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**Riviera House
The Parade
Hugh Town
St. Mary's
Isles of Scilly
Cornwall**
NGR: SV 90402 10542

A
Heritage Impact Assessment

Text

Richard K Morriss *MA(Hons) MSocSc*

Assistant

L J Morriss *BSc (Hons) MSc*
D Salt

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Summary

Proposals are being developed to replace the current wet-laid scantle slate roofs of Riviera House on the east side of the Parade in Hugh Town, on St. Mary's in the Scilly Isles. The building is Grade II listed, adjacent to other heritage assets, and within a designated conservation area. In order to inform the decision-making process, this report was commissioned to provide a better understanding of the history, development and significance of the site and to provide a heritage impact assessment of the proposals on the listed building, the outbuilding, and any adjacent heritage assets - under the guidelines of the National Planning Policy Framework (NPPF). It is not concerned with other planning matters. It concludes that the proposals are well-considered and proportionate and that whilst there would be a minor degree of change there would be no harm – either substantial or less than substantial – to the building, adjacent heritage assets, or the conservation area. Overall there would be, instead, a general enhancement. Therefore neither Sections 66 or 72 of the 1990 Planning Act nor Paragraphs 207-9 of the NPPF will be engaged and it will also comply with the Isles of Scilly Local Plan 2015-2030.

1. Introduction

Proposals are being developed to replace the slate roof covering of Riviera House, a property on the east side of the Parade in the middle of Hugh Town, on St. Mary's in the Scilly Isles. The property is Grade II listed and is adjacent to other listed buildings and within the extensive conservation area. Consequently, this Consultancy was commissioned to produce a heritage impact assessment of the proposals under the guidance set out in the National Planning Policy Framework. The remit does not extend to any other planning matters.

1.1 Report Format

The report format is quite simple. After this brief introduction, there are short sections on the requirements of NPPF (Section 2) and Heritage Impact Assessments (Section 3). These are followed by an outline of the setting and history of the site (Section 4) and an outline description of the building (Section 5). Section 6 is a discussion of the findings. Section 7 outlines the proposals and Section 8 is the heritage impact assessment. Section 9 is a short conclusion and Section 10 is a list of the references used in the report. Section 11 is an Appendix containing the listing details.

