Report to the Planning Committee
3 December 2025
Cabinet 15 December 2025
Full Council 16 January 2026

Wards: All Wards

Hull Local Heritage List Report

Report of the Executive Director Regeneration

Report Status:
This item is not exempt

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0063/25

1. Purpose of the Report and Summary

1.1. To provide a review of the public consultation response to the Hull Local Heritage List ("Local List") and propose an introduction of an Article 4 Direction ("Local List Article 4") for areas which are located outside of the current conservation areas (please see A4 List, Appendix B to the report).

1.2 To update on additions to the Local List

2. Recommendations

2.1 Following completion of public consultation and undertaking of relevant amendments, it is recommended that the following entries be added to the Local List:

(a) Former Westminster Bank of 1 Witham, Kingston upon Hull;

(b) St Anthony and Our Lady of Mercy Catholic Church of Beverley Road, Kingston upon Hull.

2.2 That this report be referred to Full Council to confirm the adoption of an Article 4 Direction for the establishment of a Local List removing permitted development rights **for demolition** and covering all entries on the A4 List (Appendix B) to the report.

2.3 To note that at this stage it is not proposed that a Local List Article 4 Direction be progressed so as to remove permitted development rights for:

1.1.1. Change of Use

1.1.2. External Alteration

3 Reasons for Recommendations

3.1. Policy 16(4) of the Local Plan advises that where evidence supports it, Article 4 Directions removing permitted development rights will be introduced to preserve the character of an area. Evidence was previously presented to 16 May 2023 Planning Committee on the need for additional planning constraints to preserve all entries featured on the Local List.

3.2. The evidence set out within this report pursuant to the completion of two rounds of public consultation supports the removal of permitted development rights for demolition of properties identified on the Local List but is not considered sufficient at this stage to exclude external alteration or change of use of the identified buildings.

3.3. To note that under Part B paragraph 5.22 of the Constitution the Planning Committee exercise duties relating to listed building consent and make additions to the Local List where objections have been received following the completion of consultation.

4. Key Organisational Impacts

4.1. Impact on other Executive Committees (including Area Committees) and decision makers:

4.1.1. Planning Committee have delegated authority to approve additions to the Local List.

4.1.2. Planning Committee to support the recommendation for the Local List Article 4 Direction to be referred to full Council for a decision.

4.1.3. Full Council to adopt the Article 4 Direction for demolition for all entries on the Local List identified in the proposed A4 List.

4.2. Contribution to the delivery of the Community Plan, the Council Plan and/or Area Plans:

4.2.1. The Article 4 Direction has the objective of preserving Hull's local heritage. This contributes towards Ambition 6 of the Community Plan which celebrates pride in place and the unique character of neighbourhoods.

4.3. Impact on other key strategies/business plans:

4.3.1. None identified.

4.4. Equalities Impact Information

4.4.1. The proposed Article 4 Direction will not introduce any additional planning constraints which will restrict or impact upon an individual or groups with a protected characteristic.

5. Consultation

5.1. Two rounds of public consultation have taken place on the adoption of an Article 4 Direction for the Local List. The first public consultation took place between 15/12/2023 and 30/01/2024, with feedback reported to 21/01/2025 Planning Committee. A second public consultation was completed between 14/02/2025 and 31/03/2025, with feedback outlined in the following sections of this report.

5.2. Direct notification by letter to the registered landowners, leaseholders and occupiers of new additions to the Local List have also been completed.

6. Background

6.1 On 16 May 2023 a report was presented to the Planning Committee outlining the status of the Local List. The report identified that the List was ineffective in preventing negative changes to individual entries where buildings were located outside of existing conservation areas. Negative changes identified include the loss of traditional joinery, removal of elements of special interest associated with a change of use, the cladding of buildings, and demolition. The report identified a possible need for an Article 4 Direction to be introduced which would bring more planning control to manage changes to buildings on the Local List, this would help mitigate the risk of uncontrolled change having a negative impact on the building and immediate area.

