

**From:** Andrew Pearce [<mailto:Andrew@Levelwood.co.uk>]

**Sent:** 22 February 2019 15:58

**To:** 'Karen Isaac'

**Subject:** Application 2019/16 Freight Terminal

Dear Andrew

I object to the application 2019/16 for the conversion of the Freight Terminal on the Wharf for use by Blue Marine for the following reasons.

The site lies in the Heritage Coast Historic Conservation Area and the application does not comply with the following:

**LDCP Intermediate Zone Primary Policy IZ. 1**, which says,

*“Development permission will be granted for... employment... development in the Intermediate Zone subject to the following criteria:*

*a) the siting, scale, layout, proportion, details and external materials in any development..., form a coherent whole both in the development itself and in relation to surrounding development.”*

**LDCP Built Heritage Primary Policy BH. 1(c)**, which says,

*“Development in Historic Conservation Areas will be permitted only if it enhances and protects the character of the Area by reference to scale, proportion, details and external materials of the proposed development in relation to those of the Historic Conservation Area.”*

**LDCP Built Heritage Primary Policy BH.5**, which says,

*“Development... within a Historic Conservation Area... shall preserve or enhance its character...”*

And,

*“The design, materials, scale and siting of any development shall be appropriate to the character of the Historic Conservation Area and its setting.”*

**Land Planning and Development Control Ordinance 2013, Section 39 (6)**, which says,

*“In determining any development application which relates to or affects... a Historic Conservation Area, the Authority must have special regard to the importance of the building, site, or area in relation to—*

*(a) the landscape; or*

*(b) the architectural, cultural, or historical heritage, of St Helena...”*

Although the applicant states there was consultation with the planning office, I understand from the Locum Chief Planning Officer (LCPO), that only rudimentary information was given with no advice in relation to any of the design issues appropriate to the Historic Conservation Area as listed in the policies above. Furthermore the LCPO was not able to advise me how the application would ‘enhance the Conservation Area’ in relation to any policy but in particular BH.1(c). This is not surprising as the application does not ‘enhance the Conservation Area’.

Lack of information.

The application does not contain a full set of ‘existing’ drawings. Notably no existing elevation. There is no sectional drawing to show how the proposed new first floor will fit below the existing roof trusses.

Design

Although the building is less than ten years old, it is clear that it is of considerable character within itself as a result of sensitive design relating to character of the Conservation Area. It is not listed but LDCP policies and planning ordinance require any alterations to it, to be thought through as if it were, in order to 'enhance the Conservation Area'.

There is still no Conservation Area Management Plan to "establish the heritage significance of a place or historic conservation area, and identify conservation policies". Without this it is difficult for the planning office to issue design advice. It is even more difficult to assess the design leading to proper planning advice for the planning authority to make a decision. I understand this application will have to be decided by Governor in Council as it is within 50m of the sea.

The Wharf is part of the area currently under review by the Waterfront Working Group for which there are draft proposals. I am a member of that group and we have not been consulted by the applicant (St Helena Government) or the planning office. The Freight Terminal is fundamental to the group's proposals.

As highlighted as the last Formal Legco meeting the island is on the UK Tentative List as a potential UNESCO World Heritage Site. The DCMS of the British Government has recommended the Cultural Heritage or Built Heritage of St Helena be reviewed again. The Wharf being the most complete surviving East India Company port in the world could be central to a future World Heritage Listing.

It must therefore be incumbent upon all who have the future of St Helena at heart to ensure any alterations to building on the Wharf are fully considered in that context.

It is clear the application that includes out of character large gable windows, glass balconies, new shallow gables and removal of the spectacular warehouse doors to be replaced with a single plastic glazed domestic front door is completely inappropriate and will damage the character of the Wharf.

As it stands this application must be refused.

It is worthy of note that Blue Marine located at Somerset House in London would certainly appreciate a quality building to house themselves. The project should be a fine example of the interface between Marine and Built Heritage.

I would be happy to assist further in helping to make the project work.

Yours sincerely  
Andy Pearce

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