

Supporting Planning Statement

July 2025

Tregarthen's Hotel

JACKSON PLANNING 

Tregarthen's Hotel



Introduction

- 1.1 This statement supports the application for a full planning permission for the upgrading the 'L' shaped staff block from 2 units of staff accommodation with shared facilities to 6 self-contained ensuite staff units. This proposal reflects the need to generate better quality staff accommodation to attract and retain staff to meet the full market demand at the Hotel and extend the tourism season.
- 1.2 This application follows informal pre-application advice provided through a Teams Meeting with the case officer. This statement sets out all the planning considerations for this proposal.
- 1.3 The applicant is Tregarthen's Hotel Ltd.
- 1.4 The application is submitted to meet the changing demands for better service for the hotel accommodation available over a longer period than the current product available to guests.
- 1.5 This proposal was subject to an informal pre-application meeting on 23 June 2025 with the local planning authority.

The Proposal

- 1.6 The proposal is to upgrade the 'L' shaped staff block Class C1 (hotel use) to 6 ensuite staff units -Class C1. This discrete 'L' shaped block is located behind the restaurant area of the hotel and is flat roof building of circa 1950 origin, it is not visible from any public vantage points.
- 1.7 The conversion of the 'L' shaped block at the Hotel is shown on plans prepared by Simpson Hilder numbered 9906.111 and 9906.112. This involves very limited minor external works to add opening doors to each unit where these did not exist previously, but significant internal upgrading to form ensuite rooms
- 1.8 Should this permission be granted this proposal will allow the release of 4 hotel bedroom in the main block to return to guest accommodation. The rooms have been temporarily allocated to staff whilst accommodation is sought and improved. The 4 bedrooms released to guest use will be upgraded in phases including significant improvements.

Rationale

- 1.9 The Hotel has been developed in a piecemeal fashion over many years, and the current owner has completed part of an ambitious programme of redevelopment to meet tourist requirements and improve the overall offer to the guests. This has been realised with the upgrading of four on-site cottages Portlight, Starboard Light, Gibson and Hendra to high quality self-catering units. The conversion of the former poor-quality staff block to two highly attractive and popular self-catering cottages 'Gerwick' and 'Gweal', the four duplex 'micro' lodges and significant upgrading of hotel rooms and hotel common areas.

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- 1.10 Tregarthen's hotel is continuing to adapt and develop to remain a viable and successful tourist offer on St Marys. The Hotel has seen a large rise in demand for serviced hotel rooms following a £3m+ programme of investment in the accommodation over the last three years.
- 1.11 High demand for hotel bedstock on the island - last year the Visit Scilly stats were reporting over 80% occupancy from April to October, following improved the quality of the bedstock, the Hotel has seen demand grow disproportionately. The micro lodges, operated as superior grade duplexes have been very successful, outperforming both booking and revenue projections.
- 1.12 The visitor market is constantly changing. Immediately post covid there was a surge in self-catering product on the market, especially through the likes of Airbnb - this was the case on Scilly too. Although there is still strong demand for the self-catering cottages, it is not as strong as it was, diluted for the reasons above, a circumstance to which the hotel is adapting. There is unlikely to be a sufficient strengthening of demand to justify provision of more self-catering product at the Hotel.
- 1.13 This market change, following the post covid pivot to demand for serviced accommodation, has led to a slight change in business direction. The Hotel is keen to retain its serviced bedroom stock and offer a balance of varying levels of serviced rooms and self-catering, but also to increase Food and Beverage Offer at the Hotel which has suffered due to the known issues of staff recruitment and retention in the islands, which these proposals seek to address.
- 1.14 Market conditions remain challenging; this in particular relates to recruitment and retention of staff. A review of necessary improvements to staff accommodation has proved central to taking the business forward.
- 1.15 The hotel currently has the following accommodation available for staff:
 - 8 rooms in the Woolpack Battery
 - 6 staff studios on site at Tregarthen's Hotel
 - 4 hotel rooms used for staff (temporary provision)
 - 1 in the Manager's flat on site at Tregarthen's Hotel
- 1.16 These can accommodate collectively a minimum of 19, but usually a small additional number if/ where the Hotel are employing some couples. The Hotel have 5 "live out" staff at the moment, a mixture of local residents and staff in externally sourced accommodation.
- 1.17 With an average of 30 staff needed to operate the hotel at its current reduced levels, the Hotel routinely find themselves under-staffed. The Hotel's current staffing level is 26, with 2 positions to fill.

