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Belper Health Centre Development Planning Statement

Derbyshire Community Health Services NHS Foundation Trust

June 2022

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1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of the Derbyshire Community Health Services NHS Foundation Trust [the Applicant/ the Trust] in respect of the site of the Babington Hospital, Belper [the Site]. The purpose of this Planning Statement is to assist officers at Amber Valley Borough Council [the Council] in their consideration of an application for full planning permission for the:

1.2 'Demolition of existing health clinic and construction of a new health centre, access and internal road layout, substation, landscaping and associated works in a Conservation Area'

Derbyshire Community Health Services NHS Foundation Trust: Background and Requirements

1.3 The Derbyshire Community Health Services NHS Foundation Trust was established in April 2011 and is the largest provider of mental health, learning disabilities, and substance misuse services in Derbyshire, serving a population of approximately 1 million people across Derbyshire and Derby city. The Trust has approximately 4,300 staff, as one of the largest providers of specialist community health services in the country.

1.4 It is estimated that the current Belper Clinic was constructed in the 1930s as a maternity ward and the Clinic served this role for an extended period of time. The Belper Clinic and the wider Babington Hospital building remain outdated and can no longer provide medical services fit for the 21st Century. The NHS Trust seek the demolition of the existing Clinic and the construction of a larger, improved health clinic that will improve the quality of healthcare service provision, as well as integrating services lost under the proposed residential redevelopment of Babington Hospital.

1.5 The planning application is accompanied by the following documents:

1. Application Form and Certificates
2. A Suite of Plans and Drawings [Race Cottam Associates/ Eammon Byrne Landscape Architects]
3. Planning Statement [Lichfields]
4. Design and Access Statement [Race Cottam Associates]
5. Heritage Impact Assessment [Lichfields]
6. Air Quality Assessment [IDOM Merebrook Limited]
7. Arboricultural Impact Assessment [Barton Hyett Associates]
8. Architectural and Archaeological Assessment [Richard K Morriss & Associates]
9. Bat and Badger Surveys [Udall-Martin Associates]
10. Biodiversity Metric 3.1 [Udall-Martin Associates]
11. BREEAM Assessment [Stroma Built Environment]
12. Drainage Strategy [Eastwood & Partners]
13. Preliminary Ecological Appraisal [Udall-Martin Associates]
14. Proposed Staff Occupancy Data [Derbyshire Community Health Services NHS Foundation Trust]

15 Energy Statement [EP Consulting]

16 Flood Risk Assessment [Eastwood & Partners]

17 Noise Impact Assessment [Stroma Built Environment]

18 Phase I and II Site Investigation Reports [Eastwood & Partners]

19 Transport Assessment [CBO Transport Ltd]

20 Travel Plan [Local Transport Projects]

1.6 A drawings schedule listing all the submitted plans is included with the planning application.

Report Structure

1.7 The following sections of this report are structured as follows:

1 Section 2 provides a description of the application site, its surrounding, and relevant planning history;

2 Section 3 outlines the Proposed Development;

3 Section 4 outlines relevant consultation undertaken to inform proposals;

4 Section 5 the relevant planning policy context for the determination of the application;

5 Section 6 considers the compliance of the proposals with planning policy;

6 Section 7 demonstrates the high degree of sustainability associated with the development with regards to economic, social and environmental benefits;

7 Section 8 summarises the key issues and draws overall conclusions.

1.8 It is concluded that the proposed development accords with the provisions of the Development Plan and comprises sustainable development in accordance with the National Planning Policy Framework [the Framework]. As a consequence, there is a presumption in favour of granting planning permission for the proposed development and planning permission should be granted without delay.

2.0 Site Description and Background

The Site

2.1 The Application Site [the Site] is situated to the west of the settlement of Belper, south of Babington Hospital and extends approximately 1.13 hectares. The Site currently comprises the existing Belper Health Clinic, access roads, a large car parking area and a grassed area with scattered mature trees. The Site is located within the administrative boundary of Amber Valley Borough Council [the Council].

2.2 The Site is relatively rectangular in shape and is bounded to:

1 The north by the main buildings comprising Babington Hospital;

2 To the east by Derby Road (A6), beyond which lies The Tavern public house and adjacent residential dwellings to the A6; and,

3 To the south and west by the Goods Road employment area, beyond which lies the River Derwent.

2.3 The eastern, southern and western boundaries of the Site are defined by a belt of mature trees with further trees scattered throughout the site area.

2.4 The Site is broadly located within Flood Zone 3 with the eastern fringes towards the A6 in Flood Zone 2. Correspondence with the Environment Agency stated the existing footprint of the building lies in Flood Zone 3a, whilst the wider site including the car park lie within Flood Zone 3b (floodplain). Flood Zone 3a present a 1 in 100 annual probability of river flooding, whilst Flood Zone 3b has a 1 in 20 annual probability of river flooding.

2.5 The Site is located within the Belper and Milford Conservation Area and the UNESCO Derwent Valley Mills World Heritage Site.

2.6 Part of the site resides within a National Habitat Network Expansion Zone though the Site holds no further ecological designations. No Public Rights of Way intersect the Site.

Site Surroundings and Context

2.7 The Site is situated to the south-west of Belper Town Centre and is met by a range of neighbouring land uses including residential properties, an employment and community services. The A6 dissects the centre of the Belper and meets the eastern boundary of the Site.

2.8 Belper Town Centre lies 500m north and the Site lies outside of this designation. The Town Centre is accessible on foot or via the A6 Derby Road, accommodating the majority of local amenities associated with the Settlement, including Belper Train Station and commercial outlets.

2.9 The Site is sustainably located and benefits from a number oof transport infrastructure links. The nearest bus stop is located directly outside the main pedestrian entrance to Babington Hospital along the A6, providing a direct link to Derby to the south, and Matlock and Buxton to the north. Belper Train Station lies 675m northwest of the Site and is located on the Midland Main line between Leeds and London St Pancras.

2.10 The Site and the wider surroundings fall under the UNESCO Derwent Valley Mills World Heritage Site designation, spanning 1,229 hectares along the banks of the River Derwent from Matlock in north leading south towards Derby.

2.11 The Site and the wider surroundings are located within the Belper and Milford Conservation Area. There is an array of listed buildings within a 200m radius of the Site:

1 South Range of Eastern Courtyard at Babington Hospital (Grade II: LE 1099180)

2 Main Entrance Lodge to Eastern Courtyard at Babington Hospital (Grade II: LE 1087380)

3 Western Range to Eastern Courtyard at Babington Hospital (Grade II: LE 1087379)

4 North Range of Eastern Courtyard at Babington Hospital (Grade II: LE 1087381)

5 Eastern Boundary Railed Walls and Piers at Babington Hospital (Grade II: LE 1087382)

6 North Lodge at Babington Hospital (Grade II: LE 1099208)

7 Derby Road Bridge (Grade II: LE 1417689)

8 Two Gatepiers And Quadrant Wall at Playing Field Entrance to South Of Number 10 (Grade II: LE 1099204)

9 Gibfield Lane Bridge Over Railway (Grade II: LE 1335685)

10 Railed Wall at Herbert Strutt School Walls and Railings Along Derby Road and Gibfield Lane Boundaries, Steps, Piers and Arch at Derby Road Entrances to Herbert Strutt School (Grade II: LE 1087385)

11 Herbert Strutt School (Grade II: LE 1349048)

12 Number 10 (Gibfield Lodge) and Attached Quadrant Wall and End Pier (Grade II: 1087378)

13 47 Derby Road (Grade II: LE 1335696)

14 Herbert Strutt Public Baths and Attached Caretaker's House (Grade II: LE 1100259)

15 Stone Wall, Piers and Railings along Gibfield Lane at Herbert Strutt Public Baths (Grade II: LE 1087363)

Existing Site Facilities on the Wider Babington Site

2.12 The proposed development site lies within the grounds of the Babington Hospital Site but forms a separate development site is the context of the red line boundary. However, the context of the wider Babington Hospital site remains of significance in the determination of this application.

2.13 Babington Hospital is managed by Derbyshire Community Health Services NHS Foundation Trust and provides intermediate care, respiratory care, rehabilitation and therapy services.

2.14 The oldest Babington Hospital Building, the Eastern Courtyard, was constructed in 1840 as a Victorian workhouse. The western part of the Hospital was constructed in 1889. In total, there are six Grade II assets listed by Historic England associated with Babington Hospital, comprising entries 1 to 6 in the above listed buildings list.

2.15 Babington Hospital continues to actively provide medical services at this time but the redevelopment of Babington Hospital into residential apartments is proposed as a separate future planning application. The Belper Clinic has since closed with former services currently subsumed into the main Babington Hospital building.

Relevant Planning History

2.16 There is no relevant planning history regarding the Belper Clinic specifically, but an Architectural and Archaeological Assessment produced by Richard K Morriss & Associates in February outlines a detailed history of the site.

2.17 The Assessment proposes that the Clinic was likely built in the 1930s in a style that matches the older surrounding Babington Hospital buildings and operated as a maternity ward for an extended period.

3.0 Proposed Development

Introduction

3.1 This full planning application seeks planning permission for the comprehensive redevelopment of the Belper Clinic, Babington Hospital involving the demolition of the existing Belper Health Clinic and the construction of a new health centre development.

3.2 Listed Building Consent is also sought as part of a separate application for amendments to the Grade II listed eastern boundary wall of the site to enable improved vehicular and pedestrian access to the site, as well as service access to a proposed substation in the south-east corner of the Site.

3.3 The description of development is as follows:

3.4 'Demolition of existing health clinic and construction of a new health centre, access and internal road layout, substation, landscaping and associated works in a Conservation Area'

3.5 This section outlines a detailed description of the proposed development, which should be read in conjunction with the Design and Access Statement prepared by Race Cottam Associates, and other accompanying planning documents including the suite of detailed design drawings.

Context of Sought Redevelopment

3.6 The Derbyshire Community Health Services NHS Foundation Trust have expressed a desire for the comprehensive redevelopment of the Belper Clinic as the existing Babington Hospital building can no longer provide the necessary quality of medical service provision in Belper.

3.7 Babington Hospital is no longer fit for purpose and does not meet the requirements of 21st Century healthcare service provision. Babington Hospital was originally constructed as a Poor Law Workhouse in 1840 and was integrated into the National Health Service in 1948. The Belper Clinic is adjacent to the main Babington Hospital building and was constructed as a maternity ward in the 1930s.

3.8 Layout issues including narrow wards and irrational proportions in Babington Hospital are detrimental to the overall quality of care that can be provided by the Trust. The Trust had initially considered attempts to modernise Babington Hospital, but the redevelopment of the building is economically and practically inviable to meet modern healthcare standards. Therefore, the existing Babington Hospital building is proposed for redevelopment seeking the provision of residential apartments as part of proposals independent from this planning application.

3.9 In addition, there are a number of newly commissioned community-based health services which need accommodating locally by the Trust, including wound care clinics, musculoskeletal assessment and treatment services, and community midwifery. However, the existing clinic is also not fit for purpose and cannot integrate required additional services in the context of the condition of Babington Hospital. In order to facilitate the provision of existing and newly proposed healthcare services to modern healthcare standards, a new health centre building is required by the Trust.

3.10 Opportunities to relocate the health centre to Derwent Street, Belper were considered by the Applicant. In the context of the requirement to integrate a number of additional services, the Derwent Street site could not viably service the requirements of the Trust.

3.11 Therefore, the demolition of the existing Belper Clinic is sought to deliver a new modern facility to retain local healthcare provision for the community in Belper, as well as significantly improving the standard of service provision.

3.12 The project has since been identified in the Derbyshire Joined Up Care Estate Plan and has secured Government Capital Funding to facilitate redevelopment. It is considered that the proposed development of the Belper Clinic will provide substantial improvements to the ability of the Trust to deliver vital healthcare services to the local community.

Use and Amount

3.13 The site area is 1.13 hectares and will provide 2,719m² of gross internal floorspace (GIA)/ 2,952m gross external area (GEA) overall. The proposed development comprises a single health clinic building composed of two pitched wings of accommodation, an eastern and western block, joined by a two-storey central entrance link block.

