

Guildhall Gainsborough
Lincolnshire DN21 2NA
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AGENDA

This meeting will be recorded and the video archive published on our website

Extraordinary Planning Committee

Wednesday, 5th July, 2023 at 6.30 pm

The Epic Centre, Lincolnshire Showground, Lincoln LN2 2NA

Members: Councillor Matthew Boles (Chairman)
Councillor Jim Snee (Vice-Chairman)
Councillor Emma Bailey
Councillor John Barrett
Councillor David Dobbie
Councillor Ian Fleetwood
Councillor Sabastian Hague
Councillor Peter Morris
Councillor Tom Smith
Councillor Baptiste Velan
Vacancy

1. **Chairman's Statement**
2. **Apologies for Absence**
3. **Declarations of Interest**
Members may make any declarations of interest at this point but may also make them at any time during the course of the meeting.
4. **Public Participation Scheme for this Meeting** (PAGES 3 - 10)
Setting out the varied scheme of Public Participation for this meeting only.
5. **Listed Building Consent Application for Determination -** (PAGES 11 - 36)
146711, Hanger 2 RAF Scampton, Lincoln, Lincolnshire LN1 2ST

Ian Knowles
Head of Paid Service
The Guildhall
Gainsborough

Tuesday, 27 June 2023



Participation at the Extraordinary Planning Committee Meeting on Wednesday 5 July 2023

Revised June 2023

West Lindsey District Council is committed to extending public involvement in the planning process. This leaflet explains how you can speak directly to Councillors at the Extraordinary Planning Committee meeting on Wednesday 5 July 2023.

The advice in this leaflet applies equally to applicants, their agents, supporters, objectors and local council representatives.

Please be aware this meeting will be recorded and the archive available on the Council's website for a period of six months.

Frequently Asked Questions and Answers

Q Can I get a copy of the agenda before the meeting?

A The agenda, containing details of the application, will be available on the Council's website and by request at the Council's offices five clear days before the meeting. A limited number of printed copies will be available at the meeting on 5 July.

Q If I object to the proposal, do I have to speak at the committee meeting?

A No. Details of all objections, if received in time, are reported to the committee anyway. It is entirely at your discretion whether you wish to speak at committee. Objections are available to view using the application tracker pages of the Council's website (<https://www.west-lindsey.gov.uk>).

Q If I wish to speak, how do I arrange it?

A You will need to register to speak with the Democratic Services team. Please send an email stating your name, contact number and whether you are speaking in support, opposition or as a Parish Council representative to:
committeeadmin@west-lindsey.gov.uk

Alternatively, please call the team on: **01427 676595, 676606** or **676594**, to register your request.

All speakers, including members of the public, visiting Ward Members and County Councillors are required to comply with the requirement to register in advance of the meeting.

For this meeting, the deadline to register to speak will be 5pm on Monday 3 July 2023. Late requests to speak will not be accepted.

Q What if I would like to speak but cannot attend the meeting?

A For the purpose of this extraordinary meeting, no alternative arrangements are available.

Q When and where is the meeting being held?

A This extraordinary meeting of the Planning Committee will be held on Wednesday 5 July 2023, at 6.30pm, at The Epic Centre, Lincolnshire Showground, Lincoln LN2 2NA.

If you make arrangements to speak, you should be present at the start of the meeting.

Q What is the order of speaking on the application?

A Planning Officers will introduce the item. Speakers will then be invited to speak in the following order:

- Town/Parish Council/Meeting representative
- Supporters (including the applicant(s) and/or agent(s))
- Objectors
- Ward and/or County Councillors (for the Ward being dealt with as part of the application)

Please ensure you make it clear in what capacity you wish to speak: objector; supporter; Parish/District/County Councillor.

Q How long will I be able to speak for?

A For this extraordinary meeting, there is a time limit of 20 minutes for each category of speakers. Where possible, you are encouraged to arrange a single spokesperson, no matter which category you fall under.

If a single spokesperson is not identified, a maximum of 10 speakers will be allowed in each category, sharing the time equally between them. If more than 10 people wish to speak,

allocation will be on the basis of the first 10 people who register with the Democratic Services team.

Please note: the time limit per category of speaker is a maximum time not a specified allocation. If registered speakers are completed within the 20minutes allowed, the Committee will move on. There will be no option on the night for others to speak, regardless of time remaining.

Q Can I ask questions of other speakers?

A No. Comments should be in the form of statements rather than questions. It is important to focus comments on material planning matters that have not otherwise been raised by other speakers.

Q Can I use photographs or plans or circulate supporting documents?

A For this meeting, supporting documentation is at the discretion of the Chairman and must be submitted via email to committeeadmin@west-lindsey.gov.uk no later than 2pm on Tuesday 4 July.

There will be a presentation by Planning Officers detailing the application and displaying relevant photographs of the area which will be on display whilst registered speakers address the Committee. For supporting documentation to be accepted, it must not be a duplicate of the information Officers will provide and it must be suitable for a public meeting.

Q What are the relevant issues in considering this proposal?

A For the purposes of clarity, it is pertinent to note that the application is for **Listed Building Consent** to relocate the grave, railings and any zooarchaeological remains. This is not an application for **Planning Permission** therefore, policies within the Development Plan, in this case comprising of the Central Lincolnshire Local Plan 2023, are not to be taken into

consideration in the determination of the application.

The Local Planning Authority must be mindful of their statutory duty contained within Section 16(2) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”). In addition, Section 16 of the National Planning Policy Framework sets out tests to ensure that where any damage against the historic environment is permitted, it is properly justified. The key matters for discussion will therefore be around the desirability of preserving the listed buildings (Hangars 1-4) and their setting, and any features of special architectural or historic interest.

Q What issues are usually not relevant in considering proposals?

A They will vary from case to case, but the following are examples:

- Matters covered by other laws (*e.g., alcohol licensing*)
- Private property rights (*e.g., boundary or access disputes*)
- The applicant’s morals or motives
- Suspected future development
- Loss of view
- Effect on value of property

Allegations of factual errors in the report are not to be the subject of oral representations. If you believe this to be the case, you must take this up in writing with the Development Management Team Manager prior to the meeting. You should particularly note that you should not make derogatory or defamatory remarks about other people. Any such comments may leave you open to legal action.

Q Can I speak more than once on the same application?

A The Planning Committee may seek points of clarification from participants if it so wishes. Should the application be deferred, public participation arrangements will apply when the application is next considered.

Q Whom do I ask if I have any other queries?

A If you have any questions not answered by this leaflet, please contact the Democratic Services Team:

Email: committeeadmin@west-lindsey.gov.uk

Telephone: 01427 676594 / 676595 / 676606

Notes:

- Councillors are elected to represent you on the District Council. You might like to contact your Councillor about the application concerned, but he/she will not be able to commit him/herself to a decision before hearing all the evidence and debate at the meeting. Councillors must take into account the laws and planning guidance as well as public opinion.
- The Chairman of the Planning Committee has absolute discretion regarding the interpretation of this scheme and its temporary suspension, variance or withdrawal at a particular meeting if it would be conducive to the debate or in the event that it becomes, or threatens to become, disruptive to the conduct of the meeting or the proper and lawful exercise of the council's statutory powers and duties.
- Minutes of Committee Meetings are published on the website and may also be viewed at council offices. Copies can be provided on request. There is a charge to cover printing and postage costs.

