

# LAND AT OAKLEY FARM, BATTLEDOWN, CHELTENHAM

## Built Heritage Statement

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Land at Oakley Farm,  
Battledown, Cheltenham  
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## BUILT HERITAGE STATEMENT

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# 1 INTRODUCTION

- 1.1 This Built Heritage Statement has been researched and prepared by CgMs Heritage, part of RPS, on behalf of Robert Hitchins Ltd, and successors in title to the land, to provide an assessment of the built heritage assets which have the potential to be affected by the development of Land at Oakley Farm in Battledown (hereafter referred to as 'the Site'). It does not cover archaeology which has been assessed in a separate report (CgMs, 2019).
- 1.2 This report refers to the relevant legislation contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 and both national and local planning policy. In addition, relevant Historic England guidance, notably The Setting of Heritage Assets and Conservation Principles, has been consulted to inform the judgements made. Relevant information, including the listing citations for the relevant heritage assets and conservation area appraisals have also been consulted in preparing this Built Heritage Statement. The conclusions reached in this report are the result of historic research, a walkover survey of the Site and publicly accessible locations in the surrounding area, map studies and the application of professional judgement.
- 1.3 A walkover survey and assessment of the Site and surrounding area was conducted on 14th May 2019. The weather was bright and clear allowing for a robust appreciation of the heritage assets surrounding the Site.
- 1.4 The findings of this report are based on the known conditions at the time of writing and all findings and conclusions are time limited to no more than 3 years from the date of this report. All maps, plans and photographs are for illustrative purposes only.

## 2 LEGISLATIVE AND PLANNING POLICY FRAMEWORK

- 2.1 The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon 'heritage assets'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically compiled by Local Planning Authorities (LPAs) and incorporated into a Local List or recorded on the Historic Environment Record.

### Legislation

- 2.2 Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.3 The relevant legislation in this case extends from section 66 of the 1990 Act which states that special regard must be given by the decision maker, in determining applications, to the desirability of preserving a listed building and its setting.
- 2.4 The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137.
- 2.5 The Court agreed with the High Court's judgment that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.
- 2.6 Section 69(1) of the Act requires LPAs to 'determine areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' and to designate them as conservation areas. Section 69(2) requires LPAs to review and, where necessary, amend those areas 'from time to time'.
- 2.7 For development within a conservation area section 72 of the Act requires the decision maker to pay 'special attention [...] to the desirability of preserving or enhancing the character or appearance of that area'. The duty to give special attention is considered commensurate with that under section 66(1) to give special regard, meaning that the decision maker must give considerable importance and weight to any such harm in the planning balance.
- 2.8 Both sections 66 and 72 are engaged in this case.
- 2.9

### National Planning Policy

#### National Planning Policy Framework (Ministry of Housing, Communities and Local Government, February 2019)

- 2.10 The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.
- 2.11 It defines a heritage asset 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'. This includes both designated and non-designated heritage assets.
- 2.12 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage

assets are ‘*an irreplaceable resource, and should be conserved in a manner appropriate to their significance*’.

- 2.13 For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 190, which requires LPAs to take this assessment into account when considering applications.
- 2.14 Under ‘*Considering potential impacts*’ the NPPF emphasises that ‘*great weight*’ should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.
- 2.15 Paragraph 195 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 196 requires this harm to be weighed against the public benefits of the proposed development.
- 2.16 Paragraph 197 states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.
- 2.17 Paragraph 200 notes 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. It also states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset should be treated favourably.
- 2.18 Furthermore, paragraph 201 states that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. When determining the impacts arising from the loss of a building or element that does positively contribute, consideration should be given to the relative significance of that building and the impact to the significance of the Conservation Area or World Heritage Site as a whole.

## National Guidance

### Planning Practice Guidance (DCLG)

- 2.19 The Planning Practice Guidance (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.
- 2.20 Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset’s special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.

### Conservation Principles, Policies and Guidance (English Heritage, April 2008)

- 2.21 Conservation Principles outlines Historic England’s approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in Historic England’s own advice and guidance, the document is recommended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable.

- 2.22 The guidance describes a range of heritage values which enables the significance of assets to be established systematically, with the four main heritage values being: evidential value; historical value; aesthetic value; and communal value.