3.14 The proposed development will operate as a health centre for the Derbyshire Community Health Services NHS Foundation Trust, delivering a range of medical services for the local community. The proposed health clinic will incorporate all of the services provided within the existing clinic to the requirements of 21st century healthcare standards, excluding inpatient beds which have since been relocated to Derwent Street.

3.15 The core opening hours of the proposed health centre will be 08:00-18:00 on weekdays. There is potential to provide extended out of hours services when required.

3.16 It is proposed that the wider Babington Hospital will be redeveloped into residential apartments and will no longer provide medical services. The core Babington Hospital subsumed the staff of the former Belper Clinic prior to its closure. Full occupation of the Babington Hospital building amounts to a total of 395 staff. The proposed health centre development will support a total of 100 jobs, many of which will be relocated from the existing Babington Hospital building.

3.17 The following medical services will be provided as part of the occupation of the proposed health centre:

- Community Nursing
- Community Therapy
- Complex Wound Care Hub
- Continence Advisory Service
- Day Services
- Day Unit
- Health Psychology
- Heart Failure Clinic
- 0-19 Children's Services
- Midwifery Clinics
- Musculoskeletal Service (MSK)
- Parentcraft Classes
- Phlebotomy and Blood Testing
- Physiotherapy
- Podiatry Services
- Respiratory Services
- Speech and Language Therapy

3.18 The proposed development will accommodate:

- 21 Clinical Rooms
- Supporting clinical ancillary spaces
- Day Unit / Physio Room
- Group Room/ Health Education Room
- Agile Team Zone Space
- Agile Working Spaces

- Hot Desking Office Space
- Meeting Rooms of varying sizes
- Staff Rest Area and Changing Facility
- Catering Facilities
- WC and Stores
- EMAS and Derbyshire Police Accommodation

3.19 The full details of the components of the development are illustrated in the supporting floor plans (please refer to Drawing Nos. A5057-RCA-00-02-DR-A-0252 Rev.P7 and A5057-RCA-00-01-DR-A-0251 Rev.P7)

Layout and Scale

3.20 The layout of the proposed development has been fundamentally driven by the primacy of flood risk management and the overall optimisation of the site area. The western region of the Site is wholly situated within Flood Zone 3b, whilst the proposed health centre is located within Flood Zone 3a. From the outset, the layout of the proposed development aims to maximise the available site area which is located outside of Flood Zone 3b.

3.21 In addition to flood risk planning, the layout and scale of the proposed development ensures full regard has been given to the key constraints and opportunities represented by the surrounding context.

3.22 The 'H-Plan' design layout is informed by the layout of the existing Babington Hospital building from a design standpoint. A maximum roof height of 78.7m (AOD) is proposed which is necessary to meet the requirements of the proposed development.

3.23 Both the eastern and western blocks are proposed for two-storey accommodation. Opposing wings clearly delineate the separation between public and private spaces. The western wing predominantly comprises public spaces including consulting rooms, physiotherapy rooms, and health education rooms. Meanwhile, the eastern wing is catered towards private spaces for medical and emergency services staff, such as open plan office space, interview rooms and facilities for use of the Derbyshire Police and the East Midlands Ambulance Service [EMAS].

3.24 Quick response facilities for the Derbyshire Police and EMAS have been directed towards the north of the east wing to enable rapid access to fleet vehicles. Derbyshire Police have a dedicated area at the north east corner of the first floor of the eastern wing with no requirement for wider hospital staff to circulate this region of the proposed building.

3.25 The ground floor will comprise an array of facilities including 5 consulting rooms, a physiotherapy room, staff and public WCs, and catering space in the western block; entrance lobby, health centre reception and waiting room in the central link block; and 2 consulting rooms, 3 treatment rooms, 3 wound treatment rooms, utility and plant storerooms, EMAS stores, external bin store and further ancillary rooms.

3.26 The first floor comprises 8 consulting rooms, a health education room, a baby feed room, utility stores, and ancillary store and refreshment rooms in the western block; a small meeting room, medium-sized meeting room, an interview room, staff WCs in the central link block; Office and general facilities for Derbyshire Police, EMAS Office, staff room and changing rooms, open plan office space for DCHS Staff, and further ancillary interview and quiet rooms.

3.27 The overall layout of the proposed development has been directly informed by the operational requirements as a health centre, namely through infection control and as a dementia-friendly environment.

3.28 The inclusion of a partial lower ground floor under the western block is proposed for plant, additional stair and lift access from the lower car park level that will deliver patients into the upper ground reception area. Secured cycle storage is also proposed in the lower ground floor.

3.29 In order to facilitate the operational requirements of the proposed development, a new 800KVA substation is required. Due to constraints regarding flood risk, there are few locations that can suitably situate a substation. Western Power informed the Trust that the sought location for the substation is in the south-eastern corner of the Site, directly south of

the proposed health centre. In order to facilitate that essential infrastructure, Listed Building Consent is sought to enable works to the wall to provide a service access.

Design and Appearance

3.30 The proposed new Belper Clinic has undertaken an array of design iterations since conceptual planning began in 2017. Former plans proposed a curved eastern block, but more geometric designs were favoured to retain a sympathetic design akin to the existing historical buildings with the Belper and Milford Conservation Area.

3.31 The proposed development takes an H-Plan form to replicate the orientation of Babington Hospital and includes wings of accommodation reminiscent of the wider Babington workhouse building. This design provides a clear and welcoming main entrance point for visitors. This is also beneficial from an amenity standpoint as site users will benefit from natural sunlight and views out onto the wider site.

3.32 The design is broadly symmetrical and simplistic with bold gable ends with wings on the northern elevation granting the building an open aura. The link block sensitively joins the two wings and broadly segregates public spaces in the eastern block from private spaces in the western block.

3.33 The building is set back from the row of mature trees to the east along Derby Road, providing significant screening during the summer months.

3.34 The proposed health centre will feature external gutters and exposed rainwater downpipes to facilitate ease of maintenance works.

3.35 From a design perspective, the proposals include red-facing brickwork as the dominant material to remain synonymous with the vernacular architecture of Belper and local historical mill buildings. The inclusion of local Derbyshire Ashlar stonework is proposed to remain in keeping with the Babington Hospital buildings.

3.36 Reclaimed stone from the existing external retaining wall and the original elements of the Belper Clinic will be used in the new retaining landscaped elements of the site. It is also intended that diminishing slates recovered from the former Belper Clinic will comprise part of the central link block element. The re-use and reclamation of existing materials restricts wastage and ensures that sympathetic design elements remain central to new proposals.

Landscaping

3.37 A paved courtyard leads site users in a southerly direction to the main entrance on the northern elevation of the proposed building and includes landscaped elements such as a sunken courtyard and specimen tree as a centrepiece with seating below. This paved entrance adjoins the new proposed pedestrian access from Derby Road and the drop-off car parking area to the north.

3.38 A landscaped patio area surrounds the southern and western exterior of the proposed health centre, providing access to the accessible parking bays and the wider car park to the west.

3.39 The proposed landscaping scheme includes the following additional measures:

1 Perennial ornamental planting and benches as part of a grassed seating area located east of the accessible parking bays. Three additional trees are proposed in this region adjacent to the car park, with a paved path running through the centre;

2 Additional tree planting is proposed to the north of the west wing of the proposed health centre, providing screening for the Babington Hospital building;

3 Mixed native hedgerow planting is proposed to the south of the block paving that traverses the perimeter of the proposed health centre;

4 Removal of existing shrubs and crown lift to trees to extend views to the new building within the landscaped around at the centre of the car park loop. Additional meadow grassland is proposed at ground level;

5 A woodland meadow area is proposed to the grassed area to the south of the site area;

6 A total of 12 individual trees and 1 hedgerow are proposed for removal to facilitate the proposed development. None of the trees proposed for removal exceed moderate quality and overall biodiversity net gain will be attained.

3.40 Full landscaping details are shown on Dwg. 2014-CO-LP-01-01-REV-5.

Access, Parking and Servicing

3.41 The Babington Hospital site is serviced by two access points off A6 Derby Road- one is located 10m south of the northern boundary and an access is located 100m further south. The southern access will primarily service the proposed health centre development.

3.42 The proposed modifications to the southern access to improve overall pedestrian and vehicular accessibility are as followed:

1 Widening of the existing southern access by 2m to the north to an overall access width of 8.65m;

2 Changing of the priority of the Council-owned access road that will serve the substation to the south of the southern access;

3 New junction markings, hatching and edge of carriageway marking at the south of the south access on A6 Derby Road;

4 Reducing the length of the fence at the southern access by circa 2m and cutting back vegetation to take them out of the improve visibility splays. This will achieve overall visibility splays of 2.4 metres x 51 metres.

3.43 It is considered that the proposed access revisions will benefit access for emergency vehicles associated with EMAS and the Derbyshire Police, whilst also enabling safer pedestrian access for site users accesses the site on foot. The Transport Statement concludes that proposed arrangements will remain suitable and will improve access to the Babington Hospital site.

3.44 Given that the western car parking area wholly resides within Flood Zone 3b, the Trust have been advised by the Environment Agency to leave this region broadly unchanged. The delivery of 100 car parking spaces is proposed, including 7 accessible spaces, 4 drop-off spaces and an ambulance bay for EMAS. The Trust are committed to the provision of 10 Electric Vehicle Charging Spaces, 10% of the overall parking spaces. Dedicated Derbyshire Police bays will be provided, but exact numbers will be disclosed at a later date.

3.45 An additional pedestrian access is proposed immediately to the south of the southern access. New blister paving is proposed to the east and west of the Council owned access road and additional road markings and signage will be included as part of the amended layout of the southern access to improve pedestrian access to the site.

3.46 Listed Building Consent is sought for the amendments to the wall as a separate submission given that the wall is Grade II listed (Eastern Boundary Railed Walls and Piers at Babington Hospital [Grade II: LE 1087382]). The Heritage Impact Assessment submitted in support of this application states that the widening of the vehicular access and creation of a new pedestrian access would be of negligible harm. In addition, once assessed against the potential for public benefits of providing a safe pedestrian and vehicular access, the proposed wall alterations are considered as appropriate to facilitate modern needs of the development.

3.47 Listed Building Consent is also sought for alterations to the southern part of the eastern wall in the south-east corner of the Site. It remains unclear whether this section of the wall is a designated heritage asset, but the Applicant wishes to proceed with caution under the guidance of the supporting Heritage Impact Assessment. This revision to the wall is essential to facilitate the delivery of a required substation and the proposed access would solely be used for private servicing access when required.

Internal Site Layout, Building Accesses and Servicing

3.48 Internal access road alignment is broadly retained, leading to the main parking area towards the south-west of the site. The internal one-way loop around the circular landscaped centrepiece is also retained as existing.

3.49 Proposals also include a drop-off area comprising four parking spaces and ambulance bay located to the northeast of the proposed health centre.

3.50 An improved pedestrian route is also proposed within the site, connecting the proposed health centre and the existing southern Babington Hospital site access. Existing internal pedestrian crossings will be retained but will be extended to meet the amended curb line. A proposed new opening in the existing eastern site wall will provide a new pedestrian footpath leading directly to the proposed health centre. The existing stone gate posts will be replicated, with a lockable gate installed. This will positively enhance pedestrian safety throughout the site.

3.51 The main public entrance to the proposed health centre is located on the northern elevation in the central atrium. Access to this entrance is granted via steps leading from the internal access road in a southerly direction via the central courtyard. Site users will be greeted into an entrance lobby in the central atrium of the building.

3.52 A secondary public entrance is located on the western elevation of the building from the lower ground floor. This access will primarily be used by site users accessing the site following parking in the western car parking area and entering the proposed health centre via the block paved access in an easterly direction. Stair and lift access granted site users access to the central atrium via the western wing. Access to the secure cycle storage room is also proposed on this lower ground floor western elevation. An external bin store is proposed on the ground floor of eastern wing of the proposed health centre. Service vehicles will access this region via an access on the eastern elevation at the north-eastern corner of the building.

