



Old Memorial Hospital Sheep Street Cirencester

Settings Assessment



for

CA Project: 6008

CA Report: TBC

August 2016



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SUMMARY

Project Name: Old Memorial Hospital

Location: Sheep Street, Cirencester

NGR: SP 2102 1836

In August 2016, Cotswold Archaeology was commissioned by Carter Jonas, on behalf of Cotswold District Council, to undertake a settings assessment to inform a pre-application submission for redevelopment of the Old Memorial Hospital site, Sheep Street, Cirencester. The redevelopment will include the demolition of the standing building and conversion of the Site into a car park.

This assessment has found that the proposed development would result in less than substantial harm to the significance of the Grade II Listed Apsley Hall, and less than substantial harm to the overall significance of the Cirencester Town Centre Conservation Area.

The Planning (Listed Buildings and Conservation Areas) Act (1990) requires decision-makers to give 'special regard to the desirability of preserving the building or its setting'. In line with the Framework paragraph 134, the identified harm would need to be weighed against the public benefits of the proposed development.

1 INTRODUCTION

Outline

1.1 In August 2016, Cotswold Archaeology was commissioned by Carter Jonas on behalf of Cotswold District Council, to carry out a settings assessment in relation to the Old Memorial Hospital, Sheep Street, Cirencester, centred on NGR: SP 02102 01836 (hereafter referred to as 'the Site', Fig. 1).

Location and Landscape context

1.2 The Site (Fig. 1) is located on the east side of Sheep Street, Cirencester, in Character Area 6 of the Town Centre Conservation Area, at approximately 114m above Ordnance Datum. The Site is bounded by Sheep Street to the west, by the staff car park of Tesco's supermarket to the east, and neighbouring properties to the north and south sides.



Photograph 1: View of Old Memorial Hospital, view to the north-east

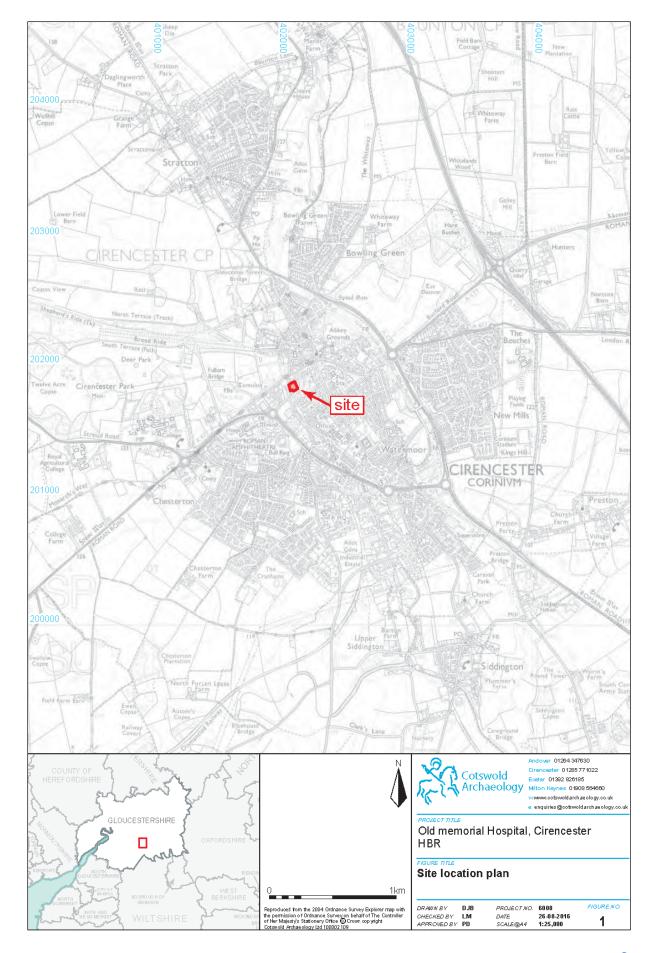
1.3 The building is surrounded by modern car park, which represents the hospital grounds acquired in 1931 for the eastern and northern extensions of that year.

Scope and objectives

- 1.4 This assessment has considered potential adverse impacts on the settings of designated heritage assets within the wider environs of the Site. The main objectives were:
 - to identify designated heritage assets within the study area, the significance of which may be harmed by the proposed development;

- to identify those elements of the setting of those heritage assets that make a
 positive contribution to their significance; and
- to assess the potential level of harm to the significance of these designated heritage assets as a result of changes to their setting.





2 METHODOLOGY

Heritage Assets

2.1 Heritage assets are defined by the National Planning Policy Framework (the Framework, Annex 2) as 'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage assets include designated heritage assets, and assets identified by the local planning authority (including local listing)'. Designated heritage assets include: World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas. Non-designated heritage assets include sites held on the Historic Environment Record, as well as other elements of the landscape understood to have a degree of heritage value (see below). Those heritage assets within the environs of the Site are recorded in Appendix A, and illustrated on Figure 2.

Settings assessment

- 2.2 The guidance on setting and development management, including assessment of the implications of development proposals, is provided by the Historic England guidance Historic Environment Good Practice Advice in Planning Note 3: the Setting of Heritage Assets (Historic England 2015b).
- In accordance with this guidance, setting comprises 'the surroundings in which a heritage asset is experienced' (Paragraph 4). All heritage assets have a setting, and elements of a setting may make a positive or negative contribution to its significance, and may affect the ability to appreciate that significance. The extent of the setting of a heritage asset is not fixed, and may change as the asset and its surroundings evolve (Paragraph 4). The extent and importance of setting is often expressed by a reference to visual considerations, but also comprises other elements that contribute to the ways in which a heritage asset is experienced, including factors such as noise, dust and vibration; by spatial associations; and by an understanding of historic relationships (Paragraph 5).
- 2.4 The Advice Note provides guidance with regard to the assessment of the implications of development proposals upon the settings of heritage assets. The methodology for the assessment of the setting of heritage assets employed by Cotswold Archaeology has been informed by this guidance. A staged approach is recommended for this assessment. The first step is to identify the heritage assets affected, together with their settings. The second step is to assess whether, how,

and to what degree, these settings make a positive contribution to the significance of the heritage asset(s), i.e. 'what matters and why'. This includes a consideration of the key attributes of the heritage asset itself, and then considers:

- the physical surroundings of the asset, including its relationship with other heritage assets; and
- the way in which the asset is appreciated.
- 2.5 The third step (where appropriate) is to assess the effect of the proposed development on the significance of heritage assets through consideration of the key attributes of the proposed development in terms of its:
 - location and siting;
 - form and appearance;
 - additional effects; and
 - permanence.
- 2.6 The fourth step is to maximise enhancement and minimise harm, and the fifth step refers to making and documenting the decision and monitoring outcomes.
- 2.7 The settings assessment presented in this report considers Steps 1, 2 and 3, which are the steps normally undertaken to inform the planning process. Step 4 is undertaken when it is considered necessary to specifically design or redesign a scheme to take heritage assets into account. This is not considered necessary in this case. Step 5 is a subsequent stage, also not applicable to this assessment.
- Step 1 was undertaken by means of an initial desk-based exercise: making use of historic environment data available from the Historic England and Gloucestershire archives. A site visit was subsequently conducted 1 September 2016, in order to assess the potential impact of the proposed development on the settings of selected designated heritage assets within the study area.

