

BUILT HERITAGE STATEMENT

Woolpack Battery, The Garrison, St Marys, Isles of Scilly

On behalf of Tregarthen's Hotel Ltd

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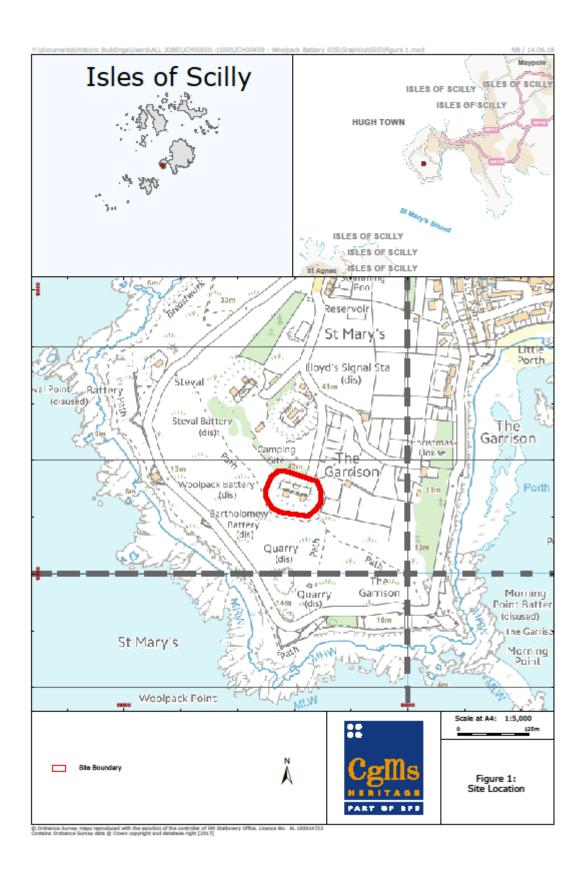
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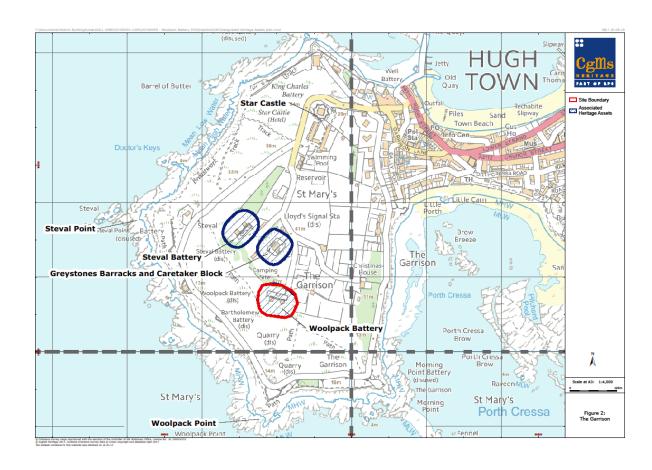
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1.0 INTRODUCTION

- 1.1 This Built Heritage Statement relates to land and structures occupied by the 1901 Woolpack Battery centred at NGR SV 898 101 (Fig.1) on the Garrison at Hugh Town, St Mary's, Isles of Scilly, henceforth referred to as the Site. The report has been researched and prepared by CgMs Heritage (part of the RPS Group) on behalf of Tregarthen's Hotel Ltd.
- 1.2 The Statement has been prepared to accompany applications which seek planning and listed building consent. The development proposal is for the upgrade of the underground chambers of the Battery, previously utilised by the Isles of Scilly Wildlife Trust for volunteer accommodation, for the use as hotel staff accommodation.
- The Site is situated within the Garrison on the headland to the west of Hugh Town and is entirely contained within the Isles of Scilly Conservation Area. Several scheduled monuments and numerous listed buildings fall within a 1,000 metre radius of the Site. Due to the discrete nature of the proposal (almost entirely below ground), the topography of the surrounding landform, intervening built form and coniferous woodland at the crown of the headland, the assets will not be affected by the Site's development and are consequently not considered further in this statement in terms of potential harmful impacts. The Statement considers the Woolpack Battery and the Garrison element of the Isles of Scilly Conservation Area.
- 1.4 The Woolpack Battery is currently recorded on Historic England's Heritage at Risk Register. The Register notes that the Battery is generally in 'good condition and secure, but unoccupied since 2015. Converted to volunteer hostel accommodation in late twentieth century/early twenty-first century, but now suffering from problems with water ingress into the former magazines'. Furthermore its condition is measured as 'poor' with 'slow decay; no solution agreed'. The development proposal will provide a sustainable use for the asset, arrest its deterioration and eventually will lead the Battery to be removed from the Register. As such the proposal will enhance the significance of the Woolpack Battery and those other heritage assets with which it holds a group value.
- 1.5 In the preparation of the report, the HER and NHLE records have been consulted, a map regression carried out and a Site survey was undertaken by the author on the 21st March 2016. A subsequent site survey has been undertaken by the client teams' buildings surveyor in March 2018.





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2.0 LEGISLATION, POLICY AND GUIDANCE

2.1 The current national policy system identifies, through the National Planning Policy Framework (NPPF), that applications should consider the potential impact of development upon 'heritage assets'. The term 'heritage assets' includes designated heritage assets which possess a statutory designation, for example Listed Buildings, Scheduled Monuments and Conservation Areas. It also includes non-designated heritage assets, typically compiled by Local Planning Authorities (LPAs) and incorporated into a Local List or recorded on the Historic Environment Record.