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- 1.18 The use of 4 Hotel rooms for staff has had a direct impact on the business. This has, of necessity, continued for three seasons. This represents £130,000 revenue loss per annum to the business.
- 1.19 Currently the Hotel cannot staff sufficient shifts to offer food other than breakfast and dinner. The severe lack of staff also constrains the hotel's ability to offer non-Resident breakfast and dinner, but also precluding morning, lunch and afternoon food and beverage service often having to turn away business amounting to an annual revenue loss of circa £80,000.
- 1.20 Research carried out the Hotel confirms that to continue to recruit the best staff, they need to offer the best staff accommodation facilities they are able to do. The Hotel continues to invest in staff accommodation as well as the Hotel public and guest areas. Further proposals to upgrade to self-contained ensuite units at the Woolpack Battery are being developed for pre-application discussions with Historic England. The intention is to increase the capacity of the Battery from 8 no. HMO bedrooms with communal ablutions to a 11 no. non-HMO bedsits with ensuite facilities. Rooms would have a standard ensuite bathroom pod with minimal connections into the existing historic fabric. This will be subject of a future application.

2. Site Location and Description

- 2.1 The site is located at western end of Hugh Town nestled under the defensive Garrison complex, which sits above the site and forms the Hugh, the defensive promontory on St Mary's. Hugh Town sits on a narrow neck of low-lying land attaching the roughly oval-shaped parcel of land containing Star Castle and its associated fortifications (The Hugh /the Garrison) to the rest of St Mary's.
- 2.2 The site occupies a prominent place overlooking the Quay and Rat Island. The Hotel occupies a visually prominent position above the lower roofscape of Hugh Town and below the skyline of The Hugh. The location of the proposal within the hotel is within the former now derelict hotel garden.
- 2.3 The site is situated within the settlement of Hugh Town, which is entirely contained within the Isles of Scilly Conservation Area. The Area was designated by the Isles of Scilly Council in 1975 and includes the whole archipelago. Several scheduled monuments and numerous listed buildings, including the Grade I listed Star Castle Hotel, associated Grade I, II* and II listed buildings within the Garrison Walls on The Hugh, fall within a 250 metre radius of the site.
- 2.4 The site for the new cottages is within the lower level of the Hotel where the former kitchen garden is adjacent to the dwellings 'Hendra and Gibson'
- 2.5 The western site boundary is strongly defined by the mass-masonry Garrison Wall formed in large blocks of well-faced, well-coursed and relatively finely jointed granite with turf capping. This is part of the extensive sixteenth and seventeenth-century fortifications on the headland to the west of Hugh Town, The Hugh. The Garrison Wall is designated as a Scheduled Monument and in this section is also listed at Grade I, which includes the adjacent Garrison Gate.
- 2.6 The hotel was originally a private residential dwelling built in the Regency style. By about 1800 the entrance façade of the building originally faced southeast, looking back towards Hugh Town and addressing Garrison Hill behind a well-stocked sub-tropical garden.
- 2.7 The house was converted to a hotel by its owner Captain Frank Tregarthen in 1849, to house visitors from Penzance. Captain Tregarthen was master of the Scilly Mail Packet between 1842 and 1858.

3. The Proposal

- 3.1 The proposal is the conversion of the L shaped block at the Hotel shown on plans prepared by Simpson Hilder numbered 9906.111 and 9906.112. This involves very limited minor external works to add opening doors to each unit where these did not exist, but significant internal upgrading to form ensuite rooms
- 3.2 The rationale for this change is explained above in paragraphs 1.9 - 1.20.

Water Efficiency

- 3.3 Policy WC5 requires any tourism development to demonstrate a reduction in waste, water and energy consumption.
- 3.4 The proposal is supported by a water calculation¹. This demonstrates that the existing unregulated fittings in the 'L' block generate 572.32 litres per day, and the new fittings for six units would generate 314.46 litres per day. A saving of 257.86 litres per day. Additional water butts for collecting rainwater are proposed, this helps prevent surcharge in the combined sewer and will be used to water the garden and landscape area.

Energy Efficiency

- 3.5 Each unit will have an efficient 500w electric heater. The overall energy efficiency of the staff ensuite rooms will be improved with the general upgrading of the Hotel as it is serviced through the hotel systems. The Hotel are moving to all electric and installing solar PVs to create a source of renewable energy for the direct benefit of the staff and customers.