6.2 A first round of public consultation was completed between 15/12/2023 and 30/01/2024. Feedback received following this consultation was considered by the Planning Committee on 21/01/2025. In summary, feedback identified that an Article 4 Direction for all external changes would be too restrictive for maintenance and repair of entries on the Local List and raised concerns over additional costs and delays associated with planning permission requirements. From the responses received, the majority were in objection to the proposals. Thus, on

21/01/2025 Planning Committee approved a second round of public consultation on amended proposals.

6.3 A second round of public consultation was completed between the 15/02/2025 and 31/03/2025. Letters were issued to all identified freeholder, leaseholders and occupiers affected by the proposals.

6.4 In total 17 completed feedback forms were received. Feedback received (see Appendix A) was mainly negative about the proposed Article 4 Direction. Feedback received identified that the Local List occupants and owners are opposed to the principle of an Article 4 Direction, which introduces planning constraints for demolition, change of use and external changes. Qualitative feedback raised concerns about additional costs and time delays associated with planning permissions introduced by an Article 4 Direction.

6.5 A further six items of correspondence were received:

Entry Name	Feedback
Londesborough and Wenlock Barracks	A discussion was held about the implications of planning permission requirements for demolition and change of use. No objection received.
Neptune House	General discussion with freeholder's agent raising concerns about the Article 4 proposals.
The Albion, Caroline Street	E-mails raising concerns that introducing restrictions for renovation will allow the building to fall into disrepair. Objecting to the proposals.
Hull Paragon Signal Box	No objections received from Network Rail – *"Given the overall reasons for trying to secure the Article 4 following the loss of many such locally listed structures I don't think I would have any issues with the need to having to apply for permission to demolish, if we ever had to etc."*
Sea Cadets HQ	Raising concern about potential increased expenses for repairs.
3 Alfred Street	Response received asked for the building to be removed from the List. Advice given on reasons for being on the List and how to remove it; no follow up e-mail received.

6.5.1 Eight visitors also attended a public consultation meeting on the 24/02/2025, including representatives of St Marks Square and the Church of the Sacred Heart. A general discussion of the implications of the proposals was held and clarifications provided on individual addresses. No specific objections were received.

6.5.2 The outcome of the consultation is that there is overall objection to the principle of the introduction of an Article 4 Direction. This is reflected in the proposals which are outlined below.

6.5.3 At the time of this report, 251 buildings feature on the Local List, of which 118 are located outside of any existing conservation area. An additional item is being proposed to be added to Local List, which is also located outside of a conservation area.

6.5.4 A further seven buildings have been removed from the Local List because of unsympathetic external alterations, which have removed their reasons for inclusion on the List.

6.5.5 Being located within a conservation area means that a Local List entry benefits from additional constraints requiring planning permission for relevant demolition and external works of alterations. These entries therefore have an effective means of preserving their special interest.

7. Issues for Consideration

7.1 Consideration has been given to the introduction of three Article 4 Directions for the Local List – 1. Demolition, 2. Change of Use, and 3. External Alteration. As detailed in the follow sections of the report an Article 4 Direction for Demolition only is being recommended for adoption.

7.2 A schedule of Local List entries has been compiled to identify entries which are located outside of any existing conservation area (A4 List); this can be found in Appendix B. The A4 List features 116 entries where an Article 4 Direction for demolition is considered appropriate.

7.3 It is noted that five entries on the A4 List are featured within the proposed Wincolmlee Conservation Area which is due to be considered for adoption by Full Council on 16/01/2026. If the Wincolmlee Conservation Area is adopted these entries will be removed from the A4 List.

7.4 **Part 1: Demolition Article 4 -** An Article 4 Direction is being proposed to withdraw permitted development rights for relevant demolition for all entries on the A4 List.

7.5 As identified above, there is a strong public objection to the introduction of planning controls affecting entries on the Local List. Since the creation of the Local List in 2006 17.9% of entries have been removed, of which 38 have been directly as a result of demolition. This demonstrates that the List in not effective in managing Hull's Local Heritage Assets.

7.6 The reasons for demolition include arson, condition, re-development with associated planning permission and as a result of prior approval for demolition. At least seven entries have been demolished as a result of re-development approved with planning permission.