4.0 Consultation

4.1 The Framework [§39] sets out that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties, and good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community. This section sets out how the Applicant has engaged with the Council and relevant consultees and stakeholders in relation to the proposed development.

Key Dates of the Consultation and Engagement Timeline

4.2 The Trust have undertaken extensive community engagement and consultation activity to ensure that the proposed health centre meets the needs of all active stakeholders, including emergency services, medical services and the local community.

4.3 Public engagement and consultation have been of paramount importance in guiding development proposals for the final design and service provision comprising the proposed new Belper Health Centre. From the outset, the Trust have placed fundamental significance on the wants and needs of the General Public as the existing and proposed health centres are community assets, servicing the health and wellbeing of the local population.

4.4 The following consultations and meetings are representative of the most significant examples of sought community and stakeholder engagement:

Consultation and Engagement Event	Consultation Date
Pre-Engagement Launch: Surveying Local Service Provision	October 2015
Case for Change Engagement: Full Public Engagement Exercise Conducted by NHS Southern Derbyshire Clinical Commissioning Group	March 2018
Extensive Service Meetings with Existing Health Service Providers at the existing Belper Clinic and Relevant Consultees (including Derbyshire Police and East Midlands Ambulance Service [EMAS])	October 2018- Submission
Pre-Application Meetings with Amber Valley Borough Council Planning Department	26th February 2019 and 4th December 2019
Pre-Application Meeting with the Environment Agency- (Letter Received Objecting Planned Development in August 2020)	23rd August 2019
Pre-Application Engagement with Highways England	Commenced in September 2019 – Submission
Pre-Application Engagement Meeting with Historic England	September 2019
Health Overview and Scrutiny Committee	25th November 2019
Belper GP Patient Participation Group Meeting and Presentation	November 2019
Public Engagement- Leaflet and Press Release	November 2019
Public Engagement Drop-in Sessions at Strutt Centre Demonstrating Proposals	8th January 2020 and 5th February 2020
Engagement Meeting with Pauline Latham MP	22nd September 2020
Plan Presentations to Local Stakeholders including Derbyshire Police	21st June 2021- 28th September 2021
Public Engagement Press Release	January 2022

Public Engagement Virtual Session	27th January 2022

Consultation with Historic England- 1st November 2019

4.5 Members of the Trust, and the Planning and Design Team sought advice from Historic England to provide an initial review of concept design for the proposed new health centre on the site of the existing Belper Clinic. Historic England attended a meeting and site visit at the Babington Hospital site on the 1st November 2019. Particular regard was placed on proposals remaining sympathetic to the surrounding heritage context. The Trust outlined the background to the proposals and confirmed aspirations for the construction of a new health centre development.

4.6 Following the meeting and site visit, Historic England approved of the general design philosophy of proposals and informed a number of additional points including:

1 Historic England stated that the proposed form and symmetry of the design proposals, including 45-degree roofscape, were considered appropriate.

2 End gables facing existing buildings are of great significance.

3 Main entrance must be legible to future site users.

4 Removal of existing conifer trees was considered positive due to perceived poor value.

4.7 Historic England were positive regarding the principle of development and core design philosophy. It is considered that the final design proposals have been strongly influenced by Historic England's confirmation that a symmetrical design with a 45-degree pitched roof was preferred to remain sympathetic to the wider Babington Hospital site.

Extended Consultation with the Environment Agency- Flood Risk Management

Meeting with the Environment Agency- 23rd August 2019

4.8 Members of the Trust and Race Cottam Associates attended a meeting with the Environment Agency on the 23rd August 2019. The Trust and wider Design Team were eager to ensure that the Environment Agency [EA] could advise on proceedings regarding flood risk as a key adviser to Amber Valley Borough Council.

4.9 As outlined within the Framework, development in Flood Zone 3b is prohibited unless it is water compatible or essential infrastructure. The EA advised that development in Flood Zone 3a is acceptable provided adequate mitigation can be demonstrated. Proposed mitigation included finished floor levels above predicted water levels and emergency evacuation plans. The EA specifically outlined that the finished floor level should be in excess of the 1 in 1000-year flood height of 64.02 metres.

4.10 In addition, given that the existing car park is broadly located within Flood Zone 3b, the EA advised that the western region of the car park is to be left unchanged and further revisions would require proposals to be water compatible. Furthermore, it was advised that emergency vehicles should located outside of Flood Zone 3b.

Written Correspondence with Race Cottam Associates- 17th September 2019

4.11 The Environment Agency provided a written response following the meeting held on the 23rd August 2019. This stated that the EA would raise no objection to the location of attenuation features within the floodplain. The EA also provided a 1 in 20-year floodplain

heights map for Flood Zone 3b, indicating a height of 61.64m AOD across the entirety of the Flood Zone 3b area.

4.12 The Environment Agency had rejected initial proposals as although the proposed ground floor finished floor level was 4.5m higher than historic flood levels, part of the proposed building footprint was situated within Flood Zone 3b. A major redesign of the proposed development has subsequently taken place to relocate the proposed health centre wholly outside of Flood Zone 3b, with remaining core design principles retained.

Written Correspondence with Eastwoods and Partners- 10th March 2021

4.13 Appendix 4 of the supporting Flood Risk Assessment [FRA] prepared by Eastwoods and Partners comprises a letter from the Environment Agency following a pre-application meeting held in January 2021. The EA provided pre-application advice regarding proposals in the context of a revised FRA issued in March 2021. This iteration of the proposed development was wholly located outside of Flood Zone 3b and was generally supported by the EA.

4.14 The EA confirmed that the finished floor level of the proposed development should be set 300mm above the 1 in 100-year 30% climate change flood level, and at or above the 1 in 100-year 50% climate change flood level.

4.15 In addition, the EA confirmed that the proposed floodplain compensation scheme provides equivalent storage for floodplain loss, and clarification of these methods are outlined within the supporting FRA.

4.16 Lastly, the EA state that no new structures or ground raising should be undertaken in Flood Zone 3b and this has remained consistent throughout proposals.

Public Engagement Sessions- 8th January 2020, 5th February 2020, and 27th January 2022

4.17 A public engagement session was held on the 27th January 2022 to grant the local population an opportunity to express their views regarding design proposals. Initial outline proposals had been presented by representatives of the Trust and Race Cottam Associates to the public at former consultation events on the 8th January 2020 and the 5th February 2020.

4.18 The overall design philosophy of the final development proposals has been fundamentally influenced by the desires of the future site users throughout the consultation period. The key points raised at the Public Engagement Session held on the 27th January 2022 included:

Key Considerations Raised by the General Public	Response from the Derbyshire Healthcare NHS Foundation Trust
Accordance with Derwent Valley Mills World Heritage Site [DVMWHS] Management Plan	The submission of an HIA is strongly encouraged for proposals exceeding 0.5 hectares by the DVMWHS. This application is supported by the submission of Heritage Impact Assessment [HIA] which provides a comprehensive assessment of the existing site conditions and surrounding Conservation Area. Proposals are then evaluated against the existing historic environment for potential harm and provide further responses regarding mitigation.

Sustainability of the proposed building	Sustainability concerns have been raised on many occasions by local stakeholders. The proposed health clinic will meet BREEAM 'Excellent' rating, regarded as 'best practice' and comprised within the top 10% of non-domestic new buildings in the United Kingdom.
Service provision in relation to the existing Belper Clinic and local need	The Belper Clinic will retain all existing services comprising the current clinic excluding inpatient beds which have been relocated to Derwent Street. As indicated within the Consultation Timeline, local service provision surveying has informed required local services.
Fondness for a sympathetic design with high regard for sustainability	Consultation responses emphasised the local desire for a highly sustainable development that remains sympathetic to the existing community and Conservation Area. Proposals will integrate reclaimed stone elements from the existing clinic and will demonstrate high regard for a sympathetic design that is conducive to the wider Babington Hospital and the Belper and Milford Conservation Area.

4.19 Further questions were raised via email following the Public Engagement Session and Reponses were retained via email by the Trust. Key points raised by the General Public included:

Key Considerations Raised by the General Public	Response from the Derbyshire Healthcare NHS Foundation Trust
Concerns over Parking Provision (Police and EMAS)	A comprehensive Transport Assessment and Travel Plan have been commissioned to inform expected staff and visitor trips to determine the required number of parking spaces for each future stakeholder. It should be noted that parking provision is also informed by local and national policy requirements.
Concerns over Accessible Parking Provision	A number of respondents suggested that a greater provision of accessible parking spaces than the 5 proposed at the time of the Public Engagement Session was sought. Minimum parking standard guidelines indicate a 5% provision of accessible spaces, but The Trust will deliver 7% (7 spaces) to remain consistent with other medical centres in Derbyshire and to meet local demand.
Further Queries Regarding Medical Service Provision	As expressed, the proposed health centre will accommodate all of the services currently provided at the Belper Clinic, apart from inpatient beds which have already been relocated to Derwent Street.

Consultation with Key Stakeholders

East Midlands Ambulance Service and Derbyshire Police

4.20 From the outset of the design process, the Trust have sought to amalgamate EMAS and Derbyshire Police facilities into final design proposals. EMAS and the Derbyshire Police

were consulted through RIBA Stages 1 and 2 to ensure that the proposed development meets their respective needs.

4.21 This directly influenced the accommodation layout, inclusion of an external door to the EMAS sluice, and access to Derbyshire Police Services.

Secured by Design Consultation- 1st April 2020

4.22 The Trust consulted with Local Force Designing Out Crime Officer on the 1st April 2020. A desk-based risk assessment was undertaken in consultation with the area NHS Security Manager, including an environmental audit of current site conditions.

4.23 A further meeting was held on the 24th September 2021 to discuss design alterations in the context of flood risk. The following mitigation has subsequently been implemented following the positive engagement from the Officer:

1 Inclusion of gates to restrict access to potential areas for rough sleepers

2 Removal of proposed elevated walkways

3 External balustrades are visually permeable

4 Inclusion of CCTV and external lighting across the site

5 Landscaping to the south has been informed by the need to deter unlawful access

4.24 The requirements for accommodation of the Derbyshire Police have also been integrated into the design Consultation with Amber Valley Borough Council

Review of Formerly Proposed Submission Documents by an Amber Valley Borough Council Case Officer - 16th November 2021

4.25 A Case Officer from Amber Valley Borough Council reviewed a former iteration of the proposed scheme in November 2021. The Case Officer declared that the application should include the following information:

1 Outline of why the existing building is not fit for purpose.

2 Submission of an accompanying Heritage Impact Assessment.

3 Submission of supporting evidence regarding proposed employment figures, including staffing and services.

4 Tree Removal must be informed by an Arboricultural Impact Assessment.

5 Submission of supporting ecological studies including a bat survey. Furthermore, the planning application should be accompanied by a supporting Biodiversity Metric 3.0 (now 3.1 as of April 2022) to demonstrate biodiversity net gain.

6 Site Sections to demonstrate how the site will appear within the local context

7 Provision of Electric Vehicle Charging Points with the proposed health centre development.

4.26 This planning application submission has been informed by the advice of the Case Officer and features each of these desired supporting documents and information to outline the feasibility and sympathetic approach of the proposed health centre development in relation to the surrounding context.

5.0 Planning Policy Context

5.1 This section of the Statement details the relevant national and local planning context for the application, as well as other relevant material considerations.

5.2 Section 70(2) of the 1990 Act and Section 38(6) of the 2004 Act requires that the Application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Statutory Development Plan Policies

5.3 The Development Plan for Amber Valley Borough Council, relevant to this application, comprises:

1 The Amber Valley Borough Local Plan [AVLP] (April 2006)

2 Neighbourhood Plan for Belper (June 2021)

The Amber Valley Borough Local Plan (2006)

5.4 The AVLP was adopted on the 12th April 2006, outlining the spatial strategy for the Borough. The Plan outlines strategic planning policies and applies them to precise areas of the Borough, provides a detailed basis for development control, and directs the use and development of land within the Council's jurisdiction. The AVLP was intended to outline strategic planning policies up to 2011.

