriate level which may include description, photography, or drawing in plan or section), the recovery of any artefacts or samples, and the identification of any further investigation needed.*
- *Boundary recording by section drawing, photography, and soil sampling as appropriate, may be recommended for the historic boundary banks and any associated ditches where disturbance is unavoidable. (Hedgerow Regulations may apply to any proposed boundary removal)*
- *Post-excavation assessment, analysis and publication may be required by the LPA following any excavation, should the results merit it.*

3.8 Subsequently, and in order to address a number of the comments made in the Heritage Impact Assessment relating to potential direct impacts any proposals might have a Geophysical Survey was commissioned in June 2019.

3.9 In conclusion, the survey did not provide supporting evidence for the assessment of the site as having high

'archaeological potential' for significant remains below ground associated with its proximity to the shrunken medieval settlement of Old Town, to Ennor Castle on its landmark outcrop – the central place of medieval Scilly – and to the landing place in Old Town Bay).

- 3.10 The former sub-dividing boundary identified on the 1907 OS Map (but not present in 1880 or today) has left no traces detectable. Therefore, its original form is open to interpretation. It may have been a fence or a living, planted hedge or an unditched built boundary – none of which would have left a detectable trace below ground.

4 Policy H3

4.1 The initial proposed wording for Policy H3 comprised:

H3: 0.53ha Land at to the west side of Old Town Road on the north of Ennor Castle, Old Town, St Mary's

- i. **A residential development of around 15 homes of an appropriate scale and design, which will require:**
- ii. **Appropriate vehicular and pedestrian access;**
- iii. **Appropriate connections and upgrades to water and sewerage, with any planned improvements taken into consideration;**
- iv. **Design and access measures to protect and enhance the setting of Ennor Castle, including:**
 - **Limiting development to the eastern 'road' side;**
 - **Bounding the western 'Castle' side through the re-introduction of a former boundary running north-south parallel with the road;**
 - **Maintenance or enhancement of the historic landscape character through careful design of density, style, fabric and variety for new homes and garden boundaries, informed by those existing in the historic core of Old Town and through retention of existing boundary banks and trees;**
 - **Retention, if possible, of the existing trackway on the south as a route to an access provided to the rear (west side) of the development; and**
- v. **Sustainable drainage to avoid surface water run-off impacts on the adjacent SSSI and reduce the impact of tidal flooding; and**
- vi. **Heritage assessment and archaeological monitoring of groundwork.**

4.2 Following consideration of the conclusions of the Geophysical Survey the wording of the Policy (in relation to heritage) was modified to delete the requirement to limit development to the eastern side of the site, and the requirement to reintroduce the north-south boundary

(which was not supported by the further analysis carried out as part of the geophysical survey work).

5 Historic England

- 5.1 In November 2020 Historic England made representations relating to Policy H3 as part of the Post-Examination Main Modifications consultation process.
- 5.2 Historic England re-iterated that their recommendation had been for the inclusion of requirements to:
- a) Restrict development to the eastern side of the allocation further away from the monument; and
 - b) Ensure that a boundary was reintroduced between the site and the castle.
- 5.3 It is further explained that these recommendations were made to establish a buffer between any development and the scheduled monument, offering minimisation and mitigation of the adverse visual impacts within its setting.
- 5.4 The representations go on to say 'the HIA identifies that the proposed development has potential for an adverse visual impact on the significance of Ennor Caste. Restricting development to the eastern side of the site would minimise this impact, as would reinstating the former north/south boundary. Whilst the geophysical survey did not clarify the line and/or form of the north/south boundary, it explains why no traces may be detectable and leaves its form open to interpretation. Consequently we find no evidence in the geophysical survey to justify removal of these requirements in relation to the scheduled monument'.

6 Assessment

- 6.1 This assessment has been informed by a visit to the site, Ennor Castle and surroundings and the information contained in the Heritage Impact Assessment. It considers the conclusions and recommendations made as part of the HIA, Geophysical Survey and also Historic England and their impact on the wording of Policy H3.
- 6.2 The review is focussed specifically on those elements that have been raised by Historic England.
- 6.3 In Section 2 this report identified three pertinent heritage designation/assets: Scheduled Ancient Monument; Conservation Area & Area of Archaeological Constraint Area.
- Scheduled Ancient Monument – Ennor Castle
- 6.4 The history and significance of Ennor Castle is identified in detail in the HIA. The Castle Rocks outcrop provided an ideal natural position for the castle with views once both towards the sea and across St Mary's to the north and west.
- 6.5 The castle's setting is visually more limited to the east and south due to the topography of the land and also the development of Old Town along the roads, the outcrop can nevertheless be glimpsed between the buildings on the western side of the road.
- 6.6 To the north and west, however, the land falls away towards Lower Moors opening up views across to the outer islands.
- 6.7 Development (of many ages and style) surrounds the 'town' side of the castle as shown in the following photographs. The following images are views Towards the castle:



Figure 2: Looking south towards Ennor Castle (on the right)



Figure 3: Looking west towards Castle Rocks from Old Town Road



Figure 4: Looking north from Trench Lane with the Castle outcrop just above the houses



Figure 5: Looking east with Castle Rocks prominently in the centre of the view

6.8 The following images are taken from the top of Castle Rocks within the site of Ennor Castle looking Out – which illustrate its important and strategic location.



Figure 6: Looking west towards Sampson



Figure 7: Looking north towards the site



Figure 8: Looking south towards Old Town Quay



Figure 9: Looking east towards old Town Road

6.9 Clearly the extent of growth on Castle Rocks has had a major impact on the ability to appreciate the wider views from the castle in some directions, but the images give a good sense of how the village curls around the castle on

its 'upper' side, whilst opening up, as the land falls away to the west.