7.7 At least five entries have also been removed from the List as a result of prior approval for demolition. Examples include Nos.250, 252 & 254 Hessle Road, Nos.126-136 Francis Street and Brave's Hall Roper Street. Prior approval can consider method of demolition and making good of the site only. It does allow the application of Part 2 of Local Plan Policy 16, which considers justification for the demolition of a non-designated heritage asset.

7.8 As a result of the significant rate of the removal of items from the Local List, it is considered expedient to withdraw permitted development rights for demolition, despite public objection. Removing permitted development rights for demolition, or demolition via prior approval, will ensure that the Local List is effective in preserving buildings of local and architectural interest. Introducing an Article 4 Direction for demolition will allow implementation of Local Plan Policy 16 and appropriate planning balance if the demolition of a Local List building is justified.

7.9 A careful balance needs to be struck to ensure buildings of heritage value are given a greater degree of protection than other buildings. Where buildings are listed or within conservation areas, - they already have a greater degree of protection. The Local List aims to provide an increased level of management over locally listed buildings due to the local heritage value they entail, given the significant level of unmanaged demolition to buildings on the Local List it is considered appropriate to bring an added level of management which should prevent their unnecessary loss. However, where a redevelopment scheme for a site is proposed which requires the removal of a locally listed building, this would be considered favourable if the scheme is only feasible with the removal of the buildings, buildings considered dangerous would still be demolished. However, the Article 4 Direction for demolition will provide a protection against buildings being developed just to clear sites. Cleared sites in turn often lead to other problems, such as fly parking, fly tipping and anti-social behaviour. If planning consent is required for demolition, within any approval, how the site is then left and secured can be addressed by planning conditions, thus helping to ensure the site does not have a detrimental impact on the immediate area.

7.10 It is therefore recommended to withdraw the permitted development right for the demolition of a building as stated within Class B of Part 11 (Heritage and Demolition) of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) – see Appendix C for recommended wording of the Article 4 Direction requirement.

7.11 **Part 2 – Change of Use & External Alteration Article 4 Direction –** Consultation has been completed on the introduction of an Article 4 Direction to

introduce planning constraints to remove permitted development rights for change of use and external alterations affecting windows, cladding and introduction of external shutters.

7.12 The Article 4 Direction was intended to introduce similar planning constraints for locally listed entries located within and without a conservation area, with the prior benefiting from associated withdrawal of permitted development rights for external cladding and demolition.

7.13 Public feedback on the introduction of such proposals has resulted in a high degree of objection. Occupants and owners of locally listed buildings are opposed to the principle of introducing additional planning constraints. Objections are based upon additional cost and time constraints associating with submitting planning applications for relevant works and uncertainty over the works that owners would need to undertake to secure consent. At present, it is not considered essential to provide this degree of protection for change for locally listed buildings to enable them to continue to be used. It is considered that if the constraints are too significant for changes to locally listed buildings this may in turn lead to higher levels of vacancy which is likely to lead to these buildings adversely affecting the immediate area.

7.14 Given the degree of objection received, it is not currently considered expedient to progress the adoption of an Article 4 Direction introducing constraints for change of use or external alteration.

7.15 It is recommended that a full review of the Local List be completed in late 2026, and positive and negative changes to individual entries monitored.

7.16 **Local List Additions**

7.17 As part of the second consultation in 2025, the public was consulted on two additions to the Local List. These are:

7.17.1 Former Westminster Bank No. 1 Witham – No objection received. Building was added onto the List on the 15/03/2025.

7.17.2 St Anthony and Our Lady of Mercy Catholic Church, Kingston upon Hull – Objection received.

7.18 Both, an objection and letter of support have been received for St Anthony's Church. The Reverend of the Church supported the addition. An objection (see Appendix D) was received from the Diocese of Middlesbrough based on:

7.18.1 Historic England did not identify the church to be of national interest.

7.18.2 Method of construction does not have a long-time frame.

7.19 In light of an objection being received, Members are asked to determine if to accept the objection of the Diocese or to progress with the building being added based on local heritage value, as outlined within Appendix E.

8. Options and Risk Assessment

8.1. Members have the option of approving or declining to undertake notification on an Article 4 Direction for demolition.