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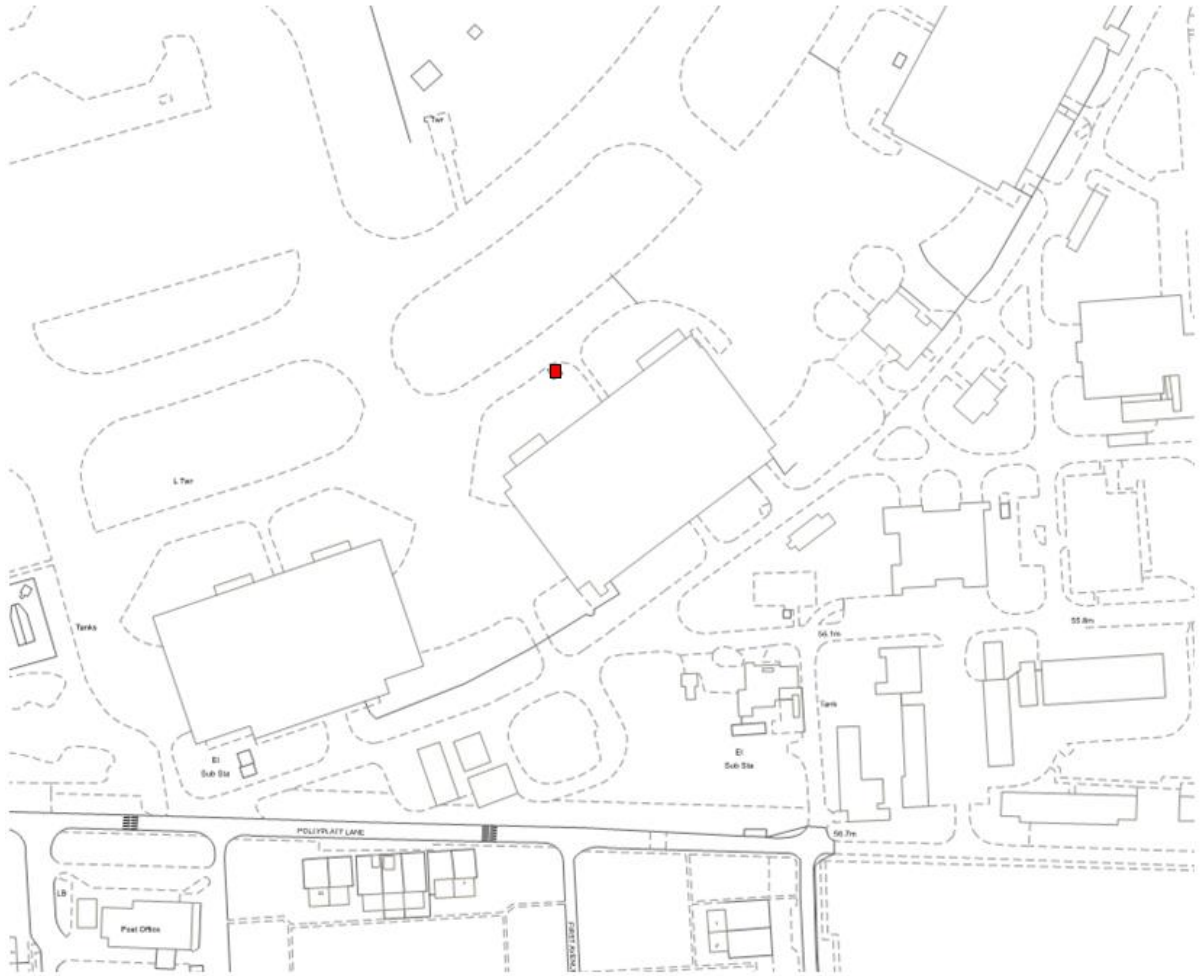
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June 2023

Agenda Item 5

Site Location Plan- Listed Building Consent 146711



Officers Report

Listed Building Consent No: 146711

PROPOSAL: Listed building consent to remove the railings, excavate and remove the grave marker and any zooarchaeological material for relocation.

LOCATION: Hanger 2 RAF Scampton Lincoln Lincolnshire LN1 2ST

WARD: Scampton

WARD MEMBER(S): Cllr R Patterson

APPLICANT NAME: RAF Heritage- Wing Commander Erica Ferguson

TARGET DECISION DATE: 05/07/2023 (Extension of time agreed until 7th July 2023)

DEVELOPMENT TYPE: Listed Building - Alter/Extend

CASE OFFICER: Danielle Peck

RECOMMENDED DECISION: Refuse Listed Building Consent

In line with the Council's constitution the application is referred to the Planning Committee for determination as the Council's Director of Planning Regeneration and Communities and the Planning Team Manager consider it is appropriate to do so due to the significant amount of public interest.

Site Description: The site relates to the grave of the dog (black Labrador) of Wing Commander Guy Gibson, located to the north west of Hangar 2 within the RAF Scampton base, located off the A15. The grave is surrounded by locked black railings with a grave marker detailing the circumstances around the death of the dog and its burial. The four aircraft hangars (C-Type Hangars), which are the most relevant buildings in this application are Grade II Listed, being first listed in 2005. Historic England List entry no. 1391594¹ describes their significance and historical background. The full list entry is attached to this report as Appendix 1.

Hangar 2 was the base of the newly formed 617 Squadron who, led by Wing Commander Gibson, undertook their raid of the Ruhr Dam in May 1943, Operation Chastise - often referred to as "the Dambusters".

The Official Listing references the dog's grave, subject of this application:

"The hangars are numbered 1 to 4, starting from the south, No. 2 Hangar retaining 617 Squadron's offices and having to the front the grave of Guy Gibson's Labrador which was killed on the eve of the Dambusters' Raid."

The wider RAF base comprises of a large number of buildings used in connection with the operation of the airbase as well as accommodation and mess halls. Most recently, the base has provided a home for the Royal Air Force Aerobatic Team

¹ <https://historicengland.org.uk/listing/the-list/list-entry/1391594>

(RAFAT), the Red Arrows until they relocated to RAF Waddington in the Autumn of 2022.

The Proposal: Listed building consent is sought for the removal of the grave and memorial for the dog. It would include removal of the iron railings and grave marker of the black Labrador belonging to Wing Commander Guy Gibson. This will also include recording, investigation and excavation of any zooarchaeological remains found and the relocation of all material to RAF Marham in Norfolk, the current home of the 617 Squadron.

The application is made by RAF Heritage. The accompanying Heritage Statement sets out the following reason for the application:

“Reasons for the Request

As there is now no guarantee of a sustainable heritage focussed future for Scampton with careful management and interpretation of the story of the raid and Wg Cdr Gibson’s dog, we believe the grave site is at risk and carries significant reputational risk given the racial slur now associated with the dog’s name. We feel it would be better to return the marker and any remains to 617 Squadron. The dog was one of the Squadron’s mascots and would take care of the story for the foreseeable future. Ideally the grave would remain at Scampton as part of the important story in the location hugely significant parts of the RAF, and indeed the Nation’s, story but the future is now too uncertain to recommend this course of action. Recent video footage of a group known as ‘Abandoned’ who broke onto the base and accessed the Officers Mess increases concern over the future of the heritage fabric of the site.”

Relevant Planning history:

No relevant planning history.

Representations, in summary:

The full comments and representations on this application can be viewed on the Councils website using the following link:

<https://www.west-lindsey.gov.uk/planning-building-control/planning/view-search-planning-applications/search-planning-application-database?docid=146711>

Chairman/Ward member(s): No representations received to date.

Scampton Parish Council: The applicant, on behalf of the MOD and the RAF, recently assured representatives of all levels of local council, at numerous community engagement meetings, that RAF Scampton’s unique and nationally important heritage would be preserved. This memorial and grave is an incredibly important part of our heritage, and it is essential that it remains at RAF Scampton to provide a focus for the future development of a Heritage Centre. To date, 5000 supporters have signed the change.org petition opposing this proposal. Additionally, in accordance with section 16 of the Planning (Listed Buildings & Conservation

Areas) Act 1990, paragraphs 198 and 199 of the National Planning Policy Framework and Policy S75 of the Central Lincolnshire Local Plan, the planning authority should not approve the proposed development.

Riseholme Parish Council: Having read the application made by Wg Cdr Erica Ferguson they fully understand the sentiment behind the application.

However, they are of the view that the historical significance of RAF Scampton cannot be underestimated and the part that this base played during the Second World War should not be forgotten.

