

6. LISTED BUILDING CONSENT: DEMOLITION OF EXISTING AMBULANCE STATION AND RIVERSIDE WARD BUILDING, PARTIAL DEMOLITION OF CART HOUSE AND WALL (GRADE II CURTILAGE LISTED) AND ERECTION OF NEW HEALTH CENTRE AND AMBULANCE STATION WITH ASSOCIATED INFRASTRUCTURE AND PARKING AT NEWHOLME, BAKEWELL (NP/DDD/1220/1232, TS)

APPLICANT: DERBYSHIRE COMMUNITY HEALTH SERVICES NHS FOUNDATION TRUST

Summary

1. This application is seeking listed building consent for the development of a new health centre and ambulance station on the site of the East Midlands Ambulance Service site and the site of the Riverside Ward.
2. The proposal is considered to be acceptable particularly in terms of impacts on amenity and heritage interests and it is recommended for approval.

Site and Surroundings

The application site is located to the north east of the middle of Bakewell on Baslow Road. It is opposite the main driveway of Aldern House, the main office of the Peak District National Park Authority.

The site is adjacent to the current Newholme Hospital which is a Grade II listed building and there are associated structures including the cart house and boundary walls which are curtilage listed by association. The site is partly within the Conservation Area.

The application site is surrounded by housing to the north and east on Aldern Way, Castle Drive and Castle Mount Crescent. These properties are laid out with gardens backing on to the application site.

The application site currently contains the Ambulance Station, built in the 1970's and with a separate entrance to Newholme Hospital, and the Riverside Ward which was built in the 1990's and is accessed from Newholme Hospital. The Riverside Ward is within the Conservation Area, but the Ambulance Station is just outside the boundary.

Proposal

1. The proposed Health Centre would facilitate the relocation of existing services from the existing Newholme Hospital site. The existing Newholme site is operating at 1/3 of its capacity according to the applicant and the listed buildings have a significant cost to the trust in terms of maintenance. The existing buildings have poor accessibility and layout and are not easily amended to meet requirements.
2. The new health centre is proposed to be smaller than the existing Newholme Hospital in terms of building massing and staff levels with 72 staff proposed to be based at the new site compared to 220 staff at the existing site (a decrease of 68%). A number of existing services will be transferred to the new health centre including podiatry, physiotherapy, mental health services, children's services and speech and language services.
3. It is proposed that the new health centre will have 54 car parking spaces.
4. The new health centre would be a multipurpose accessible building to meet the requirements of modern healthcare provision. It would also continue to be a base for the East Midlands Ambulance Service (EMAS).

5. The site area is 3,498m² and is irregular in shape. It is proposed to deliver the new health centre as an L shaped structure against the eastern and northern boundaries of the site.
6. The building proposed is has resulted from extensive pre application discussion. Externally the building incorporates traditional local materials with design features that reference the local building tradition but are delivered in a contemporary manner. The primary elevation would have a double gable arrangement with entrance between gables, and a double height offshoot to the north, forming the primary western elevation. Both of the L shaped wings have double ridgelines with a valley between which allows the provision of the necessary floor space without raising the ridgeline to an over dominant or otherwise unacceptable form. The ambulance service provision is proposed to be provided in a zinc clad 'bookend' feature. Some of the parking is proposed to be delivered in an undercroft, reducing the impact of parking on the locality and using the topography of the land to deliver this.
7. The building's ridgeline would be no higher than that of the Newholme hospital and would be two storey's high. It would be set against the eastern boundary of the site to diminish the impact it would have on the setting of the listed building and the conservation area.
8. Internally it is proposed that the ground floor comprises the main entrance into the building with staff facilities to the rear of the building and the EMAS garage, relevant rooms and accommodation for Derbyshire Community Health Services to operate to the left. The EMAS garage has been strategically positioned and designed to have easy access in and out of the site. The main entrance provides a spacious area for patients to enter and exit the building, and includes a toilet, Changing Places facility, transport waiting room, staircase and two lifts. The proposed first floor consists of a large waiting area and reception space, including a designated children's area. Also within the communal space are two toilets, a baby feeding and baby changing rooms. The consultation area would include: -
 - 10 consultation rooms
 - 4 treatment rooms
 - Waiting area
 - Group room
 - Toilet
 - Tea point.