5.5 The Council are in the process of devising a new Local Plan (2021-2038) and resolved on the 9th June 2021 to agree a refreshed programme and timescale for the new Local Plan with adoption intended in September 2023. The first consultation phase regarding Alternative Spatial Strategy Options for Housing and Economic Growth closed on the 30th September 2021 and remains the overall Local Plan remains in its infant stages and is not a material consideration towards this application.

5.6 In order to ensure that the proposed development supports the core strategic and spatial objectives of the AVLP, the most pertinent policies have been identified:

1 Policy LS1 (Sustainable Development)

2 Policy LS2 (Community Safety- Health and Leisure)

3 Policy LS3 (Design)

4 Policy TP1 (The Impact of Development on the Transport Network)

5 Policy EN13 (Biodiversity)

6 Policy EN15 (Development and Flood Risk)

7 Policy EN16 (Pollution)

8 Policy EN24 (Listed Buildings)

9 Policies EN26 and EN27 (Conservation Areas)

10 Policy EN29 (Derwent Valley Mills World Heritage Site)

11 Policy EN30 and EN31 (Archaeological and Heritage Features)

12 Policies LC11 and LC13 (Community Facilities)

Neighbourhood Plan for Belper (June 2021)

5.7 Belper Town Council formally made the Neighbourhood Plan for Belper on the 30th June 2021 following the result of a referendum conducted on the 6th May 2021. The Neighbourhood Plan for Belper now forms part of the development plan and subsequently, the Site is subject to its guidance.

5.8 The following Neighbourhood Plan Policies [NPP] are considered most relevant to the proposed development:

- NPP1 Sustainable Development and the Built Framework
- NPP2 Protecting the Natural Environment and Enhancing Biodiversity
- NPP3 Protecting the Landscape Character of Belper Parish
- NPP10 Reducing the Risk of Flooding
- NPP11 Protecting Heritage Assets
- NPP12 Energy Efficiency and High-Quality Design
- NPP17 Increasing the Use of Electric Vehicles
- NPP25 Redevelopment of Babington Hospital Site

Supplementary Planning Documents

5.9 The Council has adopted 7 Supplementary Planning Documents [SPD]. The following three SPDs are of particular significance to the proposals:

1 Listed Buildings and Buildings in a Conservation Area SPD (2007) [LBBSPD];

2 Land Between the A6 and the River Derwent, Belper SPD (2012) [A6RDSPD]; and,

3 Design for Community Safety SPD [DCSSPD] (2007).

Listed Buildings and Buildings in a Conservation Area SPD

5.10 The Listed Buildings and Buildings in a Conservation Area SPD seeks that building alterations or repairs to listed buildings preserve and, where possible, improve the character and appearance of the building. With reference to the proposed development, the LBBSPD seeks to ensure that any new buildings within the curtilage of a listed building or its setting are designed and sited to respect the character and appearance of the building.

Land Between the A6 and the River Derwent, Belper SPD

5.11 The Site is not located within the Land Between the A6 and the River Derwent, Belper SPD area but the wider Babington Hospital adjoins this designation. Though of limited significance regarding the Site specifically, the SPD seeks to provide guidance and further detail on the use and development of the land located within in this region.

Design for Community Safety SPD

5.12 The Design for Community Safety SPD seeks to help assess and determine planning applications in terms of their impact on crime, the fear of crime and anti-social behaviour. The purpose of the SPD is to inform the design process and guide architects, developers, landscape architects and urban designers to mitigate potential risks of crime.

National Planning Policy and Guidance

5.13 National planning policy and guidance is provided by the National Planning Policy framework [the Framework] and the National Planning Practice Guidance [the Practice Guidance]. The Framework and Practice Guidance are important material considerations in the determination of the planning application.

5.14 The Framework [§8 & §9] identifies three dimensions to sustainable development: economic, social and environmental, which should not be undertaken in isolation as they are mutually dependent. The Framework indicates that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

5.15 The Framework [§11] sets out the Government's commitment to the presumption in favour of sustainable development. For decision-taking, the Framework [§11d] states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or,

ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

5.16 The Framework [§38] is clear that local planning authorities should approach decisions on proposed development in a positive and creative way. They should work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

5.17 The Framework [§93] states that planning decisions should aim to provide social, recreational, and cultural facilities and services the community needs. This includes the provision of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments. This will support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

5.18 The Framework [§93] declares that local planning authorities should work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities, including hospitals, and resolve key planning issues before applications are submitted.

5.19 Chapter 9 of the Framework [§104-113] centres on the promotion of sustainable transport and ensures that transport issues are considered from the outset of the development process.

5.20 The Framework [§119] states that the promotion of effective use of land in meeting the need for homes and other uses should be considered in relation to safeguarding and improving the environment and ensuring safe and healthy living conditions.

5.21 The Framework [§126] identifies the creation of high quality, beautiful and sustainable buildings and places as fundamental to what the planning and development process should achieve. Furthermore, the Framework [§127] states that design policies should be

developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics.

5.22 Chapter 14 of the Framework declares the primacy in supporting the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. The Framework [159-168] provides guidance on development in areas at risk of flooding and states that where development is necessary in such areas, the development should be made sage for its lifetime without increasing flood risk elsewhere.

5.23 The Framework [§157] states that the local planning authorities should expect new development to comply with any development plan on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable. Development should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

5.24 The Framework [§174] outlines that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

5.25 The Framework [§179-181] seeks to minimise impacts on biodiversity and geodiversity as well as conserving and enhancing biodiversity. Furthermore, opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

5.26 Chapter 16 of the Framework sets out the key policies relating to the conservation and enhancement of the historic environment. The Framework [§194] states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

5.27 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 [§199]. 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 [§200].

5.28 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 [§202].

5.29 The Framework [§206] also sets out that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Planning Practice Guidance

5.30 The Practice Guidance also represents a material consideration when determining planning applications. The Practice Guidance provides guidance on air quality, design, flood risk and

coastal change, and the historic environment. The content of the Practice guidance is not repeated here but is referred to as appropriate in the consideration of the proposed development.

6.0 Planning Appraisal

6.1 This section of the report considers the compliance of the proposed development with the relevant policies of the statutory development plan alongside the Framework. This section demonstrates that the proposed development accords with the relevant policies of the Development Plan. There are no other material considerations which indicate that permission should not be granted in accordance with Section 70(2) of the 1990 Act and Section 38(6) of the 2004 Act.

6.2 The Amber Valley Local Plan is significantly outdated, and the emerging Local Plan is in its infant stages. Therefore, it is considered that Amber Valley Borough Council cannot demonstrate an up-to-date development plan. As a result, it is considered that the determination of the Council should be in accordance with Paragraph 11d of the Framework. The Applicant considers that the proposed development would satisfy the tests under paragraph 11d of the Framework and that the Council should approve the proposed development without delay.

Principle of Development

Demolition of the Existing Building

6.3 The Applicant considered the conversion and renovation of the existing health centre to be inviable as the current building fails to meet the demands and operating requirements of the Trust. The Trust initially explored attempts to modernise the Babington Hospital building, but this is economically and practically inviable. In order to integrate existing and newly required services in Belper, the demolition of the existing Belper Clinic is required to facilitate the construction of a new health centre.

6.4 The existing Belper Clinic cannot feasibly integrate the number of healthcare services required. In addition, the existing Belper Clinic is also no longer fit for purpose and cannot facilitate the requirements of 21st Century healthcare service provision. Therefore, a new health centre building is required by the Trust.

6.5 Opportunities to relocate the health centre to an alternative site on Derwent Street, Belper were considered by the Applicant but in the context of the requirement to integrate a number of additional services, the Derwent Street site could not effectively service the needs of the Trust. In result, the demolition of the existing Belper Clinic is sought to deliver a new modern facility to drastically improve the quality of healthcare provision in Belper for the local community.

6.6 From the outset, heritage considerations of are primary interest in the context of proposed demolition. The Site is located within the Belper and Milford Conservation Area, and Derwent Mills World Heritage Site.

6.7 The adoption of the LBBSPD Listed Buildings and Buildings in a Conservation Area SPD in April 2007 demonstrates that demolition is acceptable within the Conservation Area. The legislative framework has changed significantly post-adoption as the LBBSPD states that Conservation Area Consent [CAC] is required for the full or partial demolition of buildings exceeding 115 cubic metres. CAC has since been abolished under the Enterprise and Regulatory Reform Act 2013, replaced by a requirement for planning permission for demolition of a building in a conservation area.

6.8 It is considered that the existing Belper Clinic makes a limited contribution to the significance and special interest to the Conservation Area and its removal will be of neutral

impact to the significance or special interest of the Conservation Area. The existing building is not listed and is not considered to be a curtilage building as the existing health centre is a later edition in the 1930s, remaining peripheral to the main Babington Hospital building.

6.9 As outlined within the supporting Architectural and Archaeological Assessment, the existing Belper Clinic is subordinate in its architectural significance to the wider site. Though architectural consideration was clearly made to assimilate a similar aesthetic to the wider conservation area, the existing building does not make a material contribution to the character of the wider Conservation Area.

6.10 The wider context of the Derwent Valley Mills World Heritage Site regards the significance of the industrial heritage landscape of 18th and 19th century mills servicing the region's former cotton industry. Though the existing building is located within this designation, but the existing building is not listed and is not directly associated with mill buildings, workers' housing or structures associated with mill communities. The six designated heritage assets within the wider Babington Hospital site were all listed on the 13th December 1979, demonstrating the evident lack of heritage value of the existing building. Provided proposals remain sympathetic to the existing character of the WHS, demolition of the existing building is considered to be of neutral impact to WHS.

6.11 It is considered that the demolition of the existing health clinic will enable the Trust to provide a higher quality of healthcare provision within Belper and to continue supporting the needs of the local community. Demolition of the building will facilitate the delivery of a highly sustainable with a BREEAM 'Excellent' rating, which remains entirely unattainable in the context of the existing Belper Clinic.

Construction of a New Health Centre

6.12 The Trust seek the construction of a new health centre in Belper as the existing building does not adequately meet the operational requirements for the desired range of quality of health services provided to the community. Babington Hospital will remain operational until the proposed development has been completed. However, the context of the proposed closure of Babington Hospital has led to an overall restructuring of the Trust who have expressed the continued need to provide health care services in Belper, but this remains untenable within the existing building.

6.13 The project has been identified as a high priority in the Derbyshire Joined Up Care Estate Plan and has secured Government Capital Funding to facilitate redevelopment. It is considered that the proposed redevelopment of the Belper Clinic will provide substantial improvements to the ability of the Trust to deliver vital healthcare services to the local community and has the backing from both local and national initiatives.

6.14 It is considered that the proposals seek the redevelopment of the site and the continued active use of the site as a health centre demonstrates its suitability. In addition, there is an increasing demand for additional services to be integrated into the proposed development and this indicates that the expansion of NHS services in Derbyshire is required. The construction of a new health centre will significantly improve the quality and range of healthcare services available for the local community on a site that has long been in operation for medical service provision.

6.15 From the outset, Paragraph 11d of the Framework is of paramount importance in the consideration of this planning application. The Amber Valley Local Plan is significantly out of date and therefore, the Development Plan is not representative of the current planning context. It is considered that the proposed development remains sympathetic of the

surrounding context and will deliver significant economic, social and environmental benefits. Therefore, it is considered that the proposed development is wholly compliant with the tests outlined in Paragraph 11d of the Framework as there no associated adverse impacts that would significantly and demonstrably outweigh the benefits, particularly when assessed against the policies in Framework.

6.16 It is considered that the proposed development does remain compliant with the adopted Development Plan despite the adoption of the AVLP in 2006, as will be demonstrated throughout the course of this planning appraisal section.