It is appreciated that sadly the future of RAF Scampton hangs in the balance and is to be decided elsewhere. However, this monument is part of Scampton's unique and iconic history and reminds all of the sacrifice given by others.

Although the significance of the monument to the 617 Squadron is not to be underestimated, the view of Riseholme Parish Council is that it is a monument which is significant to the Nation as a whole and reminds all of the role played by Scampton and those who served for the benefit of all.

Therefore, they oppose the move and would propose that the monument remains appropriately protected and maintained at Scampton as a symbolic reminder of its important historical significance which should not be forgotten.

Burton Parish Council: "Burton by Lincoln fully understands and appreciates the sentiment behind the application lodged by Wg Cdr Ferguson in wishing to move the memorial to Guy Gibson's dog as it is a mascot of 617 Squadron.

However, the Parish Council are of the view that the mascot has a greater significance in terms of historical reference and as a symbol of sacrifices made.

Therefore, the preferred view is that the memorial should remain appropriately protected and in situ at Scampton. If that is felt to be unachievable then it should be moved temporarily or permanently to the International Bomber Command Centre so that its history and significance is available to all.

Third party representations and local residents:

The Council has been made aware of an online petition named 'Stop the RAF exhuming the remains of Wg Cdr Guy Gibson's dog at RAF Scampton' which has been signed by over 5500 people.

171 letters of objection have been received from the following towns, villages and counties, in, and outside of the West Lindsey District;

Lincoln, Gainsborough, Scampton, Welton, Nettleham, Welton, Saxilby, Fiskerton, Tealby, Cammeringham, Nettleton, Owmbly By Spital, Caistor, Toft Next Newton, Aisthorpe, Brookenby, Cherry Willingham, Corringham, Ingham, Langley Mill, Skellingthorpe, Sudbrooke, Marton, Snitterby, Grasby, Staindrop, North Carlton, Dunholme, Faldingworth, Washingborough, Brigg, Boston,

Cromer, Ipswich, Felixstowe, London, Nottingham, Glasgow, Derbyshire, Oxfordshire, North Yorkshire and Cambridgeshire.

The objections received are summarised as follows:

- To remove the grave from this heritage site will be a piece of history ripped out and forgotten for the local area and beyond.
- This grave is part of the famous Dambusters raid and should not be tampered with.
- Relocating the remains would be morally wrong and highly disrespectful
- This application will harm the historic setting and listed status of the building.
- This is part of the RAF history on this site and should be left as it is for future generations. Do not erase our history
- RAF Scampton played a huge role in the course of WWII and has important historical significance because of this, to remove the dog would lessen the site's impact as the grave is known throughout the world! It is integral to the story of the base.
- To allow this to go ahead would signal the end of RAF Scampton as it gives more reason for the government to abandon the heritage there completely.
- When sense prevails and local developments finally bring the area the economic advantages it deserves, this monument would have been unnecessarily disturbed.
- The grave should not be moved. It has been there peacefully all this time and belongs there.
- A full assessment of significance in support of the proposals to relocate the remains and monument has not been submitted according to Historic England's guidance for assessment significance of heritage places, nor does it refer to assessment of significance and the potential harm of any proposals as per the National Planning Policy Framework.
- Show me another site with A £300 million plan in place that has been chosen to house asylum seekers. The plan to bring jobs and tourism to Lincolnshire is an unbelievable opportunity not to be missed.
- to remove the zoological remains would significantly harm the integrity of the remains .
- The Grave of Wing Commander Guy Gibson's dog is an intrinsic feature of the historic character and heritage of this unique and extraordinary site.
- To remove the remains of Guy Gibson's dog, is an absolute insult to the memory of those who lost their lives in Operation Chastise, and to the history and heritage of Lincolnshire and Bomber Command.
- If the plan is to be agreed the archaeological evidence should remain in Lincolnshire and be put back on public display in an appropriate setting
- Guy Gibsons dog must remain at RAF Scampton, exactly where it was placed on the night of the Dambusters famous raid.
- The original plan to turn the base into a heritage centre would not only have preserved the historical value and sacrifice made by the men who served there it would have created much needed job opportunities
- Guy Gibson left instructions that his dog be buried at midnight outside the Officers' Mess of RAF Scampton, as all the crews would have left by then.

The dog was the mascot of that particular group of men forming the 617 Squadron at that time in history. It has no connection with RAF Marham

Scampton Heritage Group- Objects, in summary:

1. The application form submitted by the proposer describes the affected site as the grave of Wg Cdr Guy Gibson situated immediately in front of Hangar 2 on the former operational 'water front' of the airfield". It does not refer to Wing Commander Gibson's dog. Wing Commander Gibson's body parts are interred in the municipal cemetery at Steenberg in the Netherlands.
2. The single National Heritage List entry 1391594 includes 'HANGARS 1-4 (C-TYPE HANGARS)' at the former RAF Scampton. The dog's grave is specifically cited as being within the curtilage of Hanger 2 by the proposer and is recognised as such by WLDC Hence, even if the application was meant to reference Gibson's dog's grave, the assertion on the proposer's application that the works do not include alterations to a listed building is incorrect and grossly misleading. Indeed any proposal to relocate the grave and remains would constitute a removal of part of a listed building.
3. If removed from the Scampton site, Heritage Listing 1391594 would become significantly inaccurate. According to Heritage England, the removal of a significant part of a listed entity constitutes a "Major Alteration"
4. Although we accept that both are branches of the UK Ministry of Defence, we understand that management of the Scampton site has now passed from the Royal Air Force (RAF) to the Defence Infrastructure Organisation (DIO). We wish to question whether the DIO has given consent for an RAF officer to submit the proposal to WLDC and whether this is permissible under Planning regulations. We further question whether the undertakings given in the Certificate of Ownership section can possibly be correct in these circumstances
5. Notwithstanding that the application is to remove Gibson's grave and not his dog's, the Trustees of Scampton Heritage Group dispute with the utmost vigour some of the misleading assertions made in the proposer's "Heritage Statement". Scampton Heritage Group is a charity (Charity Number 1193701) formed by the civilian volunteers who curated and provided guided tours of the Heritage Centre in Hangar 2 at Scampton. The RAF has done virtually nothing to protect the grave in the last two decades. It is better protected by the new owners and the same volunteers who have so lovingly tended it hitherto.
6. Rather than detracting from the heroism of the personnel who bravely served on 617 Squadron 80 years ago, it enables links to be made between their acts of heroism and the everyday relationships that are as much a part of the story. In no way has the dog's grave ever detracted from the poignancy of the heroism and sacrifice.
7. It is the explicitly stated objective of our Charity, and that of the likely future owners, to maximise the access of the public to this important heritage site and the stories that underly its past. Although visits have been permitted by the RAF, this has been by prior arrangement and subject to lengthy security checks and narrow visit windows. RAF Marham is the home of the RAF's F35 force and will be subject to even greater security restrictions than the former RAF Scampton. This will further restrict access to this important historical artefact and may even exclude members of the public. Under civilian ownership, the heritage trails at RAF Scampton will vastly improve access to the public and