Legislation

- 2.2 Where any development may affect designated heritage assets, there is a legislative framework in place to ensure that due regard is given to its impact on the historic environment. This extends from primary legislation under the **Planning (Listed buildings and Conservation Areas) Act 1990**.
- 2.3 Section 16 of the 1990 Act states that in considering applications for listed building consent, the LPA shall have special regard to the desirability of preserving the listed building or its setting, or any feature of special architectural or historic interest that it possesses.
- 2.4 Section 66 (1) further states that special regard must be given by the planning authority in the exercise of planning functions to the desirability of preserving or enhancing listed buildings and their setting.
- 2.5 The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal decision in relation to Barnwell Manor Wind Energy v East Northamptonshire District Council [2014] EWCA Civ 137.
- 2.6 The Court agreed with the High Court's judgement that Parliament's intention in enacting Section 66(1) was that decision-makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.
- 2.7 Additionally, Section 72 of the 1990 Act states that in exercising all planning functions, local planning authorities must have special regard for the desirability of preserving or enhancing conservation areas. The duty under Section 72 applies with respect to any buildings or land within a conservation area only. Unlike

- Section 66(1) there is no specific provision for the protection of the setting of a conservation area.
- 2.8 The **Ancient Monuments & Archaeological Areas Act 1979** (as amended) protects the fabric of scheduled monuments, but does not afford statutory protection to their settings. Relevant policies relating to the protection of the setting of scheduled monuments are contained within national and local development plan policy, and guidance published by Historic England for assessing and managing change within the setting of heritage assets is set out in *Historic England Good Practice Advice 3: The Setting of Heritage Assets* (Second Edition, December 2017).

National Planning Policy

National Planning Policy Framework (NPPF) (Department of Communities and Local Government, March 2012)

- 2.9 The NPPF, published 27th March 2012, sets out the Government's planning policies for England and how these are expected to be applied.
- 2.10 When determining planning applications, the NPPF directs LPAs to apply the approach of presumption in favour of sustainable development; the 'golden thread' that is expected to run through the plan-making and decision-making process.
- 2.11 Where a development plan is absent, silent or out-of-date, permission should be granted except where adverse impacts would significantly and demonstrably outweigh those benefits, when assessed against NPPF policies as a whole; or where specific policies contained within the NPPF (including those with regard to designated heritage assets) indicate that development should be restricted to some degree.
- 2.12 The NPPF defines a heritage asset 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". This includes both designated and non-designated heritage assets.
- 2.13 Section 7 of the NPPF, 'Requiring Good Design' (paragraphs 56 to 68), reinforces the importance of good design in achieving sustainable development by ensuring the creation of inclusive and high quality places. Paragraph 58 affirms the need for new deign to function well and add to the quality of the area in which it is

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- built; establish a strong sense of place; and respond to local character and history, reflecting the built identity of the surrounding area.
- 2.14 Section 12, 'Conserving and Enhancing the Historic Environment' (Paragraphs 126-141) relates to developments that have an effect upon the historic environment.
- 2.15 The NPPF advises LPAs to take into account the following points when drawing up strategies for the conservation and enjoyment of the historic environment:
 - The desirability of sustaining and enhancing the significance of heritage assets and preserving them in a viable use consistent with their conservation;
 - The wider social, cultural, economic and environmental benefits that the conservation of the historic environment can bring;
 - The desirability of new development in making a positive contribution to local character and distinctiveness; and
 - Opportunities to draw on the contribution made by the historic environment to the character of place.
- 2.16 Paragraph 128 of the NPPF states that LPAs, when determining applications for development, should require applicants to describe the significance of the heritage assets affected and the contribution made by their setting. The level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance.
- 2.17 Paragraph 129 states that LPAs should also identify and assess the significance of a heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.
- 2.18 Paragraphs 132 to 136 considering the impact of development proposals upon the significance of designated heritage assets. Paragraph 132 states that where a development is proposed that would affect the significance of the designed heritage asset, great weight should be given to the asset's conservation and that the greater an asset's significance, the greater this weight should be.
- 2.19 Paragraph 133 states that where a development would lead to substantial harm to the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that such harm is necessary to achieve substantial public benefits or certain criteria are met.

- 2.20 Paragraph 134 advises that where a proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 2.21 Paragraph 135 is concerned with the impact on non-designated heritage assets and states that where a proposal will affect a non-designated heritage asset, a balanced judgement will be required having regard to the scale of any harm or loss to the significance of the heritage asset.
- 2.22 Concerning Conservation Areas, Paragraph 137 states that local planning authorities should look for opportunities for new development within Conservation Areas that enhance and reveal their significance. Paragraph 138 stresses that the loss of a building or feature that makes a positive contribution to the significance of a Conservation Area should be treated as either substantial harm (under Paragraph 133) or less than substantial harm (under Paragraph 134), taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole.
- 2.23 The NPPF therefore continues the philosophy that was upheld in PPS5 concerning approaches to managing change. This approach, reflected in the NPPF, is characterised by Historic England (former English Heritage) as 'constructive conservation'. This is defined as 'a positive and collaborative approach to conservation that focuses on actively managing change....the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment' (Constructive Conservation in Practice, English Heritage, 2009).

Planning Practice Guidance (PPG) (DCLG, March 2014)

- 2.24 The Planning Practice Guidance (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.
- 2.25 It also states that conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach. It highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation.
- 2.26 Key elements of the guidance relate to assessing harm. It states that an important consideration should be whether the propose works adversely affect a

key element of the heritage asset's special architectural or historic interest. It adds that 'it is the degree of harm rather than the scale of development that is to be assessed'. The level of 'substantial harm' is stated to be a high bar that may not arise in many cases. Whether a proposal causes substantial harm will be a judgement for the decision taker, having regard to the circumstances of the case and the NPPF.

2.27 Importantly, it is stated that harm may arise from work to the asset, or from development within its setting. Setting is defined as 'the surroundings in which an asset is experienced, and may be more extensive than the curtilage'. A thorough assessment of the impact of proposals upon setting must take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Conservation Principles, Policies and Guidance (Historic England, 2008)

- 2.28 Conservation Principles outlines Historic England's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in Historic England's own advice and guidance, the document is recommended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable. The guidance is currently being revised and updated by Historic England to ensure full compliance with the NPPF, which will include an update to the heritage values so that they relate directly to the terms used in the glossary of the NPPF.
- 2.29 This document was published in line with the philosophy of PPS5, yet remains relevant with that of the current policy regime in the emphasis placed upon the importance of understanding significance as a means to properly assess the effects of change to heritage assets. The guidance describes a range of heritage values which enable the significance of assets to be established systematically, with the four main 'heritage values' being:
 - **Evidential value**: which derives from the potential of a place to yield evidence about past human activity. It can be natural or man-made and applies particularly to archaeological deposits, but also to other situations where there is no relevant written record.
 - **Historical value**: which derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It can

be illustrative (illustrative of some aspect of the past) or associative (where a place is associated with an important person, event, or movement).