¹ Water Calculation -Appendix I

4. Planning Policy

National Planning Policy Framework (NPPF) Dec 2024 (updated February 2025)

- 4.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The latest version of the NPPF was issued on December 2024 (updated Feb 2025).
- 4.2 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise as set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990. The National Planning Policy Framework must also be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 4.3 The guiding purpose of the planning system is to achieve sustainable development, which the NPPF defines in interlinked economic, social and environmental objectives.
- 4.4 The NPPF also requires that planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each.

NPPG

- 4.5 Planning guidance has been adopted in order to guide the application of the NPPF. This is extensive guidance covering many topics online.

Local Development Framework

- 4.6 As set above planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.7 The Development Framework is a term to include all the plans that make up the development plan. In this case there are both adopted and emerging plans.

Adopted Plan

- 4.8 The Isles of Scilly Council is the Local Planning Authority for the Isles and is a unitary authority.
- 4.9 The relevant Isles of Scilly Local Plan was adopted in 2021 and runs for the period 2015 to 2030. Below are the key policy considerations for this development.
- 4.10 The relevant policy in relation to this proposal is WC5 which deals with tourism related development.

POLICY WC5 Visitor Economy and Tourism Developments

(1) Proposals for new or upgraded tourism development will be permitted where they:

- a) make a positive contribution to creating a sustainable, diverse and modern tourism economy; and
- b) are located in sustainable and accessible locations; and
- c) are appropriate to the site and its surroundings in terms of activity, scale and design; and
- d) do not result in an unacceptable impact on the environment or residential amenities, in accordance with other relevant policies in the Local Plan; and
- e) in the case of conversions, do not result in the loss of homes that would otherwise be available for permanent occupation, unless there are wider public benefits demonstrated to offset the loss of permanently available homes.

2) Proposals for tourism developments will be particularly encouraged subject to a) –e) above, and where it is demonstrated that they would:

- extend the tourism season and increase productivity and wages in tourism;
- support the promotion and interpretation of the islands' heritage; and
- provide a viable and appropriate use for under-used buildings where they can be converted and are worthy of retention, and in accordance with Policy SS

3) Proposals for the change of use of lawfully operating serviced accommodation to residential dwellings will only be permitted where the accommodation is for the permanent occupation by staff or is otherwise meeting a local housing need, in which case an occupancy restriction will be imposed

5) Proposals for a change of use of a dwelling where an informal bed and breakfast has been operating (and has not been subject to formal planning approval) or for any additional holiday letting accommodation within the curtilage, will not be permitted under (1) above, unless a certificate of lawful use has been obtained to demonstrate that the use of the property as a CI guesthouse is lawful.

6) In all cases, proposals must demonstrate a reduction in waste, water and energy consumption, supported by the incorporation of clear sustainable design measures, in accordance with Policies SS1 and SS2. Applications will need to be supported by justification as to how the above is being addressed by the proposal

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4.11 The compliance with this policy is discussed in section 5 of this report.

4.12 Policy LC3 seeks a balanced housing stock and that all new homes must offer a good standard of accommodation by being constructed in accordance with the minimum Nationally Described Space Standards (Technical Housing Standards) (or any replacement standards) and no more than 30% above these minimum standards, as a maximum. This is discussed in section 5 as the units are C1 use rather than C3 this standard does not apply.

Designations

4.13 The whole archipelago is designated as an AONB. The site also falls within the conservation area.

Supplementary Planning Documents

4.14 The **Isles of Scilly Design Guide** was approved in 2006 to complement the Local Plan and the **AONB Management Plan**.

4.15 The Isles of Scilly Design Guide was approved in 2006 to complement the Local Plan. This is not directly relevant to this current application as no design changes are proposed.

AONB Management Plan

4.16 The Isles of Scilly Area of Outstanding Natural Beauty Management Plan 2004-2005 - Planning a Bright Future. The AONB Management Plan seeks to provide a co-ordinated approach to the sustainable management of the island's nationally important protected landscape, its environment and communities. The Plan has nine management themes including Communities, the Marine and Coastal Environment, Archeology, the Historic Environment and Heritage and Nature Conservation and Geology. Each theme has a long-term vision or goal which sits within the overall shared vision of the Plan generated through extensive consultation.

