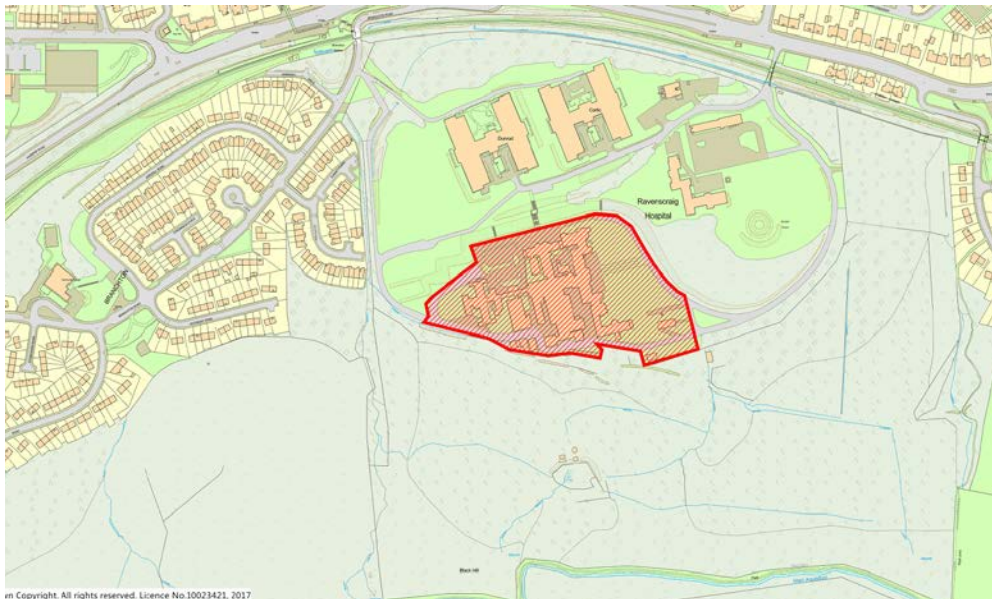

Report To: The Planning Board **Date:** 1 November 2017

Report By: Head of Regeneration and Planning **Report No:** 17/0025/LB
Plan 11/17

Contact Officer: David Ashman **Contact No:** 01475 712416

Subject: Demolition of original Ravenscraig Hospital (including front elevation) at Ravenscraig Hospital Grounds, Ravenscraig Hospital, Inverkip Road, Greenock



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SUMMARY

- The proposal accords with the Inverclyde Development Plan.
- Seven representations have been received expressing concern over a number of built and natural heritage issues.
- Consultations present no impediment to development.
- The recommendation is to GRANT LISTED BUILDING CONSENT subject to conditions.

Drawings may be viewed at:

<https://planning.inverclyde.gov.uk/Online/applicationDetails.do?activeTab=documents&keyVal=OSZDN7IMLRU00>

SITE DESCRIPTION

The former Ravenscraig Hospital building is situated within extensive landscaping and grounds extending to 32.3 hectares to the south of Inverkip Road in Greenock, with plantation forming the southern and eastern boundaries and residential development to the west and, on the opposite side of Inverkip Road, to the north.

The original building was constructed in 1879, with the listing description of the building as a “large and imposing Scots Baronial former poorhouse with tall, pyramidal-roofed entrance tower, situated on [a] raised site within extensive grounds and with later, 20th century alterations and additions. Snecked, rock-faced, red sandstone with ashlar margins. Complex, large scale site with originally largely u-plan form with central cruciform-plan courtyard wing comprising many individual buildings. One wing (W) of [the] u-plan [is] now demolished.” It is on the List of Buildings of Special Architectural or Historical Interest as a Category B listed building, being of regional or more than local importance.

PROPOSAL

Listed building consent is sought for the demolition of the Ravenscraig Hospital building. The application is supported by a supporting statement, a marketing report, sales particulars, a structural survey and a bat survey.

The supporting statement highlights that an initial proposal was to retain the façade of the building but with demolition of all other elements on the basis that the front elevation was deemed to be in a better condition than the rest of the building. Historic Environment Scotland required that this section of the building must be subject to a marketing exercise before any demolition consent could be considered. The building was marketed for over 8 months through various channels with no parties showing an interest. The marketing report and the sales particulars set out these matters in detail.

The structural survey indicates that the building’s overall condition is very poor, both internally and externally. It has suffered from significant deterioration due to water damage with areas dangerous to enter. The survey has also found that the external elevations of the building, even following a programme of repair and upgrade, would be unlikely to be suitable for retention with defective pointing to stone and brickwork due to long term weathering.

DEVELOPMENT PLAN POLICIES

Policy RES1 - Safeguarding the Character and Amenity of Residential Areas

The character and amenity of residential areas, identified on the Proposals Map, will be safeguarded and where practicable, enhanced. Proposals for new residential development will be assessed against and have to satisfy the following criteria:

- (a) compatibility with the character and amenity of the area;
- (b) details of proposals for landscaping;
- (c) proposals for the retention of existing landscape or townscape features of value on the site;
- (d) accordance with the Council’s adopted roads guidance and Designing Streets, the Scottish Government’s policy statement;
- (e) provision of adequate services; and
- (f) having regard to Supplementary Guidance on Planning Application Advice Notes.