To the left of the main reception lies an office space for staff.

RECOMMENDATION:

That the application be APPROVED subject to the conditions to control the following:

1. **Commence development within 3 years.**
2. **Carry out in accordance with specified amended plans and supporting information.**

3. **The car park the subject of the application shall not be laid out or brought into use until full details of layout and landscaping including:**
 - i) materials
 - ii) details of physical expression of historic boundary and
 - iii) alternative pedestrian entrance which does not break through the boundary wall immediately adjacent to the Carhouse is submitted to, and approved in writing by the Local Planning Authority

4. **Submit for written agreement full details of the landscaping scheme comprising both hard and soft external works together with implementation timetable. Scheme to include treatment of rear boundaries. Thereafter complete and maintain in full accordance with approved scheme.**

5. **Submit revised detailing for fenestration in:**
 - primary north western elevation windows on the gables
 - Replacement of triple opening on south west elevation with double opening of reduced size.
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6. **Approval of sample panels of stone, external paving, surfacing, zinc and roofing materials.**

7. **Approval of door and window details/finishes.**

8. **Specify minor detailed design matters e.g. Rain water goods, other joinery details.**

9. **No development shall take place until a Written Scheme of Investigation for a scheme of archaeological monitoring and recording has been submitted to and approved by the local planning authority in writing.**

Key Issues

- The principle of development
- The scale and massing of the building
- The impact of the building on listed structures and the conservation area

Planning History

9. The Newholme Hospital site has an extensive history of planning, advertisement consent and listed building applications associated with minor changes to the buildings and site. None have particular relevant to this application.

Consultations

10. **Bakewell Town Council** – Support the development due to benefits to the community. Raise concerns about:
 - Industrial nature of cladding on Ambulance Station
 - Light pollution

- Inadequate parking
- Protection of culvert

11. **Historic England** – Do not wish to make comments, advise that the we week advise from our Conservation specialists.

12. **PDNPA Cultural Heritage Team** – *“There is no objection to the proposal to demolish the existing ambulance building. I agree that this building does not enhance the setting of the Conservation Area; the hospital site is perceived as ‘gateway’ site to the Conservation Area and improvement of this site would be an enhancement.*

The proposal documents the significant design improvements that have been made to better reflect the character and importance of the adjacent hospital site, the listed buildings and their setting.

There remain some areas for concern about the changes to the plot layout, coherence and symmetry and impact upon curtilage listed structures and careful weighing up of the planning balance will be needed (in particular, with reference to our policies DCM5, DCM7, DCM8).

1.1 Demolition of northern boundary wall

This wall has been identified as being in the curtilage of the Grade II listed building of Newholme Hospital, and thus falls under the listing of that building (also often referred to as being ‘curtilage listed’). I agree with this assessment. The northern and western (frontage) wall were original parts of the site development; the former workhouse was built away from the main centre of Bakewell on land surrounded by fields. This is clear from historic mapping.

The proposed development relies on the removal of the northern wall to allow car parking and construction of the new building to straddle the currently separate land plots. The demolition plan shows the removal of the wall along its entire length within the red line boundary. It is not clear why the eastern section of the wall needs to be removed at all; indeed, some of it appears to fall outside the red line boundary.

1.1.1 Impact upon the wall itself

I consider that removal of the northern wall, or a significant length of it, would constitute substantial harm to the significance of the wall itself. I agree with the Heritage Statement that the wall does not have the same significance as the principal listed building, but it does fall within its curtilage and forms an integral part of the complex. Loss of a Grade II asset should be ‘exceptional’ (NPPF Para 194) and the planning balance and substantial public benefit would need to be achieved (NPPF Para 195) to outweigh this (and see Development Management Policy DMC7).