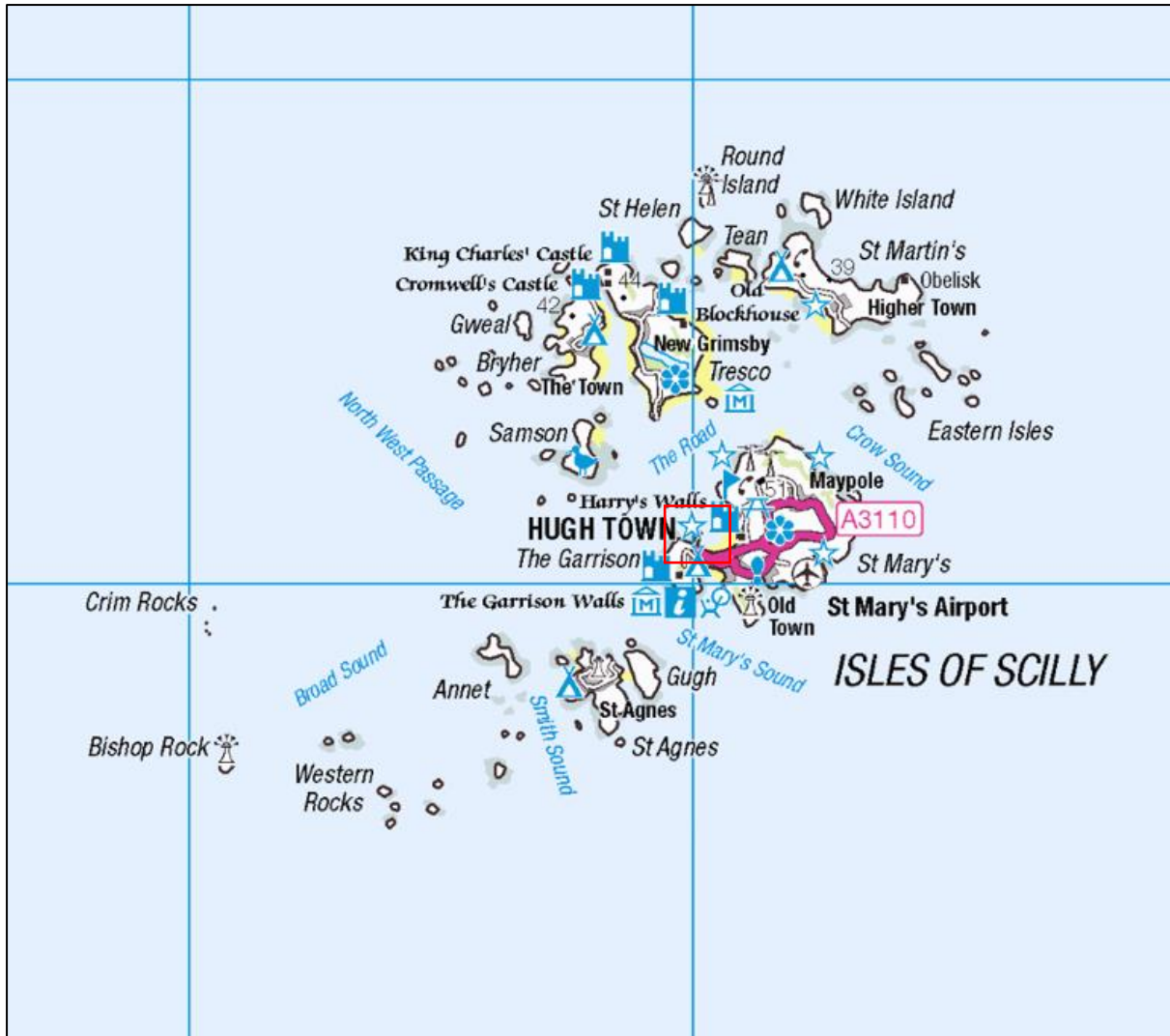


Fig.1: Location plan.
(Ordnance Survey Open Data).

2. National Planning Policy Framework Guidelines

2.1 The National Planning Policy Framework

Planning law relating to listed buildings and conservation areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of the Act deals with the responsibilities of local planning authorities – the decision makers - when dealing with planning applications that could impact on heritage assets and states that:

*‘In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.*¹

Section 72 of the same Act states that, in relation to conservation areas:

*‘with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.*²

Government guidelines regarding the listed buildings and conservation areas legislation in the 1990 Planning Act changed twice in two years, resulting in the introduction of a new *précis* of planning guidance published in March 2012 – the *National Planning Policy Framework* (NPPF) – which replaced all other separate *Planning Policy Guidelines* and *Planning Policy Statements*.³ Revised versions were published in July 2018, February 2019, July 2021; September 2023 and December 2023. The glossary of the NPPF described ‘heritage assets’:

‘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. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).’

The main relevant paragraph in the NPPF states that local planning authorities should require applicants:

*‘...to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposals on their significance’.*⁴

¹ Planning (Listed Buildings and Conservation Areas) Act 1990 c.9 section 66 (1), 41

² *Ibid.* section 72

³ Department for Levelling Up, Housing & Communities, 2023, *National Planning Policy Framework*.

⁴ *Op. cit.*, para. 200

3. Heritage Impact Assessments

3.1 General Introduction

The purpose of a heritage impact assessment (HIA) is to meet the relevant guidance given in the NPPF. This outlines the need to inform the planning decisions when considering proposals that have the potential to have some impact on the character or setting of a heritage asset. It is not concerned with other planning issues.

The nature of the heritage assets and the potential impact upon them through development are both very varied. The heritage assets include both designated heritage assets – such as listed buildings, scheduled ancient monuments and conservation area – and non-designated heritage assets, a rather uncomfortable and sometimes subjective category that includes locally listed buildings, field systems, buried archaeological remains and views.

The degree of impact a development could have on such assets is variable and can sometimes be positive rather than negative. The wide range of possible impacts can include loss of historic fabric, loss of historic character, damage to historic setting, and damage to significant views.

Under the requirements of the NPPF and of other useful relevant guidance, such as English Heritage's *Conservation Principles* and *Informed Conservation*, and recent material from the newly formed Historic England, the process of heritage impact assessments can be summarised as involving three parts:

1. understanding the heritage values and significance of the designated and non-designated heritage assets involved and their settings;
2. understanding the nature and extent of the proposed developments;
3. making an objective judgement on the impact that the proposals outlined in Part 2 may have on the information outlined in Part 1.⁵

3.2 Definition of Setting

Setting, as a concept, was clearly defined in PPS5 and was then restated in the NPPF which describe it 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. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'

⁵ English Heritage, 2008, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*; Clark, K, 2001, *Informed Conservation*

The latest version of the Historic England guidance on what constitutes setting is virtually identical to the former English Heritage guidance:

‘Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.’⁶

The new Historic England guidance also re-states the earlier guidance that setting is not confined entirely to visible elements and views but includes other aspects including environmental considerations and historical relationships between assets:

‘The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance’.⁷

In terms of the setting of heritage assets the approach is the same but the latest Historic England guidance - *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (GPA3)* of 2017 - suggests a five-step approach.⁸

The steps are:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

⁶ Historic England, 2017, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3 (2nd ed.)*, para.9

⁷ *Op.cit.*, Part 1, reiterating guidance in the PPG of the NPPF.