Site walkover

2.9 A walkover survey was conducted to the Site and its environs on the 1 September 2016. There was sufficient access to the majority of the heritage assets to assess likely impacts upon the significance of the assets due to changes in their setting. The visit and setting assessment was undertaken in reasonably good weather, with clear visibility.

Assessing heritage significance

- 2.10 Assessment of the heritage significance (value) of a site sets out to identify the ways in which particular parts of a place and different periods in its evolution, contribute to, or detract from, the identified heritage values associated with the asset.
- 2.11 Significance (for heritage policy) is defined in the Framework (Annex 2) as 'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historical. Significance derives not only from the physical fabric of a heritage asset, but also from its setting'.
- 2.12 The significance of heritage assets is articulated using the following criteria described by Historic England (formerly English Heritage) in the guidance Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment (English Heritage 2008). Within this document, significance is weighed by the potential for the asset to demonstrate the following heritage values:
 - Evidential value derives from 'the potential of a place to yield evidence about past human activity' (*ibid*, 28). It is primarily embodied by physical remains or historic fabric, but also includes buried archaeology;
 - Historical value derives from 'the ways in which past people, events and aspects of life can be connected through a place to the present' (*ibid*, 28). Illustrative historical value depends on visibility in a way that evidential value does not; and 'has the power to aid interpretation of the past [...] through shared experience of a place' (*ibid*, 29). Associative historical value creates resonance through felt connections with a notable family, person, event or movement;
 - Aesthetic value derives from 'the ways in which people draw sensory and intellectual stimulation from a place' (*ibid*, 30). Aesthetic value might be generated through conscious design and artistic endeavour, fortuitous and organic change, and the relationship of structures and materials to their setting; and
 - **Communal** value is tied to historical (associative) value and aesthetic value, deriving from 'the meanings of a place for the people who relate to it, or for

whom it figures in their collective experience or memory' (*ibid*, 31). Communal value may be commemorative, symbolic or social. The latter is typically 'associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence' and might only be articulated when the resource is under threat (*ibid*, 32).

- 2.13 The significance of a heritage asset is typically derived from a combination of some, or all, of these values, and the setting of a heritage asset can contribute to, or detract from, any of these four values. In Section 5 (below), the contribution made by setting to the significance of heritage assets is specifically discussed in terms of the ways in which it fosters or assists in the appreciation of these value(s) (Historic England 2015, 4-6).
- 2.14 The other attribute of setting that is of key relevance is the way in which the significance of the heritage asset is 'experienced'. As with its physical surrounds, the intelligibility of the heritage asset (and thus the way in which it is or can be appreciated) can only be articulated from an informed position on the heritage significance of the fabric of the asset. These statements of significance describe 'what matters and why'.
- 2.15 Although terms such as High, Medium or Low value, and National, Regional or Local importance are often adopted by the industry to express a summary description of the 'relative significance' of heritage assets, they are not universally recognised or accepted terms. These concepts require complex definitions to properly allow for their application and don't directly relate to the language or key tests required in determining planning applications or heritage consents.
- 2.16 Therefore, a simple three-tiered structure (derived directly from the Framework) to differentiate the relative significance of heritage assets is adopted. In descending order of relative heritage significance:
 - Designated heritage assets of the highest significance¹;
 - Designated heritage assets of *less than the highest significance*²; and

Designated heritage assets of the highest significance as derived from paragraph 132 of the Framework are Scheduled Monuments, protected wreck sites, Battlefields, Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, and World Heritage Sites".

² By elimination, those assets classified as "designated" but not noted within paragraph 132 and would comprise Grade II Listed Buildings, Conservation Areas and Grade II Registered Parks and Gardens.

Non-designated heritage assets.

- 2.17 The language used in this assessment is entirely consistent with the Framework and the Act and provides the decision-maker with sufficient (and no more) information than is necessary to understand how change (see below) could bring about harm to the heritage significance of an asset(s). Each of these 'ranks' of heritage asset have their own bespoke and relevant policy within the Framework. Thus the adopted approach simplifies the process of reaching an informed judgement, a necessary element of the planning-balance exercise.
- 2.18 Although the statements of significance will rightly acknowledge the fabric of the assets as being the embodiment and physical manifestation of heritage significance, the surroundings of the assets can contribute to their overall significance.

Harm (impact or effect)

- As clearly illustrated within the Framework, setting is not a heritage asset, therefore any attempt to convey the impact or harm of a Project has to be framed within the tightly defined parameters of *harm to the significance of the heritage asset itself*. This is a fundamental principle. In summary, a project could bring about change within a heritage asset's setting, causing harm to the significance of the heritage asset or the way in which the significance is experienced. References such as 'harm to the setting' are avoided.
- 2.20 Any quantitative description of change (or harm) is also avoided. Much like the scalar approaches to defining relative significance, those that adopt complex quantifying criteria are often weakened by circular definitions (i.e. "a moderate impact equates to significant changes to many of the attributes of the asset").
- 2.21 The clear statements of significance (the 'what matters and why') and a sound understanding of the character of the change brought about by the "Project", as presented in this assessment methodology, allow for a transparent articulation of the nature of the harm.
- 2.22 To further assist in the decision-making process, much like the approach taken for relative significance, a three-tiered approach is adopted to summarise the 'scale of the harm'. It is not used as the sole descriptive frame of reference, but just a simplistic summary. Again, the language used is entirely consistent with the

Framework and the Act and provides sufficient information to reach an informed judgement.