- Aesthetic value: which derives from the ways in which people draw sensory and intellectual stimulation from a place. Aesthetic values can be the result of the conscious design of a place, including artistic endeavour, or they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time.
- Communal value: which derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects. Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it. Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of a place.

Overview: Historic Environment Good Practice Advice in Planning

- 2.30 The PPS5 Practice Guidance was withdrawn in March 2015. This document has been replaced with three Good Practice Advice in Planning Notes (GPAs) published by Historic England (formerly English Heritage): 'GPA1: Local Plan Making' (Published 25th March 2015), 'GPA2: Managing significance in Decision-Taking in the historic Environment' (Published 27th March 2015) and 'GPA3: The Setting of Heritage Assets (25th March 2015). A further document entitled 'GPA4: Enabling Development' is yet to be adopted.
- 2.31 These GPAs provide supporting guidance relating to good conservation practice. The documents focus in particular on how the good practice can be achieved through the principles included within national policy and guidance. As such, the GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants, and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment.
- 2.32 These GPAs are complemented by the Historic England Advice Notes in Planning with includes HEA1: Understanding Place: Conservation Area Designation,

Appraisal and Management (February 2016), HEA2: Making Changes to Heritage Assets (February 2016), HEA3: The Historic Environment and Site Allocations in Local Plans (October 2015), and HEA4: Tall Buildings (December 2015).

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March, 2015)

- 2.33 This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:
 - understanding the significance of the affected assets;
 - understanding the impact of the proposal on that significance;
 - avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
 - look for opportunities to better reveal or enhance significance;
 - justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
 - off set negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

GPA3: The Setting of Heritage Assets (Second Edition, December 2017)

2.34 This advice note focuses on the management of change within the setting of heritage assets. This document replaces *GPA3: The Setting of Heritage Assets* (English Heritage, March 2015) and *Seeing the History in the View: A Method for Assessing the Heritage Significance within Views* (English Heritage, 2011 – previously withdrawn) in order to aid practitioners with the implementation of national legislation, policies, and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF, and PPG. This guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.

- 2.35 As with the NPPF the document defines setting 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'. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.
- 2.36 While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of an asset's setting, which can inform or enhance the significance of a heritage asset. Further clarification on this matter has been provided by the High Court in relation to **Steer v Secretary of State for Communities' and Local Government and Others** [2017] which stresses the potential importance and contribution of non-visual elements of setting.
- 2.37 This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.
- 2.38 The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.
- 2.39 Although not prescriptive in setting out how this assessment should be carried out, noting that any approach should be demonstrably compliant with legislation, national policies and objectives, Historic England recommend using the '5-step process' in order to assess the potential effects of a proposed development on the

significance of a heritage asset, with this 5-step process continued from the 2011 quidance:

- Identification of heritage assets which are likely to be affected by proposals;
- Assess the degree to which these settings and views make a contribution to the significance of a heritage asset9s) or allow the significance to be appreciated;
- 3. Assess the effects of proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
- 4. Explore ways to maximise enhancement and avoid or minimise harm; and
- 5. Make and document and decision and monitor outcomes.

Local Planning Policy and Guidance

- 2.40 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy, and by other material considerations.
- 2.41 The local planning context is currently prescribed by the Council of the Isles of Scilly. The Council is currently in the process of adopting a new Local Plan 2015-2030. However, until this is formally adopted, the Local Plan for the Isles of Scilly comprises the saved policies set out in The Isles of Scilly Local Plan A 2020 Vision. The relevant policies are set out below.

The Isles of Scilly Local Plan - A 2020 Vision (adopted November 2005)

2.42 CORE POLICY 1: ENVIRONMENTAL PROTECTION

'To ensure that all relevant future development proposals respect and protect the recognised quality of the islands' natural, archaeological, historic and built environment, they will be permitted only where, as applicable, they inter alia:

- a. 'Conserve or enhance the natural beauty, wildlife and cultural heritage of the Area of outstanding Natural Beauty and protect the unspoilt character and good appearance of the Heritage Coast;
- b. Preserve nationally important archaeological remains and their settings;
- c. Preserve or enhance the character or appearance of the Conservation Area and preserve the architectural or historic interest of all listed buildings, including their features and settings;

- d. Safeguard the integrity and nature conservation objectives of Special Protection Areas (SPAs), Ramsar Sites and Special Areas of Conservation (SACs);
- e. Protect a statutorily-protected plant of animal species and the wildlife, geological and geomorphological interest and features of designated Sites of Special Scientific Interest; and locally important biodiversity habitats, species and landscapes features; and
- f. Secure the future character, appearance and setting of any Parks and Gardens of Special Historic Interest included in the English Heritage Register'.

2.43 CORE POLICY 2: SUSTAINABLE DEVELOPMENT

`Development will be permitted in situations where a proposal would, where practicable an appropriate, contribute to the sustainability of the island environment, economy or local communities through:

- a. Conserving or enhancing the landscape, coastlines, seascape and existing buildings of the island through appropriate design including siting, layout, density, scale, external appearance (i.e. details and materials) and landscaping;
- b. Ensuring or facilitating the re-use of previously developed land and existing buildings for the economic, social and environmental benefit of the island and local communities taking into account any environmental designations set out in Policy 1; and,
- c. Utilising natural resources efficiently in the design, construction and future use of land and buildings including, where appropriate, energy conservation and the use of renewable sources of energy generation, minimising the consumption and discharge of water and waste and by securing the recovery and reuse of suitable building materials'.
- 2.44 It is noted that **Policy 1 (c)** cannot be afforded full weight by the decision maker as it is not consistent with the NPPF: it offers no opportunity to weigh any harm caused to heritage assets by a scheme against its public benefits. It also does not identify the threshold of significant harm.
- 2.45 The **Isles of Scilly Design Guide Supplementary Planning Document** (SPD) was approved in 2006 to help inform and assist in the application of policies contained within the Local Plan. This SPD has therefore been referred to in the

production of this report, along with the objectives set out within **A Heritage and Cultural Strategy for the Isles of Scilly (January, 2004).** The Isles of Scilly Council's 2015 Conservation Area Character Statement Consultation Draft has also been consulted.