⁸ *Op.cit.*, para.19

3.3 Definition of Significance

The glossary of the *Planning Practice Guidance* (PPG) to the NPPF defines significance as:

‘The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting’.

These are further explained as:

- **Archaeological interest:** *as defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- **Architectural and artistic interest:** *These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.*
- **Historic interest:** *An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.*

The PPG also states that:

*‘Local planning authorities may identify non-designated heritage assets. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as ‘locally listed’.*⁹

but cautions that:

*‘A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process’.*¹⁰

⁹ Planning Practice Guidance, 2014, paragraph 39

¹⁰ *Ibid.*

3.4 Definition of Harm

Current guidance by Historic England is that ‘change’ does not equate to ‘harm’. The NPPF and its accompanying PPG effectively distinguish between two degrees of harm to heritage assets – *substantial* and *less than substantial*. Paragraph 207 of the revised NPPF states that:

‘Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable use of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use’.*¹¹

Paragraph 208 of the revised NPPF states that:

‘Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposals including, where appropriate, securing its optimum viable use’.

and Paragraph 209 states that:

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

Recent High Court rulings have emphasised the primacy of the 1990 Planning Act – and the fact that it is up to the decision makers in the planning system to ‘*have special regard to the desirability of preserving the [listed] building or its setting*’. As stated by HH Judge David Cooke in a judgment of 22 September 2015 regarding impact on the setting of a listed building:

‘It is still plainly the case that it is for the decision taker to assess the nature and degree of harm caused, and in the case of harm to setting rather than directly to a listed building itself, the degree to which the impact on the setting affects the reasons why it is listed.’

¹¹ Ministry of Housing, Communities & Local Government, *op. cit.*, para.207

The judgment was endorsed by Lord Justice Lewison at the Court of Appeal, who stated that:

*‘It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused’.*¹²

¹² Court of Appeal (PALMER and HEREFORDSHIRE COUNCIL & ANR) in 2016 (Case No: C1/2015/3383)

4. Setting & Outline History

4.1 Hugh Town

Hugh Town on St. Mary's is the *de facto* capital of the Scilly Isles, an archipelago of many islands off the south-western extremity of Cornwall. There is evidence of settlement of the islands in prehistoric times and some evidence of contact with early classical civilisations prior to the conquest of most of the rest of Britain by the Romans in the 1st century CE.

Writing in the early-16th century, probably in the 1530's, the occasionally eccentric antiquary John Leland noted that St. Mary's was the largest of the Scilly Isles and that '*in it is a poore town and a neatly strong pile; but the roves [roofs] of the buildings in it be sore defaced and worn*'. He was presumably describing the original main settlement on the island, now the small village of Old Town on its south-eastern coast with the remnants of an ancient chapel.

Towards the end of the century, and after the establishment of Star Castle on the Heugh on the western side of St. Mary's as part of improved defences in light of Spanish aggression, a new settlement developed on the low spit of land between the main island and the new fortress which became Hugh Town. Initially serving the needs of the new garrison it became, and remains, the only town in the Islands. According to one writer at the end of the 18th century:

'Heugh Town is the capital of this island.....it is situated upon the low land of the isthmus, which joins the main part of the island to the high land of the garrison above the town.....The town consists of one long street, and two cross ones, of strong stone-built houses, where are shopkeepers, innkeepers and all sorts of trades-people required in the islands'.¹³

The 'town' was still, however, small and fairly insignificant and seemed to be in danger of decline after the main garrison left the islands after the threat of the Napoleonic Wars was over. Then, in 1834, the Crown lands on Scilly were leased by Augustus Smith who seemed to have a better attitude to the sub-tenants and encouraged growth. By the end of the decade the quay at Hugh Town had been extended and a new church had been built at the east end. The improvements were noted by visitors, including, for example, the Rev. North who wrote:

*'The houses in Hugh Street are very old, and many of them certainly wear a somewhat forlorn and dreary aspect; but as the visitor advances towards the Church and sees those more recently built on the Parade and in Buzza Street, towards Porcrass, he will be impressed with a widely different feeling. He will find himself surrounded by houses with every token of cheerfulness and comfort.....'*¹⁴

According to *The Galaxy* magazine in 1868 there was on St. Mary's '*....a flourishing city consisting of one street and about two hundred houses, known to the Scillyian world as Hugh Town*'.

¹³ Troutbeck, J, 1796, *A Survey of the Ancient and Present State of the Scilly Islands*'

¹⁴ North, I W, 1850, *A Week in the Isles of Scilly*, 50



Fig.2: A 1752 engraving of Star Castle from the east with the beginnings of Hugh Town below it, prior to extending eastwards to the Parade and beyond.