- help us all meet out educational aspirations for the site. The dog's grave needs to stay at Scampton to be properly safeguarded and to remain available for public viewing.
8. The Heritage case makes no mention of the ashes of ten airmen that have also been interred on the site. Over a period of several years, relatives of deceased contemporaries of 617 Squadron personnel have requested the RAF's permission to have their loved one's ashes interred at the unofficial mascot's grave within spiritual sight of the squadron offices that overlook it. Volunteer civilian tour guides have overseen the interments and comforted the relatives.
 9. We consider the exhumation of the remains of a dead dog macabre in the extreme. Moreover, as the on top of the dog are the ashes of ten airmen who served on 617 Squadron, the exhumation of the dogs remains is offensive to public decency and completely unacceptable.
 10. Gibson's dog was his own personal pet. It was a dark brown labrador (not black as the current headstone erroneously states) and was not a squadron mascot. Indeed, although Gibson's personal bravery is beyond question, both he and his dog were not well-liked by Squadron personnel. The key link is between the dog and his master, Guy Gibson, and not between the dog and the modern 617 Squadron.
 11. Gibson was never based at RAF Marham, nor was his dog. Moreover, 617 Squadron has been based at RAF Coningsby , RAF Binbrook (briefly) and RAF Lossiemouth as well RAF Marham and has had a least three intervals (1955-58; 1981-1983 and 2014-2018) in which it was disbanded.
 12. The remaining historical evidence presented in the proposer's Heritage Case is also seriously flawed. The Heritage Case presents First World War Plans , Cold War Plans and Second World War Plans showing concrete/ tarmac runways but Gibson and his dog were only present for a few months in 1943. It was only after 617 Squadron left Scampton in 1943 that hard runways were constructed. The Dams' raid was trained for, and launched from, a grass airfield and Gibson's dog was buried in the curtilage of Hangar 2 on the edge of that grass airfield. 617 Squadron did return in the 1950's but Gibson was killed in 1944 and had no direct association with the Squadron after 1943.
 13. Many people worked hard to ensure that the Central Lincolnshire Plan contained robust protection for RAF Scampton's heritage, developing the mechanism of protection through planning control agreed through extensive consultation. We were aware that disposal, not preservation, was the RAF's primary aim. Against this backcloth, it is unacceptably disappointing that RAF Heritage Branch are the ones proposing destruction that that protection was designed to prevent.
 14. In their current location, the "Gibson's office; grave and squadron HQ triptych" has a strong presumption in favour of heritage conservation in the Central Lincolnshire Plan and an equally strong focus on access by the public to a key part of their heritage. The people of Lincolnshire have a long history of support for the personnel of the RAF and have shown that they will not balk at even the threat of thermonuclear annihilation.
 15. We note that RAF Heritage Branch is described as "... a small department within the RAF with the responsibility of providing the Air Staff, the wider RAF and MOD, and other government departments with RAF related historical support on operational and other matters". (see Air Historical Branch | Royal Air

Force (mod.uk) . The proposal submitted by the RAF's Air Historical Branch reaches far beyond their remit.

WLDC Environmental Protection: Environmental Protection has no comments to make on this proposal.

WLDC Conservation Officer: Objects.

The proposal is to totally remove the buried remains, memorial and associated iron railings of the black Labrador dog that belonged to Wing Commander Guy Gibson. This dog acted as the mascot for the 617 Squadron stationed at RAF Scampton who led the Dambusters Raid in 1943. The grave is a memorial and a curtilage listed heritage asset associated with the grade II listed Hangars 1-4 (C Type Hangars), specifically associated with Hangar 2.

Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority shall 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.

These hangars were listed for their special architectural and historic significance being some of the best surviving hangars of their type. The listed hangars are four large sheds designed to curve and face towards the runways. The hangars are built with a steel main frame, reinforce concrete walls with a turnerised slate roof replacing asbestos slates. Hangar 2 retains the original furniture and features from 617 Squadron's offices from the Dambusters Raid.

The memorial of Guy Gibson's dog is specifically located outside of his office window. The memorial is curtilage listed due to its physical and historic significance and it meets the three key factors for curtilage as defined by Historic England's Listed Buildings and Curtilage Historic England Advice Note 10 (2018).

The memorial offers historic interest in its association with the 617 Squadron, Guy Gibson, and the Dambuster Raid. One important factor is that it provides a more human element to the nationally and international important military operation. The significance of this is elevated through the location and care of the grave which strongly indicates the love of this dog with the 617 Squadron and, most importantly, Wing Commander Guy Gibson.

The remains also offer archaeological interest which help understand the treatment and cause of death of the much-loved mascot of the 617 Squadron.

The dogs grave is consider a memorial that is curtilage listed. The National Planning Policy Framework (NPPF, 2021) state that memorials should have regard to the importance of their retention in situ (paragraph 198) and designated heritage assets should have great weight in their conservation irrespective of the type of harm.

The proposal would be considered to be substantial harm as the significance and interest in the grave as a memorial is almost totally lost if removed from its location.

Paragraph 201 of the NPPF states this harm must achieve substantial public benefit that outweighs the loss. I do not consider there to be any public benefit for its removal. The second section of this paragraph sets out a criteria of four points to meet but this proposal does not meet all of these and is therefore not applicable.

Policy S57 of the Central Lincolnshire Local Plan (CLLP, 2023) echoes the criteria for substantial harm to heritage assets which are not met.

Policy S75 of the CLLP seeks to have a holistic and sustainable masterplan for the site. This proposal conflicts with this policy and is not a sustainable approach as it will entirely remove a designated heritage asset which will lose much of its historic interest if removed.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that when considering the decision on an application there shall be special regard to the preservation of the building, its setting, or any features of special architectural or historic interest.

This application will cause substantial harm to the historic interest of the listed hangars and the curtilage listed dog grave through its removal. The setting and historic interest in hangar 2 will be altered as the grave is specifically located and noted in the listing.

I must object to this proposal as it is contrary section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Para 201 of the NPPF, and Policy S57 & Policy S75 of the CLLP.

The retention of the grave in situ as a memorial can be sustained and protected for the future use of RAF Scampton. All effort should be made to keep the grave in situ and protected rather than seeking to remove the memorial and exhume the remains.

If this does get considered to be approved then there must be conditions on retaining the memorial, remains, and railings together and returning them back to the exact location in RAF Scampton as soon as practicably possible.

Lincolnshire County Council Archaeology: The proposed development involves the exhumation of the suspected zooarchaeological remains of a Labrador dog that belonged to Wing Commander Guy Gibson, and which acted as the mascot for 617 Squadron who led the Dambusters Raid whilst stationed at RAF Scampton in 1943. It also proposes the removal of the dog's memorial plaque together with other commemorative items and the associated iron railings that surround it and their removal from the site. Together these items and any buried remains are a heritage asset and a memorial in the terminology of the Government's National Planning Policy Framework (NPPF).

The memorial is located in front of Hangar 2, which is one of four hangars at RAF Scampton that have been designated as Grade II Listed buildings, because they were deemed to be amongst the best surviving and most significant survivals of

their type in the country following a review by Historic England (formerly English Heritage). Hangar 2 still contains the offices of 617 Squadron and the grave is explicitly mentioned by Historic England in the official list description. The memorial is therefore deemed to be curtilage listed by the local planning authority.

RAF Scampton is a heritage site of national and indeed international importance, not only for its role during WWII and its associations with 617 Squadron and their Dambusters Raid, but also for the site's role in the early days of military aviation during WWI, and later its adaption during the Cold War to accommodate the V-force bombers required to project Britain's ambitions as a nuclear power. Systematic research carried out by Historic England during its Airfields Survey has also recognised RAF Scampton as one of the most complete surviving airfields of Bomber Command in the country. It is this preservation and the quality of the planning behind the creation and adaption of the base that is one of Scampton's most distinctive qualities. It is also something which has been lost or eroded at other bases within Lincolnshire and beyond through intentional post-war clearance or gradual loss and alteration.

The grave and the above ground memorial contribute to the significance of the Grade II Listed Hangar 2. This includes the archaeological interest of any surviving buried remains, which could shed light on the perception and treatment of animals during WWII, as well as the circumstances around the burial of one of the best-known RAF mascots. The memorial is also of considerable historical interest because of its association with 617 Squadron, Wg Cdr Guy Gibson, and the Dambusters Raid that coincided with the dog's death. The exhumation of the grave and the removal of the above ground monument would therefore harm the significance of the Grade II Listed Hangar 2. The local planning authority has a legal requirement under section 16 of the Planning (Listed Buildings & Conservation Areas) Act 1990 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", whilst the NPPF states that "great weight should be given to the asset's conservation...irrespective of whether any potential harm amounts to substantial harm" (section 16, paragraph 199).

The proposed removal of the memorial from its original location is also contrary to the NPPF's policy these heritage assets should be kept in their original location, even in cases of contested heritage: "in considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal" (section 16, paragraph 198).