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3.0 HISTORICAL DEVELOPMENT

Introduction

- 3.1 The Site is centred at NGR SV 898101. It comprises a reinforced concrete gun battery and associated turf ramparts dating from the turn of the twentieth century. The Site occupies an elevated position in the southern part of the Garrison peninsula, St. Mary's, Isles of Scilly.
- 3.2 At present, the Site adjoins a campsite to the north and east. To the south and west of the Site open scrubland slopes down to the rocky shoreline of the island.

Historic development

- 3.3 The Isles of Scilly were probably first permanently settled in the Bronze Age. Shortly after the Norman Conquest of 1066 they became Crown Property, before becoming part of the Duchy of Cornwall in 1337. They have remained as part of the Duchy since this date, although they have been leased to various holders throughout history.
- 3.4 St. Mary's itself has a long history shaped by maritime warfare. The strategic significance of the Isles of Scilly, as a base from which rival nations could potentially disrupt British shipping, was recognised from the mid sixteenth century; as was the particular importance of St. Mary's in protecting the safe anchorages and roads between the islands [Brodie, 2011]. Following the attempted invasion of England by the Spanish Armada in 1588, plans were drawn up to improve the islands' defences. The site chosen for these defences was the Garrison (then known as 'The Hugh'); a prominent headland on the western side of St. Mary's. Star Castle, which lies to the north of the Woolpack Battery, formed the nucleus of the scheme. A length of curtain wall was also constructed across the neck of the headland to protect the Garrison from land attack [Gill, 1975; Brodie, 2011].
- 3.5 The Garrison played an important part in the Civil War. In March 1646 the future Charles II retreated to the Isles of Scilly for a short period before fleeing to Jersey and, following a revolt two years later, the Garrison again became a Royalist stronghold before being forced to surrender in 1651 [Gill, 1975].
- 3.6 In the eighteenth and early nineteenth centuries invasion by France or Spain remained a very real possibility and a series of improvements to the fortifications on St Mary's were undertaken. Following a survey in 1715, substantial repairs

were undertaken to Star Castle and a number of additional structures were built within the Garrison. These included the Storehouse (now Newman House) and the Master Gunner's House [Brodie, 2011]. Nonetheless, a further survey in 1738/9 found the existing defences to be in a poor physical condition. Consequently, during the mid-eighteenth century the curtain wall was extended around much of the headland [Brodie, 2011].

- 3.7 No further strengthening of The Garrison was attempted until the turn of the twentieth century, when additional defences were introduced to meet the perceived threat of French invasion and advances in maritime weaponry. During the late nineteenth century the fire-power of maritime weapons increased significantly in range, penetrating power and rate of fire. As a result, existing fortifications were rendered vulnerable and a new approach to their design was necessitated. Defences were required to blend into their surrounding landscape. Earthwork defences were preferable and guns needed to be dispersed rather than concentrated in any one large structure [Brodie, 2011]. Concurrently, the idea of utilising the Scilly Isles as a protected anchorage for shipping was raised. As a result, between 1898 and 1901 the Woolpack and Steval batteries, with the Greystones Barracks between them, were constructed overlooking St. Mary's Sound.
- 3.8 Between 1902 and 1906 the Woolpack and Steval batteries were supplemented by 'Defence Electric Lights' designed to illuminate enemy shipping. These were constructed at Woolpack Point and Steval Point. Nonetheless, the Woolpack and Steval batteries very quickly became outdated. Designed to defend against large and relatively slow moving targets, these batteries were ineffective against the small, fast torpedo boats developed by the French. As a result, additional quick-fire batteries had to be established at Steval Point, to the northwest of the Woolpack Battery and at Bant's Carn at the northern end of St. Mary's [Brodie, 2011].
- 3.9 The signing of the *Entendente Cordiale* in 1904 signalled even greater change for the Isles of Scilly. In ending centuries of hostility with France, this series of agreements greatly reduced the strategic importance of the islands. Furthermore, the growing military power of Germany resulted in a re-alignment of Britain's defences to the east coast. In 1906 the Woolpack and Steval Battery guns were dismantled.

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- 3.10 The Garrison was briefly re-armed during both the First and Second World Wars. In the latter, the Isles of Scilly regained strategic importance as the Allied forces struggled to secure vital shipping routes across the Atlantic. A homing beacon was installed on the Woolpack Battery to help guide anti-submarine aircraft back to airfields in south west England, for which a raised concrete mast base was added to each of the two aprons of the emplacements [scheduling description]. However, few other material alterations were made to the earlier defences.
- 3.11 Following the Second World War the Garrison ceased to be used for military purposes. Presently, the headland's main uses are for recreation and tourism. Star Castle is currently an hotel and restaurant, and there are also holiday homes and a campsite. The Woolpack Battery itself had been used as a residence for Isles of Scilly Wildlife Trust volunteers from the late twentieth century until 2015.

Historic Map Appraisal

- 3.12 The Woolpack Battery, with the Steval Battery, and Greystones Barracks and Caretaker's Block, was constructed 1898-1901. Prior to this the area was unenclosed heathland crossed by informal tracks and with the occasional site of a former quarry [Fig.3, below]. The reference to 'Woolpack Battery' towards the southern coastline is nothing to do with our Site, the 1901 battery. This is a reference to an earlier battery at Woolpack Point and does not appear again in subsequent editions of OS mapping.
- 3.13 The completed Batteries and the Greystones Barracks etc. are shown on the OS mapping of 1909 [Fig.4] as already dismantled within eight years of completion.
- 3.14 By the advent of the OS mapping from 1980 [Fig.5], the area to the north and east of the Woolpack Battery has been subjected to some enclosure. There is also relatively extensive planting of coniferous woodland to the north of the Woolpack, which envelopes much of Steval Battery and Greystones Barracks etc.

