

## PLANNING CONSULTATIONS

REFERENCE: PA/2020/1706

CASE OFFICER: TANYA COGGON

TEAM: HISTORIC ENVIRONMENT RECORD

AUTHOR: ALISON WILLIAMS, HISTORIC ENVIRONMENT OFFICER

TEL: 01724 297471

EMAIL: [alison.williams@northlincs.gov.uk](mailto:alison.williams@northlincs.gov.uk)



**SUBJECT:** Planning permission to erect an emergency care extension to the existing hospital, alterations and enhancements to existing ambulance drop-off and demolition of existing administration building adjacent to the Cliff Gardens site, and new car park deck above existing public parking spaces adjacent to the Church Lane entrance, Scunthorpe General Hospital, Cliff Gardens, Scunthorpe

**PARISH:** SCUNTHORPE

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### SUMMARY OF ADVICE

- The Scunthorpe War Memorial Hospital building is a non-designated heritage asset recorded on the council's Historic Environment Record
- The building has historic and architectural interest, and is of high communal value to the population of Scunthorpe and district
- The proposal to demolish this building to make way for the new emergency extension would result in substantial harm to the non-designated heritage asset
- The heritage considerations should inform the planning decision and be given due weight in the planning balance in accordance with paragraph 197 of the NPPF
- The preferred option would be to retain this building and seek an alternative site for the extension
- Where the planning authority considers the loss of the building is justified and is minded to grant permission for this application, conditions to secure the implementation of appropriate mitigation measures would be necessary
- The applicant has submitted a Heritage Statement that proposes the dismantling and relocation of the entrance archway to form a pedestrian access off Cliff Gardens, subject to assessment
- The HER supports this proposal but recommends that the assessment is carried out **prior to the determination of the application** to inform the decision
- A programme of historic building recording prior to any demolition should be undertaken and standard planning conditions are suggested below.

**HISTORIC ENVIRONMENT RECORD (HER) FUNCTION:** To hold, maintain, interpret and manage heritage information, enhancing the understanding of the area's historical development as a distinctive and attractive place. HER information provides source material for interpretation by heritage professionals and for use by community groups and individuals. The HER database is updated as new information about the historic environment is discovered.

The HER also provides advice on development proposals that affect, or may affect, the sites and settings of all heritage assets i.e. designated and non-designated historic buildings, archaeological sites and monuments, and historic places, areas and landscapes. This advice is provided against saved local plan policies and national historic environment policies. See <https://www.northlincs.gov.uk/planning-and-environment/historic-environment-and-conservation/>

**DETAILED ADVICE:** Thank you for consulting the HER on this application. This is the joint response of the HER Historic Environment and Conservation Officers.

### **Heritage Policy**

The National Planning Policy Framework (NPPF) provides guidance to local authorities for conserving heritage assets and their settings. Policies 189 and 190 require an applicant and local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset). This assessment should be taken into account when considering the impact of a proposal on a heritage asset, and used to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

This information allows the planning authority to make an informed and reasonable decision in line with the NPPF and local planning policies including policy CS6 of the North Lincolnshire Core Strategy which states that '***The council will seek to protect, conserve and enhance North Lincolnshire's historic environment, as well as the character and setting of areas of acknowledged importance including historic buildings, conservation areas, listed buildings (both statutory and locally listed), registered parks and gardens, scheduled ancient monuments and archaeological remains.***'

Where assessment shows that the significance of heritage assets will be adversely affected by the proposals, then consideration should be given to drawing up appropriate mitigation measures to conserve them (NPPF 190). This may include avoiding or minimizing disturbance to assets and features of significance, if necessary by modifying the layout and/or design of the proposals.

Paragraph 192 of the NPPF guides local planning authorities to take account of

- a) the desirability of sustaining and enhancing the significance of heritage assets putting them to viable uses consistent with their conservation
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality, and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Effects of an application on designated and non-designated heritage assets are a material consideration and the NPPF directs the local planning authority to have regard to the scale of any harm or loss and the significance of the heritage asset when judging the planning balance (NPPF 193-197).

Where loss of significance as a result of development is considered justified, the NPPF (199) makes provision to allow for the recording and advancing understanding of the heritage asset before it lost using planning conditions or obligations as appropriate. The NPPF states that the results of these investigations should be made available to the public via the HER and that the archive evidence should be deposited with a local museum. This procedure also accords with Local Plan policy HE9.

### **Heritage Interest**

The applicant has submitted a Heritage Statement included in the Design and Access Statement (05 Heritage Statement). Contrary to the applicant's assertion, the Scunthorpe War Memorial Hospital building is a non-designated heritage asset recorded on the HER database (ref MLS22516).