Policy ENV6 - Trees and Woodland

Trees, groups of trees and woodland designated as Tree Preservation Orders (TPOs) will be safeguarded. Where it is considered necessary to protect other trees and woodland areas for amenity reasons, new Tree Preservation Orders will be promoted.

Trees and woodland will be protected and enhanced by having regard to the Scottish Government's Woodland Removal Policy and through:

- (a) promoting the planting of broad leaved and native species, or other species with known biodiversity benefits;
- (b) protecting and promoting the positive management of hedgerows, street trees and any other trees considered to contribute to the amenity of the area;
- (c) protecting and promoting the positive management of ancient and semi-ancient natural woodlands; and
- (d) encouraging the planting of appropriate trees as an integral part of new development.

Woodland creation proposals will be guided by the GCV Forestry and Woodland Framework Strategy (FWS), where priority locations for woodland management and expansion in Inverclyde will be assessed against the following criteria in accordance with the UK Forestry Standard:

- (e) the benefits of woodland creation to the value of the existing habitat;
- (f) contribution to the enhancement of the wider Green Network;
- (g) the safeguarding of nature conservation and archaeological heritage interests;
- (h) safeguarding of water supplies;
- (i) the area's landscape character;
- (j) integration with agricultural interests;
- (k) existing and potential public access and recreational use;
- (l) woodland design and the proposed mix of species; and
- (m) points of access to and operational tracks through woodlands.

Policy RES3 - Residential Development Opportunities

Residential development will be encouraged and supported on the sites and indicative locations included in Schedule 6.1 and indicated on the Proposals Map. An annual audit of the housing land supply will monitor and review and, where necessary, augment the Effective Land Supply, to maintain a minimum five year's supply in accordance with the GCV SDP and SPP guidance.

Policy HER4 - Alteration, Extension and Demolition of Listed Buildings

There is a presumption in favour of the retention of listed buildings, and their demolition, in full or in part, will only be accepted after a full assessment of the importance and condition of the building has been undertaken. Proposals to alter, extend or demolish a listed building must respect the reasons for listing, be of a high standard and will be approved only where the proposed works do not adversely affect the special interest of the building and are satisfactory having regard to Historic Scotland's SHEP and "Managing Change in the Historic Environment" guidance note series.

CONSULTATIONS

Historic Environment Scotland - No objection to the demolition of these buildings; the proposals do not raise historic environment issues of national significance. It should be noted that the decision not to object should not be taken as our support for the proposals.

Greenspace Manager - Satisfied that the bat survey is thorough and accurate but referral is required to Scottish Natural Heritage for licence purposes.

PUBLICITY

The application was advertised in the Greenock Telegraph and Edinburgh Gazette on 21 July 2017 as development affecting a listed building.

SITE NOTICES

A site notice was posted on 21 July 2017 for development affecting a listed building.

PUBLIC PARTICIPATION

Seven representations have been submitted. The points of objection may be summarised as follows:

Built heritage issues

- It is an important landscape feature of historical significance to Inverclyde.
- The façade of the building is iconic and should be retained as being of historical significance.
- Like any building it can be repaired and is capable of transformation into flats, a hospital or some other use.
- The owners of the building have deliberately let it deteriorate but this should not stand in the way of retaining it.
- The relatively recent listing of the building in 2008 should not be overturned.

Natural heritage issues

- Bats and owls are found within the building.

Miscellaneous issues

- The supporting documents are inadequate and contradictory.
- The extent and depth of pre-application consultation with the Council and Historic Environment Scotland is questioned.
- The proposal does not pass criteria in the Historic Environment Scotland Policy Statement supporting demolition.
- Suspicion that the information provided is incorrect, based on personal testimony.
- The supporting documents are inadequate and contradictory, particularly in respect of marketing.
- Survey records are not available.

ASSESSMENT

The material considerations in determination of this application are the Inverclyde Local Development Plan, Historic Environment Scotland's Policy Statement (which replaces the SHEP) and the "Managing Change in the Historic Environment" guidance note series on "Demolition", the consultation replies and the applicant's supporting information. The determining factor is does this proposal comply with the Development Plan?

The application site is located within a mainly residential area under Policy RES1 and is also identified as a residential development opportunity under Policy RES3. Furthermore, it is also subject to a tree preservation order under Policy ENV6.

Of more significance to this listed building application, however, is Policy HER4, which relates to the alteration, extension and demolition of listed buildings. This policy sets a presumption in favour of the retention of listed buildings and states that their demolition, in full or in part, will only be accepted after a full assessment of the importance and condition of the building has been undertaken. Proposals to demolish the building require to be satisfactory with regard to Historic Environment Scotland's Policy Statement and the "Managing Change in the Historic Environment" guidance note series.