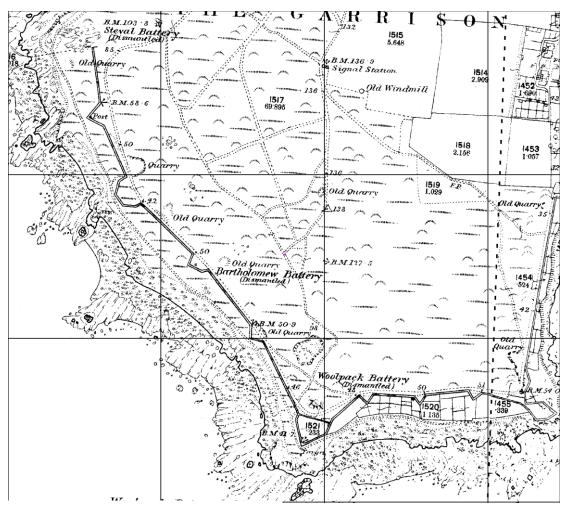


Figure 3: **OS 1:2,500 1890 map**

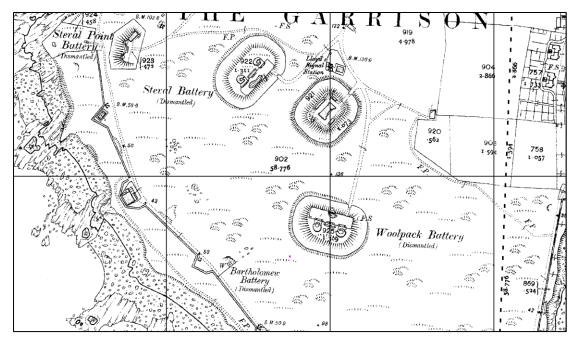


Figure 4: **OS 1:2,500 1909 map**

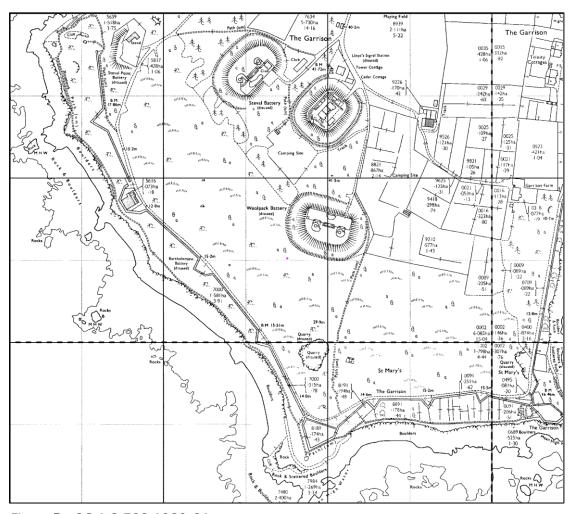


Figure 5: **OS 1:2,500 1980-81 map**

4.0 ASSESSMENT OF SIGNIFICANCE

Introduction

- 4.1 The Site, excluding the underground structures, is designated as a Scheduled Monument and also, with the underground structures, as a Grade II Listed Building. Additionally, the Site lies within the Isles of Scilly Conservation Area. The following section assesses the significance of the Woolpack Battery itself, and the contribution it makes to the significance of the Conservation Area.
- 4.2 The Grade II Listed Building designation and the Scheduled Monument designation that the Site forms part of, also encompasses the Steval Battery, and the Greystones Barracks and Caretaker Block.
- 4.3 The Garrison, St Marys and the Isles of Scilly include a plethora of defence and military related heritage assets. These assets will largely not be considered further in this statement, since the proposals for the Woolpack Battery are almost entirely underground and will consequently have no negative impacts on the significance of any assets. These other assets will only be considered in regard to the positive and enhancing nature of the proposals for the Woolpack Battery in terms of group value derived from historic, residual functional and former ownership association with many of these defence and military assets. This discussion is covered off below in section 4 below.

Woolpack Battery

- 4.4 **Description:** The Woolpack Battery is designated as a Scheduled Monument (NHL: 1014783). Constructed between 1898 and 1901, it forms one part of a defensive system designed to protect a naval signalling and refuelling station then to be established at St. Marys. The other two main parts of this system were the Steval Battery, located 125 m northwest of the Woolpack Battery, and the Greystones Barracks and Caretaker Block located between the two. These three assets are also collectively designated as a Grade II Listed Building (NHL: 1218945). Copies of drawings (sections and plans) of the Battery as completed in 1901 are reproduced in Appendix 1 of the Statement.
- 4.5 The Woolpack Battery is broadly rectangular in plan with rounded corners. The Battery has two concrete emplacements set into the rear of a rampart, each formed of a raised podium around a circular central recess, which housed the central-pivot gun mounting. The front of the podium merges into a concrete apron that extends over the adjoining rampart top. On the rear face of the

- podium there are metal brackets for handrail stanchions and recessed lockers which once stored shells.
- 4.6 The terreplein is approximately 55 m long and extends approximately 15 m back from the emplacements. The Battery's entrance is located near the eastern end of the terreplein, now visible as an open gap. Within the terreplein, a concrete revetted, semi-circular traverse extends from the centre of the rear wall. This contains a small former communications room. Above this room is a concrete post which once supported Watkin's depression range-finder sighting equipment. In the south-western corner of the terreplein there is also a small latrine.
- 4.7 Beneath the terreplein there is a series of underground rooms. These are accessed via a pair of iron stairs set within a lightwell, which bears a concrete date slab inscribed '1900' located immediately behind the Battery's emplacements. These rooms initially comprised a brick-vaulted magazine with two cartridge stores, three shell stores and a war shelter. These formerly limewashed rooms retain their original plan, although most original fittings, doors and joinery have been removed. During the Second World War this underground complex housed two Ford engines to power a homing beacon used to guide antisubmarine aircraft. One of the shell stores was used as a barracks for Royal Canadian Airforce personnel and later, was also used to store aviation spirit. These rooms have been further adapted to house Isles of Scilly Wildlife Trust volunteers in the early twenty-first century.
- 4.8 The Battery's emplacements, underground complex, terreplein and the structures it contains, are enclosed within extensive low profile earthworks, which were designed to protect them from incoming fire and the attack of ground troops. These earthworks include a forward rampart and an encircling ditch, which would have been filled with barbed wire.
- 4.9 The Battery's underground complex is excluded from the scheduling, but included in the listing building designation. All modern signs, fittings, service trenches and their contents are also excluded from the schedule designation.
- 4.10 The Battery is currently recorded on Historic England's Heritage at Risk Register. The Register notes that the Battery is generally in 'good condition and secure, but unoccupied since 2015. Converted to volunteer hostel accommodation in late twentieth century/early twenty-first century, but now suffering from problems with water ingress into the former magazines'. Furthermore its condition is measured as 'poor' with 'slow decay; no solution agreed'. The applicant's

building surveyor inspected the asset, including all underground chambers, in March 2018. He concluded that if there is any external water ingress into the asset, this is extremely minimal in volume. He takes the view that reuse of the chambers with associated ventilation, will reduce the effects of any dampness derived from condensation. The most notable threats to the asset, though not noted on the Heritage at Risk Register, relate to vegetation and rabbits.