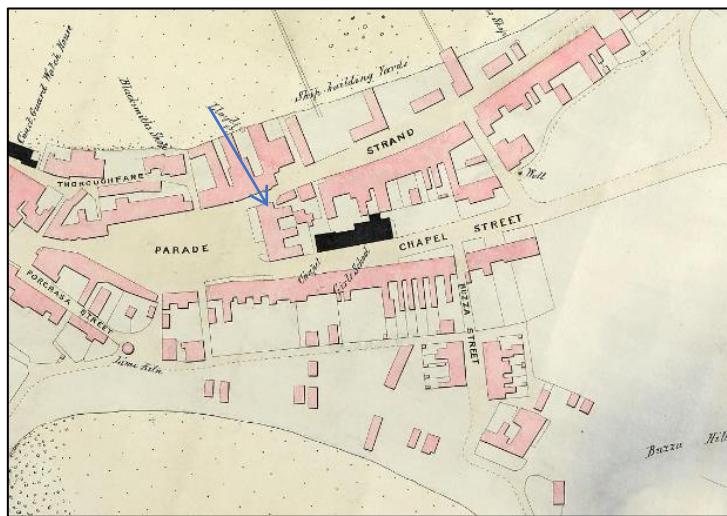


Fig.3: Extract from the 1862 plan of Hugh Town for the Hydrographic Office (site arrowed).



Fig.4: Extract from the 1906 revision of the Ordnance Survey 1:2500 map.

4.2 Riviera House

Riviera House forms part of a property on the east side of the Parade, at its junction with The Strand. According to the listing details it dates to the 18th century but there is some conflict with the given historical development of Hugh Town, as this area seems to have been mainly a result of the early-19th extension eastwards of the core of Hugh Town, with the new church at its eastern extremity.

This therefore could have been one of the ‘*houses with every token of cheerfulness and comfort...*’ mentioned by the Rev. North in 1850 and thus possible built as late as the second quarter of the century.

However, the house could predate the present uniform eastern side of The Parade. The differences in the masonry and detailing between Riviera House and the property to the south to which it is attached are quite clear and it seems very likely that it was built as a freestanding detached property. As with several other houses in the vicinity it was abutted by a later property. Consequently, a later-18th century date is perfectly possible.

The house, and its immediate neighbours, are certainly shown on the 1862 map of the town (*see Fig.2*). The 1st editions of the 6” Ordnance Survey map are of little use in understanding the development of the property, because by that stage it already consisted of a front range with a rear wing. The 1:2500 mapping is more detailed, but both it and the 1906 revision show virtually the same arrangements (*see Fig.3*). The property was carefully renovated and new sashes added under planning consents in the recent past.



Pl.1: 1938 aerial view of Hugh Town from the south-east, Riviera House arrowed.



Pl.2: The Parade, looking east; Riviera House is arrowed.



Pl.3: The front elevation of Riviera House (James Faulconbridge).

5. Description

5.1 The Exterior

Riviera House is a two-storey property consisting of a frontage range aligned north-south and a slightly lower – and probably later – rear wing at right-angles. Set back from a diminutive walled forecourt, the front elevation faces west, to The Parade.

This is a composition of three almost symmetrical bays – the central bay set very slightly to the left of centre and closer to the left-hand windows. It is faced in large roughly worked but quite well coursed blocks of granite.

The front door is modern and protected by a rather oddly designed porch, probably of the early-20th century. The window openings have flat-arched heads of well-worked granite. Those to either end are vertically aligned and contain balanced horned bespoke hardwood sashes of 4x2 pattern which are good quality early-21st century replacements. The central first-floor window opening above the entrance is narrower but still has the same 4x2 pattern of sashes.

Above the eaves and the modern guttering there are two evenly spaced dormer gables in the slate-covered roof slope, with hipped slated roofs and slate cheeks; these contain balanced horned sashes of 3x2 pattern, contemporary with the others. At either end of the building are ridge chimneys – the one to the left, or north, being of worked stone and the other, of bare brick, apparently shared with the adjacent property.

The north gable faces Lower Strand; it has single windows with flat stone lintels on each floor level – the ground-floor one to the left and the first-floor one to the right; these both have balanced horned sashes of 3x2 pattern. The verges are protected by a single course of attached slate, which also caps the ends of the roof purlins.

The visible short sections of the rear wall on either side of the rear wing are of similar coursed and worked granite. The ground-floor section of the northern end of the rear wall is abutted by a later lean-to structure.

There are possible hints in the disturbance of the coursing of the masonry of the rear wall to the north of its junction with the rear wing to suggest the former existence of a window on the first floor.