- **Substantial harm**: defined with specific regard to change within the setting of a heritage asset that "...would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced."³;
- Less than substantial harm; and
- **No harm** (or 'preservation'⁴), such that the attributes identified within the statement of significance have not been adversely affected.
- 2.23 The Framework does not employ the use of the terms 'substantial (or less than substantial) harm' with regard to non-designated heritage assets. However, for purposes of this assessment methodology it is deemed appropriate to apply the same terms for the 'scale of harm' to all types of heritage asset, whether designated or not.
- 2.24 Further information on good practice in implementing historic environment policy in the NPPF is provided within the guidance Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015a). This document provides advice on the assessment of the significance of heritage assets in support of applications for planning permission, and emphasises that any required information regarding heritage significance should be no more than would be necessary to inform the planning decision.

³ Paragraph 25 of the judgement by Jay J in R DCLG and Nuon UK LTD v. Bedford Borough Council [2013] EWHC 2847 (Admin).

⁴ Paragraph 45 of the judgement by Lindblom J in R (Forge Field Society) v. Sevenoaks DC [2014] EWHC 1895 (Admin) "Preserving", for both listed buildings and conservation areas, means doing 'no harm'. Thus 'preserving' does not mean 'no change'; it specifically means 'no harm'.

3 PLANNING POLICY

Legislative framework, national planning policy and relevant sector guidance

- 3.1 This assessment has been compiled in accordance with the following legislative, planning policy and guidance documentation:
 - National Heritage Act 1983 (amended 2002);
 - Planning (Listed Buildings and Conservation Areas) Act (1990);
 - National Planning Policy Framework (2012);
 - National Planning Practice Guidance: Conserving and enhancing the historic environment (Dept. for Communities and Local Government 2014);
 - Historic England, (2015a): Historic Environment Good Practice Advice in Planning: Note 2: Managing Significance in Decision-Taking in the Historic Environment, and
 - Historic England, (2015b): Historic Environment Good Practice Advice in Planning: Note 3: The Setting of Heritage Assets.

Planning (Listed Buildings and Conservation Areas) Act (1990)

3.2 The Planning (Listed Buildings and Conservation Areas) Act sets out the laws on planning controls with regard of Listed Buildings and areas of special architectural or historic interest (Conservation Areas). The document states that, when making planning decisions with regard to developments affecting Listed Buildings or their settings, the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses (Section 66).

National policy: National Planning Policy Framework (2012)

- 3.3 The Framework sets out national planning policy relating to the conservation and enhancement of the historic environment. It defines the historic environment as all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
- 3.4 Individual components of the historic environment are considered heritage assets: buildings, monuments, sites, places, areas or landscapes identified as having a

degree of significance meriting consideration in planning decisions, because of their heritage interest.

- 3.5 Heritage assets include designated sites and non-designated sites, and policies within the Framework relate both to the treatment of assets themselves and their settings, both of which are a material consideration in development decision making.
- 3.6 Key tenets of the Framework are that:
 - when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be (Paragraph 132);
 - significance can be harmed or lost through alteration or destruction of the heritage asset, or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to, or loss of, a Grade II Listed Building, park or garden should be exceptional. Substantial harm to, or loss of, designated heritage assets of the highest significance, notably Scheduled Monuments, Protected Wreck Sites, Battlefields, Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, and World Heritage Sites, should be wholly exceptional (Paragraph 132);
 - where a proposed development 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 (Paragraph 134); and
- 3.7 Local planning authorities should require an applicant to describe the significance of any heritage assets affected by a proposed development, including any contribution made to significance by their setting. The level of detail required in the assessment should be 'proportionate to the assets' importance, and no more than is sufficient to understand the potential impact of the proposal on their significance.'

Local planning policy

The Site is located within the administrative boundary of Cotswold District Council. Cotswold District Council is currently preparing a new Local Plan for 2011 – 2031. Prior to the adoption of the emerging Local Plan, planning applications are still subject to saved policies from the Local Plan for 2001 – 2011 (adopted 2006).

Those policies which are applicable to heritage and the proposed development are reproduced below.

Policy 15: Conservation Areas:

- 1. Construction of, alterations to and change of use of buildings or land, and the display of advertisements within or affecting a conservation area, must preserve or enhance the character or appearance of the area as a whole, or any part of the designated area. Uses that create additional traffic, noise or other nuisance, which would adversely affect the character of a Conservation Area will not be permitted. However, development may be permitted if it can be demonstrated that a proposal can help an Area to remain alive and prosperous without compromising its character or appearance.
- 2. Proposals for development requiring planning permission and/or Conservation Area Consent will be permitted unless:
 - a. they result in the demolition or partial demolition of a wall, structure or building, or the replacement of doors, windows or roofing materials, which make a positive contribution to the character or appearance of the Area;
 - b. the siting, scale, form, proportions, design, colour and materials of any new or altered buildings or advertisements, are out of keeping with the special character or appearance of the Conservation Area in general, or the particular location; or
 - c. they would result in the loss of open spaces, including garden areas and village greens, which by their openness make a valuable contribution to the character or appearance, or allow important views into or out of the Conservation Area;
- 3. Existing trees, hedgerows and other features, which are important to the character or appearance of a Conservation Area, will be protected. Within a Conservation Area, any new tree planting or other landscaping work, including surfacing and means of enclosure, shall be in character with the appearance of the Area.
- 4. Minor householder development that does not adversely affect or obscure historic property boundaries, such as burgage plots, is likely to be

acceptable in principle, although cumulative development that adversely affects the area as a whole may not be permitted. Where appropriate, the local authority will seek the reinstatement or enhancement of historic features, such as boundary walls, in association with acceptable development. New dwellings or other substantial structures, particularly those that cover more than one plot, are unlikely to be acceptable.'

Policy CIR.4: Memorial Hospital Site, Sheep Street, Cirencester:

The site shown as Policy CIR.4 is allocated for car parking until such time as adequate alternative public parking provision is made within or adjacent to Cirencester town centre. Once alternative public parking provision has been secured, the site is allocated for redevelopment for office and residential uses, subject to the following criteria being met:

- a. That the cedar tree is retained;
- b. an attractive pedestrian link is provided through the site from Sheep Street to the town centre, to be open for use by the general public at all times;
- c. a contribution towards the provision of off-site parking, to meet the needs of the development and to replace the public car parking lost through the site's redevelopment, shall have been secured; and
- d. the front section of the former Memorial Hospital and the air raid shelter must be retained at least until such time as a satisfactory redevelopment scheme has been approved.'

4 HISTORICAL BASELINE

Introduction

4.1 This section provides an overview of the historical background of the Site and the surrounding landscape, within at least 100m of its boundary (the study area). This provides a robust understanding of the context and significance of any heritage assets that may be affected by development within the Site.