4.17 The Isles of Scilly AONB guidance can be summarised as:

- Retains the qualities of its land and marine aspects that together form the island's unique essence.
- Is recognised, understood and conserved for all to appreciate, enjoy and respect in a sustainable manner
- **Welcomes visitors who contribute sustainably to the economy and spirit of the islands without overwhelming the qualities that they have come to enjoy.**
- Supports a farming community successfully rising to the challenges of the changing economics of agriculture through sustainable diversification.

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- Supports a community for whom Scilly is home, to enjoy a good quality of life, providing opportunities for young people whilst achieving an environmentally sustainable economy

The Garrison Conservation Plan

4.18 This document is non-statutory publication, which sets out the practical management of the Garrison. Whilst this is a useful document for the original application it has less influence in this application given this proposal does not alter the design of the building it has no impact on the Garrison.

Climate Emergency

4.19 The Council, along with many other local authorities, have declared a 'climate emergency'. In April 2019 the Council supported a Climate Emergency motion, setting a target that the Council will become carbon neutral by 2030. Since then, a working group of councillors and staff has worked to establish what the carbon footprint of our organisation is, identify opportunities to reduce our carbon emissions, and prepare an action plan to reach a zero-carbon target by 2030.

4.20 In October 2019 Councillors unanimously endorsed the commitment to move towards a zero-carbon future through the preparation of a plan, including a reworking of the existing climate change strategy, and the identification of funding solutions.

5. Planning Assessment & Conclusion

Introduction

- 5.1 The assessment of the planning application is a balance of all the considerations associated with the proposal, the site and the local environment. Whilst planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise as set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act (1990) they must also pay regard to the guidance provided by the NPPF as a material consideration.
- 5.2 The proposal for the improvement of staff accommodation at Tregarthen's Hotel has significant economic benefits as one of the three key strands of sustainability. The upgrading of water and energy efficiency supports the environmental strand, and the support of better accommodation for hotel staff supports the social aspects of sustainability.

Development Plan

- 5.3 **Policy WC5** supports the upgrading of tourist development where there are positive outcomes in terms of the modern tourism economy. This proposal is consistent with the policy as a whole as in this case because the increase in staff accommodation both in number and quality supports the revenue stream for the hotel. The proposal improves the quality of accommodation and therefore productivity of staff consistent with 2a) of the Policy. It also makes best use of an existing building in line with 2c).
- 5.4 As the site is within the settlement boundary of Hugh Town it is considered a sustainable location consistent with 1b). As there are no external changes in terms of scale and design, it will not have an unacceptable impact on the environment or amenities consistent with 1c) and 1d). It does not result in the loss of any permanent dwellings 1e).
- 5.5 In term of WC5 (6) the proposal will overall result in a reduction of water use and bring energy efficiency to meet the requirements of policy SS1 and SS2.
- 5.6 **Policy LC3** -this policy expects compliance with national described space standards (NDSS) when there are new dwellings. This proposal falls under class C1 and are not dwellings for the purposes of the policy. The space achieved in each - varies from 9.61sqm to 14.65 sqm (GIA). Given the staff units do not meet NDSS for permanent accommodation the applicant accepts a condition to ensure that the staff units are not permanently occupied.

Conclusion - The Planning Balance and Recommendation

- 5.7 In coming to a conclusion on the proposal the planning authority must consider whether the proposal constitutes sustainable development and considers the balance of harms and benefits of the proposal given legislation, development plan policy and any planning conditions used to make the development acceptable.

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- 5.8 The proposal as described and assessed in this statement has shown to comply with policy WC5 and causes no harm to the amenity of adjacent residents or any other harms to any public interest. The condition restricting permanent occupation overcomes the deficiency with policy LC3.
- 5.9 In summary the applicants believe that the positive economic benefits of the proposal balance in favour and considerably outweigh any residual minor harm from the small size of the units. Noting that staff have a distinct preference for ensuite rather than shared bathrooms, being able to offer staff modern, self-contained accommodation is a significant improvement over much of the substandard staff accommodation available on the islands.
- 5.10 The scheme has overall compliance with National and Local Policy and with no demonstrable harms that outweigh the considerable benefits, assessed against the policies of the Framework as a whole. The proposal should therefore be considered sustainable and planning consent for the variation should be granted without delay.