- 4.11 **Significance:** The Woolpack Battery is an asset of high national significance. This significance derives in part from the evidential value of the asset. The historic fabric of the Woolpack Battery has survived well, including the original form of its earthworks. Such a survival is relatively rare. Therefore, the Battery is an important source for our understanding of the development of early twentieth-century artillery defences. The Battery's evidential value is added to by the survival of the other components of the early twentieth-century defensive system that it forms a part of, namely the Steval Battery and the Greystone Barracks etc. Consequently, the Site holds a strong group value with these other components of early twentieth-century defences.
- 4.12 The Woolpack Battery also derives significance from its illustrative value. Both individually, and as a group with other elements of the contemporary defensive system, the Battery illustrates concerns for and the focus of national defence at the turn of the twentieth century. Together with other historic defensive structures on the Garrison and across the Isles of Scilly (and other south coast sites of re-armament at the turn of the twentieth century), the Woolpack Battery also demonstrates a step change in the evolution of military architecture and defensive strategies through the islands' c.400 years of military history. The Site is therefore illustrative of the *ad hoc* but continuing strategic importance of St Marys and the Isles of Scilly up until the early twentieth century and, as a result, holds some degree of group value with all surviving defence and military heritage assets across the Isles of Scilly.
- 4.13 **Setting:** The Woolpack Battery is situated below the southern crest of the summit plateau of the Garrison headland. It is orientated with its forward flank facing southwest, so that its field of fire could command the deep water approach to the islands through St Mary's Sound. The setting is therefore largely defined by this seaward view. As this view was a vital aspect of the design and function of the Battery, it contributes greatly to its significance and to an understanding of this significance.

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- 4.14 The wider setting of the asset is considered to include the fortified headland on which it is located, together with the associated structures and fortifications that comprise the Garrison. Due to the topography of the headland, and the coniferous woodland situated to the north of the asset, there is limited intervisibility between the asset and much of its wider setting. However, long views of the asset and the headland are available from Buzza Hill and from St. Agnes. These views contribute to an understanding of the significance of the asset as part of a series of historic defensive structures. There is also a strong historic functional connection between the Woolpack Battery and many of the defensive structures and fortifications within its wider setting; most particularly the Steval Battery, and Greystones Barracks and Caretaker's Block.
- 4.15 **Summary:** The significance of the Woolpack Battery is principally derived from is historical and architectural special interest, which is embodied in the fabric of the asset as a relatively rare, near complete survival of its type. It is also derived from its group value with other defensive structures within its setting, in particular the Steval Battery and Greystones Barracks and Caretaker Block, which hold a strong historical functional association having been an integral, single phase, designed group. It gains a secondary contribution to its significance with the Garrison and the defence structures from other periods across the Isles of Scilly, being illustrative of the islands' c.400 years of continuing but *ad hoc* military history.

The Garrison, Isles of Scilly Conservation Area

- 4.16 **Description:** In 1979 the entirety of the Isles of Scilly were designed as a single Conservation Area. This report, however, will address the contribution of the Site to the character and appearance of the Garrison, a well-defined element of the Conservation Area. The designated heritage assets contained within the Garrison (in the form of Listed Buildings not hitherto referred to) will also be considered in this context.
- 4.17 The Garrison is located on a prominent, raised headland, the Hugh, on the western side of St. Mary's and is enclosed by a fortification including a wall and breastwork. A high proportion of the structures within the Garrison are Listed Buildings and/or Scheduled Monuments. These relate to the Garrison's former defensive and military use over *c.*400 years.
- 4.18 The north-eastern fringe of the Garrison comprises residential properties whose plots abut the perimeter wall. These properties look out of the Garrison over the

western extent of Hugh Town and the Quay. A number of them date from the eighteenth century and are formally of military use. They are largely of two or three storeys and are constructed from roughly coursed granite rubble stone with sash windows and slate roofs. Some of these granite buildings are rendered. Additionally, there are also a number of modern properties, predominantly constructed in the 1960s and 1970s in unsympathetic materials. These are not considered to aesthetically enhance the character and appearance of the Garrison, and their domestic character detract from an understanding of the significance of the Garrison as a defended peninsula.

- 4.19 The central elevated plateau of the Garrison is, at present, predominantly in use as holiday accommodation. Star Castle, now an hotel, is located at the northern end of the plateau and the Garrison campsite covers it southern extent. The open field between these is currently used as a sports field and contains a nautical themed children's play area. The plateau is enclosed to the southwest and west, along the crown of the headland, by coniferous woodland, but long views are available to the north and to the east across Hugh Town and St Marys.
- 4.20 The sloping northern, southern and western flanks of the Garrison are comprised of open land covered in bracken, which extends down to the rocky shoreline. The area is traversed by footpaths, including one extending around the Garrison's perimeter. A number of disused batteries of varying ages are located across the Garrison overlooking the deep water approach to the islands. The Woolpack Battery is a later example of one of these batteries. There are also numerous small, disused quarries close to the headland's coastline.
- 4.21 Important views to and from the Garrison are identified in the Isles of Scilly Council's 2015 Conservation Area Character Statement Consultation Draft. These include views to the north and west from Star Castle, views of the northeast of the Garrison from Buzza Hill (on the eastern side of Hugh Town), and views south and west from Colonel George Boscawen's Battery (on the western edge of the headland south of Steval Point). The Site does not feature within these identified views. The document also notes the particular importance of kinetic views of St Marys from ferries arriving from the mainland. Since the ferries approach from north of the island, the Site does not feature in these views. Despite its low profile, the elevated position of the Woolpack Battery means that it is an element in long-distance views of the Garrison from the neighbouring island of St Agnes.