1.1.2 Impact on Conservation Area

The wall forms the northern edge of the Conservation Area. The hospital site lies within a pocket of Conservation Area surrounded by more modern residential properties and the wall makes a very clear demarcation between these distinct areas of historic institutional and recent residential character.

I consider that removal of the northern wall, or a significant length of it, would constitute less substantial harm to the significance of the Conservation Area and it would fall at the low point on this scale (see also Development Management Policy DMC8).

1.1.3 Impact on the setting of Newholme Hospital

I consider that removal of the northern wall, or a significant length of it, would constitute less than substantial harm to the setting of the listed buildings on the hospital site. This boundary originally formed a clear division between what was open land beyond the confines of the former workhouse development. Whilst the open land has since been built on (at least, to the east of Baslow Road) the boundary is still well defined. The site layout has important symmetry and formality (see section 1.4 below). This would be eroded by the proposal, although it is also true that the key part of this symmetry, with relation to the listed hospital buildings, would be impacted to a lesser degree – the proposal lies within a former ancillary area of the site, not within the more formal landscaped layout surrounding the principal building.

1.2 Frontage wall – insertion of pedestrian entrance

This wall adjoins the gable end of the cart shed and forms a robust corner to the hospital site. The wall is fairly high here, especially compared to the height of the wall on the ambulance site frontage. Inserting an entrance would erode the strength of the hospital frontage. I consider that this would constitute less than substantial harm to the significance of the wall itself, on the low end of this scale. It would be beneficial if an alternative location for a pedestrian entrance could be found.

1.3 Partial demolition of cart shed

1.3.1 Impact on the cart shed

The former cart shed has been identified as being in the curtilage of the Grade II listed building of Newholme Hospital, and thus falls under the listing of that building. I agree with this assessment.

The proposed development requires the demolition of almost half of the cart shed (two bays out of five) and the rebuilding of the eastern gable end in the new gable location – I note that the angle of the original gable would not be re-created in this process (as per Drawing 0211).

The cart shed has historic interest, relating to the use and function of the former workhouse site. The size of the cart shed itself provides important information about the use of the site and the level of facilities that were needed to service the building complex. Any potential archaeological interest of the structure has not been addressed in the Heritage Statement.

The architectural interest is modest, as expected of a utilitarian structure. The modern extension is harmful and its removal would be an enhancement, as would be bringing it into better/regular use. Its character and contribution to the built environment could be better articulated if it was more easily seen and maintained in good condition.

I consider that demolition of almost half the cart shed would constitute substantial harm to its significance. I agree with the Heritage Statement that the cart shed does not have the same significance as the principal listed building, but it does fall within its curtilage and forms an integral part of the complex and its original use. The relationship of the cart shed to its principal listed building would also be wholly severed by the building of a new boundary wall to the south of the development site.

Loss of a Grade II asset should be ‘exceptional’ (NPPF Para 194) and the planning balance and substantial public benefit would need to be achieved (NPPF Para 195) to outweigh this (and see Development Management Policy DMC7).

1.3.2 Impact on the Conservation Area

The cart shed and the adjoining walls frame this corner of the Conservation Area. The long ‘blank’ rear (northern) cart shed wall is very visible on the approach to the site from the north, as one travels downhill along Baslow Road. This is shown well in Plates 4 and 8 of the Heritage Statement. Plate 8 also illustrates how the Newholme Hospital building rises up behind the low roof of the cart shed giving a glimpse of the formal hospital frontage before it is more fully revealed as one approaches the site.

I consider that demolition of almost half of the cart shed would constitute less than substantial harm to the significance of the Conservation Area and it would fall at the low point on this scale (see NPPF Para 201 also Development Management Policy DMC8).

1.3.3 Impact on the setting of Newholme Hospital

The cart shed was an integral part of the former workhouse site from its inception. I consider that demolition of almost half of the cart shed would constitute less than substantial harm to the setting of the listed buildings on the hospital site through the partial loss of former ancillary service building and through the erosion and loss of integrity of the site boundary. The physical relationship between the two buildings would be severed by the insertion of a new boundary between them.