- 6.10 The presence of Old Town nestling around the base of the castle rocks is as much an important part of its setting as the longer views across St Mary's towards Lower Moors.

The site and the impact of potential development

- 6.11 At the time of visiting it was nearly impossible to see the site from the castle (figure 7). However, the following image, reproduced from the HIA c.2 years ago gives a clearer opportunity to understand the location of the site in relation to the castle.



Figure 10: Looking north from Ennor Castle (HIA, August 2018)

- 6.12 The site visible in this view is the triangle of land in the middle distance behind the hedge, which itself is behind the solar panels.
- 6.13 The western part of the site forms part of the open vistas to the north from the castle – an important element of its setting. However, the image shows clearly how the settlement of Old Town is a visible and historic part of the castle's northern setting.

- 6.14 In considering the sensitivity of the setting of the castle to the north, a replication of the plan in Figure 1 is perhaps helpful:



- 6.15 When considering the position of the converted barn to the north of the castle and the edge of the Old Town Inn, the most sensitive part of the site – in the context of the setting of the castle – is the western part. It is this part for which development could cause a possible adverse visual impact.
- 6.16 Development on the majority of the central and eastern part of the site would have a negligible impact on the ability to appreciate the setting and significance of the Castle. If appropriately designed and located, it would sit comfortably and contextually amongst the emerging buildings in Old Town.

- 6.17 The location of the north-south boundary identified on the 1907 OS Map does not have any relevance in relation to the impact on setting of Ennor Castle.
- Archaeological Constraint Area
- 6.18 The site lies outside the boundary of the identified ACA and the Geophysical Survey has further confirmed that there no evidence was found of significant archaeological remains on the site.
- 6.19 Proposed development on the site should not have any impact on the this designated area.
- Conservation Area
- 6.20 Whilst the conservation area encompasses all of the Isles of Scilly, in this particular location its character and appearance relates to the shrunken medieval settlement of Old Town and its connection to the agricultural hinterlands.
- 6.21 The main elements of the medieval landscape, Ennor Castle, the Old Quays and Old St Mary's Church, form a coherent group around Old Town Bay, together with Old Town itself, articulating routes serving the landing in the bay, and the marshes inland, as can be appreciated in viewing it from Castle Rocks (although it is now only views to the west that remain open and clear due to the extent of growth on Castle Rocks).
- 6.22 The agricultural heritage of the Islands is clearly an important part of its character and appearance, however this has evolved considerably over the centuries with boundaries constantly re-configured to suit changing uses, occupation and methods.
- 6.23 A north-south boundary to the east of the site is identified on the 1907 OS Map, although it does not appear on the 1880 OS Map and is now gone. The HIA concludes that this is boundary formed a small field of a type prevalent in the area at that time, commonly used for growing bulbs or other crops benefiting from sheltered hedges.
- 6.24 Whilst there is no evidence to refute this, assessment of the Maps would suggest that these 'specialised' small plots were considerably smaller in scale and that this boundary was merely part of a transient sub-division of a

field typical across the whole Island and not of particular significance.

- 6.25 Although the Geophysical Survey did not identify any significant remains below ground associated with the site's proximity to the shrunken medieval settlement of Old Town the HIA makes it clear that the settlement was – at one stage- larger than currently exists.
- 6.26 Proposed development on the site will need to consider its impact on the character and appearance of the conservation area however it would potentially not be historically inappropriate – subject to sensitive contextual design layout and siting.

7 Conclusions

- 7.1 Having regard for the Heritage Impact Assessment, Geophysical Survey and the advice and recommendations of Historic England this review concludes:
- 7.2 The setting of Ennor Castle, by its prominent nature, is wide and in some directions far-reaching and contributes to its significance. This is especially the case in views to the west and north-west.
- 7.3 The proposals site is located to the north, where the setting of the castle starts to morph from one of open agricultural land and long views to the more semi-rural character of Old Town – the settlement that grew up around the castle and old quay.
- 7.4 The character and appearance of the conservation area, and historic landscape character in this location relates to the shrunken medieval settlement of Old Town and its connection to the agricultural hinterlands. Ennor Castle and its setting is a key contributor to this character. The north-south boundary identified in the HIA reflects the ever-changing nature of agricultural land on St Mary's but is not itself of special interest.
- 7.5 The already established Archaeological Constraint Area has a clearly defined boundary to the south of the site and the Geophysical Survey has confirmed that it is unlikely that there is any significant buried archaeology on the site.
- Effect on the appropriateness of the site for residential development
- 7.6 It should be possible to allow development on this site providing design and access measures are incorporated to protect and enhance the setting of Ennor Castle and the character and appearance of the conservation area.
- 7.7 This can be achieved by careful design of density, style, fabric and variety for new homes and garden boundaries, informed by those existing in the historic core of Old Town and through retention of existing boundary banks and trees; retention of the existing trackway on the south as a

route to any access provided to the rear (west side) of the development and a requirement for a Heritage Assessment and archaeological monitoring of ground work.

- 7.8 It does not seem appropriate to link the boundary of any development to the long-gone north-south boundary previously identified on the eastern side of the site – which has little heritage significance in terms of the conservation area and no relevance in terms of the setting of Ennor Castle.
- 7.9 The requirement for a Heritage Assessment should ensure that the sensitivities of the site and the impact on the setting of surrounding heritage assets is given full consideration and the most sensitive, western side of the site remains open in views from the castle.