- 4.22 There are 11 Listed Buildings within the Garrison not already considered within this report. They comprise:
 - Star Castle Grade I NHL: 1015671;
 - Garrison Walls and Gatehouse Grade I NHL: 1018370;
 - Trinity Cottages 1 and 2 Grade II NHL: 62515;
 - Garrison Cottage, The Garrison Grade II NHL: 62516;
 - Gatehouse Cottage, the Garrison Grade II* NHL: 62517;
 - Hugh House, the Garrison Grade II NHL: 62518;
 - Master Gunner's House, the Garrison Grade II NHL: 62519;
 - Newman House, the Garrison Grade II* NHL: 62520;
 - Powder Magazine and Blast Walls, the Garrison Grade I NHL: 62522;
 - The Guard house, the Garrison Grade II* NHL: 62526; and
 - Veronica Lodge, the Garrison Grade II NHL: 62527.
- 4.23 **Significance:** Whilst there are a number of twentieth-century residential properties within the Garrison, and its use is now largely given over to tourism, the dominant character and appearance of this part of the Isles of Scilly Conservation Area remains as an historic fortified headland. The large number of scheduled and listed assets within the Garrison provides this element of the Conservation Area with a high level of historic value, illustrating the development of the fortifications over time. In addition, there is a high level of evidential value, with many of the surviving fortifications being rare examples of their type.
- 4.24 **Summary:** The significance of the Garrison as part of the Isles of Scilly Conservation Area is principally derived from the scheduled and listed assets it contains. As such the Woolpack Battery, itself one of these fortifications, contributes to this significance. Moreover, in views from St Agnes, the Site helps to identify the Garrison as a fortified headland central to the islands' ad hoc c.400 year military history, and thus contributes to an understanding of its significance.

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5.0 NATURE AND IMPACT OF THE PROPOSED DEVELOPMENT

Proposed Works

- 5.1 The proposed works to Woolpack Battery are to re-fit and modernise the previous works to convert the underground chambers into accommodation (last used in 2015). The previous works were likely to have been carried out nearly twenty years ago. The proposed works largely comprise the updating of existing services and the introduction of stud wall insertions to subdivide some of the existing chambers. These are light-touch, cause no notable impacts to original fabric and will be reversible in nature.
- 5.2 The proposed works will also include three instances of notable, if limited impacts to the historic fabric. These comprise the opening up of two windows into the light-well and the insertion of a new door between two of the chambers.
- 5.3 The only ground level element of the proposals is a health and safety consideration in regard to the emplacements. This will involve the filling of the gun pits with sand bags, which will be entirely reversible and will not be visible from ground level around the Battery.
- In summary, the proposed works comprise [see Appendix B]:
 - Two new windows and openings, with lintel to support barrel vaulting, to match existing window;
 - New interior window and opening;
 - Erection of new partitioning to create bedrooms 2, 3 and 4;
 - Creation of lobby area to bedroom 1 and 6;
 - Erection of new partitioning to create and relocate kitchen from proposed bedroom 7;
 - Erection of new partitioning within bedroom 7 to create store cupboard; and
 - Ensuite kitchenette and shower room to bedroom 6.
- 5.5 It was apparent to the applicant's building surveyor that considerable works were carried out up to twenty years ago to provide accommodation. This included replacement of the doors and windows, the addition of a bathroom and kitchen and the introduction of a mechanical ventilation system.

Impacts of the Works

- 5.6 The proposals are almost entirely underground and are not perceptible from outside of the Battery. Consequently, the proposals will cause no harmful impacts to any other heritage asset.
- 5.7 In terms of the Woolpack Battery itself, the majority of the proposed works relate to the update of the previous alterations to provide accommodation, are light-touch, have a minimal number of negligible impacts on non-diagnostic fabric (through screw and bolt fixings of services and partitions) and are reversible.
- 5.8 The few direct, less easily reversible impacts on fabric are limited in number. These include an internal doorway between chambers and two new windows into the light well. The latter will be wholly in the style and character of the existing windows.
- 5.9 The preparation for the works will also include the working up of a draft conservation management plan for the Battery to be provided as a condition of listed building consent. This will be an iterative and evolving document that will provide the methodologies and approaches to improving the condition of the monument over a five year period. The ultimate aim would be to improve the long term condition of the asset such that it can be removed from the Historic England heritage at risk register.
- 5.10 The reuse of the chambers will mean that ventilation will reduce any effects of condensation. The conservation management plan will consider ventilation and also external ingress of moisture, should this prove to be happening. The applicant is looking to a partnership with the Duchy of Cornwall, the freeholder of the Battery, to effect these improvements and to lead on management improvements relating to impacts from vegetation and rabbits.
- 5.11 The proposed works will not only cause no harm to the significance of heritage assets around and associated with the Site, but will cause no harm to the significance of the Woolpack Battery. The sustainable re-use of the asset, together with the institution of a suitable conservation management plan, will lead to the enhancement of the asset's significance, the improved legibility of that significance and the asset's eventual removal from the Historic England Heritage at Risk Register.

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- 5.12 It can be concluded that the proposed works will cause a **negligible enhancement** to the significance of those heritage assets on the Isles of Scilly with a small degree of group value with the Woolpack Battery. These are namely the defence and military assets from the islands' c.400 year military history. As a consequence, the proposed works will also cause a **negligible enhancement** to the significance (that is the character and appearance) of the Isles of Scilly Conservation Area by providing a sustainable re-use for the Woolpack Battery (a notable positive contributor to the Area's character and appearance) and the drafting of a conservation management plan for the Battery (leading to its eventual removal from the Heritage at Risk Register).
- 5.13 The proposed works will also cause a **minor/moderate enhancement** to the significance of those heritage assets on the Isles of Scilly with a strong degree of group value with the Woolpack Battery. These are namely the Steval Battery, and the Greystones Barracks and Caretaker's Block.
- 5.14 The proposed works, in providing a sustainable re-use for the asset and the drafting of a conservation management plan (leading to its eventual removal from the Heritage at Risk Register), will cause a **moderate enhancement** to the significance of the Woolpack Battery, which will be reflected by its removal from Historic England's Heritage at Risk Register.