1.4 Overall plot layout and boundary changes

The formality of the building design, historic planned layout and landscape setting of the hospital site is of high significance.

I understand that the flow of traffic around the proposed ambulance site depends on partial demolition of the existing boundary wall and the cart shed. The impact of changing the plot boundaries has not been addressed in the Heritage Statement. Given that the site has been modelled it would also have been beneficial to have more visualisations submitted as part of the proposal.

I would like to know if the sufficient parking could be achieved with another layout, and if the cart shed could function as bin store, cycle shed and housing for the substation, removing the need for these new structures along the frontage of the site.

The new boundary wall to the south of the development is shown on the cycle store Drawing 2004. This implies a new wall that is taller than the existing street frontage wall. This will alter the symmetry of the hospital site – currently the listed hospital building lies centrally within its plot – and it will separate the cart shed from its principal building.

There will be a narrow strip of land left in between the new boundary wall, and the existing wall that currently forms the southern enclosure of the parking area to the cart shed.

1.5 Massing/scale

Several design iterations have been developed to try and create a new facility that holds sufficient space to be viable, whilst respecting the scale of the existing listed buildings on the hospital site. There does not seem to be a plan showing the new building in relation to the hospital building, but the Design and Access Statement notes that it sits further back than the existing ambulance station, along the same line as Newholme Hospital which is welcomed. The height of the building apparently does not exceed the hospital (although I cannot see a height of the ridge on the new building, on Drawing 0220).

1.6 Impact on Burre Cottage and Aldern House

Burre Cottage has been identified as a non-designated heritage asset, probably related to the original development of the former workhouse site. Aldern House (eastern part) is Grade II listed.

The proposed changes detailed above, and the wider scheme, will not alter the significance that the setting contributes to these assets to any greater degree than the development that is already present. The relationship of the asset to the hospital site will remain although views into the hospital site will be altered by the new components.

2 Archaeological issues

2.1 Archaeological sensitivity and significance of the site

The Heritage Statement identifies some archaeological sensitivity on the site and suggests the potential is low, and relating to buildings of the original workhouse site that have been lost.

Pre-application advice was clear that an archaeological sensitivity plan would be required, although this has not been provided. The ground levels change quite significantly over the site and archaeological preservation is likely to be variable. Remains relating to former buildings on the site would be considered of local interest.

2.2 Archaeological impact of the development

The impact cannot be fully assessed with the information provided, and the constraints of the site (upstanding buildings etc) mean that it would be impossible to evaluate the site in its current state. On balance, given the potential significance and levels of disturbance that have occurred on parts of the site, the preservation of any buried archaeological remains 'by record' would be an acceptable form of mitigation.

Representations

13. Friends of Bakewell Hospitals – support to proposal to retain and enhance health services in the locality.
14. Five local residents have made representations. The representations are general comments, rather than objections, but raise concerns about the following issues:
 - 5m high lighting poles proposed and the impact of their amenity. They ask for these to be replaced with bollard fittings and timings for external lighting to ensure that this is not left on overnight and at weekends if the health centre is closed.
 - The possible use of residential roads by people parking to access the health centre. They would like to see a residents parking scheme introduced on nearby roads.
 - They also consider that pedestrians may be at risk from speeding vehicles on Baslow Road. They consider the turn from Aldern Way should have double yellow lines to improve safety of the junction.
 - They raise concerns about use of the site entrance by emergency vehicles and normal traffic. And consider there is insufficient provision of space for ambulances and staff parking.
 - They do however like the design of the building and consider it an improvement from the current ambulance facility.

- Concerns have also been raised about design and appearance and parking.
- Concerns have been raised that zinc is a non-traditional material which would have an unacceptable impact on the conservation area.
- In addition the representation raises concerns that more parking is needed to accommodate staff and that the transport assessment is inaccurate. They propose that residents parking schemes and speed management measures are necessary.