Topography and geology

4.2 The Site is located on a plateau, at a height of *c*. 115m above Ordnance Datum (aOD). The bedrock of the Site consists of a Forest Marble Formation mudstone. Sedimentary bedrock formed approximately 165 to 168 million years ago in the Jurassic Period. There is an overlying superficial deposit of River Terrace Deposits Gravel. Superficial deposits formed up to 3 million years ago in the Quaternary Period.

Summary of designated heritage assets

- 4.3 No World Heritage Sites, or sites included on the Tentative List of Further Nominations for World Heritage Site status, are situated within the Site or its environs.
- 4.4 Part of the Corinium Roman Town Scheduled Monument is located within the Site with additional parts located within the study area, although the land immediately below and adjacent to the Old Memorial Hospital building is not included in the designated area.
- 4.5 No Listed buildings are recorded within the Site. There are several Listed buildings within the immediate environs of the site, the closest being Grade II listed 25 and 25A Sheep Street on the south-east edge of the Site. On the south side of 25 and 25A Sheep street is Kingsleigh and attached railing bases (B: c.30m south of Site) and 29 Sheep Street (C: c.50m south of site). On the west side of Sheep Street, opposite the Site is Apsley Hall (D: c.35m west of Site) and the former Railway Station (E: c.40m west of Site). There are more buildings to the north on Castle Street, the closets of these are 63 Castle Street (F: c.50m north of Site) and 53 and 61 Castle Street (G: c.50m north of Site) with more to the north-east of the Site.
- 4.6 The Grade I Cirencester Park, Registered Park and Garden (H), approximately 65m north-west of the Site. The park is an 18th century landscaped park of extensive woodland, with park and pleasure grounds.

4.7 The Site is located within western part of the Cirencester Town Centre Conservation Area. The Cirencester Park Conservation Area adjoins the Cirencester Town Centre Conservation Area on the north-west edge and is visible from the site.

The surrounding landscape

- 4.8 The Site is located within the historic town of Cirencester which is located c. 17km east of Stroud and c. 22km south-east of Gloucester. The origins of Cirencester town are based around a Roman fort which was located on the Roman road linking Exeter and Lincoln (Wacher and McWhirr 1982). The fort was established within the Leaholme area of Cirencester c.AD45 and was occupied until the mid-70s AD. The town replaced the fort c.AD75 and in the 2nd century the town was enclosed by a defensive circuit, initially of earthen rampart which was later reinforced with a stone wall along the external face (Wacher and Pamment Salvatore 1998). Excavations carried out from the 1960s onwards have revealed sections of the defensives, with the rampart appearing to run close to Sheep Street (Wacher and Pamment Salvatore 1998).
- 4.9 Following the end of the Roman Empire, activity within Cirencester appears to have declined until the 7th century when Cirencester re-emerged as an estate centre (Darvill and Gerard 1994). During the medieval period, Cirencester continued to develop and became a market town (Darvill and Gerard 1994).
- 4.10 The 17th century saw the development of two estates on the edge of the town (CTC 21016). Oakley Manor is the manor associated with Cirencester Park. It changed ownership infrequently and consists of Elizabethan houses set within landscaped grounds and parkland (CTC 2016). The manor was sold in 1695 to Benjaminn Bathurst, whose son is responsible for the extensive landscaping of Cirencester Park (CTC 2016).

5 SETTINGS ASSESSMENT

- 5.1 Designated heritage asserts within a 100m radius of the Site were considered for a settings assessment according to Step 1 of Historic England's *Historic Environment Good Practice Advice in Planning Note 3: the Setting of Heritage Assets* (Historic England 2015b). This process took into account the nature of the prevailing topography, distance between the Site and the asset concerned, the presence of intervening vegetation (woods, tree belts, and hedgerows), built form screening, the primary aspect, experience of the heritage assets and the nature of the proposed development and comments provided by the Conservation Officer.
- The exercise concluded that there was no inter-visibility between the Site and the majority of the designated heritage assets located within the Site's wider environs, including four Listed Buildings (Fig. 2, B,C, F and G) and one registered Park and Garden (Fig. 2, H). This was due to the screening effect of intervening built form, vegetation and topography. This lack of inter-visibility and any other perceived visual relationship was confirmed during the site visit. Research into the history of the Site and the surrounding environs shows that these assets share no historical or functional relationship with the Site. As such, the Site is not considered to form part of the setting of these designated heritage assets from which they draw significance, and thus they have been excluded from further assessment.

Corinium Roman Town Scheduled Monument

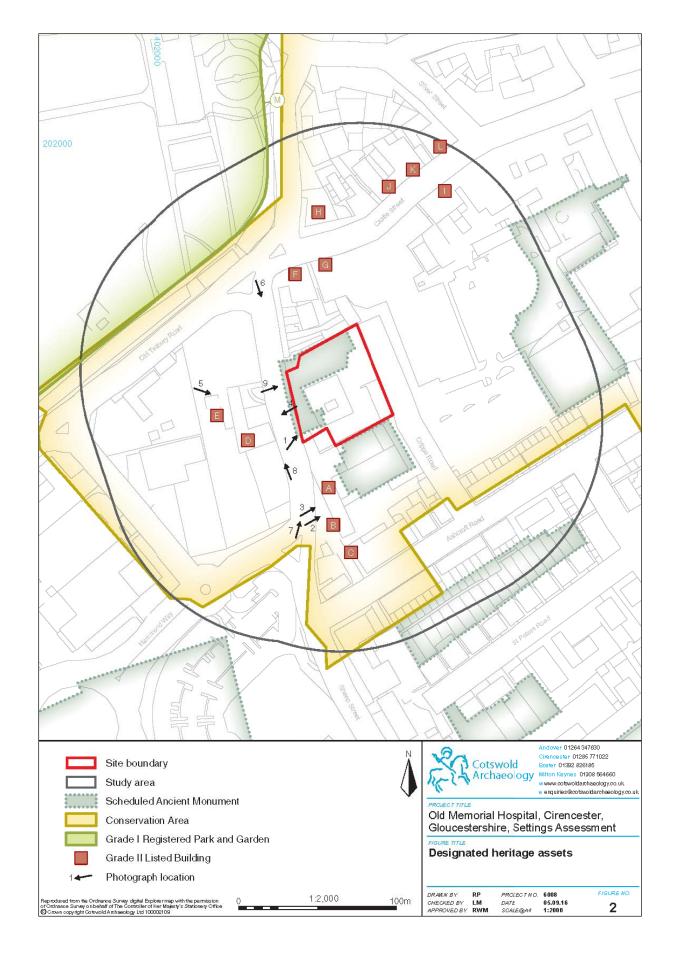
- 5.3 Large areas of modern Cirencester are designated as Corinium Roman Town Scheduled Monument, which is protected under the provisions of the Ancient Monuments and Archaeological Areas Act (1990). The scheduling is split into a number of parcels and includes many of the open spaces within the town, although some built areas are also included.
- Within the Site, the area of car parking to the immediate north and west of the Old Memorial Hospital, and the area to the south are included within the Scheduled area (Fig. 2). The scheduling across most of the town is intended to protect buried archaeological remains related to the major Roman town that existed on the same site as the modern town. Those areas of Corinuim Roman Town Scheduled Monument within the Site, and in its immediate vicinity, include no surface remains, and there are no visible indications of the highly significant archaeology that survives under the surface. However, planning Note 3, The Setting of Heritage Assets (Historic England, 2015b, 5), notes that buried archaeological remains may