The proposal could also be considered to go against the requirements of Policy S75 of the recently updated Central Lincolnshire Local Plan. This seeks to protect the historic environment of the RAF Scampton site holistically by requiring developers to consider the site as a whole through a masterplan-led approach to the future of the site.

Recommendation: It is recommended that the local planning authority should refuse consent for the proposed development in accordance with the requirements

of section 16 of the Planning (Listed Buildings & Conservation Areas) Act 1990, and paragraphs 198 and 199 of the National Planning Policy Framework, as well as Policy S75 of the Central Lincolnshire Local Plan. Piecemeal developments such as this proposal, which remove and erode aspects of character and heritage of RAF Scampton without consideration of the preservation or future use of the site as a whole could lead to erosion and eventual loss of RAF Scampton's heritage significance, which is of national and international importance.

In the event that the local planning authority is minded to grant consent it is recommended that prior to any groundworks the developer should be required to commission a Scheme of Archaeological Works (on the lines of 4.8.1 in the Lincolnshire Archaeological Handbook), in accordance with a written scheme of investigation (WSI) submitted to and approved in writing by the local planning authority. This should be secured by appropriate conditions to enable heritage assets within the site to be recorded prior to their destruction. Initially, I envisage that this would involve the recording of the above ground memorial site, followed by the hand excavation of the grave and exhumation of any zooarchaeological remains and any associated material under archaeological conditions.

The NPPF requires that material recovered from archaeological excavations carried out as part of the planning process to be deposited with a museum where they can be made publicly accessible (section 16, paragraph 205). The Lincolnshire Archaeological Handbook details requirements for this on excavations within the county and identifies the county museum in Lincoln as the usual place of deposition for archaeological archives. The developer's application does not make clear whether it is intended to rebury or retain any zooarchaeological remains at RAF Marham, and whether the integrity of the archive is to be maintained. Any future WSI should contain sufficiently detailed and enforceable plans for post-excavation analysis by named specialists and the long-term conservation of any remains uncovered in a publicly accessible archive or museum. If reburial is proposed then details of the proposed location, and a clear justification should be provided for how material will be selected for retention, reburial, or discard.

"Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. **However, the ability to record evidence of our past should not be factor a in deciding whether such loss should be permitted**" National Planning Policy Framework, section 16, paragraph 205.

Historic England:

Summary

The application affects the grave of Wing Commander Guy Gibson's black Labrador dog, buried near to the Grade II listed hangars at RAF Scampton. The grave is not listed in its own right; your authority has decided that the grave should be considered as a curtilage listed structure to the Grade II hangars and thus listed building consent is required for the proposed works.

RAF Scampton is the most famous base in the story of Bomber Command, 617 Squadron and the Dam Busters raid. Guy Gibson's dog was an important mascot for 617 Squadron and Gibson's previous squadron, supporting morale for personnel under extraordinary pressure. The dog's story, death and purposeful burial adjacent to Hangar no 2 and near Guy Gibson's office is inextricably linked to that wider national story and is focussed on Scampton.

This application proposes the total removal of the dog's grave and the excavation of his remains, with their relocation to RAF Marham the current home of 617 Squadron. Given the contribution made by the grave to the history and legend of the base, its removal would cause some harm to the significance of the Grade II listed hangars and the wider heritage significance of RAF Scampton as a place.

Significance

The list description for the hangars at Scampton provides a good overview of the importance of Scampton during the Second World War and the Cold War and the history and importance of Bomber Command and 617 Squadron as part of that. In summary, Scampton was Bomber Command's most famous base during the Second World War. It is the base from which 617 Squadron undertook the Dam Busters raids and is thus an essential part of the story of technical innovation, heroism and military strategy represented by those raids and the wider role of Bomber Command. As the Second World War progressed, heavy bombers were of increasing importance as the main means of striking Germany and military targets in occupied Europe. The famous Dam Busters raid demonstrated the ability of bomber strikes to achieve precision. The increasing use of bombers was associated with heavy loss of life - out of 125,000 personnel who entered Bomber Commands Units an estimated 50,000 died, whilst German civilian deaths are estimated at up to 593,000.

The story of 617 Squadron, Wing Commander Guy Gibson and the Dam Buster raids is well known. Guy Gibson's black Labrador dog is a part of that story. Gibson's dog was with him in his previous squadron (106) as well as 617 and was considered as a much-loved squadron mascot. Mascots played an important role for service personnel, isolated from wider family and friends and facing the strong possibility of death. A mascot (and dogs were a popular choice) provided a focus for affection, being treated with titbits, often travelling with the squadron, and providing love and companionship in return. It is sobering to remember that many bomber command personnel were very young - Gibson himself was only 26 when he died in 1944 - an affectionate mascot played an important role in morale and supporting young crews under immense pressure.

Gibson's dog was killed on the day of the famous raid in a road accident. The dog was buried at midnight the same day whilst Gibson was on the raid. The placement of the grave appears very deliberate - adjacent to Hangar 2, the home of 617 squadron and Gibson's office, maintaining that close link between the mascot and the squadron. In conclusion Guy Gibson's dog played an important role as a squadron mascot at Scampton, he died at Scampton and was purposefully buried at Scampton, with the grave being commemorated by a stone and later railings.

The grave is thus significant as part of the story of Scampton, Bomber Command, 617 Squadron, Guy Gibson and the Dam Busters raid.

Impact

The proposal is to remove the gravestone and railings that mark the grave of the dog and to excavate any remains, relocating the remains, railings and stone to RAF Marham, the current home of 617 Squadron. The proposal would entail the complete loss of the grave, any remains and associated markers from Scampton, the place to which they are fundamentally tied.

The removal of the grave and dog's remains would cause some harm to the significance of the Grade II listed hangars through removal of an element which is part of the history of the hangars and their important role in World War II, and a part of the history of the airfield as a whole.

Policy

When considering the application, we would draw your attention to the statutory duty of the local authority set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Under section 66(1) the local planning authority has a statutory duty to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Section 2 of the National Planning Policy Framework (NPPF) sets out three objectives which seek to ensure sustainable development. Protecting and enhancing the historic environment is an integral part of these objectives.

Section 16 of the NPPF describes heritage assets as 'an irreplaceable resource' that should be conserved in a manner appropriate to their significance, for existing and future generations to enjoy (paragraph 189).

Any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification (paragraph 200). Whilst para 202 states that less than substantial harm should be weighed against the public benefits associated with a proposal in determining an application.

Position

Historic England considers this proposal harmful to the significance of the listed hangars of RAF Scampton. Whilst we support the aim of protecting the heritage of Scampton we believe that in this case the proposed means of achieving that is not justified.

As discussed above, the story of Guy Gibson's dog is part of the wider story of Bomber Command, Wing Commander Guy Gibson and the Dam Busters Raid, all of which are centred at Scampton. The dog's grave is deliberately placed at Scampton in close association with Hangar 2 and Guy Gibson's office.

The loss of Guy Gibson's dog's grave would harm the significance of Number 2 hanger, a building listed at Grade II. The dog's role as a mascot, its life and death and deliberate burial adjacent to no 2 hangar, is part of the history and significance of the listed hangars. Furthermore, the loss of the dog and its grave reduces the heritage significance of Scampton more widely as a place.

Harm to the significance of the hangers runs counter to the NPPF's policy for the conservation of the significance of designated heritage assets (NPPF, 189). The requirement for clear and convincing justification is engaged by this proposal (NPPF, 200).

The justification presented for this proposal is explained in the submitted documents. The applicant is concerned there is uncertainty around the future management of the site, and the ability to protect the grave due to the proposed temporary use of the site by the Home Office for asylum seeker accommodation. However, it would be possible to protect the grave from any potential inadvertent damage through physical barriers, whilst the site will be staffed during the proposed temporary use. It is our understanding that the Home Office are already considering such measures to protect the grave and other heritage assets on site. Whilst the proposed use which has raised concerns for the applicant is temporary the solution proposed here is one which will permanently reduce the heritage significance and interest of Scampton. Thus whilst we also wish to protect Scampton's heritage, we are not convinced that the justification presented is the only means of achieving that protection.