National Planning Policy Framework (NPPF)

15. National Park designation is the highest level of landscape designation in the UK. The Environment Act 1995 sets out two statutory purposes for national parks in England and Wales: Which are; to conserve and enhance the natural beauty, wildlife and cultural heritage and promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public. When national parks carry out these purposes they also have the duty to; seek to foster the economic and social well-being of local communities within the National Parks.
16. The National Planning Policy Framework (NPPF) has been revised (2019). This replaces the previous document (2012) with immediate effect. The Government's intention is that the document should be considered as a material consideration and carry particular weight where a development plan is absent, silent or relevant policies are out of date. In particular Paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, which have the highest status of protection in relation to these issues.
17. In the National Park, the development plan comprises the Authority's Core Strategy 2011 and the Development Management Policies (DMP), adopted May 2019. These Development Plan Policies provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. In this case, it is considered there are no significant conflicts between prevailing policies in the Development Plan and government guidance in the NPPF.
18. With regard to the historic environment para 193 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. Para 195 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.

Main Development Plan Policies

Core Strategy

19. GSP1, GSP2 - *Securing National Park Purposes and sustainable development & Enhancing the National Park*. These policies jointly seek to secure national park legal purposes and duties through the conversion and enhancement of the National Park's landscape and its natural and heritage assets. Policy GSP1 E states that in securing

national park purposes major development should not take place within the Peak District National Park other than in exceptional circumstances. Major development will only be permitted following rigorous consideration of the criteria in national policy. GSP2 states that opportunities should be taken to enhance the valued characteristics of the National Park. This is expanded in policy L3 relating to the conservation and enhancement of features of archaeological, architectural, artistic or historic significance.

20. GSP3 - *Development Management Principles*. Requires that particular attention is paid to the impact on the character and setting of buildings and that the design is in accord with the Authority's Design Guide and development is appropriate to the character and appearance of the National Park.

Development Management Policies

21. Policy DMC3 expects a high standard of design that respects, protects and where possible enhances the natural beauty, quality and visual amenity of the landscape.
22. Development Management policy DMC5 states that applications affecting a heritage asset should clearly demonstrate its significance including how any identified features will be preserved and where possible enhanced and why the proposed works are desirable or necessary. Development of a heritage asset will not be permitted if it would result in harm to, or loss of significance character and appearance unless the harm would be outweighed by public benefit. DMC8 states that planning applications involving a Registered Park and Garden and/or its setting will be determined in accordance with policy DMC5.
23. DMC7 aims to ensure that development preserves the character and significance of listed buildings.
24. DMC8 requires that proper consideration is given to the qualities of the conservation area and that its character and appearance is properly evaluated.

Assessment

Design and Appearance

25. The proposed building is the result of extensive pre-application discussions held over a considerable period of time. The application sets out how the design has developed, primarily to address concerns about scale and massing.
26. Typically in the Peak District, buildings of this size are agricultural or industrial. The only traditional buildings of this size are mills and country houses. It is important that the design is not a pastiche of a mill or country house and also that it does not diminish the prominence and setting of Newholme Hospital as a listed building. In line with the Design Guide, the building needs to be contemporary but respect its setting and reference the local building tradition. This is a difficult balance to achieve.
27. It is important that the building is easily understood and used by members of the public and that it is readable as a public building.
28. The building proposed by the application is an L shaped structure against the east and northern boundaries of the plot. Both parts of the L have a double pitch with a valley