### **Overview: Historic Environment Good Practice Advice in Planning**

- 2.23 The PPS5 Practice Guide was withdrawn in March 2015 and replaced with three Good Practice Advice in Planning Notes (GPAs) published by Historic England. GPA1: The Historic Environment in Local Plans provides guidance to local planning authorities to help them make well informed and effective local plans. GPA2: Managing Significance in Decision-Making includes technical advice on the repair and restoration of historic buildings and alterations to heritage assets to guide local planning authorities, owners, practitioners and other interested parties. GPA 3: The Setting of Heritage Assets replaces guidance published in 2011. Of these, GPA2 and 3 are relevant and are described in more detail below. These are complemented by the Historic England Advice Notes in Planning which include HEA1: Understanding Place: Conservation Area Designation, Appraisal and Management (February 2016), HEA2: Making Changes to Heritage Assets (February 2016), HEA3: The Historic Environment and Site Allocations in Local Plans (October 2015), and HEA4: Tall Buildings (December 2015).

### **GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)**

- 2.24 This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
6. Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

### **GPA3: The Setting of Heritage Assets (Second Edition; December 2017)**

- 2.25 This advice note focuses on the management of change within the setting of heritage assets. This document replaces GPA3: The Setting of Heritage Assets (March 2017) and Seeing History in the View (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.

- 2.26 As with the NPPF the document defines setting as *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'*. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.
- 2.27 While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset.
- 2.28 This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.
- 2.29 The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.
- 2.30 Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:
1. Identify which heritage assets and their settings are affected;
  2. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
  3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
  4. Explore ways to maximise enhancement and avoid or minimise harm; and
  5. Make and document the decision and monitor outcomes.

## Local Planning Policy

- 2.31 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Local Development Plan Policy and by other material considerations. The Site falls within Cheltenham and therefore planning policy for the area is set out by Cheltenham Borough Council. The Council are currently in the process of writing a new local plan, however at present the documents which are used to assess development are Cheltenham Borough Council Local Plan Second Review 2006, and the Joint Core Strategy.

### **Cheltenham Borough Council Local Plan Second Review 2006**

- 2.32 The Local Plan was reviewed and adopted in 2006. It has a number of policies which relate to direct work to a listed building or within a conservation area, however no policies which address the setting. None of these are therefore relevant in this case. There is one core strategy which relates to Built Heritage and the proposed development:
- 2.33 *'POLICY CP 7 DESIGN*



*Development will only be permitted where it: (a) is of a high standard of architectural design; and (b) adequately reflects principles of urban design; and (c) complements and respects neighbouring development and the character of the locality and/or landscape (note 3).*

*Extensions or alterations of existing buildings will be required to avoid: (d) causing harm to the architectural integrity of the building or group of buildings; and (e) the unacceptable erosion of open space around the existing building.'*

### **Joint Core Strategy 2017**

2.34 The Joint Core Strategy is a joint venture between Gloucester City Council, Cheltenham Borough Council and Tewksbury Borough Council. It was adopted in December 2017 and will guide development in the area until 2031. There is one policy which relates to this Site and built heritage:

#### 2.35 *'POLICY SD8: HISTORIC ENVIRONMENT*

*1. The built, natural and cultural heritage of Gloucester City, Cheltenham town, Tewkesbury town, smaller historic settlements and the wider countryside will continue to be valued and promoted for their important contribution to local identity, quality of life and the economy;*

*2. Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment;*

*3. Designated and undesignated heritage assets and their settings will be conserved and enhanced as appropriate to their significance, and for their important contribution to local character, distinctiveness and sense of place. Consideration will also be given to the contribution made by heritage assets to supporting sustainable communities and the local economy. Development should aim to sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation whilst improving accessibility where appropriate;*

*4. Proposals that will secure the future conservation and maintenance of heritage assets and their settings that are at risk through neglect, decay or other threats will be encouraged. Proposals that will bring vacant or derelict heritage assets back into appropriate use will also be encouraged;*

*5. Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision) demonstrating that the potential impacts on heritage assets and appropriate mitigation measures have been addressed.*

*This policy contributes towards achieving Objectives 1, 2, 4 and 5'.*

## 3 HISTORIC BUILT ENVIRONMENT APPRAISAL

### Introduction

- 3.1 The following section describes the Site and the surrounding areas as it stands today, explores the historical development of the Site and the area around it, and concludes with an assessment of the significance of those assets potentially affected by the development of the Site.