6.17 From a policy perspective, Policy LC13 (Community Facilities) states that planning permission will be granted from the development of community centres or similar community facilities provided proposals meet the following criteria:

a the development is of a scale, character and appearance appropriate to the local environment;

b where possible, the development would be located so as to be accessible to existing public transport routes; and,

c the development will not significantly detract from the amenity of local residents

6.18 It is considered that the proposed development is wholly compliant with the criteria contained under Policy LC13. The proposed development is in keeping with the scale, character and appearance of the local environment, incorporating reclaimed stone elements from the existing Belper Clinic and emulating the general arrangement and appearance of the Babington Hospital building under a contemporary style.

6.19 In addition, the Site is sustainably located from the outset with the nearest bus stop located directly outside the main pedestrian entrance to Babington Hospital along the A6 Derby Road. Belper Train Station provides further connectivity to wider settlements. Finally, the proposed development will remain compliant in its totality regarding the amenity of local residents, as demonstrated by the comprehensive suite of assessments and reports submitted in support of this application.

6.20 The proposed development will also deliver a scheme with highly sustainable credentials, meeting the requirements for the attainment of a BREEAM 'Excellent' rating, in accordance with the primacy of sustainable development contained within AVLP Policy LS1. It is considered that it would not be possible to attain these sustainability benefits through the conversion or retention of the existing building, even if the existing building met the operational requirements of the Applicant. Therefore, it is considered that the proposed development seeks to meet the objectives of Policy LS1 of the AVLP regarding sustainable development.

6.21 Overall, it is considered that the proposed development is essential to maintain a high standard of healthcare in Belper and the wider settlement area for the local community. The existing building is no longer fit for purpose and in the context of local and national support, it is considered that the proposed development provides an opportunity to deliver a new health clinic of an excellent standard of sustainability.

Design

6.22 Design considerations have been of central importance in informing the final design of the proposed Belper Health Centre Development. The proposed development meets a very high standard of design and attains the BREEAM 'Excellent' rating. From a practical

perspective, design has been largely informed to meet the operational requirements of a health care facility in terms of infection control and user-friendly design.

6.23 Due to the surrounding context of the site, heritage considerations have also been of central importance to the design process for the proposed Belper Health Centre Development. The proposed layout, scale and massing, aesthetic appearance and materials have all been informed by the surrounding heritage context of the Grade II listed Babington Hospital and the wider Belper and Milford Conservation Area.

Layout

6.24 The layout of the proposed Belper Health Centre Development has been informed by two core components: the primary operational requirements of a health centre and remaining sympathetic to the surrounding context.

6.25 The site layout has been fundamentally dictated by the on-site constraints, namely flood risk. The proposed health centre is positioned as far outside of Flood Zone 3b as possible towards the eastern boundary of the site. In addition, the proposed development is located with a buffer zone to the southern site boundary to ensure retention of high-quality Category A trees.

6.26 The 'H-Plan' design layout is informed by the layout of the existing Babington Hospital building from a design standard point and mirrors existing design of the vicinity. This layout also enables amenity benefits with natural daylight and views outwards for site users.

6.27 The overall spatial arrangement of the design aims to minimise travel distances for patients to aid use comfort and ensure efficiency in keeping to appointment times. The internal layout of the development remains as legible as possible with clear delineation of public, semi-private and private spaces. Legibility remains a core component of the design to integrate dementia-friendly design from the outset with a clear pathway to consulting rooms. Furthermore, the operational requirement of health centre demands that infection control can be easily managed.

6.28 The requirements of emergency service providers such as EMAS and Derbyshire Police also informed internal layout. EMAS and Derbyshire Police accommodation is located in the north of the east wing to ensure rapid access to fleet vehicles when required.

Scale and Massing

6.29 The proposed development has been modelled to remain sympathetic to the scale, massing and height of the Babington Hospital building from the outset of the design process.

6.30 The proposed development comprises a lower ground floor and two further storeys, which does demonstrate an increase in comparison to the height of the existing one-storey health centre. However, the supporting Heritage Impact Assessment states the scale of the proposed building is acceptable given the separation distance and comparatively small footprint of the clinic in relation to the wider site.

6.31 Depths of the wings have been designed to be as narrow as possible to reflect the elongated linear nature of the wings of Babington hospital. The length of these wings has been largely dictated by access and parking provision required to the northern boundary of the proposed health centre, flood risk constraints to the west, and minimisation of extension into tree protection zones to the southern elevation.

6.32 The pitched roof matches the main roofs of Babington Hospital and is set at 45 degrees.

6.33 Structural and engineering zones have zones have been designed to be as efficient as possible to keep floor heights to minimum, provided comfortable ceiling heights have been achieved.

Appearance and Materials

6.34 The accompanying DAS provides extensive detail on the main architectural features and material choices for the scheme. The proposals aspire to create a contemporary health centre that remains sympathetic to the surrounding heritage context of Babington Hospital and the Belper and Milford Conservation Area.

6.35 The proposed building has been aligned to replicate the orientation of Babington Hospital with wings of pitched accommodation running from north to south. The proposed health centre has simple, symmetrical and bold gable ends, whilst a splaying of the wings on the north elevations gives the building a sense of openness.

6.36 The Applicant and the design team placed core significance on devising a scheme that is akin to the local character of the area. The material palette seeks to achieve a high-quality contemporary proposal that remains sensitive to the surrounding context.

6.37 The proposals include red-facing brickwork as the dominant material to remain synonymous with the vernacular architecture of Belper and local historical mill buildings. The inclusion of local Derbyshire Ashlar stonework is proposed to remain in keeping with the Babington Hospital buildings.

6.38 Reclaimed stone from the existing external retaining wall, and the original material elements from the Belper Clinic will be used in the new retaining landscaped elements of the site. It is also intended that diminishing slates recovered from the former Belper Clinic will comprise part of the central link block element.

Conclusion

6.39 The proposed development has been designed to ensure it responds effectively to the surrounding context and heritage assets in proximity to the site. The proposed health centre is representative of a contemporary design but seeks to integrate a historic local design philosophy, whilst retaining reclaimed materials from the existing development.

6.40 The supporting Heritage Impact Assessment also confirms that particular consideration has been placed on devising a sympathetic scheme that respects the existing historic context.

6.41 It is considered that the proposed development accords with AVLP Policies LS3 (Design) and EN26/27 (Conservation Areas), as well as Polices NPP11 (Protecting Heritage Assets) and NPP12 (Energy Efficiency and High-Quality Design) of the Neighbourhood Plan for Belper. Furthermore, the proposed development remains in full accordance with the Framework and seeks to deliver the creation of 'high quality, beautiful and sustainable buildings' [§126] as part of a scheme that holds defining characteristics of local communities at its core [§127].

Heritage

6.42 A Heritage Impact Assessment [HIA] prepared by Lichfields to demonstrate an assessment of the proposal in the context of surrounding heritage assets is submitted in support of this application. Given the proposed development resides with the Belper and Milford Conservation Area and Derwent Valley Mills World Heritage Site, it is of paramount importance to fully assess potential impact of development.

6.43 In accordance with Paragraph 194 of the Framework, Heritage Impact Assessments establish the existing significance of the heritage assets to be affected, including an understanding of their setting. Future effects of proposals are subsequently assessed in relation to setting and perceived significance in accordance with IEMA/IHBC/CIfA's methodology.

6.44 The existing Belper Health Centre is a later addition to the wider Babington Hospital site and is not a listed heritage asset. The HIA states that the proposed development will be of negligible harm to the Grade II listed Babington Hospital building as despite the inclusion of an additional floor and wider building footprint, the proposals remain sympathetic to the heritage asset in terms of design and layout.

6.45 Furthermore, proposed alterations to the Grade II listed Eastern Boundary Wall (UID 1087382) are also considered to be of negligible harm provided works are conducted sensitively, including reconstructing pillars in their original form in a revised position. The public benefits of providing safe access arrangements meeting modern requirement and thereby facilitating the redevelopment of the site to provide an upgrade health centre are considered to comprehensively outweigh the negligible harm of revisions to the wall.

6.46 Similarly, access to the proposed 800KVA substation in the south-eastern corner of the application site will be achieved by creating a further opening on the stone wall, resulting in an impact on the significance of the eastern boundary wall through the loss of historic fabric. However, due to the limited size of the opening and its discrete position on the southern extremity of the eastern wall outside of public view, the HIA also deems this proposed wall revision to be negligible harm. In addition, the position and size of the substation has been informed by Western Power and is required to facilitate the operational requirements of the proposed health centre and cannot be accommodated elsewhere on the Site.

6.47 In terms of wider heritage designations, the HIA states that the proposed development remains stylistically compatible with the wider Belper and Milford Conservation Area. The HIA concludes that the proposed development would have a neutral effect on the Conservation Area and its overall significance would be preserved.

6.48 Similarly, the HIA assesses the proposals against the character of the Derwent Valley Mills World Heritage Site and considered that the proposed development would have neutral/nil impact on the WHS.

6.49 The HIA concludes:

1 The setting and significance of the surrounding Grade II Listed buildings will be preserved and proposed alterations to the Grade II Listed eastern wall and gate pier will be of negligible harm, particularly in the context of wider public benefits associated with the development;

2 The proposed development will have a neutral effect on the Conservation Area;

3 The proposed development will have a neutral effect on the World Heritage Site;

4 The proposed development reflects Belper's existing local vernacular in terms of scale, design, layout and massing; and,

5 The proposed development reflects the industrial character of the World Heritage Site.

6.50 Based on the evidence provided by the HIA, it is clear that the proposals remain sympathetic to the surrounding heritage context. Therefore, it is considered that the proposed development remains in accordance with Policy EN24 (Listed Buildings), Policies

EN26 and EN27 (Conservation Areas), Policy EN29 (Derwent Valley Mills World Heritage Site), Policy EN30 and EN31 (Archaeological and Heritage Features) of the AVLP.

6.51 Furthermore, the proposals remain in keeping with the local character of the Belper and Milford Conservation Area and wider Derwent Valley Mills WHS.

6.52 On the following grounds, it is considered that the proposed development also remains in accordance with Chapter 16 of the Framework regarding the Conservation and Enhancement of the Historic Environment.

BREEAM and Sustainability

6.53 The proposed scheme will be designed in accordance with the BREEAM criteria and has the potential to achieve the required 'Excellent' rating. Stroma Built Environment have managed the project in the pursuit of an 'Excellent' rating under the BREEAM UK New Construction 2018 guidelines.

6.54 BREEAM 'Excellent' requires a very high standard of sustainability across an array of categories including management, health and wellbeing, energy, transport, water, materials, waste, land use and ecology, pollution, and innovation.

6.55 An Energy Statement (March 2022) prepared by EP Consulting is submitted in supported of this application. This Energy Statement demonstrates the high degree of sustainable practices integrated into the proposed development to mitigate carbon emissions.

6.56 The Energy Statement outlines the following measures that are integrated into the building design to reduce energy usage:

1 The building has been designed with exceptionally low 'U' Values to reduce energy loss;

2 Air Source Heat Pumps shall provide heating to the building;

3 The proposed development is predominantly designed with Natural Ventilation with Mechanical Heat Recovery Ventilation provided only to Clinical Areas to comply with Health Building Notes and Health Technical Memorandum;

4 Low energy LED lighting is incorporated with automatic monitoring an reduction;

5 Hot water is generated as required without storage, thus reducing standing losses from large storage tanks.

6.57 The adoption of these measures results in substantial energy reduction and therefore, carbon emissions are reduced by 11.7% against the NCM Notional Building.

6.58 The proposed development will also include 2 solar arrays will feature on the roof of the proposed health centre to provide solar energy. The estimated yield of these solar array is 37,385 kWhr per annum, equating to a carbon emissions reduction of 19,403 kgCO2 per annum.

6.59 It is considered that the proposed development is representative of sustainable design of the highest order. The proposed development remains on track to obtain a BREEAM 'Excellent' rating and this has been central to the design philosophy from the outset. Therefore, it is considered that the proposals seek to meet the objectives of Policy CS1 of the AVLP regarding sustainable development. Furthermore, the proposed development accords with the primacy of sustainable practices outlined within the frameworks [§8-9, §126]

Highways, Access and Parking

6.60 The development proposals have been designed to be as sustainable as possible from a transport perspective. A Transport Statement [TS] (prepared by CBO Transport in May 2022) and Travel Plan (prepared by Local Transport Projects [LTP] in May 2022) have been prepared in support the application proposals.