- between, effectively creating a parallel range. This allows the building to deliver the volume of floor space required without the ridgeline exceeding the ridgeline of Newholme Hospital.
29. The Ambulance Service provision is proposed to be delivered in a 1.5 storey element at the northern end of the primary elevation. It is proposed that this element have less traditional form and detailing and be a flat roof addition in a contemporary form. It is considered that in terms of massing this is a very small part of the development and its appearance helps to reduce the massing of the elevation and adds a contemporary element that is not dominant or obtrusive.
 30. The double pitch with valley is not a typical feature of the Peak District in most domestic architecture which tends to be simple with uncomplicated gables. However, the building is not a domestic building and its massing is too large to lend itself to the simple domestic form easily.
 31. The massing of the building is broken up with the entrance at the front elevation on the outward corner of the L between a double gable feature. The gables have dual pitches with a glazed and canopied entrance between. The gables add interest to the elevation and give a clear prominence to the entrance, suitable for a public building.
 32. The return of the L on the southern part includes a small break and reduction in ridgeline to break the massing. The rear part includes undercroft parking, using the rise of the land to deliver this.
 33. The longer stretches of the L are traditionally detailed with appropriate volumes of glazing delivered in a traditional form with larger windows beneath and smaller windows above.
 34. On the south west elevation a larger opening is proposed, which is considered to be incongruous and would be better delivered with a dual opening. This can be secured by condition.
 35. The rear elevations are simply detailed with modest fenestration.
 36. The predominant materials proposed are traditional to the Peak District, helping to ensure that the development would appropriately reference its setting.
 37. The primary elevation is proposed to be primarily split faced limestone with random coursing and gradation of sizing. Windows are proposed to have gritstone surrounds and detailing of the entrance in gritstone, glazing and zinc.
 38. The gables are proposed to have a ashlar gritstone surround framing each of the gables and having the effect of visually narrowing the gables – a welcome feature.
 39. The southern return of the L shape after the ridgeline break is proposed to be constructed primarily from gritstone with random coursing and gradation of size. This will also have gritstone detailing on windows and openings. The mixed use of primary materials will have a significant role in reducing the massing of the building and also reflects the mixed use of materials in Bakewell as described in the Building Design Guide. This is a central feature to the success of the scheme.

40. The flat roofed contemporary part of the building proposed to house the ambulance service is to be provided in zinc cladding. There has been some concerns raised about this from the Town Council and some representations.
41. In this case the use of zinc breaks up the primary elevation and helps to avoid a very laboured horizontal emphasis, which would be unacceptable. The ambulance service element of the building is effectively garaging and a more utilitarian material is appropriate here. The shape of this element is contemporary with the flat roof and the use of contemporary materials is an honest and appropriate solution. The colour of the zinc will need careful consideration, and the detail of that can be reserved by condition.
42. In line with policies GSP3 and DMC5 the development is considered to be appropriate in terms of scale and massing. The design is contemporary but makes appropriate references to the local vernacular and the materials also will ensure that the development will make a positive addition to Bakewell.

Cultural Heritage Impacts

43. As noted above, the site is partly within the Bakewell Conservation Area, several of the buildings within the wider Newholme site are individually listed and the site also contains other historic buildings that are not individually listed but that are considered to be curtilage listed buildings.
44. The existing EMAS and Riverside Ward buildings that would be demolished are modern structures of no historic merit. They are not individually listed or curtilage listed buildings. They make no particular positive contribution to the setting of the historically-important buildings either. As such, the proposed demolition of these buildings would not result in any harm in terms of the impact on heritage assets within the site and the Bakewell Conservation Area. Indeed, the development presents an opportunity for enhancement in this respect.
45. The site is an important gateway to the town and the Conservation Area. Overall, the replacement of the existing buildings with the proposed new building would improve the appearance of this part of the site and would enhance the entrance to the Conservation Area.
46. The proposal does however directly impact a historic cart shed that lies close to the Baslow Road site boundary. This is a curtilage listed building. In order to provide sufficient car parking and circulation space, it is proposed to demolish part of the curtilage listed cart shed. This would clearly result in harm to the significance and character of the curtilage listed building. The proposed works in this area also include the removal of a boundary wall that currently separate the Newholme and EMAS sites. This is a historic wall that is understood to be part of the original Newholme development. The removal of this wall would also result in significant harm. This issue therefore must be given considerable weight in the planning balance.
47. Our Cultural Heritage Team has advised that the harm to the cart shed would be above the substantial threshold. The NPPF makes it clear that substantial harm to listed buildings should only be approved in truly exceptional circumstances when it is in the public interest to do so.
48. As discussed above, the provision of the health care facilities here is a very important public benefit. Alternatives to demolishing part of the cart shed have been thoroughly explored. Ultimately though, the conclusion has been reached that the demolition is essential to allowing the development to go ahead and an insistence on the retention of

the cart shed would be highly likely to jeopardise the continued provision of health care facilities on the scale proposed at the site.