### Site Description

- 3.2 The Site is centred at NGR SO 97076 22382 and comprises a collection of agricultural land parcels. These are principally grassland, with large mature trees forming the boundaries between field parcels. The site measures c.14.1 ha and is broadly rectangular in shape. Currently the principal access to the Site is to the west, with a long driveway leading up to Oakley Farm off Prior's Road.
- 3.3 The Site is surrounded by mature trees and hedgerows which create a verdant character despite being surrounded by built development on the southern, northern and western sides. To the east lie two reservoirs, which are raised and covered so are not immediately identifiable as reservoirs. The Site is located at a raised elevation, with the southern part of the Site rising further for clear views over settlement to the north and west, and views over surrounding hills to the east. The highest part of the Site is along the southern boundary. To the south, views are blocked by the continued rise and fall of the hill on which it is located. At the northern extent of the Site there are a collection of run down derelict farm buildings. Some of these barns have some historical value and are assessed below as non-designated heritage assets.



**Plate 1: View of the Site**

## Historic Development

- 3.4 The settlement of Cheltenham was first recorded in the early ninth century, when there was a dispute between the Bishops of Hereford and Worcester over who was entitled to keep the revenues of the Minster Church in Cheltenham (Blake, 2013). In the Domesday Book of 1086 the settlement is named as Chinteneham (Williams and Martin, 2003), however Charlton Kings and Battledown do not appear individually. The name of Charlton Kings comes from the word for a free peasant's farm/settlement, and as it was an ancient Demesne of the crown the word 'King' was added on as a suffix (University of Nottingham, 2016).
- 3.5 The growth of agriculture in and around Cheltenham led to the increased prosperity of Charlton Kings during the thirteenth and fourteenth centuries. Extensions to the arable fields in the thirteenth and fourteenth century created prosperity (Paget, 1998) and the settlement grew so rapidly in the medieval period that it became an independent parish in the mid-twelfth century (Blake, 2013).
- 3.6 Battledown started as a private residential estate, established during the nineteenth century to the north-east of Charlton Kings. A solicitor George Ridge, who was a Town Commissioner and agent to the Conservative MP, created the concept for Battledown estate, and he worked with William Bain and Somerset Tibbs, who were land owners in the area ([www.battledown.co.uk/history.asp](http://www.battledown.co.uk/history.asp), accessed 3/6/19). The cost of the project and lack of demand for the plots meant that it took four years to sell all the lots and 40 years after the initiation of the concept only 16 new houses had been constructed. Following the return of wealth to the country more people did choose to move up to Battledown and build large properties and it is at this time that it expanded. After World War Two the remaining plots and land associated with the large villas were subdivided and smaller buildings were constructed.
- 3.7 Charlton Kings including Battledown, now appears as part of the settlement of Cheltenham, with the historic medieval core centred around St Mary's Church. Battledown itself sprawls out from the core of Charlton Kings to the north.
- 3.8 The Site itself has been in agricultural use since before the first edition Ordnance Survey Map in 1887 (fig 2). At this time the field boundaries were almost identical to their current layout. All the non-designated agricultural buildings at Oakley Farm were also in situ at this time. This surrounding land was all in agricultural use, apart from the Reservoir which existed to the east. Harp Hill bounded the Site to the south however there were no buildings along it. Buildings begin to appear along Harp Hill in the early twentieth century (fig 3), however it is not until the 1954 OS map that this becomes a truly residential road. On the 1954 (fig 4) map there are several properties to the south of the road. It is also on this map that industrial style buildings appear to the immediate north of the Site, these were associated with Government Communications Head Quarters (GCHQ). These buildings will have dramatically altered the agricultural landscape, whilst the Site itself was undeveloped, it was no longer a rural isolated Site. The GCHQ buildings remained on the land to the north of the Site until 2005 when they were mostly demolished, with a supermarket being constructed in 2006 and housing development from 2014.

## Assessment of Heritage Assets

- 3.9 The Site is raised up on high land overlooking much of Cheltenham and therefore there is a large quantity of designated heritage assets which can be seen from the Site. In most cases these are just read as part of the general roof-scape of Cheltenham and it is not possible from the Site to discern their significance. Equally, from these assets there is no appreciation of the Site and the Site does not make any contribution to the significance of the assets. These have therefore been considered as part of the assessment of the Cheltenham Central Conservation Area, and in some cases the Prestbury Conservation Area. Only assets which derive any particular significance from the Site have been considered individually. There are also some buildings which are considered to

be non-designated heritage assets in close proximity to the Site, and these have been considered below.