Recommendation

In determining the application, your Council must weigh the harm consequent on the proposal against such public benefits it would secure (NPPF, 202). In this case, the weight to be given to public benefits may be lessened by the weakness of the justification, but in addition there is a further question over the benefits themselves. The applicants believe that the historic interest of the grave would best be served by its relocation, whereas we believe that relocation would reduce its historic interest, and that of the listed hangers and the wider site. There is, in this case, a genuine difference of opinion on this point.

Given this conclusion, Historic England would suggest that your Council invite the applicants to withdraw this application. If it is not withdrawn, we recommend that your Council refuse the application, unless you consider that the harm it would cause to the significance of the hangers would be outweighed by the public benefits it would secure.

LCC Highways/Lead Local Flood Authority: No objections. The proposal does not affect the Public Highway.

Assessment-

The Courts have accepted that Section 54A of the Town and Country Planning Act 1990 does not apply to decisions on applications for listed building consents since in those cases there is no statutory requirement to have regard to the provisions of the development plan. However, Local Planning Authorities are required to be mindful of their duty under the legal framework in determining such matters, i.e. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Any decisions relating to listed buildings and their settings must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (in particular Section 16).

Statutory Duties contained within the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990-

Section 16(2)² - In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall 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.

Referred to as **the 'Act'** within the following officer's report.

Other Material Considerations

- **National Planning Policy Framework (NPPF) Revised July 2021-**

This document states the Governments objectives for the historic environment and the rationale for its conservation. It recognises the unique place that the historic environment holds in England's cultural heritage and the multiple ways it supports and contributes to the economy, society, and daily life. Tests are identified within Section 16 of the framework to ensure that any damage against the historic environment is permitted where it is properly justified. Here, paragraphs 198, 199, 200, 201 and 202 are particularly relevant.

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- **National Planning Policy Guidance (NPPG)**

Paragraph ID 18a- Conserving and Enhancing the Historic Environment

<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

<https://www.gov.uk/government/collections/planning-practice-guidance>

Main issues

- Preliminary Matters;

² <https://www.legislation.gov.uk/ukpga/1990/9/section/16>

- Summary of special significance and historical value of Designated Heritage Asset(s);
 - *Curtilage Listed grave.*
 - Assessment of the Proposal;
 - Conclusion.
-

Preliminary Matters

For the purposes of clarity, it is pertinent to note that the application is for **Listed Building Consent** to relocate the grave, railings and any zooarchaeological remains of the black Labrador of Wing Commander Guy Gibson. This is not an application for **Planning Permission** where the policies within the Development Plan, in this case comprising of the Central Lincolnshire Local Plan 2023, are to be taken into consideration in the determination of the application. It is noted that many of the objections received from members of the public make reference to the provisions and policies within the Central Lincolnshire Local Plan, specifically Policy S75: RAF Scampton, which relates to a master plan for the site and the protection of its heritage.

As stated above, the Local Planning Authority must be mindful of their statutory duty contained within Section 16(2) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”).

The following report is therefore based on Section 16(2) of the Act, taking into account the special regard of preserving the building or its setting or any features of special architectural or historic interest it possesses. The provisions of the National Planning Policy Framework, specifically Section 16 of the Framework, is also relevant as set out in the Other Material Considerations section above.

Summary of special significance and historical value of Designated Heritage Asset(s)

RAF Scampton is a heritage site of national and international importance, not only for its role during WWII, but also for the site’s role in the early days of military aviation during WWI and later its adaption during the Cold War to accommodate the V-force bombers required to Britain’s ambitions as a nuclear power. Systematic research carried out by Historic England during its Airfields Survey has also recognised RAF Scampton as one of the most complete surviving airfields of Bomber Command in the country. It is this preservation and the quality of the planning behind the creation and adaption of the base that is one of RAF Scampton’s most distinctive qualities.

RAF Scampton is the most famous base in the story of the 617 Squadron and the Dambusters raid. The aircraft Hangars were listed for their special architectural and historic significance being some of the best surviving hangars of their type. They were first listed in 2005 and the official Historic England listing description³ for the

³ <https://historicengland.org.uk/listing/the-list/list-entry/1391594>

Hangars provides an in depth history, an extract from the description states the following:

The hangars at Scampton - built to house all the station's aircraft, and examples of the careful design that typified the Air Ministry in the period from 1934-9 - define its function as one of the bomber stations built for the Air Ministry in the period immediately prior to the Second World War, deployed in reaction to the threat from Germany. They are associated with what became Bomber Command's most famous base, and one which continued to evolve as a landscape for the projection of deterrent power against the Soviet Union in the Cold War period. The hangars are numbered 1 to 4, starting from the south, No. 2 Hangar retaining 617 Squadron's offices and having to the front the grave of Guy Gibson's Labrador which was killed on the eve of the Dambusters' Raid.

Wing Commander Guy Gibson's dog, a black Labrador was an important mascot for the 617 Squadron and as detailed above the grave site of the Labrador contributes to the wider significance of RAF Scampton. The relationship between pets and aircrew are well known, many squadrons had dogs as mascots, and the black Labrador would have been well known within the 617 Squadron. It is believed that the dog was killed by a car on the 16th May 1943, the day of the Dambusters raid. The dog was then buried on this day at midnight in front of Guy Gibson's office in Hangar 2, at his request, whilst he was leading his squadron on the attack against the Mohne and Eder Dams.

The 'Dambusters' Raid is a very well-known part of British military heritage that received significant interest at the time, and thereafter. As the Official List Entry states:

"It captured the imagination of the press and public at a critical moment in the war, making national heroes of Guy Gibson and his crews. It provided a huge boost to Bomber Command's morale and enabled Churchill, in Washington with his chiefs of staff for a meeting with Roosevelt, to both silence American critics and boost confidence among the Canadians who were contributing increasing amounts of air crews to Bomber Command."

It was even made into a well-known film in 1955 (Dir. Michael Anderson) starring Richard Todd and Michael Redgrave. Notably – the dog features throughout – it is an integral part of the public's understanding of the overall story.

Curtilage Listed grave-

[Section 1\(5\)](#) of the Listed Building & Conservation Areas Act 1990 sets out that;

"(b) any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948, shall... be treated as part of the [Listed] building."

Section 1(5A) (inserted in 2013) gives provision for the list entry to expressly exclude any such objects/structures within the list entry.

Historic England's *Listed Buildings and Curtilage Historic England Advice Note 10 (2018⁴)*, also sets out three key factors for considering curtilage listing. These are;

- *the physical layout of the listed building and structure;*
- *their ownership, both historically and the date of listing; and*
- *the use or function of the relevant buildings, again both historically and at the date of listing.*

The view of the Local Planning Authority is that the grave site of the dog is considered to be curtilage listed due to its physical and historic significance associated with Hangar 2 and Guy Gibson's office, and the overall historical significance of 617 Squadron and RAF Scampton. As previously detailed, the dog grave is also explicitly mentioned in the official listing description by Historic England.

Assessment of Proposal

Listed building consent is sought for the removal of the railings and grave marker of the black Labrador belonging to Wing Commander Guy Gibson. This will also include the removal of any zooarchaeological remains found and the relocation of all material to RAF Marham, the current home of the 617 Squadron, in Norfolk. The application is made on behalf of the RAF. Within the submitted documentation, the RAF state that they are concerned with the future preservation and protection of the grave site given the Home Offices' future proposals for RAF Scampton.