sometimes have a 'setting'. It gives an example whereby 'buried archaeological remains may also be appreciated in historic street or boundary patterns, in relation to their surrounding topography or other heritage assets or through the long-term continuity in the use of the land that surrounds them'. It concludes that 'while the form of survival of an asset may influence the degree to which its setting contributes to significance and the weight placed on it, it does not necessarily follow that the contribution is nullified if the asset is obscured or not readily visible'.

The Site has no visual, historical or functional relationship with the former Roman town, and the layout of the Site does not reflect the former Roman occupation. As such, the Site does not contribute to the perceptibility, or intelligibility of Corinium Roman Town, therefore it can therefore be concluded that the proposed development will have no impact on the significance of the Scheduled remains as a result of changes to their setting. No further analysis is therefore required. A separate assessment has been undertaken in relation to the potential archaeological implications of the proposed development.

Designated heritage assets potentially susceptible to non-visual impact

- 5.6 Three designated assets were identified as being potentially susceptible to the proposed development. These comprise:
 - Grade II Listed 25 and 25A Sheep Street (Fig. 2, A),
 - Grade II Listed Apsley Hall (Fig. 2, D), and
 - Grade II Listed Former Railway Station (Fig. 2, E).
- 5.7 Any effects on the significance of these three assets, resulting from the proposed development, have been assessed in detail, with the results provided below. As the Site is situated within Cirencester Town Centre Conservation Area, a full Conservation Area assessment has also been undertaken, which is detailed in Section 6 of this report.



Grade II Listed 25 and 25A Sheep Street (Fig. 2, A)

Special architectural and historic interest

The Grade II Listed 25 and 25A Sheep Street is located on the southern edge of the Site (Fig. 2, **A**) and comprises a three storey early 19th century house (25 Sheep Street, Photograph 2 below), as well as a probable former stable wing, now a separate house (25A Sheep Street, Photograph 3 below). The frontages of both buildings are constructed from coursed squared limestone, with coursed limestone rubble to the sides. Architectural detailing includes carved stone console brackets supporting an open pediment hood above the entrance door, a coped parapet, and sash windows with glazing bars.



Photograph 2: View of 25 Sheep street(Fig. 2, A), view to the east

5.9 25 and 25A Sheep Street draw significance predominantly from the evidential and historical value embodied within their fabric, as an example of an early 19th century town house and stables. The aesthetic value of 25 Sheep Street is manifest witin its physical fabric, its design, craftsmanship and the quality of the building materials used in its construction.

Physical Surrounds – 'What Matters and Why'

5.10 The principal elevation of 25 and 25A Sheep Street faces south-west, fronting onto Sheep Street, at the junction of Sheep Street and Ashcroft Road. The key and immediate setting of 25 and 25A Sheep Street comprises the street scene along the eastern side of Sheep Street / Ashcroft Road, which includes broadly contemporary (i.e. 18th and 19th century) buildings. Some of these are also Grade II Listed. This street scene makes a positive contribution towards the historic significance of 25 and 25A Sheep Street, allowing for an appreciation of its former historic setting.



Photograph 3: View of 25A Sheep street (Fig. 2, A), view to the east

5.11 The Site, being set back from Sheep Street, does not feature in key views of 25 and 25A Sheep Street, nor do the Site and 25 and 25A Sheep Street share any intelligible historical or landscape associations. As such, the Site is not considered to form a part of the setting of 25 and 25A Sheep Street which contributes to its significance.

Experience- 'What Matters and Why'

5.12 The best location to appreciate the architectural and historical aspects of 25 and 25A Sheep Street is from Sheep Street facing north-east, where the key and immediate setting of the Listed building (as defined above) is most appreciable.

Assessment of development effects

- 5.13 The proposed development is located on the north edge of the rear of 25 and 25A Sheep street. Those elements of setting that contribute to the heritage significance of the building are limited to the views towards it from the public road, from where its fine, early 19th century architecture can best be appreciated.
- 5.14 The proposed development will not affect 25 and 25A Sheep Street physically and therefore will not alter its physical fabric, which is the key contributor to its significance. The Listed building will, therefore, retain its most important evidential, aesthetic and historic illustrative heritage values.
- 5.15 Due to the limited inter-visibility between the Site and 25 and 25A Sheep Street, the proposed development would not alter the character of the key and immediate setting, nor key views of the Listed building from which it draws significance.
- 5.16 Research into the background of the Site and the surrounding environs has found no evidence of a historical relationship between the Site and the Listed building. Therefore, the proposed development would not impact upon the historical aspect of 25 and 25A Sheep Street. In view of this the Site is not considered to comprise a part of the setting which contributes to the significance of this heritage asset.
- 5.17 The proposed development would result in **no harm** to the heritage significance of 25 and 25A Sheep Street as a result of changes to its setting.

Grade II Apsley Hall (Fig. 2, D)

Description of the asset

5.18 The Grade II Listed Apsley Hall (Fig. 2, **D**) is a former independent/congregational chapel dated to 1833 with later alterations (Photograph 4, below), located *c*.35m west of the Site. The Hall was built on land leased from Lord Bathurst, and was granted to the Memorial Hospital (i.e. the Site) in 1921. Apsely Hall became the Cirencester Memorial Centre, a mental health resource centre, in 1990. The building is of limestone ashlar to front and coursed squared limestone to sides. Architectural detailing includes a Doric porch with a pair of columns to each side which are raised on a high plinth, a moulded stone cornice and a broad shallow pediment. A war memorial was added to the front of Apsley Hall in *c*.1919 and

incised lettering on a frieze to the broadly east facing elevation reads 'To the memory of our glorious dead 1914 – 1919'. A second frieze reads 'Their name liveth for evermore'.

