

P/21/077/COU and 078/LBC Freesia, The Parade, St Mary's

Thank you for consulting us on this application for proposed works to this Grade II Listed Building, formerly known as the Stanmore Hotel (NHLE 1219064). We have consulted the Cornwall & Isles of Scilly Historic Environment Record (HER) and the submitted Heritage Statement (HS) (Johns 2022).

As the HS outlines, the potential impacts on the heritage significance of the proposed scheme include -

- Removal of chimney at the west end of the building
- Removal of chimney breasts on the first and second floors
- Removal of period staircase
- Works to the modern rear extension

While the HS considers that the potential impact of the scheme is less than substantial, it is disappointing that the proposal involves the loss of significant historic fabric of which, internally, there is now already little surviving.

The removal of the chimney stack at the west end of the building is presumably to also enable the removal of the chimney breasts on the first and second floors but results in a considerable amount of historic fabric being removed from this designated heritage asset. The removal of the chimney breasts on the first and second floors has the potential to reveal former fireplaces during opening up works.

The stair is the principal surviving historic feature within the interior of the building, with decorative moulding panels and turned newel posts, and part of the original internal plan of the building.

Externally, while the render of the brick-built chimney is cracking, this could be easily repaired, and the feature retained as part of the building's historic fabric and character – a building located in the historic core of Hugh Town.

For these reasons, we would encourage the applicant to reconsider these proposals to reduce the impact on the historic fabric and character of this Grade II Listed Building.

While Policy 7 (2) of the Isles of Scilly Local Plan states, 'Proposals causing harm will be weighed against the substantial public, not private, benefits of the proposal, and whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long-term use of the asset', we caution that, 'the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted' (Paragraph 205, NPPF July 2021).

If, however, the public benefit of the proposed scheme is accepted and weighted in favour to granting consent, we consider it prudent that an historic building

record and an archaeological watching brief (during the opening up works) should be carried out during the early stages of the development, undertaken by a suitably qualified organisation or individual.

We would advise, for the above reasons, that any consent issued should carry the condition as worded below of sections A-D inclusive (please do not split into separate Conditions or treat separately), which includes words recommended by the Association of Local Government Archaeological Officers (ALGAO), as follows:

- A) No demolition, conversion or alteration to the building shall take place until a programme of archaeological and historic building recording work including a Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of significance and research questions, and:
1. The programme and methodology of site investigation and recording
  2. The programme for post investigation assessment
  3. Provision to be made for analysis of the site investigation and recording
  4. Provision to be made for publication and dissemination of the analysis and records of the site investigation
  5. Provision to be made for archive deposition of the analysis and records of the site investigation
  6. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation
- B) No demolition, conversion or alteration to the building shall take place other than in accordance with the Written Scheme of Investigation approved under condition (A).
- C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.
- D) The archaeological and historic building recording condition will normally only be discharged when all elements of the WSI including on site works, analysis, report, publication (where applicable) and archive work has been completed.

A pre-commencement condition is necessary in this instance due to the need to ensure that a programme and methodology of site investigation and recording of the historical features is undertaken before physical works commence on site.

This is in accordance with the provisions of NPPF (2021) Chapter 16, paragraph 205 and Isles of Scilly Local Plan policy 7 (3).

Cornwall Archaeological Unit

Peter Dudley

28/04/2022