Highways and Access

6.61 The supporting TS prepared by CBO Transport provides information on the traffic and transport aspects of the development proposals. CBO Transport assessed the baseline traffic conditions of the surrounding area on the 12th February 2020.

6.62 CBO Transport submitted a scoping note to Derbyshire County Council Highways outlining details of proposals, staffing, working hours, proposed access arrangements and parking provision. Derbyshire County Council Highways confirmed that no junction capacity assessments were required as part of this assessment.

6.63 The TS assessed the accident data from 2016 to 2020, including provisional 2021 data through to June, associated with the full length of the A6 Derby Road stretch that adjoins the eastern boundary of the site. One personal injury accident was recorded at the southern site access during the identified five-and-a-half-year period, occurring in November 2019. This injury accident did not involve a pedestrian or cyclist. In addition, one personal injury accident record was recorded 50m to the south of the southern entrance opposite the Tavern Public House. The TS concludes that no notable accident has been recorded in the vicinity of the site linked to the existing Babington Hospital site access, nor does the presence of a notable highway safety issue exist in the immediate vicinity of the site. Therefore, there are no existing highway safety issues that impact upon the proposals.

6.64 Swept path analysis appended to the TS (Figure 5.1/5,2) confirms that ample space for emergency and refuse vehicles is provided as part of the development. These vehicles will use the drop off area located to the north-east of the proposed health centre.

6.65 Given the recent impact of the Covid-19 pandemic, a significant number of desk-based NHS staff now have increased potential for flexible, homeworking. This is reflected in the significant reduction to daily traffic flows of around 232 vehicles movements under the proposals compared to the 'non-Covid existing situation', and a reduction of 391 vehicles movements compared to fully occupied condition. Therefore, the TS concludes that no operational/capacity assessment are required as part of the consideration of the proposed development and confirms that the proposals will have no impact on the operation of the Babington Hospital site accesses or the wider highway network.

6.66 Furthermore, the TS concludes that the proposed Health Centre will not prejudice the future sought redevelopment of the Babington Hospital in terms of traffic impact, access arrangements and parking provision.

6.67 Overall, the TS confirms that it is the recommendation of CBO Transport that there are no traffic or transportation grounds on which to refuse this application. Therefore, it is considered the proposed development remains wholly in accordance with Policy TP1 of the AVLP and seeks to improve access arrangements that are already deemed as appropriate in the context of the existing development.

Parking

6.68 This application is supported by a Travel Plan [TP] prepared by Local Transport Projects Ltd. In conjunction with the Proposed Site Plan, the proposed development includes a total of 100 car parking spaces for a range of site users.

6.69 Appendix 3 of the AVLP recommends that Non-Residential Institutions (D1), including medical or health service surgeries should provide 4 car parking spaces per consulting room. The proposed health centre includes 21 consulting spaces, equating to a provision of 84 parking spaces. Proposals include the provision of 100 total car parking spaces and in accordance with the conclusions determined by the TP, Appendix 3 of the AVLP is satisfied.

6.70 7 accessible spaces are proposed and are located to the east of the central car park loop to enable ease of access into the proposed health centre, an increase from 4 spaces currently present on site. This exceeds the minimum 5% provision as the Trust have sought to provide additional accessible spaces in accordance with demand at the recent Heanor Clinic planning application.

6.71 A total of 4 drop-off spaces are proposed to the north-east of the health centre entrance to enable swift entry into the facility and may also be used by taxi services. In addition, one ambulance bay for the use of EMAS is proposed in this location.

6.72 The proposed development will also include 10 electric vehicle charging points in accordance with BREEAM requirements, an increase from the existing 2 charging points present on site. This seeks to ensure a sustainable future for the development and the objectives of NPP7 of the Neighbourhood Plan for Belper.

6.73 It is considered that the proposed development provides ample car parking space provision for a range of site users, including the needs of accessible users, EMAS and Derbyshire Police, and will facilitate the transition towards increased electric car usage. Therefore, it is considered that the proposed development accords with the parking standards outlined within Appendix 3 of the AVLP and seeks to aid the transition towards a low carbon future as outlined within the Framework [Chapters 9 and 14].

Pedestrian and Public Transport Accessibility

6.74 The TS states that pedestrian infrastructure in the vicinity of the Babington Hospital site is of a good standard with good quality footways on both sites of the A6 Derby Road, leading towards Belper Town Centre, local bus stops and Belper Train Station. There is an existing traffic light controlled pedestrian crossing located circa 80 metres north of the southern access.

6.75 The accompanying TP also demonstrates the array of sustainable transport offerings available to future site users and presents an Action Plan for increasingly sustainable site access over time. The accompanying Action Plan provides a means of reducing staff trips from a baseline 93.8% of staff trips being made by vehicle drivers to no more than 88% in Year 5 by encouraging sustainable transport solutions, such as encouraging cycling to work and car-sharing.

6.76 An additional pedestrian access is proposed immediately to the south of the southern access. New blister paving is proposed to the east and west of the Council owned access road and additional road markings and signage will be included as part of the amended layout of the southern access to improve pedestrian access to the site.

6.77 Listed Building Consent is sought for the amendments to the wall given that the wall is Grade II listed (Eastern Boundary Railed Walls and Piers at Babington Hospital [Grade II:

LE 1087382]). The Heritage Impact Assessment submitted in support of this application states that the widening of the vehicular access and creation of a new pedestrian access would be of negligible harm. In addition, once assessed against the potential for public benefits of providing a safe pedestrian and vehicular access, the proposed wall alterations are considered as appropriate to facilitate modern needs of the development.

6.78 The site is located sustainably from the outset as the entirety of the town centre is within a 1km walk of the proposed development. The Site remains highly accessible for pedestrians and there is a large catchment of residential properties within a 2km radius, considered the maximum acceptable commute distance on foot.

6.79 The site is also highly accessible for cyclists and the scheme includes 18 cycle spaces, including power points for e-bike charging in the proposed cycle storage shed.

6.80 Bus stops are located directly outside of the Babington Hospital site on either side of the A6 Derby Road. Additional bus stops are located 400m north of the site on the A609 New Road. Local bus services provide direct links to Derby to the south, and Matlock and Buxton to the north. These services are relatively frequent with services ranging between 15-40 minutes between Belper and Derby.

6.81 Belper Train Station lies 675m northwest of the Site and is located on the Midland Main line between Leeds and London St Pancras.

6.82 Overall, it is considered that proposed development is sustainably located from the outset and benefits from a wide array of existing public transport links. In addition, proposed junction improvements, improved road marking and paved pathways leading to the sought health centre increase overall pedestrian safety when accessing the site on foot.

6.83 Therefore, it is considered that proposals fully accord with the sustainable transport promotion outlined in Chapter 9 of the Framework, and Policy TP1 of the AVLP regarding assessment of impacts on the existing transport network associated with development proposals.

Amenity

Noise

6.84 A Noise Impact Assessment [NIA] has been prepared by Stroma Built Environment (May 2022) to accompany this application. This included a site visit to assess the baseline noise conditions of the locality, and noise modelling to determine impacts on local amenity.

6.85 The NIA assesses the proposed development in accordance with HEA05 (Health and Wellbeing- Acoustic Performance) and Pol 05 (reduction of Pollution- Noise Attenuation) credits of the BREEAM 2018 New Construction guidelines.

6.86 A baseline noise survey was undertaken between 27th February and 2nd March 2022 to assess prevailing noise level of the site and immediate surrounding asses against the British Standards 4142 (2019) with regards to methods for rating and assessing industrial and commercial sound. A concurrent short-term monitoring was also undertaken on the afternoon of 27th February to assess the change in noise level across the site.

6.87 Closest noise sensitive receptors to the Site include residential dwellings along A6 Derby Road 17m east, and commercial/office buildings on Goods Road 12m south of the site boundary respectively.

6.88 The NIA confirms that the noise climate in this vicinity is largely determined by traffic activity on Derby Road. The NIA provided provisional fixed plant noise limits to meet the BS 7445 rating. Operational plant is proposed internally in the lower ground floor of the building and will not materially impact the assessed criteria for external noise levels.

6.89 It is considered that the proposed development remains sympathetic to the existing community and will not incur undue amenity impacts. Therefore, it is considered that the proposed development remains in accordance with Policy EN16 regarding pollution and amenity impacts, and Policy LS3 (Design). Furthermore, it is considered that British Noise Standards and the Framework [§174] are adhered to.

Air Quality

6.90 An Air Quality Assessment was prepared by IDOM Merebrook Limited (IDOM) in support of this application in March 2022. The Assessment evaluates the proposed development in relation to nearby sensitive receptors, relevant local, regional and national policy, determines the suitability of the Site via qualitative assessments and provides suggestions for potential mitigation.

6.91 The Air Quality Assessment concludes the following:

1 The Site is not located in an Air Quality Management Area and baselines concentrations of all air pollutants are expected to be significantly below relevant Air Quality Objectives [AQOs] based on a review of published data sources. In response, the Site is considered suitable in air quality terms and no specific mitigation measures are considered necessary to reduce the exposure of air pollution to future site users.

2 The Site is considered to be predominantly 'low risk' in terms of dust soiling at surrounding sensitive receptors as a result of construction on site, whilst risk of human health impacts during construction is also considered to be 'low'. Recommended mitigation measures are advised as part of a Construction Environmental Management Plan [CEMP] and if construction is carried out in accordance with these measures, the overall effect on local air quality is considered to be 'not significant.'

3 The scheme is expected to result in a significant decrease in vehicle movements compared with the site's existing use, which is considered to have a positive impact on local air quality.

4 The operation of the proposed heating strategy on local air quality is deemed 'not significant'

5 Overall, it is considered that the development proposals adhere to policy guidance and concludes that air quality is not a constraint in the granting of full planning permission.

6.92 Based on the evidence provided throughout IDOM's Air Quality Assessment, it is considered that the proposed development fully accords with Policy EN16 of the AVLP.

Ecology

Preliminary Ecological Appraisal

6.93 A Preliminary Ecological Appraisal [PEA] has been prepared by Udall-Martin Associates Limited in support of this planning application. This PEA includes a desk study, an extended phase-1 habitat survey and a bat scoping survey.

6.94 The PEA confirms that that the site includes no statutory or non-statutory designated nature conservation sites. One statutory site (LNR) and 15 non-statutory sites are

identified within the 2km study area. The main potential ecological constraints identified in association with the proposed development included potential loss, damage and disturbance to habitats, and the spreading of non-native invasive species.

6.95 A large number of mitigation, compensation and enhancement recommendations are outlined within the PEA and have informed design and landscaping proposals, and commitments to biodiversity net gain.

6.96 It is considered that further pre-commencement conditions will be enforced by the Council to ensure that additional badger surveys and nesting bird checks are undertaken prior to the commencement of demolition works. It is considered that further site surveys will be undertaken to mitigate any re-growth of Himalayan Balsam and Japanese Knotweed.

6.97 In addition, a Site Ecology Management Plan should be produced outlining recommendations for maintaining and enhancing the variety of habitats on the site as stated within the PEA.

6.98 Udall-Martin Associates have produced a Biodiversity Metric 3.1 demonstrating the extent of biodiversity net gain provision on site. The proposed development will include an array of methods of ecological enhancement to prove overall biodiversity net gain. For instance, these measures include the delivery of native species-rich wildflower meadow, and native tree and shrub planting to provide a 12.69% increase to habitat units and a 91.36% increase to hedgerow units across the overall site. Therefore, the Metric identifies that overall biodiversity net gain has been achieved and the proposed development subsequently accords with the need to demonstrate measurable net gains outlined within Paragraph 179 of the Framework.