5.19 Apsley Hall derives significance predominantly from the evidential and historical (illustrative) value of its physical remains as an example of an early 19th century chapel, with later memorial additions. The physical fabric of the building also holds aesthetic value as the design, craftsmanship and quality of building materials can be appreciated by the public, and the interior by the owners and visitors. It was clearly designed to be a focal point in this part of the town. Apsley Hall also derives significance from its communal value, both as a former religious building, forming a place for communal worship, and more recently as a memorial monument to those who died in World War One.



Photograph 4: View of Apsley Hall (Fig. 2, D), view to the west

Physical Surrounds – 'What Matters and Why'

The principal, broadly east facing elevation of Apsley Hall fronts onto Sheep street, and the street scene, which includes various broadly contemporary buildings, forms the key and immediate setting of Apsley Hall. This setting makes a positive contribution towards the historic value of Apsley Hall, allowing for an appreciation of its former historic context. The Memorial Hospital is contemporary with Apsley Hall, and shares a historical (associative) relationship with the Listed building, having

been erected by the same benefactor (Bathhurst), and Apsley Hall having been granted to the Memorial Hospital during the early 20th century. As such, the Site forms part of the setting of Apsley Hall from which it draws significance.

Experience - What Matters and Why'

5.21 Due to the urban situation of Apsley Hall, it is experienced in restricted views from Sheep Street, which the Hall fronts onto, and which contains a number of contemporary structures. Views towards Apsley Hall were a key consideration in its design, as demonstrated by its bold architectural detailing which makes it a prominent feature within the street scene. This prestigious architectural expression enhances the intelligibility of Apsley Hall as a religious centre, and later as a war memorial, setting it apart. The isolated position of Apsley Hall, within the context of other surrounding structures of the same date, adds to its prominence along Sheep Street. As such, views towards the Apsley Hall make a positive contribution towards its historic and communal value as a former chapel and war memorial.



Photograph 5: View from the Grade II Listed Apsley Hall (Figure 2, D) towards the Site.

5.22 There is little evidence to suggest any designed views from Apsley Hall, and a review of historic Ordnance Survey mapping indicates that the Hall has overlooked adjacent built form since at least the later 18th century. As such, views from Apsley Hall make a much more limited contribution towards its significance. As noted

above, views from Apsley Hall take in a number of contemporary structures, including the Grade II Listed Former Railway Station constructed in 1841 to the north, the Grade II Listed 25 and 25A Sheep Street which dates to the early 19th century, and the Memorial Hospital which was built between 1873 and 1875. Views of those contemporary assets within the environs of Apsley Hall allow for an appreciation of its former historic setting. Whilst views towards the Site are somewhat restricted owing to intervening vegetation (Photograph 5, above). There remains reasonable inter-visibility between the Site and Apsley Hall, and this view makes a positive contribution to both the illustrative and associative historic value of Apsley Hall, thus contributing to its overall significance.

Assessment of Development Effects

- 5.23 It is concluded that the elements which contribute to the heritage significance of the Apsley Hall include its:
 - early 19th century architecture, as viewed from surrounding public areas;
 - historical and current communal value as a religious and later public meeting place; and
 - historical association with Lord Bathurst, and the Old Memorial Hospital.
- The proposed development will not affect the Listed building physically and Apsley Hall will, therefore, retain its most important evidential, aesthetic and historic (illustrative) heritage values, as manifest within its fabric.
- Based on the design of the architecture of the building it is evident that it was intended to be a focal point within the surrounding street scene. As such, views towards Apsley Hall are a key part of its experience, and make a positive contribution towards its significance. The Site lies on the opposite side of Sheep Street, set back from the road. It is not a prominent feature in views directly towards Apsley Hall, nor in longer views along Sheep Street towards the Hall. Therefore, removal of Memorial Hospital would not alter key views of Apsley Hall, nor alter the prevailing character of its immediate environs, and Apsley Hall will remain a prominent building along Sheep Street.
- 5.26 As defined above, views from Apsley Hall make a much more limited contribution towards its significance, adding to its experience as part of the 19th century street scene. The Memorial Hospital is later 19th century in date and, as such, comprises a structure of similar date, visible from Apsley Hall, and which does contribute to

some extent towards its significance. Removal of Apsley Hall would result in a change to a part of the asset's setting which contributes to its significance. The Memorial Hospital currently screens views of a modern supermarket, to the east, from Apsley Hall. Removal of the Memorial Hospital would therefore also enable longer views towards the rear of the store. However, the contribution of the remaining 19th-century buildings to the prevailing character of the asset's immediate surroundings would be preserved.

- 5.27 Research into the background of the Site shows an historical relationship between the Site and Apsley Hall through their shared founder, and the subsequent donation of Apsley Hall to the Memorial Hospital in the early 20th century. This associative value contributes to the asset's significance. The buildings were constructed independently of one another, however, and do not share a functional relationship, which somewhat limits this contribution. As such, removal of the Memorial Hospital would result in the loss of this element of Apsley Hall's historic (associative) value.
- 5.28 In this context, it is concluded that the proposed development would result in a degree of harm to the significance of Apsley Hall. Within the parameters of the Framework, the level of this harm would be **less than substantial**.

Grade II Former Railway station (Fig. 2, E)

Description of the asset

5.29 The Grade II Listed Former Railway Station (Fig. 2, E), situated c.40m west of the Site was designed in the Tudor style by I. K. Brunel, and constructed in 1841. The Former Railway Station is constructed from coursed square limestone, with a welsh slate roof and rendered, corbel chimney stacks. The key architectural details include moulded stone mullions, a coped parapet with carved ribbon decoration to the first floor, and a shaped gable with heavy moulded coping corbelled out in moulded kneelers, and which is topped by the base of a former stone finial. The Former Railway station also has a number of 20th century alterations, and is now used as offices and public lavatories.

The Former Railway Station derives significance predominantly from the evidential and historic value of its fabric as an example of mid-19th century railway architecture. Aesthetic value is drawn from the architectural detailing of its construction in the Tudor style. The Former Railway Station also derives significance from the historical (associative) value of its association with Brunel, one of the most celebrated engineers of the 19th century.