Plans to build a larger hospital for Scunthorpe on this site were agreed in 1914 but delayed until after the First World War when it was suggested the hospital be dedicated to the memory of the Great War dead. Public subscription raised funding for the building which opened as the War Memorial Hospital in 1929, opened by HRH the Prince George in October 1933.

The War Memorial Hospital building is of brick with stone dressings in the late 17<sup>th</sup> century style influenced by Sir Christopher Wren. The architect was W.H. Buttrick of Scunthorpe. It is an architecturally pleasing building with an imposing symmetrical frontage and fine entrance portico comprising a stone arch with columns and pediment containing the engraved dates 1929 and 1914-1918 Scunthorpe General Hospital.

The hospital saw rapid development and extensions through the 1930s and 40s funded by further public fund raising, and by the NHS after the Second World War. Much of the original buildings have become subsumed into or been replaced by many more modern buildings, with the War Memorial Hospital range being the only visible survival and is now used as the administration building. The original building provides legibility to the history and development of the hospital site as well as the changing design and demands of hospital building over time.

As the applicant's Heritage Statement acknowledges, there is strong community feeling about the War Memorial building. Hospitals were often dedicated as functional war memorials, as socially beneficial forms of remembrance. Scunthorpe hospital carries the inscription recording this memorial function although the official war memorial for the town is located elsewhere. Much of the significance of the building is in its social and communal values, as well as the historic and architectural interest. The building has potential to be a candidate heritage asset for Local Listing.

### **Assessment**

Paragraph 190 of the NPPF directs local planning authorities to consider the impact of proposals on the significance of heritage assets and to avoid or minimise any conflicts between their conservation and any elements of the development.

The proposed development will result in the demolition and total loss of the heritage interest of the War Memorial Hospital building including the historic and architectural interest and in particular its heritage significance to the community.

In heritage terms this scale of destruction amounts to substantial harm to a non-designated heritage asset.

The significance of the building and the impact of development should be taken into account when determining this application. Paragraph 197 of the NPPF directs local planning authorities that in the case of 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.

The preferred option would be to retain this building and seek an alternative site for the extension. The decision-making should take account of Paragraphs 190 and 192 of the NPPF and consider whether there are any alternatives for retaining the War Memorial Hospital with a viable use that would conserve its heritage benefits to the local community and maintain the character and distinctiveness of the Scunthorpe hospital site.

### **Mitigation**

The applicant states that alternative sites for the proposed Emergency Department and options for retaining the War Memorial building are not feasible. These alternatives are not explored in any detail in the Design and Access/Planning Statement. The latter section notes that 'Remaining available land for building is extremely limited, so demolition of existing assets is one of the only viable ways to create new buildings.'

To mitigate the loss of the acknowledged locally important building, the applicant proposes retaining the stone archway from the entrance to the building and relocating it to another part of the site as part of the wider landscaping scheme. An artist's impression is included showing the archway potentially relocated to the site boundary on Cliff Gardens, enhancing the existing pedestrian access onto the hospital site. We consider that this would be an appropriate mitigation measure. It would provide some

measure of legibility of the history of the site and continue to respect the communal value of the remembrance of the hospital as a War Memorial to the dead of the Great War.

The report notes that the dismantling and relocation of the archway would be a challenging process and implies that its implementation would be subject to structural assessment and financial viability.

As it currently stands, the information accompanying the application is not sufficient to assess the feasibility of relocating the memorial archway as the mitigation of the total loss of and substantial harm to the heritage building. The applicant should provide this information to the planning authority **prior to the determination of the application** to inform the decision-making process.

The applicant should commission a suitably experienced Conservation structural engineer to assess and advise on the mitigation proposal, or alternative proposals to retain the stonework, to a brief agreed with the HER and Conservation Officer.

Where the planning authority considers that the demolition and loss of the War Memorial building is acceptable, we recommend that a full historic building record be made prior to the demolition. The record archive should be deposited with the North Lincolnshire Museum Service and a report placed on the Historic Environment Record; to ensure that a permanent archive record is preserved of the War Memorial hospital building to inform future study and management.

The appropriate level of recording of the hospital buildings should be to Level 2 specified in *Understanding Historic Buildings, A Guide to Good Recording Practice*, 2016, English Heritage (<http://historicengland.org.uk/images-books/publications/understanding-historic-buildings/>). This Historic Building Record should comprise a descriptive record comprising a primary photographic archive of the structures and complex as a whole, supplemented by accurate drawn plans and elevations, scale drawings of features and fittings, and a general account of the building's origin, development and use.