As the application concerns designated heritage assets (curtilage listed and principally listed), Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the 'Act') is particularly relevant. Section 16(2) requires the decision maker in considering whether to grant listed building consent for any works, 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.*"

Paragraph 198 of the NPPF states that; '*In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.*'

Paragraph 199 of the NPPF states that; '*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and 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.*'

⁴ <https://historicengland.org.uk/images-books/publications/listed-buildings-and-curtilage-advice-note-10/>

Paragraph 200 of the NPPF states that; *‘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. Substantial harm to or loss of:*

- a) *grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*

As previously discussed the story of Guy Gibson’s dog is part of the wider story of the bomber command and the Dambusters raid, all of which are centred at the Scampton RAF base. The grave is deliberately located in close association with Hangar 2 and Guy Gibson’s office, both of which are intrinsically linked. The dog’s role as a mascot, its life and death and intentional burial adjacent to no 2 Hangar, is part of the history and significance of the listed hangars, as well as the wider base. As a result, the total loss/removal of the grave marker, railings and zooarchaeological remains from this location would be contrary to the statutory duty contained within Section 16(2) of the Act in that it would not preserve the special historic interest that it possesses. It would instead result in a total loss of the special historic interest it holds.

Under Section 66(1) of the Act Local Planning Authorities have a statutory duty to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

It is considered that the loss of the grave site would also detract from the setting and thereby the significance of the principal Grade II listed Hangars, in particular Hangar 2. This significance includes the archaeological interest of any surviving buried remains. Whilst this consideration (the impact on the setting) in isolation, is beyond the scope of the considerations contained within Section 16 of the Act there is an obvious inter-relationship between the grave and the Hangar, thus forming part of its setting and significance.

It is considered that the loss would amount to heritage harm. Guidance on how to judge the level of harm is given in Section 16 of the National Planning Practice Guidance, ultimately it is for the decision maker to decide.

Paragraph: 018 Reference ID: 18a-018-20190723⁵

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to

⁵ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#assess-substantial-harm>

be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

It is noted that there is some difference of opinion on this matter from the heritage specialists. Historic England state that there is 'some harm' whilst the Council's Conservation Officer cites 'substantial harm'.

However, it is ultimately for the decision-maker to make such a judgment. With regard to the above discussion around the site and its significance it is considered by Officers that the level of harm in this case would amount to 'substantial', as the significance and historical interest in the grave would be totally lost if removed from its location, and it is a unique and integral feature to the significance of the Listed Building and its association with the nationally-renowned "Dambusters" raid.

Paragraph 201 of the NPPF states that; *Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

The National Planning Policy Framework does not define what public benefits are, however, further guidance is given within the Historic Environment Section of the National Planning Practice Guidance;

Paragraph 20 Reference ID: 18a-020-20190723⁶

The [National Planning Policy Framework](#) requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

⁶ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework ([paragraph 8](#)). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- reducing or removing risks to a heritage asset*
- securing the optimum viable use of a heritage asset in support of its long term conservation.*

It is considered by Officers that the proposed removal and relocation of the grave site would lead to substantial harm, through its historic significance no longer being linked to Hangar 2 and Guy Gibson's office. The statement submitted by the applicant states that the historic interest of the grave would be best served by its relocation. The statement does not give any justification on what economic, social or environmental public benefits would flow from the development that would outweigh the level of harm to the heritage significance that would arise from its total loss, nor demonstrates that criteria (a) to (d) of paragraph 201 of the NPPF have been met. For clarity, there are no public or any heritage benefits that the Officers have identified that would outweigh the level of harm identified, nor do Officers consider that criteria (a) to (d) of paragraph 201 of the NPPF have been satisfied. It is therefore your Officer's view that the test set out in paragraph 201 of the National Planning Policy Framework has not been met.

If the planning committee were minded to decide that the level of harm would be 'less than substantial' then the following test set out in the NPPF would apply.

Paragraph 202 of the NPPF states that: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

As above, however, there are no identified public benefits that would outweigh the harm that would arise from its complete removal and relocation.

Within the submitted Heritage Statement the justification provided by the applicant for the proposal is as follows;

'As there is now no guarantee of a sustainable heritage focussed future for Scampton with careful management and interpretation of the story of the raid and Wg Cdr Gibson's dog, we believe the grave site is at risk and carries

significant reputational risk given the racial slur now associated with the dog's name. We feel it would be better to return the marker and any remains to 617 Squadron. The dog was one of the Squadron's mascots and would take care of the story for the foreseeable future. Ideally the grave would remain at Scampton as part of the important story in the location hugely significant parts of the RAF, and indeed the Nation's, story but the future is now too uncertain to recommend this course of action'

The statement later concludes:

Given uncertainty over the future of the former RAF Scampton and the potential that future plans will not include interpretation and sharing the important heritage of the Station and its people has led to the requirement to seek permission to move the grave marker and any remains of Wg Cdr Guy Gibson's dog who was run over and buried on the night of Operation Chastise. As the RAF can no longer protect the heritage and whilst the grave falls within the curtilage of the Grade 2 listed No 2 C Type hangar a listed building consent application is required to facilitate the move of the grave to RAF Marham and 617 Squadron.

Uncertainty over the future of RAF Scampton is cited as the driving force in seeking to relocate the dog's grave to RAF Marham.

There is sympathy towards the applicant's position – there appears to be genuine concern as to their ability to secure the ongoing safety of the dog's grave, sitting within the curtilage of the listed hangar.

Para 200 of the NPPF requires clear and convincing justification for the loss of the significance of a designated heritage asset, it is considered that alternative methods to protect the grave site rather than its complete removal have not been fully investigated, nor evidenced by the applicant.

The Officer would like to bring the amount of public interest received to the committee's attention. The number of objections received by the Council has been significant. Many of the objections received state that the grave should not be moved due to its historic significance and association with Hangar 2, Guy Gibson's office and RAF Scampton as a whole. It is also noted that some of the objections received state that they understand the reasoning behind the application and that the grave should be located where the current 617 Squadron are now based. Considering this, together with the discussion above in that there has been no identification of the public benefits that would outweigh the level of harm by the applicant nor any identified by Officers, it is your Officer's view that the proposal would also not meet this test.

The dog's grave is intrinsically linked to Hangar 2 and the story of Operation Chastise – the history and role of RAF Scampton in the national war effort. It is considered by Officers that to relocate the dog's grave and memorial would lead to permanent harm to the Listed Building and its historic context and significance.

Whilst the Local Planning Authority sympathises with the justification given by the RAF for consent to remove and relocate the grave, in accordance with para 201 of the NPPF, the level of harm must be weighed against the public benefits, otherwise consent must be refused. In this case there is no public benefits that would outweigh or justify the permanent heritage harm to the dog's grave and RAF Scampton identified above.

Conclusion

In conclusion, it is your Officer's opinion that the complete removal and relocation of the Grade II curtilage listed dog grave would lead to harm to the Listed Building, its significance and context and would not preserve its special historic interest and is contrary to Section 16(2) of the Act. The removal of the grave would also cause harm to the setting of Grade II Listed Hangars, in particular Hangar 2. Having regard to the tests set out in paragraphs 200 and 201 of the National Planning Policy Framework, it is considered there are no identified public benefits that would outweigh the level of substantial harm.

Consequently, having given special regard to the desirability of preserving the building, its setting and features of historic interest, it is considered that listed building consent should be refused.

RECOMMENDATION:

Refuse Listed Building Consent for the following reason;

1. The proposal, comprising of the removal and relocation of the grave of the Wing Commander Guy Gibson's black Labrador would wholly remove the heritage value of this Grade II curtilage listed grave site, thus not preserving its special historical interest. Substantial harm would also be caused to the setting and significance of the principal listed buildings, being the Grade II Listed Hangars, specifically Hangar 2 containing Guy Gibson's Office as well as causing harm the heritage value of RAF Scampton as a whole. There are no identified public benefits that would outweigh the level of substantial harm that would arise from the proposals.

Having given special regard to the desirability of preserving the building its setting and features of historic interest in accordance with Section 16(2) of the Planning (Listed Building and Conservation Areas) Act 1990 and the provisions of paragraphs 198, 199, 200, 201 and 202 of the National Planning Policy Framework (2021), it is determined that listed building consent is refused.