Physical Surrounds – 'What Matters and Why'

5.30 The key and immediate setting of the Former Railway Station would have been the former railway (and other related infrastructure and railway buildings), the terminal of which was situated immediately west of the Former Railway Station. The Former Railway Station and the railway itself shared an intrinsic functional relationship, which was lost (according to historic Ordnance Survey mapping) sometime between 1960 and 1970. As such, the former Railway Station now lies entirely divorced from its key and immediate setting from which it would have drawn historical (illustrative and associative) value. The present setting of the Former Railway Station comprises an area of car parking to the north and west, enclosed by mature trees. This wider setting makes a neutral contribution towards the significance of the Former Railway Station.



Photograph 6: View of Former Railway Station (Fig. 2, E), view to the south-east

Experience – What Matters and Why'

5.31 The Former Railway Station was designed to be experienced in relation to the former associated railway, accessed by passengers and staff, which is evidently no longer possible. Due to the urban situation of the Former Railway Station, its position set back from Sheep Street, and the mature planting which surrounds it, the best location to appreciate the architectural and historical aspects of the Listed building is through restricted views from within the public car park which surrounds

- it. Such views allow for an appreciation of its architectural design, which had aesthetic as well as functional considerations.
- Inter-visibility with contemporary buildings in the wider environs of the Former Railway Station (including the Memorial Hospital) is limited due to its set back position, and the intervening mature trees. As such, this wider setting is considered to make a neutral contribution towards the significance of the Former Railway Station, neither adding to, nor detracting from its intelligibility as a formerly functioning railway station.

Assessment of Development Effects

- 5.33 It is concluded that the elements which contribute to the heritage significance of the building include its:
 - early 19th century architecture which can be viewed from a public areas, and
 - historical associations with the notable 19th century architect, I. K. Brunel.
- 5.34 The proposed development will not affect the Former Railway Station physically and therefore will not impact upon that key contributor to its significance, i.e. that which derives from its physical fabric. The building will, therefore, retain its most important evidential, aesthetic and historic (illustrative and associative) heritage values as a 19th-century railway building, designed by Brunel.
- Due to the loss of the railway line for which the Former Railway Station was constructed, and which would have formed the key element of its historical setting, the asset's current setting (including the Site) makes an overall neutral contribution to its significance. The proposed development would not result in a change to an aspect of the asset's setting that contributes to its significance. Thus, the proposed development would result in **no harm** to the significance of the Former Railway Station as a result of changes to its setting.

6 CIRENCESTER TOWN CENTRE CONSERVATION AREA

Introduction

- 6.1 The Site is located with the Cirencester Town Centre Conservation Area. A detailed appraisal for the Character Area is available on Cotswold District Council's website and the characteristics of this area presented below are based on the *Cirencester Town Centre Conservation Area Character Appraisal and Management Plan* (hereafter 'the Appraisal', Cotswold District Council c.2007). There is no date provided on the character appraisal, however, based on the information provided within, it is assumed to be dated to around 2007.
- 6.2 The town of Cirencester is split into four adjoining Conservation Areas:
 - 1. Cirencester Park
 - Gloucester Street and River Walk
 - 3. Cirencester Town Centre, and
 - 4. Cirencester South.
- 6.3 The Site lies within the Cirencester Town Centre Conservation Area. The Conservation Area encompasses the historic core of Cirencester containing the majority of the medieval town, including the Market Place, the Abbey Grounds and the principle streets. The most northern point is the Norman Arch of the Abbey Grounds and follows the grass verge and the northern boundary of the Corinium Gate. The southern edge follows the southern edge of London Road and Lewis Lane, before going along Cricklade Street and then heading west to Ashcroft Road. At Ashcroft road, it turns into Sheep Street then turns west along the old Tetbury Road so as to include Sheep Street within the conservation area.
- 6.4 The Conservation Area has been split into six character areas with the Site falling within Character Area 6: Sheep Street.

Key Characteristics

- 6.5 The principal contributors to the significance of Character Area 6: Sheep Street, as defined by the Appraisal, are as follows::
 - The 'elegant eighteenth Century classicism' which dominates the architectural style;

- The dominant use of Cotswold stone;
- Attractive views towards the Roman Amphitheatre and Circumster Park;
- Trees and limestone rubble walls;
- The architectural and historic interest of the Listed Buildings including Grade
 II listed Apsley Hall and Former Railway station; and
- The architectural and historic interest of the non-Listed Buildings including Old Memorial Hospital.
- 6.6 Whilst this area is described within the Appraisal as 'a more open-plan area than most part of the town', inter-visibility between it and the neighbouring Character Area 1: Town Core are heavily restricted by both historic and modern built form.
- 6.7 The contribution of the Site towards the setting and significance of Grade II Listed Apsley Hall and the Grade II Listed Former Railway Station has been considered separately, above.
- With regards to the contribution of the Memorial Hospital to the overall special architectural and historic interest of the Conservation Area, no detail is provided as to the level of significance of the building. A detailed assessment of the Memorial Hospital has been undertaken by Cotswold Archaeology and has concluded that 'it has been extensively altered both externally and internally, and consequently retains little of its original overall quality. Only the central bay still retains aspects of this architectural quality' (Cotswold Archaeology, 2016). Historic England reached a similar conclusion in its assessment of whether the building merited designation as listed building. This was undertaken in June 2016, concluding that the building was 'too altered to merit statutory designation'. On this basis, it is considered that the Memorial Hospital makes a very limited contribution towards the overall significance of the Conservation Area.

Key views

Character Area 6 is further described by the Appraisal as '....dominated by large detached buildings, set within larger plots but with two sets of terraces of quite different character to either end of Sheep Street'. Three 'key views' are identified by the Appraisal within Character Area 6. One view focusses on the Grade II Listed Apsley Hall (Fig. 2, **D**), viewed north-west along Sheep Street. The remaining two views focus on the Grade II Listed Former Railway Station (Fig.2, **E**), seen from the roundabout at the southern end of Hammond Way, viewed to the north/north-north-

east across the carpark to the south-west of the Listed building. The Site does not feature prominently in any of these views and, as such, the proposed development would preserve all three key views.