6.99 Overall, it is considered that provided the appropriate mitigation outlined by the PEA is accorded to, the proposed development remains in full accordance with Policy EN13 (Biodiversity) of the AVLP. The proposed development meets national policy outlined in the Framework regarding the provision of net gains for biodiversity [§179].

Bat Survey

6.100 A Bat Survey (June 2022) has been prepared by Udall-Martin Associates Limited in support of this application. This bat survey involved a bat scoping survey and two dusk bat surveys at the existing building. These surveys were initially undertaken as part of a prior survey on the 15th October 2019 but updated surveys were undertaken in support of this application on the 29th June 2021. These surveys inform potential impacts to roosting bats and make recommendations for general mitigation, compensation, enhancement and further surveys, as appropriate.

6.101 No bats or evidence of roosting bats were found on the building surveyed and no bats were recorded emerging from the surveyed buildings or trees. Therefore, adverse impacts to roosting bats are considered unlikely and an EPS mitigation licence will not be required for the building demolition works or tree felling works.

6.102 The Bat Survey recommends that if building demolition is not carried out until the bat survey period May to August 2022, then further bat surveys should be carried out during the optimal bat survey period in May-August 2022 to update present survey results.

[redacted]



Trees- Arboricultural Impact Assessment

6.107 An Arboricultural Impact Assessment (June 2022) [AIA] has been prepared by Barton Hyett Associates in support of this application. The scope of the AIA centres on inspections of trees relevant to the planning application at the site and to provide written advice on how they inform feasibility and design options for the Site.

6.108 A total of 74 individual trees, 12 groups of trees, and 4 hedgerows were assessed as part of the AIA.

6.109 In order to facilitate the proposed development, a total of 12 individual trees are proposed for removal. 9 of these trees are Category B (moderate quality) and a further 4 are Category C (low quality). No category A trees (high quality) are proposed for removal. One Category B hedgerow is also proposed for removal.

6.110 The AIA states that the partially incurred loss of canopy cover is justified as a minor impact in relation to the wider proposals, including the potential for new tree planting on site.

6.111 The AIA concludes that the proposal is feasible from an arboricultural perspective and provided development is implemented in accordance with an approved arboricultural method statement, the proposed development would have no to low potential negative impacts on retained trees. It is considered that an arboricultural method statement will likely be required as a pre-commencement condition by the Council.

6.112 The following tree protection measures are advised by the AIA:

1 Tree protection barriers should be used to clearly demarcate construction exclusion zones, as outlined in Section 3 of the AIA;

2 Orange mesh fencing is erected along the edges of the boundary hedges H1 and H2 to alert site operatives that they are to be protected;

3 Signs advising the purpose of tree protection barriers should be affixed at regular intervals to inform site workers of their significance.

6.113 The AIA concludes that provided the advised mitigation is adhered to, the proposed development is acceptable from an arboricultural perspective. The proposed loss of trees can be readily mitigated and retain can be adequately protected during the construction phase of the development.

6.114 Therefore, it is considered that the proposed development accords with Policy EN13 (Biodiversity) and BS 5837:2012 regarding the technical assessment of tree protection and arboricultural methodologies. In turn, it is considered that the proposed development meets national policy contained within §179-181 of the Framework.

Ground Conditions

6.115 A Phase 1 and Phase 2 Geotechnical and Geo-environmental Site Investigation conducted by Eastwoods and Partners (Consulting Engineers) Limited is submitted in support of this application. The Phase 1 investigation reviews published documentation regarding current and former land uses on site and in the immediate surroundings, as well as the environmental sensitivity of the site location in terms of geology, hydrogeology and hydrology. The Phase 2 investigation consists of intrusive works and laboratory analysis. Findings are assessed against a conceptual model to produce a final risk assessment.

6.116 Eastwoods and Partners conducted a Ground Investigation on the 14th January 2020 which included the excavation of 10 trial pits. Soil samples were assessed under laboratory testing. The assessment uncovered rare pockets of ashy sand, but no other visual or olfactory evidence of significant contamination was identified within any of the exploratory holes.

6.117 The Phase 2 Investigation identified marginally elevated lead concentrations in one sample of topsoil and one sample of made ground from TP05, potentially identified from a historic surface spillage. All topsoil from this region of the site will be removed as part of wider construction works and will be removed as there is no requirement for re-use. All in all, the material will not present a significant risk to the health of future site users, and therefore no remediation works are required.

6.118 The overall risk to the health of construction workers over the course of the development is considered to be low.

6.119 The Phase 1 and 2 Geotechnical and Geo-environmental Site Investigation identifies no other significant constraints that would impede development.

6.120 Overall, it is considered that the proposed development wholly accords with Policy EN16 regarding management of pollution. Given that no significant land contamination has been identified as part of this Phase 1 and Phase 2 Site Investigation, the proposed development does not qualify for the imposition of additional planning conditions associated with Policy EN17 and Policy EN18. In addition, the proposals remain in accordance with the guidance contained within the Framework, particularly Paragraph 174 with regards to the conservation and enhancement of the local environment.

Archaeology

6.121 A comprehensive Architectural and Archaeological Assessment and Statement of Significance of the wider Babington Hospital Site was conducted by Richard K Morriss & Associates in February 2018. An assessment of the existing Health Centre building is

comprised with Section 3.3.24 'Building X: The Nursery' and is regarded as the last major addition to the site constructed as a modern development with respect to the wider character of Babington Hospital.

6.122 The Assessment evaluates the significance of the main Babington hospital building from Very High (Grade I assets) to Limited (Structures of little value) but the Site in question is not directly categorised. The overall Babington Hospital site is considered to be of High local, regional and national significance as a historic Poor Law Workhouse site, but the site has no close historical association with a historic event of national or even regional significance.

6.123 The Assessment concludes that despite clear constraints in the context of listed heritage assets and the wider Belper Conservation Area, redevelopment and demolition is not insurmountable proved proposals are well-designed and enhances existing heritage assets. In addition, the Assessment states that only the buildings identified as being of high significance in Figure 9 of the Assessment should be retained as part of any proposed development and the proposed site does not come under this designation.

6.124 The Assessment states that any of the remaining buildings on site could be demolished provided there is a robust justification for redevelopment. Furthermore, the Assessment (Figure 10) specifically states that an obvious area for new build development would include the Nursery, e.g. the proposed site, provided the requirements of the Conservation Area are met.

6.125 It is considered that the principle of development and demolition, and the compatibility of the design scheme within the context of the Belper Conservation Area have been comprehensively established in prior sections of this planning appraisal. The Assessment provides further evidence of the principle of demolition and redevelopment of the proposed site from an archaeological and architectural heritage perspective.

6.126 It is considered that the collaborative conclusion of this Assessment is in accordance with the conclusions of the Heritage Impact Assessment also submitted in support of this application. Therefore, the proposed development is regarded to fully accord with the Development Plan. This specifically relates to Policies EN24, EN26, EN27, EN29, EN30 and EN31 of the AVLP regarding heritage concerns, Policies NPP3, NPP11 and NPP25 of the Belper Neighbourhood Plan, and the Listed Buildings and Buildings in a Conservation Area SPD.

Flood Risk and Drainage

Flood Risk

6.127 A Flood Risk Assessment [FRA] prepared by Eastwood & Partners in January 2022 accompanies this application. Extensive consultation with the Environment Agency has informed the overall design process throughout the planning stage and submission plans remain in accordance with the advice issued by the EA.

6.128 From the outset, Table 2: Flood Risk Vulnerability Classification (PPG Reference ID: 7-066-20140306) of the Practice Guidance states that health centre development is classified as a 'more vulnerable' use. However, the proposed development remains wholly compliant with Table 3: Flood Risk Vulnerability and Flood Zone 'Compatibility' (PPG Reference ID: 7-067-20140306) provided an Exception Test is undertaken. The supporting FRA demonstrates compliance with Paragraph 160 as the proposed development will provide

significant sustainability benefits to the community that outweigh flood risk, whilst extensive mitigation has been implemented to manage flood risk concerns.

6.129 For example, the FRA concludes that the proposed development is compatible with Flood Zone 3a as the proposed development has been designed to remain out of Flood Zone 3a levels with the accommodation levels of the building structure significantly above flood levels.

6.130 The proposed development is to be water resistant and resilient with a finished floor level set at 64.50m AOD, 1.48m above the design flood level (1 in 100 year plus 30% climate change flood level) and 0.91m above the 1 in 100 year plus 50% climate change flood level.

6.131 The UK Government's Standing Advice for Vulnerable Developments states that vulnerable development must have a finished floor level of at least 300mm clear of the estimated river level. The finished floor level of the proposed development is 64.50m AOD which is 1.63m above the estimated river level, significantly above the 300mm threshold.

6.132 This approach has been directly informed by pre-application advice received from the Environment Agency on the 10th March 2021. This pre-application advice constitutes Appendix 4 of the FRA. The EA confirmed that no new structures or ground raising should take place in Flood Zone 3b, and finished floor levels must be set 300mm above the 1 in 100-year 30% climate change flood level, and at or above the 1 in 100-year 50% climate change flood level.

6.133 The lower ground level of the western entrance serving the existing car park is to be below the 1 in 20-year (Flood zone 3b) floodplain level. Flood resistant construction is incorporated into the proposed development up to the design flood level of 63.02m AOD with flood resistant design incorporated where possible. This will prevent internal areas of the building at lower ground level from flooding. External areas at lower ground level will be allowed to flood and comprises part of the floodplain compensation provision.

6.134 The wider site, including the car park, are situated within Flood Zone 3b. No ground raising or new structures are proposed within this region and will not reduce floodplain groundwater storage. In fact, a substantial net increase in floodplain storage in excess of 450m^3 as a part of the proposed development, including undercroft space beneath the west wing.

6.135 The northern main entrance and fire escape routes are to remain at the existing level of 64.15 AOD, 1.29m above the design flood level to ensure safe evacuation routes to high ground and safe, flood-free accesses are maintained. Additional exit points in the east wing lead directly into Flood Zone 1.

6.136 The delivery of SuDS is inviable on the Site due to poor infiltrations rates of the underlying ground within the floodplain. Surface water disposal will naturally occur via the wider existing surface water sewerage network between Babington Hospital and the existing clinic via the existing 150mm pipe connection. Surface water discharge will be restricted to 70% of the current levels and attenuated to reduce the brownfield rate by 30% to 6[.5l/s. Attenuation storage will be sized for the 1 in 100 year plus 40% climate change event, accommodated by proprietary underground storage crates.

6.137 It is considered that the proposed development fully accords with the Development Plan, namely Policy EN15 (Development and Flood Risk) of the AVLP and Policy NPP10 (Reducing the Risk of Flooding) of the Belper Neighbourhood Plan. Furthermore, the supporting evidence demonstrates that the proposed development meets the guidance

contained in Chapter 14 of the Framework regarding meeting the challenges associate with flooding, with particular reference to Paragraph 160.

Drainage Strategy

6.138 A Proposed Drainage Strategy prepared by Eastwood & Partners in January 2022 accompanies this application.

6.139 The Proposed Drainage Strategy concludes that:

1 Part of the proposed health centre building will be located over the existing sewer and therefore, the sewer will be diverted to ensure that the necessary minimum easement to the proposed building is provided. An application for sewer diversion is to be made to Severn Trent Water upon obtaining planning approval.

2 Disposal of surface water via soakaways is not suitable on this site and there are no suitable watercourses on or immediately adjacent to the Site. Therefore, discharge to the public sewer network remains the sole viable option for the disposal of surface water. It is proposed that surface water from the Site be discharged to the existing private 150 dia.

3 A vortex flow control device will provide a 30% reduction to existing discharge rates to reduce flood risk, granting a permitted discharge rate of 6.5 litres/second.

4 All surface water storage is to be provided above the modelled 1 in 100 year + 20% for climate change flood water level of 62.86 AOD. The proposed post development impermeable area of 1,883m^2 will require 66.3m^3 of storage to meet the design criteria. This storage will comprise two blocks of proprietary below ground voided storage units and a length of oversized pipe.