The rear wing is assumed to post-date the front range; it is also of two storeys and has a ridge chimney on top of its eastern gable. On the north side steps lead up to the first-floor apartment. The doorway at this level is inserted and flanked by window opening of different width to either side; these have recent 3x2 and 2x2 balanced hardwood sashes.



Pl.4: Detail of the front slope of the front range and the cheek and roof of a dormer.



Pl.5: The north elevation – with frontage range to right and rear wing beyond.

5.2 The Roofs

The roofs of the two main parts of the property are both plain gabled, and covered in wet-laid scantle slate, a traditional roof covering in the Scilly Isles since the later-18th century; the slates are typically quite small but well-coursed.¹⁵ The roof of the frontage range has clearly been altered and replaced at some time in the past – though the precise date is unclear.

The roof space is now a usable domesticated attic space, but this is probably the result of a later colonisation of the space to achieve more domestic space – a common evolution of houses in the area.

The basic roof structure in the frontage range is visible from within the attics, but not the laths or soffits of the slate. Structurally it appears to be of three bays and two trusses are exposed in the bedroom and neighbouring *en suite*.

These have over-painted principal rafters, crisply cut and of fairly thin scantling; each has an added bolted collar – effectively a yoke – just below the apex, suggesting that a lower collar (or perhaps a king-post – as the apex of each is hidden behind a modern ceiling) has been removed in order to achieve the necessary head-height for access through the truss.

The trusses carry two tiers of very thin scantling purlins, barely trenched into the top of the principal rafters; the ends of the purlins are capped in the slate of the verges in the north gable end. The regularity of the exposed, though painted, roof timbers suggests that they are machine-sawn.

The rear range is lower than the front range and consequently the roof space could not be converted into domestic use. This also means that access into the roof space above the first-floor space is limited.

From what can be seen the roof structure seems to be of machine-sawn common rafters meeting at a substantial ridge-piece. It was not possible to identify any trusses in this section because of the limited access. The roof of the single-storey lean-to in the angle between the north side of the rear wing and the east side of the front range is also slated.

The main roofs are covered in wet-laid scantle slates, protected by slate shelf weatherings cantilevered out from the inner faces of the gable chimneys. The ridges are formed of inverted ‘V-cut’ stone bonnets.

The scantle slate covering is of uncertain date, but evidently not primary to the building. The technique used in this case was unsubtle; instead of ‘edging’ the soffit of each slate with the mortar – i.e. around the sides and lower edge of each slate before laying it on the slates below – in this roof virtually all of the upper surface of each slate in each ascending course was covered in mortar before the next slate up was laid on it.

¹⁵ The term ‘scantle’ is probably derived from medieval English, ‘scant’ – meaning small. According to the OED, the term is first recording in regard to roofing in the 1850’s.



Pl.6: Attic bedroom in the front range, showing truss and purlins.



Pl.7: En suite in the attic of the front range.



Pl.8: Machine-sawn timbers in the roof space of the rear range.

This would have resulted in the use of far more mortar and greater weight for the roof to carry. Partly because of this mortar technique and the lack of access to the soffits of the slate it is difficult to see if they are pegged or nailed to the laths – but the latter technique seems to be more likely. Where visible, the common rafters appear to be machine-sawn softwood with quite wide centres.

The slate covering has clearly failed or is failing. It is not, however, in the remit of this report to provide a technical assessment of the degree of failure. On the rear slope of the front range roof there is clear slippage immediately adjacent to the ridge.

The roof of the rear range is obviously worse condition and the slippage below the ridge has developed into a large gap in the slate cover, exposing the tops of the common rafters and the internal modern boarding beneath them to the elements.



Pl.9: View of the northern end of the easter slope of the front range roof. Note slate slippage just below the ridge.



Pl.10: The southern end of the rear roof slope of the front range.



Pl.11: The roof of the rear range, showing obvious evidence of failure in the wet-laid scantle slate just below the ridge.

6. Discussion

Riviera House was built as a detached two-storey, three bay dwelling facing The Parade; its rear wing was probably added slightly afterwards. Accepting the 18th century date of the listing details it would have been one of the earliest properties in this part of the expanding Hugh Town and had a degree of architectural aspiration in its symmetrical façade and use of flat-arched heads to the window openings – perhaps copying those of Hugh House, the former officers’ mess in the Garrison, built in 1792. Even had it been slightly later than suggested it would have been one of the higher status properties in the area.

It is thus evidently worthy of its Grade II listed status. It utilised local materials in its granite walled shell, but the slates for the roof – both original and in subsequent repairs or replacements – were presumably imported from the mainland.

