

Tracey Crews
Director of Planning
Cheltenham Borough Council
Municipal Offices
Promenade, Cheltenham
Glos, GL50 9SA

Date: 22/11/2018

Dear Ms Crews

Re: REF: 18/02171/OUT Outline application for residential development of up to 69 dwellings including access, layout and scale, with all other matters reserved for future consideration (revised scheme following refusal of application ref. 17/00710/OUT)

I am writing to you to respond to the consultee comments from Historic England that you have recently received concerning the above application.

This response demonstrates that, despite historic evidence to the contrary, Historic England continues to employ erroneous facts in their assessment of the impact that the proposed development may have on the development site. (They first state that this outline application is for 100 houses; it is in fact for up to 69 houses.)

In assessing the application Historic England's comments begin by setting out that this is an important Grade II* villa. However the comments then go on to attribute its significance to the wrong period of architectural and landscape history, consequently failing to understand the asset and how it was designed in its setting. As the Local Planning Authority you will, of course, be fully aware that understanding any heritage asset the subject of an application is key. This is set out in the NPPF, which stresses that it is the

"Local authority [which needs to] identify and assess the particular significance of any heritage asset, taking into account the available evidence and any necessary expertise" (para 190).

In order to assist the Local Planning Authority in making this assessment, this information was provided to you by myself and Professor Mowl on behalf of the applicant. The information provided is the result of thorough academic research and an understanding of the site reached over a period of many days. It clearly sets out

Architectural History & Conservation

what makes the site significant. As you know this information was also made available to Historic England via the usual consultation process.

I reiterate that that St Edward's School, a Grade II* listed building is indeed very significant *but that its significance does not stem from the land to the north of the immediate school site*. Contrary to Historic England's comments this land is not and never has been 'Parkland' as they have once again stated: it is simply agricultural land. We have proven this with the use of historic landscape maps and architectural treatises of the period.

In the same way we have proven through evidence that the villa was designed specifically to *face away* from this functional land towards its own intricately-designed Regency gardens facing south, towards Leckhampton.

Similarly we have explained, carefully and in detail, in response to Historic England's previous comments, that this 19th century, English Villa has nothing to do with the 16th century Italian architect Palladio, who designed buildings some three hundred years prior to St Edward's School. Our research is supported by a doctorate in Palladianism, thorough, fully-referenced research into contemporary treatises as well as many years of contextual research, papers and lectures.

No evidence has been put forward by Historic England to support their theory that St Edward's Villa is related to the designs of Palladio (and naturally they do not have the time to carry out detailed research as we have been able to do). However as Local Planning Authority you are in possession of our research into this site which will enable you to make an informed and correct assessment of the significance of the site and, consequently, a correct assessment of any likely impacts of the outline application.

In my professional opinion the Historic England assessment of the site and comments provided under this application remain fundamentally incorrect.

I would also like to address the comments in a letter which has been uploaded to the portal, whose home address is noted as being 'Charlton Manor'. This letter discusses the presence of a spring and how this feeds into the garden. If this is the case, it could be protected in any development of the site and the applicant would be happy to do this.

The letter also states that there was once a link between Charlton Manor and the Icehouse, which would be well protected and its presence made clear, under this

Architectural History & Conservation

outline proposal. There may once have been access across the field to the Icehouse from Charlton Manor but, the Icehouse was *historically and functionally* linked to St Edward's School, not Charlton Manor.

As previously stated, there has never been a historic intention to link Charlton Manor (or St. Edwards) with this site. Charlton Manor is simply the first house that was constructed on the Estate. The site now forms part of the wider setting to these assets. As such in my opinion the impact of the proposed development on the significance of St Edward's School and Charlton Manor lies at the low end of the spectrum that is encompassed by the words 'less than substantial harm'. 'Great weight' is to be placed on this very low level of harm when undertaking the overall planning balance'.

Yours faithfully

Dr Carole Fry
Director AHC Consultants
22/11/18