Photograph 7: View of Sheep Street, view to the south



Photograph 8: View of Sheep Street, view to the north

Buildings of the Conservation Area

- 6.10 A number of Listed and non-Listed buildings are situated within Character Area 6, which make a positive contribution to the prevailing character, and special architectural and historic interest of Character Area 6. Unlisted buildings within the Conservation Area are categorised within the Appraisal as follows:
 - Positive: i.e. those buildings which '[contribute] positively to the special architectural and historic importance of the Conservation Area';
 - Neutral: i.e. buildings which neither add to, nor detract from the character or significance of the Conservation Area; and
 - Negative buildings: i.e. those buildings which 'detract from [the] special character and appearance' of the Conservation Area.
- 6.11 The Appraisal identifies the historic core of the Memorial Hospital as a positive building, identifying it as a building which makes a positive contribution to the architectural and historic interest of the Conservation Area. The more recent extensions extending south-east from the historic core are identified as neutral buildings.
- The proposed development is for the demolition of the Memorial Hospital. As such, the proposed development will result in the loss of a building which the Appraisal identifies as making a positive contribution towards the architectural and historic interest of the Conservation Area. Policy CIR.4 within the Local Plan (Memorial Hospital Site, Sheep Street, Cirencester), recommends that the Site be used for car parking, until such a time where alternative parking provision has been secured, after which the Site is 'allocated for redevelopment for office and residential uses'. This allocation is subject to criteria (as outlined above in Section 3), particularly the requirement that 'the front section of the former Memorial Hospital [i.e. the 'positive' historic core] and the air raid shelter must be retained until such time as a satisfactory redevelopment scheme has been approved'.
- 6.13 However, Policy 15 of the Local Plan (Conservation Areas) states that planning proposals which 'result in the demolition or partial demolition of a wall, structure or building which make[s] a positive contribution towards the character or appearance of the Area' will be refused. Paragraph 215 of the Frameworks states 'due weight should be given to relevant policies in existing plans according to their degree of

consistence with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight may be given'.

- Paragraph 14 of the Framework notes that Local Plans should 'meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the Framework] taken as a whole; or specific policies in [the] Framework. Paragraph 138 of the Framework states the 'loss of a building or other element) which makes a positive contribution towards the significance of the Conservation Area [...] should be treated as either substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the Conservation Area [...] as a whole.
- As per paragraph 2.22 (above), the proposed development would not affect the character of the Conservation Area such that its significance would be 'vitiated altogether or very much reduced' and, therefore, the proposed development would not result in substantial harm to the significance of the overall Conservation Area. Paragraph 134 of the Framework would therefore be considered to apply. Paragraph 134 states that: 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including its optimum viable use'.

Negative features and issues

- 6.16 Within Character Area 6: Sheep Street, the negative aspects of the area include:
 - High level of traffic movement and large areas of car park with a lack of landscaping;
 - Lack of appropriate context for historical buildings (including the Grade II Listed Former Railway Station and the Grade II Listed Apsley Hall);
 - Unsympathetic buildings and views of 20th century buildings (particularly the Tesco superstore);
 - Loss of and/or inappropriate replacement of architectural details; and

- Loss of boundary walls surrounding and defining public and private spaces resulting in a loss of privacy and enclosure, and the creation of uninspiring areas of car park.
- 6.17 The proposed development is for the demolition of the existing built form within the Site, and redevelopment of the Site for car parking. Whilst the proposed development would result in more areas of car parking, and greater visibility of the Tesco superstore from Sheep Street, as per Policy CIR.4, the development would be temporary, and the Site will ultimately be re-developed for office and residential use.

Conclusion

Overall, the contribution of the Site to the character and appearance of the Cirencester Town Centre Conservation Area is considered to be limited. The Memorial Hospital is not one of the key contributors to the Conservation Area's character or significance, nor does it feature in any 'key views' identified by the Appraisal. The Old Memorial Hospital does contribute something towards the overall character of Character Area 6, however, and it also serves to limit the negative views of the modern supermarket on the edge of the adjacent Town Core Character Area. On this basis, the proposed development would result in a small level of harm to the Conservation Area's overall significance; within the parameters of the Framework, this level of harm would be **less than substantial**.

7 CONCLUSIONS

- 7.1 This assessment has considered the potential non-physical effects of the development upon the significance of designated heritage assets within the surrounding landscape, as a result of changes to their setting. The assessment has identified that the proposals would result in **no harm** to Grade II Listed 25 and 25A Sheep Street and **no harm** to Grade II Listed Former Railway Station as a result of changes to their setting.
- The proposals would result in **less than substantial** harm to the significance of Grade II Listed Apsley Hall as a result of changes to its setting. The Planning (Listed Buildings and Conservation Areas) Act (1990) requires decision-makers to give 'special regard to the desirability of preserving the building or its setting'. In accordance with the Framework paragraph 134, this level of identified harm would need to be weighed against the public benefits of the proposals.
- Overall, the contribution of the Site to the character and appearance of the Cirencester Town Centre Conservation Area is considered to be limited. The Memorial Hospital is not one of the key contributors to the Conservation Area's character or significance, nor does it feature in any 'key views' identified by the Appraisal. The Old Memorial Hospital does contribute something towards the overall character of Character Area 6, however, and it also serves to limit the negative views of the modern supermarket on the edge of the adjacent Town Core Character Area. On this basis, the proposed development would result in a small level of harm to the Conservation Area's overall significance; within the parameters of the Framework, this level of harm would be **less than substantial**.
- Paragraph 14 of the Framework notes that Local Plans should 'meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the Framework] taken as a whole; or specific policies in [the] Framework. Paragraph 138 of the Framework states the 'loss of a building or other element) which makes a positive contribution towards the significance of the Conservation Area [...] should be treated as either substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the Conservation Area [...] as a whole.

7.5 As the proposed development would result in **less than substantial** harm to the significance of the Conservation Area, paragraph 134 of the Framework would apply. Paragraph 134 states that: 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including its optimum viable use'.



8 REFERENCES

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APPENDIX A: RECORDED HERITAGE ASSETS

No.	Description	Designation	NGR	HE ref.
	Cirencester Town Centre Conservation Area	-	-	-
Α	25 and 25A Sheep Street	Grade II Listed	402108 201792	1298656
В	Kingsleigh and Attached Railings Bases	Grade II Listed	402111 201773	1187516
С	29 Sheep Street	Grade II Listed	402120 201758	1187517
D	Apsley Hall	Grade II Listed	402066 201811	1298657
E	Former Railway Station	Grade II Listed	402050 201832	1187518
F	63 Castle Street	Grade II Listed	402093 201919	1280855
G	53 and 61 Castle Street	Grade II Listed	402101 201922	1187428
Н	The Old Police station	Grade II Listed	402092 201942	1205185
1	31 and 33 Castle Street	Grade II Listed	402168 201954	1298732
J	30 Castle Street	Grade II Listed	402139 201955	1205071
K	22, 24 and 26 Castle Street	Grade II Listed	402153 201969	1280910
L	20 Castle Street	Grade II Listed	402161 201978	1205068
М	Cirencester Park	Grade I Registered	497916 103285	1000432



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