A suitably qualified individual or organisation with proven experience of historic building recording should undertake the survey using appropriate equipment and materials to create an archival quality record. The recording would be carried out in strict accordance with the applicant's proposed timetable and would cause no delay to the development unless otherwise agreed. The HER can provide a brief for the recording programme, or advice on a specification produced by the developer's contractor. All historic building recording work should be undertaken in accordance with the relevant Chartered Institute of Archaeologists' Standards and Guidance ([www.archaeologists.net](http://www.archaeologists.net)) and relevant Historic England professional guidelines (<http://www.historicengland.org.uk/images-books/publications/>).

## **Recommendation**

If the planning authority considers that the locally important War Memorial Hospital building should be retained for viable reuse to secure its conservation, and/or that the applicant has not adequately considered alternative sites for the development that would avoid loss and substantial harm to the heritage asset, then permission should be **refused**. This is because the development does not protect and enhance the historic environment contrary to paragraph 8 of the NPPF, taking into account paragraph 190 that the effects of the development would not avoid or minimise the conflict with the heritage significance. It is further contrary to Core Strategy policy CS6 (see above).

Alternatively, where the planning authority considers the loss of the heritage asset is justified when weighing the planning balance and is minded to grant permission for this application, it will be important to secure the implementation of the mitigation measures set out above. We would be grateful if the following conditions and reasons are attached to any consent, to secure their implementation:

### **Condition 1**

No development shall take place until a Heritage Mitigation Strategy to dismantle and re-erect the War Memorial Hospital building entranceway at an agreed location on the hospital site has been submitted to and approved in writing by the local planning authority. The Heritage Mitigation Strategy will include a structural condition assessment, feasibility study and detailed measures, method statements and timetable of works relating to carrying out this work and shall be developed in consultation with the local planning authority and their heritage advisers.

### **Reason**

To comply with paragraphs 190, 192 and 199 of the NPPF and policy CS6 of the Core Strategy as the building is a non-designated heritage asset of historic and architectural interest that is locally

important. The Heritage Mitigation Strategy will provide for the retention of the most significant part of the physical fabric of the building to conserve this heritage significance.

**Condition 2**

The applicant shall notify the local planning authority in writing of the intention to commence the dismantling and erection of the entranceway at least two weeks before commencement. Thereafter, the development shall be carried out in accordance with the approved details and timings in the Heritage Mitigation Strategy.

**Reason**

To ensure that the Heritage Mitigation Strategy is carried out as agreed and that the local authority heritage advisers have the opportunity to monitor the works, in accordance with paragraph 199 of the NPPF and Core Strategy CS6.

**Condition 3**

No demolition of the War Memorial Hospital (Administration Building) shall take place until the applicant, or their agents or successors in title, has secured the implementation of a Historic Building Record to be defined in a Written Scheme of Investigation that has been submitted to, and approved in writing, by the local planning authority. The strategy shall accord with a brief provided by North Lincolnshire Historic Environment Record equivalent to Historic England's Level 2 building survey and shall include details of the following:

- i. Measures and methodologies to ensure the preservation by record of the heritage building, fabric and fittings
- ii. Report and archive content
- iii. Archive preparation and deposition with recognised repositories including the ADS.
- iv. A timetable of works in relation to the proposed development, including sufficient notification and allowance of time to ensure that the recording work is undertaken and completed in accordance with the strategy.
- v. Monitoring arrangements, including the notification in writing to the North Lincolnshire Historic Environment Record Office of the commencement of recording works and the opportunity to monitor such works.
- vi. Personnel involved in the implementation of the strategy, including sub-contractors and specialists, their responsibilities and qualifications.

**Reason**

To comply with paragraph 199 of the NPPF and policy CS6 of the Core Strategy as the building is a non-designated heritage asset of historic and architectural interest that is locally important. Demolition will result in the total loss of heritage significance and the proposed historic building record will ensure the creation of an appropriate record of the building and a permanent archive.

**Condition 4**

The applicant shall notify the local planning authority in writing of the intention to commence the historic building recording at least one week/ 7 days before commencement. Thereafter, the recording shall be carried out in accordance with the approved details and timings.

**Reason**

To ensure that the Historic Building Record is carried out as agreed and that the local authority heritage advisers have the opportunity to monitor the works, in accordance with paragraph 199 of the NPPF and Core Strategy CS6.

**Condition 5**

The historic building report shall be deposited at the North Lincolnshire Historic Environment Record and the archive at the North Lincolnshire Museum within six months of commencement of the recording or such other period as may be agreed in writing by the local planning authority.

**Reason**

To ensure that a permanent record is secured in accordance with paragraph 199 of the NPPF and Core Strategy CS6.

I trust this recommendation is satisfactory.