49. As there is no alternative, it is necessary to weigh the harm against the public benefits of the health care development going ahead. A balanced view must therefore be taken. In most cases, a development proposal that involves the demolition of a large part of a listed building would be unacceptable because the threshold for justifying the harm this would cause is very high indeed. In most cases, the public benefits would not outweigh the harm to the heritage asset. However, in this particular case, the public benefits of providing health care facilities are so important that the substantial harm is considered to be justified.
50. Whilst we have no doubt that the harm to the cart shed when the impact just on that one building in isolation is taken into account would be above the substantial threshold, it is also necessary to consider the impact on the cart shed in the context of the wider Newholme site. Given that the primary listed buildings would be unaffected, the view can be taken that the impact on the whole Newholme site would be below the substantial threshold. Any harm still requires clear and convincing justification and must be outweighed by public benefit, but looking at the impact both on the cart shed individually and in the context of the wider site helps with the formation of a balanced judgement.
51. Overall, in our view, the substantial harm to the cart shed and the less than substantial harm this causes to the wider site is clearly outweighed by the public benefits the development would deliver, these public benefits amount to the exceptional circumstances that are required to justify the substantial harm.
52. As well as the demolition of part of the cart shed, the scheme as originally submitted proposed the puncturing of the site boundary wall immediately next to the cart shed in order to provide a pedestrian access. The western gable end of the cart shed runs into the boundary wall on the site frontage. The gable end of the cart shed and the wall together form a strong feature of the site frontage, puncturing the boundary wall in the position proposed would be harmful. Whilst the removal of part of the cart shed is essential to allow the development to happen, the removal of part of the boundary wall is not as there is clear potential to provide an alternative pedestrian access further to the north, outside of the Conservation Area and without affecting this sensitive part of the site frontage. The applicant has agreed to omit the puncturing of the wall on this part of the site frontage and a condition is proposed for an alternative pedestrian access to be submitted and approved, the applicant has provided initial details of a pedestrian footbridge over the culvert to provide access further to the north. This would be a viable and acceptable alternative.
53. In terms of the impact on the setting of the principle listed buildings within the site, notwithstanding the harm caused by demolition of part of the cart shed, it is noted that the development lies within an ancillary area of the site, and not within the more formal landscaped areas around the main listed buildings, The scale and design of the proposed new buildings would not undermine the significance of the principle listed buildings and it is considered that the impact in this respect would be acceptable.
54. In terms of the impact on archaeological heritage assets, The Heritage Statement identifies some archaeological sensitivity on the site and suggests the potential is low, and relating to buildings of the original workhouse site that have been lost.
55. The ground levels change quite significantly over the site and archaeological preservation is likely to be variable. Remains relating to former buildings on the site would be considered of local interest.

56. The impact cannot be fully assessed with the information provided, and the constraints of the site (upstanding buildings etc.) mean that it would be impossible to evaluate the site in its current state. On balance, given the potential significance and levels of disturbance that have occurred on parts of the site, the preservation of any buried archaeological remains 'by record' would be an acceptable form of mitigation
57. Overall, it is fully acknowledged that the proposed development would cause harm to the heritage value of the site through the demolition of part of the cart shed and the northern boundary wall. However, this harm has been fully justified and is outweighed by the public benefits that the development would deliver. The proposal therefore accords with policies DMC3, DMC5, DMC7, DMC8 and the guidance within the NPPF.

Conclusion

58. The scheme would result in harm to heritage assets. However, it has been demonstrated that the public benefit of providing a new health centre clearly outweighs the harm to heritage assets. The proposal therefore accords with local policy and the guidance within the NPPF. The application is recommended for approval.

Human Rights

59. Any human rights issues have been considered and addressed in the preparation of this report.
60. List of Background Papers (not previously published)
61. Nil

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