

# Council of the Isles of Scilly Planning Application

Ref: P/25/102/FUL  
& P/25/103/LBC

## Consultation Request: Conservation Officer

**Date:** 17<sup>th</sup> December 2025

**Ref:** [P/25/102/FUL](#) & [P/25/103/LBC](#)

**Site:** Customs House, Lower Strand, Hugh Town, St Mary's, TR21 0PS.

**Proposal:** Replacement of all external doors and windows due to poor condition and to accommodate double glazing (Listed Building).

You are being consulted on this application as archaeological input is required to inform the decision. Please complete the response form below and return to [planning@scilly.gov.uk](mailto:planning@scilly.gov.uk) as soon as possible and no later than **9<sup>th</sup> January 2026** or by post to the Planning Department, Old Wesleyan Chapel, Garrison Lane, St Mary's, Isles of Scilly TR21 0JD.

I look forward to receiving your comments in due course.

### The Site

The Custom House is an early 19th-century Grade II listed building. Originally a house, it was remodelled in 1927 by Richardson and Gill for the Duchy of Cornwall estate when the custom house was moved from the rear of the Atlantic Hotel. It is significant for its role in the islands' maritime administration and as a prominent part of Hugh Town's historic harbour frontage. Architecturally, it illustrates the local tradition of coursed granite rubble (later rendered and stuccoed) with a hipped slate roof and restrained classical detailing.

### Duty, Policy and Guidance

The proposals must comply with the following;

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 – special regard must be paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 - Development must preserve or enhance the character or appearance of Conservation Areas.

Part 16 of the NPPF and the accompanying planning practice guidance –

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Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 202).

Great weight should be given to the asset's conservation (the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (paragraph 212).

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification (paragraph 213)

Policy OE7 of the Isles of Scilly Local Plan, adopted in 2021, reinforces that any harm to the significance of a designated or non-designated heritage asset must be justified and that proposals causing harm will be weighed against the substantial public, not private, benefits of the proposal. Also, that it should be demonstrated that all reasonable efforts have been made to mitigate the extent of the harm to the significance of the asset.

We also highlight the guidance on 'Making Changes to Heritage Assets – Historic England Advice note 2' paragraph 42 '*The historic fabric will always be an important part of the asset's significance, in normal circumstances the retention of as much historic fabric as possible, together with the appropriate use of materials and methods of repair is likely to conserve heritage assets in a manner appropriate to their significance, as a fundamental part of any good alteration or conversion. It is not appropriate to sacrifice old work simply to accommodate the new*'.

## Advice

The existing timber windows and doors are of mixed styles and ages. Some units are likely to make a stronger contribution of the significance of the building than others. Historic units will make an important contribution to its significance because they represent a rare survival of original or early joinery that illustrates the building's historic character and craftsmanship. In heritage terms, such features are valued for their authenticity: they demonstrate traditional construction techniques, proportions, and detailing that are integral to the architectural language of the 19<sup>th</sup> century and the early 20<sup>th</sup> century phase of remodelling. Elements like slender glazing bars, traditional sash profiles, and surviving historic glass contribute to the character and historic significance of historic buildings.

The survival of historic windows and doors will additionally, enhance the building's contribution to the wider streetscape and the character and appearance of the conservation area.

The adopted position on making changes to windows in listed buildings is set out by Historic England in the following five principles:

1. Where historic windows, whether original or later insertions, make a positive contribution to the significance of a listed building they should be retained and repaired where possible. If beyond repair, they should be replaced with accurate copies.

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2. Where historic windows have already been replaced with windows whose design follows historic patterns, these usually make a positive contribution to the significance of listed buildings. When they do, they should therefore be retained and repaired where possible. If beyond repair, they should be replaced with accurate copies.
3. Where historic windows or replacement windows of historic pattern survive without historic glass it may be possible to introduce slim-profile double glazing without harming the significance of the listed building. There are compatibility issues to consider as the introduction of double glazing can require the renewal of the window frame to accommodate thicker glazing, thereby harming significance.
4. Where historic windows have been replaced with ones whose design does not follow historic patterns, these are unlikely to contribute to the significance of listed buildings. Replacing such windows with new windows of a sympathetic historic pattern, whether single glazed or incorporating slim-profile double glazing, may cause no additional harm. It also provides an opportunity to enhance the significance of the building, which is the desired outcome under national policy.
5. Where a new window or re-glazing is agreed, the reflective properties of secondary and double glazing as compared to modern, polished single glazing, do not usually harm the significance of the building. But when new multi-paned windows are proposed, the desirability of reproducing broken reflections by individually glazing each pane should be considered. Where the aesthetic value of the building is high, then the impact on the whole of the relevant elevation should be considered, including the desirability of accurately matching other windows.

The presumption of repair first applies - complete replacement is only accepted when existing windows are beyond practical repair.

The applicant's heritage statement suggests the windows are of multiple phases, which is not surprising given the age and historic development of the building.

It also suggests that some early joinery and glass still survive, notably on the sea-facing elevation (North) and that the 1927 remodelling is likely to have introduced the sash patterns and profiles that define the current appearance of this property.

There have been numerous later repairs – again this is expected considering the age of some of the units and the exposed coastal location.

The proposal seeks to replace all existing windows and doors with new high quality Accoya timber units incorporating slimline 4/4/4 heritage double glazing.

Whilst selective photos of timber decay have been provided the application lacks a detailed window and door condition assessment. This is normally provided by a joiner experienced in repairing traditional windows. The assessment should set out the age, condition and extent of repair needed to

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each individual unit supplemented by photos and should clearly identify which units have historic glass surviving.

Slim profile double glazing is only usually supported where historic windows or replacement windows of historic pattern survive without historic glass and the introduction of slim-profile double glazing can be introduced without harming the significance of the listed building, or where historic windows have been replaced with ones whose design does not follow historic patterns, and the new windows are of a more sympathetic historic pattern.

Wholesale replacement of all the windows and doors with slim profile double glazing will undoubtedly impact the historic character and integrity of the listed building and will be harmful. Presently this is not justified. It is recommended further information be provided and the scheme be amended in line with the above principles and advice.

## Summary

The current windows and doors are of mixed age and style, with some original or early examples offering high heritage value. National guidance prioritises repair over replacement, allowing slim-profile double glazing only where it does not harm significance or where non-historic patterns exist. The proposal to replace all windows and doors with Accoya timber units and slimline double glazing lacks a detailed condition survey and justification. Wholesale replacement would harm the building's historic integrity. Further assessment and a revised scheme aligned with Historic England's principles are recommended to ensure conservation of significant fabric while addressing performance needs.

Completed By	Time Spent	Date
Vic Robinson – Cornwall Council Senior Development Officer (Historic Environment)	3 hours	9 <sup>th</sup> January 2026
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