8.2. The introduction of an Article 4 Direction is considered to be the most effective measure to take in order to stop demolition of Local List entries via the prior approval process and prevent the loss of buildings with local heritage value. The proposal is being progressed despite public objections but considered necessary by the significant level of buildings being demolished on the Local List.

8.3. By adopting the Article 4 Direction the Council is introducing additional constraints upon owners and users of building(s) on the A4 List. It is accepted that this will involve additional fees and time constraints, as planning permission will be required. However, this is balanced against a positive impact that this will bring to the entries on the A4 List, and surrounding areas as a whole, but more importantly it will be a significant step in securing and protecting this city's heritage.

8.4. By not adopting the Article 4 Direction the Council will be in a position of responding to public feedback which objects to the introduction of additional planning constraints. The Local List would remain vulnerable to demolition which fall outside of planning requirements and would be considered an in-effective management tool.

9. Comments of the Monitoring Officer (Town Clerk)

9.1. The report concerns proposed updates to the Hull Local Heritage List and adoption of a new Article 4 Direction seeking to remove permitted development rights for demolitions in areas that are located outside of the current conservation areas. Proposals are considered policy compliant. Consultation requirements have been followed. Equality issues considered. The appropriate delegations are accurately detailed. The Article 4 Direction, if approved by Council, will be made under Article 4 (1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). In this case, it will have the effect of removing Permitted Development Rights relating to the demolition buildings under Class B Part 11 of Schedule 2 to the General Permitted Development Order, within the city.

10. Comments of the Section 151 Officer (Director of Finance and Transformation)

10.1 The Section 151 Officer notes the recommendations within the report but has no specific comments to make.

11. Comments of the Assistant Director OD & HR and compliance with the Equality Duty

11.1 The content of the report is noted. There are no staffing or equality issues arising for the council from this decision.

12. Comments of Overview and Scrutiny

12.1 This report has not been subject to pre-decision scrutiny. (Sc8994 – AS_

13 Comments of the Portfolio Holder for Economic Renewal, Housing and Organisational Development

13.1 The Hull Local Heritage List is an important management tool which recognises the City's unique social and cultural heritage. The current proposals strike a clear balance between ensuring that the list is effective in ensuring that Hull's heritage is saved from demolition but also allowing them to be managed in a way which ensures that they are economically viable. The proposals being made for an Article 4 Direction also recognises how public consultation is important for the Council in implementing new policies and strategies, and that feedback will influence its decision-making process."

Chris Jackson, Executive Director of Regeneration

Contact Officer: Stephen Walker Telephone No.: 612124

Officer Interests: None

Background Documents: -

Appendix A - Local List Feedback 2025

Appendix B - A4 List

Appendix C - Local List A4 Schedule

Appendix D - St Anthony Letter

Appendix E - St Anthony and Our Lady of Mercy Catholic Church

Implications Matrix

I have informed and sought advice from HR, Legal, Finance, Overview and Scrutiny and the Climate Change Advisor and any other key stakeholders i.e. Portfolio Holder, relevant Ward Members etc prior to submitting this report for official comments	Yes
I have considered whether this report requests a decision that is outside the Budget and Policy Framework approved by Council	Yes
Value for money considerations have been accounted for within the report	Yes
The report is approved by the relevant Director/Assistant Director	Yes
I have included any procurement/commercial issues/implications within the report	N/A
I have considered the potential media interest in this report and liaised with the Media Team to ensure that they are briefed to respond to media interest.	Yes
I have included any equalities and diversity implications within the report and where necessary I have completed an Equalities Impact Assessment and the outcomes are included within the report	Yes
Any Health and Safety implications are included within the report	N/A
Any human rights implications are included within the report	N/A
I have included any community safety implications and paid regard to Section 17 of the Crime and Disorder Act within the report	N/A
I have liaised with the Climate Change Advisor and any environmental and climate change issues/sustainability implications are included within the report	Yes

I have considered how the decision may contribute or impact on culture and heritage within the city.	Yes
I have included information about how this report contributes to the Community Plan/ Area priorities within the report	Yes
I have considered the impact on air quality, carried out an appropriate assessment and included any resulting actions or opportunities necessary to improve air quality in the report.	N/A
I have considered the impact on Children Looked After and Care Leavers and any resulting actions/implications have been included within the report.	No