Human Rights Implications:

The above objections, considerations and resulting recommendation have had regard to Article 8 and Article 1 of the First Protocol of the European Convention for Human Rights Act 1998. The recommendation will not interfere with the applicant's and/or objector's right to respect for his private and family life, his home and his correspondence.

Legal Implications:

Although all planning decisions have the ability to be legally challenged it is considered there are no specific legal implications arising from this report.

Appendix 1- Historic England Official List Entry- Hangars 1-4 (C-Type Hangars) ⁷

SCAMPTON

422/0/10003 RAF SCAMPTON 01-DEC-05 Hangars 1-4 (C-type Hangars)

GV II Aircraft hangars with annexes housing associated stores, workshops and offices. 1936-7. By J. H. Binge of the Air Ministry's Directorate of Works and Buildings, to drawing number 5043/36. Steel main frame and roof trusses, 14-inch reinforced concrete walls, turnerised slate roofing replacing asbestos slates.

PLAN: Four large sheds (including one repair shed) with full height steel doors at each end, running to external gantries. Single storey lean-to annexes, to hangars 2 and 3 rising to two storey squadron offices to the centre, which housed workshops, rest rooms and squadron offices.

EXTERIOR: The roof a series of transverse ridges with hipped ends, behind a parapet, and with deep apron above doors. The long side walls are in plain concrete with slightly worked surface. At mid height are 10 large 32-pane fixed steel casements separated by concrete piers, and with continuous sill and lintel bands. Above the windows a high parapet to flush coping. One bay at each end, also in concrete, is slightly brought forward in a 'Moderne' manner, and with a higher parapet; a tall single light with horizontal bars is centred to the bay. The end elevations have full height and width steel doors, with 12-pane lights at the top, under a deep projecting concrete rail carrying the rolling headgear; beyond the opening a light steel lattice beam projects out and is carried by a light steel strutted support, with steel ground-stops for the doors. Above the doors, and contained by the wing walls of the first bays, a deep apron with asbestos-cement slate hanging. The doors originally had sand or gravel fill between inner and outer sheeting at the lower panels, to enhance blast protection. Annexes have steel casements.

INTERIOR: Plain concrete floor, steel stanchions exposed internally carry deep lattice trusses in steel channel, double to top and bottom chords, set to the ridges of the transverse roofs and shaped to the hipped ends. At right angles to these are cantilevered members, in steel angle, at 15ft (4.6m) centres, meeting at and carrying the internal gutters. The bays adjoining the doors have horizontal wind-bracing members. The roof slopes are underlined in softwood square-edged boarding. Art Deco style talvstrades to stairs in hangars 2 and 3.

⁷ <https://historicengland.org.uk/listing/the-list/list-entry/1391594?section=official-list-entry>

HISTORY: The hangars at Scampton - built to house all the station's aircraft, and examples of the careful design that typified the Air Ministry in the period from 1934-9 - define its function as one of the bomber stations built for the Air Ministry in the period immediately prior to the Second World War, deployed in reaction to the threat from Germany. They are associated with what became Bomber Command's most famous base, and one which continued to evolve as a landscape for the projection of deterrent power against the Soviet Union in the Cold War period. The hangars are numbered 1 to 4, starting from the south, No. 2 Hangar retaining 617 Squadron's offices and having to the front the grave of Guy Gibson's Labrador which was killed on the eve of the Dambusters' Raid. Until the onset of perimeter dispersal from the late 1930s all the aircraft of an operational airfield - typically an omni-directional flying field of 1000 yards diameter - would be accommodated in its hangars: their construction took up a considerable part of the construction cost for a new site. As a consequence, military planners shadowed aircraft development through the planning and development of hangar buildings, a fact which underpins the importance of this group in the context of British air policy, which since the end of the First World War had been based on the philosophy of offensive deterrence. The C-type shed, which was built to accommodate workshops and squadron offices, was the standard hangar type for the post-1934 Expansion Scheme, originally designed in 1934 and of which 155 examples were built. Its dimensions (300ft long, 150ft span and clear height of 35ft), were intended to accommodate 100-ft span heavy bombers, enabling new specifications to be issued to aircraft manufacturers by the Air Ministry.

Nothing remains of the 3-squadron Training Depot Station which opened in July 1918 and closed in 1919. The site was completely rebuilt under Scheme C of the post-1934 expansion of the RAF, and was opened on the 27th of August, 1936, Heyford and Virginia bombers arriving from Aldergrove in October. It became, during the Second World War, one of the best-known RAF stations. Attacks on German shipping and ports, including minelaying operations and attacks on the Scharnhorst in June/July 1940, was followed by involvement in May 1942 in the first 1000-bomber raids after the introduction of Lancaster bombers two months earlier. The newly-formed 617 squadron, who arrived here in spring 1943 (and were based from No 2 Hangar), achieved worldwide fame under the command of Guy Gibson with their raid on the Ruhr dams in May. Operation Chastise, better known to millions as the Dambusters' Raid, pioneered the long-distance control by squadron commanders of precision operations, converting in the words of one historian (Terraine: 540) Bomber Command's tactics from those of 'a bludgeon into a rapier'. It captured the imagination of the press and public at a critical moment in the war, making national heroes of Guy Gibson and his crews. It provided a huge boost to Bomber Command's morale and enabled Churchill, in Washington with his chiefs of staff for a meeting with Roosevelt, to both silence American critics and boost confidence among the Canadians who were contributing increasing amounts of air crews to Bomber Command. Leonard Cheshire took command of 617 Squadron in October 1943, and spearheaded a series of raids on sites ranging from the rocket site at Peenemunde and the U-boat pens at Le Havre that developed the effectiveness of precision bombing. After the expansion of the airfield and construction of runways in the summer of 1944, Scampton continued to play an important role in the Strategic Bomber Offensive and the daylight raids in support of the Allied offensive in Europe. Scampton's enlargement and remodelling for the V-force bombers and its nuclear weapons (one of 10 Class One V-bomber bases remodelled in the late 1950s)

underpinned its continued importance during the Cold War and had a major impact on its landscape. This included the construction of a new main runway (the main WWII SW-NE runway has remained on its original axis), H-shaped dispersal platforms, an avionics maintenance building, a nuclear weapons store and an Operational Readiness Platform, to allow the bombers to be scrambled within a couple of minutes. The two 'T'-type hangars on the airfield, adjacent to the avionics building, were assembled at speed in order to accommodate the servicing facilities of the 'Blue Steel' rocket powered stand-off missile, delivered to the RAF in 1962 and fully operational by 1963. It was deployed to counter improving Soviet air defences which could engage high flying bombers before they reached their target. The facilities at Scampton reflect the urgent need to introduce this weapon and thereby maintain the credibility of the British nuclear deterrent.

The core of parent bomber stations - augmented by wartime satellites - which launched the Strategic Bomber Offensive against Germany were planned from 1923, initially under General Sir Hugh Trenchard, who ranks as the period's most strident advocate of the doctrine of offensive deterrence, and then as war threatened from 1934. A major feature in the Second World War was the construction of airfields with concrete runways for four-engined bombers such as the Lancaster. The heavy bomber was, as Churchill acknowledged, the only means - in the absence of an invasion of northern Europe - to take the war to German soil and divert resources from the Eastern Front. After Sir Arthur Harris's appointment as head of the Bomber Command in February 1942, and especially after the Casablanca conference of January 1943 - which postponed Overlord to the following year - even greater resources were committed by the US and British economies towards the bomber offensive. The bomber offensive was conducted at enormous cost to human life. Sir Arthur Harris's own estimates put Bomber Command's fatalities - out of 125,000 who entered its units during the war - at 50,000. Up to 593,000 German civilians died, the firestorms at Dresden and Hamburg accounting for tens of thousands of deaths as a result of single concerted raids.

Richard Morris, Guy Gibson, London, 1994; Operations Record Books, PRO AIR 28/681-91; John Terraine, *The Right of the Line. The Royal Air Force in the European War, 1939-1945* (London, 1985); Max Hastings, *Bomber Command* (London, 1979).