5 Foul discharge will be collected within a traditional gravity drainage system before discharge to the diverted 300 dia. Combined sewer. An application for sewer diversion is to be made to Severn Trent Water for the new connection after the details of sewer diversion have been agreed.

6 Full details of the proposed foul and surface water drainage scheme are shown in Appendix 7 of the accompanying Drainage Strategy (Dwg. 44618/016c).

6.140 It is considered that the proposed development fully accords with the Development Plan, namely Policy EN15 (Development and Flood Risk) of the AVLP and Policy NPP10 (Reducing the Risk of Flooding) of the Belper Neighbourhood Plan. Furthermore, the supporting evidence demonstrates that the proposed development meets the guidance contained in Chapter 14 of the Framework regarding meeting the challenges associate with flooding and managing drainage concerns [§169].

Landscaping

6.141 A comprehensive landscaping scheme has been devised by / Eammon Byrne Landscape Architects. The supporting Ecology Report has strongly informed the proposed elements of this landscaping scheme to ensure that biodiversity net gain is achieved.

6.142 As stated in the AIA section of this planning appraisal, the majority of trees will be retained as part of the proposals. Detailed components of the landscaping scheme have been established in Section 3.0 of this Statement and are demonstrated on Dwg. 2014-CO-LP-01-01-REV-5.

6.143 Landscape design has been central to the design of the proposed development and has sought to sympathetically entwine the proposals to the local setting from an architectural and landscaping perspective.

6.144 Hard landscaping areas will use permeable materials where possible to reduce rainwater run-off or will drain into adjacent planted areas for self-irrigation.

6.145 Soft landscaping seeks to encourage biodiversity and utilises native species that are compatible with the flood plain. Planters are located at the building entrance to encourage further diversity and further hard landscaped areas.

6.146 Landscape design has been informed by the requirement to deliver measurable net gains for biodiversity as outlined within Paragraph 179 of the Framework. A Biodiversity Metric 3.1 prepared by Udall-Martin Associates accompanies this planning application and demonstrates that the proposed landscaping scheme will deliver a 12.69% increase to habitat units and a 91.36% increase to hedgerow units across the overall site.

6.147 Therefore, the landscape scheme accompanying this application secures biodiversity net gain for this development and aligns within national policy contained within §179-181 of the Framework. In addition, the proposed landscape scheme ensures a high degree of design quality in terms of both soft and hard landscaping. It is considered that the proposed development accords with Policy EN13 (Biodiversity) and Policy LS3 (Design) of the AVLP.

Summary

6.148 It has been demonstrated in Section 6.0 that the proposed development is compliant with Development Plan policy. The proposals therefore accord with the Framework which states that planning applications that accord with the policies in the Development Plan will be approved without delay unless material considerations indicate otherwise. In accordance with Section 70(2) of the 1990 Act and Section 38(6) of the 2004 Act the proposed development should therefore be granted planning permission.

7.0 Sustainable Development

7.1 The section considers the compliance of the proposed development with the principles of sustainable development as set out in the Framework [§8]. It demonstrates that the proposals perform a positive economic, social and environmental role and should be given significant weight in the planning balance.

Economic Role

7.2 The proposed development will contribute to vitality of town centres and ensure that essential local services continue to operate in rural areas.

Economic Benefits during Construction

7.3 A number of economic benefits arise from the proposed development during the construction phase, including significant job creation of additional GVA as a result of direct, indirect and induced jobs.

7.4 National construction firms use a combination of their own permanent workforce and local contractors on projects, with a proportion of construction workers drawn locally. Based on experience elsewhere, it is reasonable to expect that a proportion of the construction jobs created by the proposed development will be taken up by the local workforce, particularly if measures are in place to encourage local recruitment and to raise local skill levels.

7.5 In addition, it is also likely that some businesses in the local area, (as well as the North West economy generally), would benefit from the trade linkages that would be established to construct the proposed development. This means that further indirect jobs would be supported locally from suppliers of construction materials and equipment. Local businesses would also benefit to some extent from temporary increases in expenditure as a result of the direct and indirect employment effects of the construction phase (e.g. construction workers visiting local shops and other facilities).

7.6 Additional employment opportunities would result in terms of indirect and induced jobs. For example, as a result of businesses in the local area benefiting from the trade linkages that would be established to construct the development.

Economic Benefits after Completion

7.7 The proposed development seeks to retain local healthcare provision in Belper and will continue to generate secondary trade for local businesses. It is of paramount importance that rural communities remain sustainable from a services perspective, but the secondary benefits of drawing site users and employees to Belper continues to aid the local economic conditions of the settlement.

7.8 The main Babington Hospital building currently supports a total of 317 staff members, which is a reduction from the former 395 staff that worked in the hospital upon full occupation. The proposed health centre will support 100 members of staff and will maintain public health care provision in Belper.

Social Role

7.9 The Framework [§92] sets out that the planning system should seek to protect and enhance the natural, built and historic environment including making effective use of land, improving biodiversity, and mitigating and adapting to climate change.

7.10 The proposed development will provide a high-quality health centre that will provide a significantly greater standard of healthcare provision in Belper and the wider Derbyshire area. Babington Hospital is no longer fit for purpose and the existing Belper Clinic cannot feasibly integrate new healthcare services or meet the necessary requirements of modern public health standards. The proposed development will provide increased and improved facilities to ensure that the local community continues to receive high-quality public healthcare services on a local level.

7.11 The proposed development will deliver fairer access to all site users, particularly compared to the existing health clinic. The design philosophy has held users with accessible needs at its core with the integration of drop-off car parking spaces, 7 accessible car parking spaces and multiple lift accesses throughout the building. In addition, dementia-friendly design from the outset in terms of layout and detailing ensures that site users with further needs can efficiently navigate the building with ease. The proposed development is egalitarian in nature and seeks to enable efficient, high-quality provision for all.

7.12 The proposals will deliver a highly sustainable development which has good access to jobs, shops, services and transport links. Evidence submitted in conjunction with this report demonstrates that the site is highly accessible through a range of sustainable modes of transport including buses and trains. 18 cycle spaces are included to encourage the promotion of an active lifestyle and sustainable access to the site. The integration of modern technological infrastructure in the form of EVCPs seeks to aid the transition towards a low-carbon future and increased electric vehicle usages.

7.13 Furthermore, the proposed development seeks to protect and enhance the surrounding context of the Belper and Milford Conservation Area and the Derwent Valley Mills World Heritage Site to ensure that the local community continues to benefit from the heritage site of the region. In the context of the wider residential redevelopment of the main Babington Hospital building, it is considered that the proposed development will retain the legacy of healthcare provision in Belper, and on this site in particular.

Environmental Role

7.14 The Framework [§8] sets out that the planning system should seek to protect and enhance the natural, built and historic environment including making effective use of land, improving biodiversity, and mitigating and adapting to climate change.

7.15 The proposed development will provide a number of positive environmental benefits, with the inclusion of numerous environmental initiatives and the protection and enhancement of the historic environment surrounding the site. Sustainability has been a key feature of the scheme's design evolution and the proposals incorporate a number of sustainability initiatives which have ensured a BREEAM 'Excellent' rating. In particular:

1 The site is located in a highly sustainable location in Belper and seeks the maintained provision of local healthcare services within the settlement.

2 The proposals will promote the use of sustainable modes of transport from the outset in the Site's proximity to existing bus and train services. Furthermore, 18 cycle spaces will be provided as part of the scheme to encourage cycling to and from the development.

3 The proposed development will provide energy efficient design principles to help meet CO_2 reductions.

4 Materials are proposed to be responsibly sourced and materials with low environmental impact will be selected and local suppliers will be prioritised. This

includes the re-use of stone materials from the existing health clinic to retain the character of the area and minimise waste.

5 The proposed health centre will utilise a multi-faceted energy strategy to mitigate the impacts of climate change and the attainment of a BREEAM 'Excellent' rating.

6 The proposed development places heritage considerations at its core and seeks to protect and enhance key features of the historic environment.

Conclusion

7.16 It is concluded that the proposed development performs a positive economic, social and environmental role and comprises sustainable development in accordance with the provisions of the Framework [§8].

8.0 Conclusions

Development Plan

8.1 The starting point for the consideration of the development proposal must be whether the proposals comply with the Development Plan. In this case, the relevant policies are contained the Amber Valley Borough Local Plan [AVLP] (April 2006).

8.2 It is demonstrated within this planning statement that the proposals accord with the relevant policies of the adopted Development Plan. Therefore, it is considered that the proposed development should be approved without delay in accordance with Paragraph 11d of the Framework.

8.3 In accordance with Section 70(2) of the 1990 Act and Section 38(6) of the 2004 Act, the proposed development should therefore be granted planning permission without delay.

Material Considerations

8.4 There are also material considerations which support the grant of planning permission. In particular, the proposed development will secure the benefits of the three roles of sustainable development identified in the Framework [§8]. The proposed development of this site represents sustainable development as it will deliver significant economic, social and environmental benefits.

8.5 It is considered that the proposals present an opportunity to provide the local community with an exceptionally high-quality health centre that exceeds the current standard of healthcare provision in Belper immeasurably. The sought attainment of a BREEAM 'Excellent' rating epitomises the sustainable practices that have remained central to the design process. Therefore, it is considered that the proposed development wholly accords with the primacy of sustainable development outlined within the Framework.

Planning Balance

8.6 When considering the proposed development at this site, in the context of S.38(6) of the 2004 Act and S.70(2) of the 1990 Act, the position is therefore that there is no justified conflict with planning policy and other material considerations weigh in favour of the proposed development. There are no impacts associated with the proposed development which would significantly outweigh the benefits of the scheme.

8.7 For the above reasons, and in accordance with the requirements of Paragraph 11d of the Framework, we request that planning permission is granted for the proposed development without delay.

Appendix 1

Ms Amy Paget
Race Cottam Associates Limited
1 East Parade
Sheffield
South Yorkshire
S1 2ET

Our ref: LT/2019/124604/01-L01
Your ref: Email 28 Aug 2019

Date: 17 September 2019

Dear Ms Paget

PROPOSED REDEVELOPMENT OF HOSPITAL SITE
HOSPITAL SITE AT BELPER.

Thank you for giving the Environment Agency the opportunity to comment on the notes you took at our meeting on 23 August 2019 (as provided in your email dated 28 August 2019).

I apologise for the delay in replying.

We agree that the notes provided are an accurate reflection of what was discussed at the meeting.

We have attached the CIRIA guidance on locating SuDs in flood zones (although this does not apply to Flood Zone 3b). Below is *our internal opinion* on what issues will need to be considered with regards to SuDS being located in Flood Zone 3:

We have no issues in principle, with the location of attenuation features within the floodplain (Flood Zone 3), however ingress into the storage capacity, either through the ground or in flood conditions would be a potential concern. The normal mitigation would be through lining the pond to stop groundwater, and raising bunds around the edge of the pond to stop flood water getting in, however there is then the potential for third party impacts due to loss of storage.

In short, as long as these aspects are considered as part of the site specific flood risk assessment (FRA) then we would not raise objections based solely on attenuation features contained within Flood Zone 3.

Also attached is the 1 in 20 year (Flood Zone 3b) floodplain heights map. Our floodplain heights indicate 61.64mAOD across the entirety of the Flood Zone 3b outline area. The topographical survey supplied indicates some level of flood depths would flow to the

north east portion of the site albeit fairly shallow in depth. However, irrespective of depth it would appear this is still Flood Zone 3b and therefore could present issues both in terms of development but also attenuation. As a result, the model from WYG is even more crucial to the proposed development, in the Environment Agency's opinion.

Below are some useful links to the National Planning Policy Framework (NPPF):

Table 2: Flood Risk Vulnerability Classifications and Table 3: Flood Zone compatibility: https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-zone-and-flood-risk-tables.

NPPF Flood Risk and Coastal Change guidance: https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-zone-and-flood-risk-tables.

Yours sincerely

Mr Nick Wakefield
Planning Specialist

[redacted]

End

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years

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