The Policy Statement indicates that “in assessing an application for listed building consent, the planning authority is required to 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”. It goes on to state that “where the application proposes the demolition of a listed building applicants will be expected to provide evidence to show that (a) the building is not of special interest; or (b) the building is incapable of repair; or (c) the demolition of the building is essential to delivering significant benefits to economic growth or the wider community; or (d) the repair of the building is not economically viable and that it has been marketed at a price reflecting its location and condition to potential restoring purchasers for a reasonable period.” Furthermore “where proposals involve ...the demolition of a listed building the planning authority should involve Historic Environment Scotland in the pre-application discussions.” The guidance note on “Demolition” reinforces and expands on these criteria.



Historic Environment Scotland was involved in pre-application discussions and the applicant responded to advice and guidance through the marketing exercise which was carried out. I am satisfied over the adequacy of this exercise and the timescale during which it was undertaken, as is Historic Environment Scotland. Clarification has been provided by the applicant that the site was marketed for over 8 months. It is clear from this exercise that no potential purchaser has been identified and this is probably largely informed by the condition of the building, as revealed by the applicant’s structural survey. In this respect, it is not for the application to be determined based on how the building has reached its present condition, but instead to assess the current position. Based on the submitted documentation, I do not disagree with the conclusion that the building is no longer economically viable for re-use. I am therefore satisfied that the applicant has provided sufficient evidence to meet one of the key tests of the Policy Statement and that the case for demolition is supportable.

The case for demolition, however, requires to be balanced against the historic interest of the building. I note that Historic Environment Scotland considers the proposal does not raise historic environment issues of national significance, however as a category B listed building it is of regional or more than local importance. I am also conscious that productive occupation of the building has ended and the evidence suggests that, due to intermittent vandalism and the ongoing effects of weathering, the likelihood is that the condition of the building will continue to deteriorate. Whilst an absolute position could be taken that the owners of the building should be required to invest in maintaining a vacant building in perpetuity for heritage purposes, the economic reality of the situation is that this is not a sustainable position in the longer term. The Council is therefore required to decide whether or not to support the demolition of the building given the evidence that has been presented.

A further consideration, however, is what are the potential consequences for the Council should the application to demolish not be supported. The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, under Section 28, provides the option for owners who have been refused listed building consent to require the planning authority to purchase their interest in the building and the land. One of the conditions for the service of such a notice is that the building and land in respect of which the notice is served have become incapable of reasonably beneficial use in their existing state, as is advised to be the case in this instance. Although the Council could refer the matter to the Scottish Ministers in an effort to contest such a notice, I am conscious that, in this instance, Historic Environment Scotland has already indicated no objection to the demolition. Should such a purchase notice be confirmed, the Council could inherit a safety and maintenance liability.



Alternatively, the Town and Country Planning (Scotland) Act 1997 provides an option for councils to serve a notice on a landowner under Section 179 requiring the proper maintenance of land ("land" extends to "building" in this case). Should a landowner not carry out such maintenance, the Council has the option under Section 135 to enter the land and carry out the required works and seek to claim the costs back from the landowner. Reclamation of costs can be a lengthy legal process, however, with no certain outcome and there is also the question of, having entered a site to carry out such works, whether or not a maintenance responsibility liability potentially transfers across to the Council.

In conclusion, a full assessment of the importance and condition of the building has been undertaken and the proposal to demolish is supported by evidence required by Historic Environment Scotland's Policy Statement and the guidance note on "Demolition". The loss of the building to demolition, whilst regrettable in historical terms, has been justified by the applicant. The proposal can therefore be supported under Policy HER4 of the Local Development Plan. It rests to consider if there are any material considerations that suggest determining the application contrary to the Plan.

With reference to the bat survey, it identifies a single roost meaning that the applicant will require to obtain a European Protected Species (EPS) Licence from SNH. The report specifies satisfactory mitigation measures which should be followed. The Greenspace Manager is content with the contents of the bat survey and the procedure to be followed.

Considering the objectors' concerns not addressed by my assessment against the Local Development Plan, I note concerns over submitted evidence from the applicant but have not determined substantive or verifiable grounds on which it may be questioned. Furthermore, I do not consider it necessary to have survey records when the structural survey has been signed off by recognised, appropriately qualified persons.

Drawing all of the above matters together, I am content that there are no material considerations to suggest that this proposal should be determined contrary to the Development Plan. It is therefore recommended that listed building consent be granted for the demolition of Ravenscraig Hospital.

RECOMMENDATION

That the application be granted subject to the following conditions:

1. That prior to the commencement of demolition, full details shall be submitted to and approved in writing by the Planning Authority of the method of demolition and the treatment of the site following demolition.
2. That a licence to exclude the bat roost identified on site during the ecological assessment shall be obtained by the applicant prior to any works commencing on site.
3. That an emergency procedure shall be put in place to ensure that if any additional bat roosts are identified prior to or during site development, works will be postponed and Scottish Natural Heritage contacted for advice on how to proceed.

Reasons

1. In the interests of visual amenity.
2. To protect bats in accordance with the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended).
3. To protect bats in accordance with the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended).

Stuart Jamieson
Head of Regeneration and Planning

Local Government (Access to Information) Act 1985 – Background Papers. For further information please contact David Ashman on 01475 712416.