It is a good exemplar of its type and appears to have been a rather higher status dwelling than its later neighbours – above the ‘vernacular’ and even, given its location by the Parade, perhaps with some connection to the military stationed in Hugh Town. In this regard it also forms an important part in the overall appearance of The Parade and the surrounding streetscape – providing an element of urban formality within the area.

As well as its historical interest as an early building in the eastern expansion of Hugh Town, it has retained much of its original architectural character in the basic design of its elevations, scale and massing – the major impact on the latter being abutted by the adjacent building to the south to create the misleading impression that it was part of a semi-detached development.

It has, like all buildings, evolved and been altered. The present sashed windows are bespoke hardwood replacements of the early-21st century and it is assumed that the initial conversion of the roof space of the frontage range to domestic use – including the addition of the dormer gables - took place earlier in the 20th century; this level has since been modernised. More recently a separate holiday let has been created within the property.

The focus of this report is the roof and the proposed re-slating of it. Given its status it is probable that the roof was slated from the start. The traditional roof covering in the Scilly Isles up until the 18th century – and for vernacular houses well into the 19th century – was thatch which, as in other exposed coastal areas of Britain from Cornwall to the Scottish Highlands, often had to be held in place by a variety of rope or straw. As noted by Troutbeck in 1796:

‘They cover houses with slates and tiles, but mostly with straw; the first is brought from England, and laid upon the roofs of houses here as it is there; the latter is of their own product, and the method of covering is with a thin coat, which is commonly renewed every year when harvest is over.....binding the coat with straw ropes...’¹⁶

The basic chronology of roofs is outlined in the Isles of Scilly *Design Guide* of 2007 which states that:

‘Slates imported from the mainland became popular in the 19th and 20th Centuries, particularly Delabole ‘smalls’ and ‘peggies’. Slate roofs are frequently scantled (small slates cut roughly, at random widths usually diminishing from bottom to top of the roof slopes, often bedded on mortar and trimmed all the way round).’

Wet-laid scantle slate roofs evolved as a better-quality roof covering to thatch, and one that could utilise relatively poor quality and small sized slate in an efficient manner. Fixing the slate in mortar helped to lift the ‘tail’ of each slate so that the ‘head’ rested more securely on the batten where it would be fixed with wooden peg or nail. The mortar then also sealed the gaps between the slates – effectively an external ‘torching’ – to increase water-tightness.

This could be adapted in a way that left the mortar bedding hidden from view or resulted in the gaps between slates and slate courses extruded flush with the surface. In rarer cases the slates were completely covered with a bed of mortar, though this appears usually to have been an afterthought.

¹⁶ Troutbeck, J, 1796, *A Survey of the Ancient and Present State of the Scilly Islands*

Whatever the original roof covering or roof structure of Riviera House, it seems clear that neither the present covering nor roof structure is original. Wet-laid scantle slate roofs in such exposed areas generally have a life of 100-150 years but this can be much shorter depending on the quality of the slate or the quality of the slating. This is partly due to the small size and irregularity of the slate, the reliance on mortar as bedding and torching, and the fragility of nail fixings in a seaside salt-laden environment.

Whilst it can be difficult to date hand-cut traditional wet-laid scantle slate roof coverings by visual inspection alone – due to the character of the material - the evidence of the roof structure of Riviera House shows that the roof trusses, purlins and common rafters are crisp, regular, relatively small scantling and machine sawn.

The evidence would suggest a date for the roof of no earlier than the late-19th century, and it could be significantly later. Evidently the house itself was modernised during this broad period of time. It is even possible that the roof was altered and perhaps re-slatted when the attics of the front range were created.

Whatever the date, it is the case that the present roof is not part of the original building and is a secondary, or even tertiary, alteration. This slightly diminishes its contribution to the significance of the listed building, but it is evidently still an important element in the building's present form.

The use of natural slate – whether wet-laid scantle slate or dry-laid imported and more regularly coursed slate – is now an integral element in the architectural character of Hugh Town and has completely replaced the thatch of earlier centuries.

7. The Proposals

Because of the condition of the wet-laid scantle slate and its failure in large areas, it is proposed to replace it with a dry-laid natural slate instead. This will be designed to conform to the basic character, colour and texture as the existing slate but will be more regular in size of slate and height of coursing, with proposed slate dimensions of 400mm x 200mm.

8. Heritage Impact Assessment

8.1 Impact on the Listed Building

Riviera House is a Grade II listed building. As noted above (in Section 6) its main significance is considered to be historical and architectural and whilst the present roofscape and materials do contribute to its significance they are not original to the building. The proposals are to replace the non-original slate covering with a new slate covering of a similar but not quite identical character using more regular dry laid natural slate.