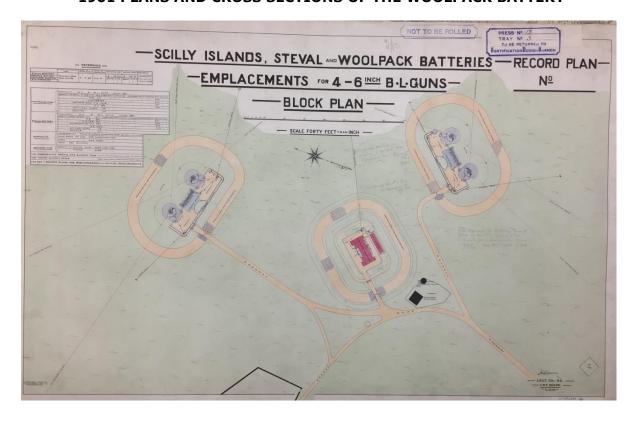
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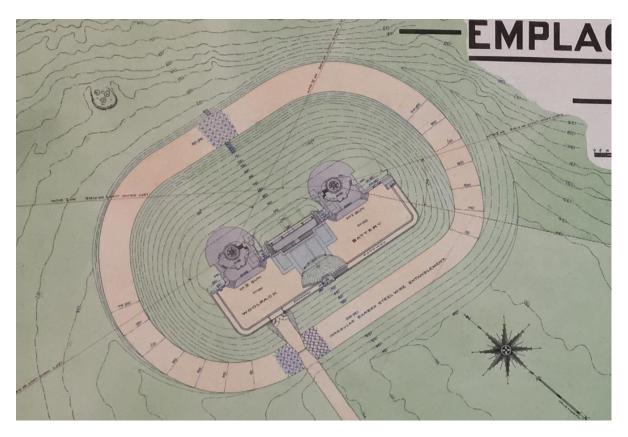
6.0 CONCLUSIONS

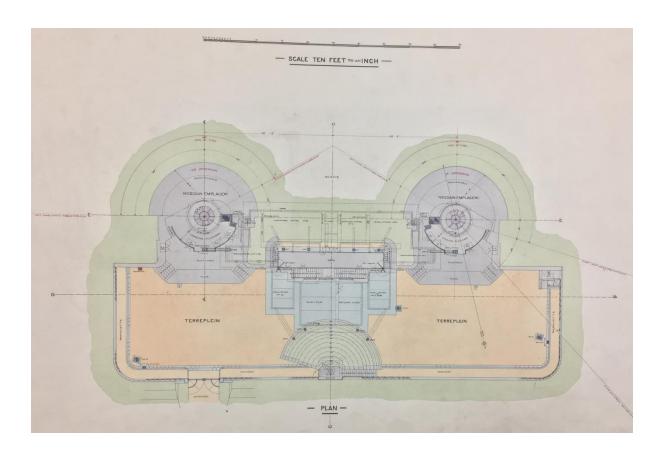
- This heritage statement comprises an appraisal of the significance of heritage assets potentially affected by the proposed works to the Woolpack Battery, designated as a Listed Building and as a Scheduled Monument. The appraisal includes consideration of the contribution of setting to that significance and an assessment of the scheme's likely impacts on built heritage assets' significance. This Statement covers built heritage considerations only; there are no archaeological implications for the proposed works.
- 6.2 The Site is situated within the Garrison set on the headland to the western margins of St Marys, which is entirely contained within the Isles of Scilly Conservation Area. Several scheduled monuments and numerous listed buildings, including the Grade I listed Star Castle Hotel, fall within a 1,000 metre radius of the Site.
- Due to the discrete nature of the proposal (almost all entirely underground), the topography of the surrounding landform, the presence of built form and coniferous woodland at the crown of the headland, the assets within this radius will not be affected by the Site's development and were, therefore, not considered further in this Statement in terms of potential harmful effects.
- heritage assets from harm under the auspices of s.66 (in regard to listed buildings) and s.72 (in regard to conservation areas) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Following the statutory test, the decision maker would need to weigh any harm that the scheme causes to heritage assets' significance with the scheme's public benefits, as required by paragraph 134 of the NPPF. The proposed development, however, causes no harm to the significance of any one heritage asset, therefore, both statutory duties and paragraph 134 are not engaged in this case.
- Not only will the proposed development cause no harm to any heritage asset's significance, the scheme will deliver a negligible enhancement to the significance of the Isles of Scilly Conservation Area (and the associated military assets within it), a minor/moderate enhancement to the Steval Battery and the Greystones Barracks etc., and a moderate enhancement to the significance of the Woolpack Battery, which will be reflected by its removal from Historic England's Heritage at Risk Register.

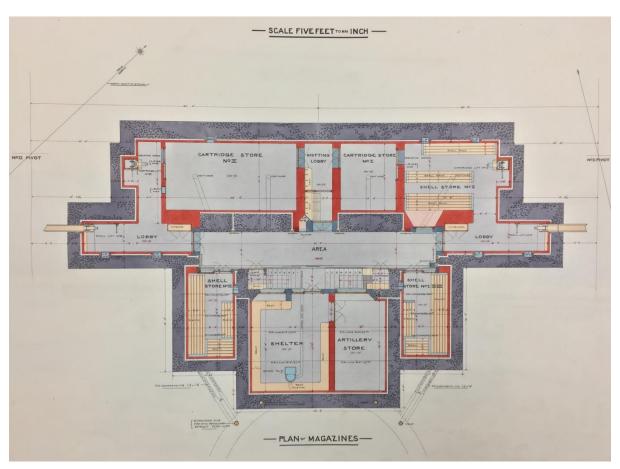
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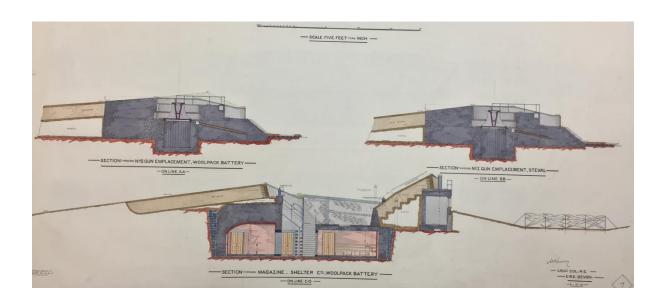
APPENDIX A: 1901 PLANS AND CROSS SECTIONS OF THE WOOLPACK BATTERY

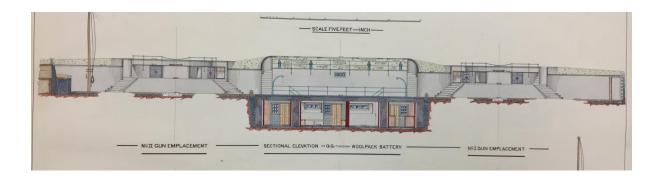














APPENDIX B:

PROPOSED WORKS