The 1990 Planning Act stipulates the importance of preserving listed buildings and any features of architectural or historical interest they possess, a requirement repeated in Policy OE7 of the *Isles of Scilly Local Plan 2015-2030*. Whilst the loss of the traditional form of slate cover may usually be considered to result in a degree of less than substantial harm – although at the lower end of that spectrum of harm – it is considered to be an appropriate response to the poor condition of the roof.

In addition, there are issues regarding replacing such a roof on a like-for-like basis bearing in mind the difficulties in obtaining sufficiently skilled craftsmen capable of such traditional techniques – a fact tacitly accepted in the *Isles of Scilly Design Guide*:

‘Scantling slate (small slates cut roughly in random widths usually diminishing from bottom to top of the roof slope, often embedded in mortar and trimmed all the way round) is an established building tradition which should be used as first preference wherever possible. It is important however that the specification and detailing are correct, and that builders who are experienced in this work are selected. Slate in larger more regular sizes can also be used. It is likely that a rough edged type would be appropriate’.

The replacement of failing wet-laid scantle slate roofs in the islands by sympathetically sourced, textured and coloured dry-laid slate has become quite common in the recent past for both listed buildings and within conservation areas. Consequently it is considered that the minor degree of change that would ensue through these proposals for the re-covering of the roof would not equate to harm to the significance of the listed building – and therefore neither Section 66 of the 1990 Planning Act nor Paragraphs 207-8 of the NPPF would be engaged.

8.2 Impact on Adjacent Heritage Assets

There are many listed buildings close to Riviera House and others that could be considered as non-designated heritage assets. However, as is clear from the proposals, there will be no significant change, other than the subtle changes to the character of the slate roofs, to the public elevations of the building and therefore minimal change to the building’s relationship with these adjacent heritage assets.

It is considered, therefore, that there will therefore be no change to the significance of the settings of these assets and consequently, no harm could ensue – substantial or less than substantial. Consequently, neither Section 66 of the 1990 Planning Act nor Sections 207-209 of the National Planning Policy Framework would be engaged.

8.3 Impact on the Conservation Area

Uniquely, all of the Scilly Isles are a designated conservation area. Riviera House's principal façade towards The Parade makes a positive contribution to the character and significance of the conservation area – but will not be significantly changed as a result of these proposals. The principal elevations will be unaltered and the difference in appearance caused by the new roofing is considered to be minimal.

Given these facts it is considered that the proposals will result in no change, or harm, to the character or significance of the conservation area and that therefore Section 72 of the 1990 Planning Act would not be engaged.

8.4 Archaeological Issues

All of the proposals are for the roofs of the standing buildings and therefore it is clear that there would be no archaeological implications as a result of these proposals.

9. Conclusions

For the reasons outlined above it is considered that the proposals for the re-slatting of Riviera House are well-designed and proportionate and whilst they will result in a minor degree of change – through the replacement of a non-original slate cover with a new slate cover of similar character – such change would not equate in harm to the character, setting or significance of the building, or to adjacent designated or non-designated heritage assets, or to the conservation area.

Overall it is considered that, instead, these proposals would result in the evidently necessary restoration of the main roofs of the listed building – thus arresting a failing element of the building and helping to ensure the long-term future of a designated heritage asset within a conservation area, which is a public benefit.

In the recent past, planning guidance has recognised that change to historic buildings and their settings is part of their history and that buildings are not and should not be fossilised. The prospect of change, even to listed buildings, is anticipated in the government's *National Planning Policy Framework*, but was more clearly expressed in earlier guidance from 1996, *Planning Policy Guideline No.15 (PPG 15)*.

That document stated – in relation to listed buildings that:

‘Many listed buildings can sustain some degree of sensitive alteration or extension to accommodate continuing or new uses. Indeed, cumulative changes reflecting the history of use and ownership are themselves an aspect of the special interest of some buildings, and the merit of some new alterations or additions, especially where they are generated within a secure and committed long-term ownership, should not be discounted.’

This echoes the statement in the pioneering 2008 document, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* that: *‘Change in the historic environment is inevitable, caused by natural processes, the wear and tear of use, and people’s responses to social, economic and technological change’.*

Furthermore, conservation areas are not designed to stifle development but to guide development so that it does not impact adversely on the area’s special character. This is echoed in the foreword to the current Historic England guidance which states that:

*‘Change is inevitable. This guidance sets out ways to manage change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management’.*¹⁷

That change to conservation areas does not equate to harm in law was also made clear in one of the key High Court judgements related to conservation areas by Lord Bridge, related to developments within conservation areas, *South Lakeland District Council vs. Secretary of State for the Environment*. He stated that whilst all developments within a conservation area *‘must give a high priority to the objective of preserving or enhancing the character or appearance of the area’*, where a development would not have any adverse impact and met other planning requirements:

*‘.... One may ask rhetorically what possible planning reason there can be for refusing to allow it. All building development must involve change and if the objective of Section 277(8) [of the 1971 Planning Act, substantially the same as Section 72(1) of the 1990 Act] were to inhibit any building development in a conservation area which was not either a development by way of reinstatement or restoration on the one hand (‘positive preservation’) or a development which positively enhanced the character or appearance of the area on the other hand, it would surely have been expressed in very different language...’*¹⁸

¹⁷ EH

¹⁸ 1992, *South Lakeland District Council vs. Secretary of State for the Environment*

10. References

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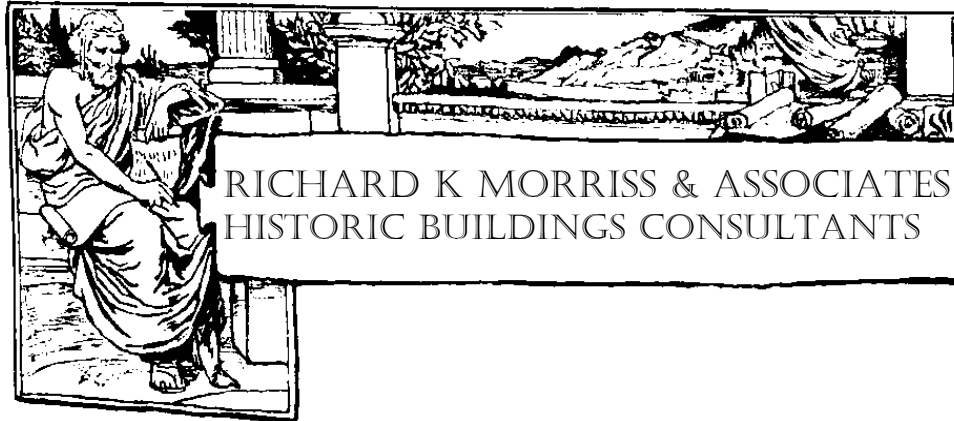
11. Appendix: Listing Details

SV9010 THE PARADE, Hugh Town 1358-0/8/91 (East side) 06/04/59 Rivera House

GV II

House. C18. Coursed and squared granite; gabled slate roof, with scanted slate roof to rear wing; rendered end stacks. L-plan with rear left wing. 3-unit plan including central staircase. 2 storeys; symmetrical 3-window range. C20 gabled porch. Flat arches with voussoirs over late C19/C20 8/8-pane sashes. Hipped dormers with similar horned 6/6-pane sashes. Early C19 3-storey rear wing with 6/6-pane sashes. Interior not inspected.

Listing NGR: SV 90402 10542



The Consultancy

Richard K Morriss founded this Consultancy in 1995 after previously working for English Heritage and the Ironbridge Institute of the University of Birmingham and spending eight years as Assistant Director of the Hereford Archaeology Unit. Although Shropshire-based the Consultancy works throughout the UK on a wide variety of historic buildings for clients that include the National Trust, the Landmark Trust, English Heritage, the Crown Estates, owners, architects, local authorities, planning consultants and developers. It specialises in the archaeological and architectural analysis of historic buildings of all periods and planning advice related to them. It also undertakes heritage impact assessments and broader area appraisals and Conservation Management Plans.

*Richard Morriss is a former Member of the Institute of Field Archaeologists and of the Association of Diocesan and Cathedral Archaeologists, currently archaeological advisor to four cathedrals and author of many academic papers and of 20 books, mainly on architecture and archaeology, including *The Archaeology of Buildings* (Tempus 2000), *The Archaeology of Railways* (Tempus 1999); *Roads: Archaeology & Architecture* (Tempus 2006) and ten in the *Buildings of series: Bath, Chester, Ludlow, Salisbury, Shrewsbury, Stratford-upon-Avon, Warwick, Winchester, Windsor, Worcester* (Sutton 1993-1994). The latest work is an Historic England funded monograph on the *Houses of Hereford* (Oxbow 2018).*

He was a member of the project teams responsible for the restoration of Astley Castle, Warwickshire, winner of the 2013 RIBA Stirling Prize; the restoration of the Old Market House, Shrewsbury, winner of a 2004 RIBA Conservation Award; and Llwyn Celyn, Monmouthshire, winner of the RICS Conservation Project of the Year 2019. He has also been involved in several projects that have won, or been short-listed for, other awards including those of the Georgian Group for Mostyn House, Denbigh; St. Helen's House, Derby; Radbourne Hall, Derbyshire and Cusgarne Manor, Cornwall.



BROMLOW HOUSE
BROMLOW
SHROPSHIRE
SY5 0EA

rkbromlowhouse@gmail.com