### **No.1 Reservoir (Grade II, list number: 1423571)**

- 3.10 The No.1 Reservoir at Hewlett's Reservoir was designated as a Grade II listed building in 2015. It is an underground reservoir, largely hidden from view, and has a capacity of 413,000 gallons. It was constructed in 1824 for the Cheltenham Water Works Company as Cheltenham and Charlton Kings expanded and therefore the need for more water arose. Cheltenham Water Works Company was itself set up by an Act of Parliament to address the demand for more water. The reservoir site collects water from the Northfield Springs on the surrounding hillsides.
- 3.11 The Reservoir was built in stone, along with the custodians' house and a grand entrance with gatepiers and gates incorporating the Company's crest. Due to a lack of capacity later reservoirs were built and took over the main role of No.1 Reservoir, and for much of its life it was used to store spring water from surrounding hills for breweries. Whilst the Hewlett's Reservoir site as a whole is still in use, No.1 Reservoir is now redundant.
- 3.12 The immediate setting of the asset is made up of the other structures which form part of Hewlett's Reservoir, including the other individual reservoirs, the pavilion building, the boundary walls and the Stone Lodge. All of these contribute to the significance and understanding of the significance of asset through demonstrating the scale of the operations, and the historical growth of the Site. The wider setting, which includes the Site, is made up of both Cheltenham and the surrounding rural landscape, which both contribute to the significance of the asset. The water was fed into the reservoir from the surrounding natural environment, and the location of the asset will have been specifically thought out in relation to the topography of this landscape. Its isolated setting allowing for provision of water is therefore a contributor to the significance. In addition, Cheltenham itself contributes to the significance of the asset, as it is the growth and expansion of Cheltenham and Charlton Kings which led to the requirement for the reservoirs. The Site is immediately adjacent to the asset and provides a degree of separation between the asset and Cheltenham town as well as providing a rural character to the assets. The direct contribution that the rural character provides to the overall significance of the asset is limited, with this being secondary to the architecture and innovation of the structure itself.
- 3.13 The significance of the building has a high degree of technological interest, with it representing the earliest known surviving example of an underground reservoir. It was also designed by James Walker, who is one of the most notable civil engineers of the nineteenth century. In addition to this interest, the building has a high level of architectural interest, which is furthered by the construction in stone as opposed to brick which is more common in reservoirs. The asset is largely retained intact, which adds to its historical interest.

### **No.2 Reservoir (Grade II, list number: 1423572)**

- 3.14 The No.2 Reservoir was listed at the same time as the No.1 Reservoir (in 2015). It was added to the Reservoir Site in 1839 in order to increase the capacity of the site. It was substantially larger than the first reservoir with a capacity of 2 million gallons rather than 413,000 gallons, and was constructed in brick rather than stone. The second reservoir, like the first, was also designed by James Walker, however capacity was still not considered enough and in 1847 a further open-air brick reservoir which held 9 million gallons was constructed. The reservoir consists of seven parallel rectangular chambers with walls of brick, shallow inverted-arched brick floors, and brick barrel-vaulted roofs.
- 3.15 The asset has the same immediate and wider setting as the No.1 Reservoir, and this is described above. The Site therefore makes a limited positive contribution to the significance of the asset through providing separation between the town of Cheltenham and the Reservoirs and through providing a rural and open landscape immediately adjacent to the reservoirs.



- 3.16 The No.2 Reservoir at Hewlett's Reservoir has technological interest, which derives from being designed by James Walker, a distinguished civil engineer of the nineteenth century. It has less technological interest than No.1 Reservoir, as it is later in date and constructed from brick rather than stone, however this still contributes to its significance. The reservoir, as with No.1 is also largely intact which allows for the historical and architectural value of the structure to be appreciated. The group value, as part of the reservoir site, adds to its significance, in particular its relationship to No.1 reservoir.



**Plate 2: Hewlett's Reservoirs**

### **Pavilion at Hewlett's Reservoir (Grade II, List number: 1104324)**

- 3.17 The pavilion at Hewlett's Reservoir was designated as a Grade II listed building in 1983. Historic England state that it possibly originated as a valve house, however now it is purely decorative. The pavilion dates to the mid-nineteenth century and provided a principal decorative element of the reservoir site. It demonstrates the desire to make utilitarian sites decorative in the nineteenth century. The building is constructed in red brick with vermiculated stone quoins and plinths. It has a fishscale slate roof which extends to a veranda supported by thin iron colonnettes, running around the entirety of the building. The building is octagonal in form, with a window on all sides except one where the door is located. The windows have brick surrounds with pointed arches and stone cills, however the windows themselves are modern replacements which make a negative contribution to the building. The door is a pointed timber door with iron decorative strap hinges. The apex of the roof has a cast iron weathervane.
- 3.18 The immediate setting of the asset is made up of the surrounding structures associated with Hewlett's Reservoir. These contribute to the building through providing both the raised position of the asset, but also through demonstrating the historical use and connection of the building. With these it can be read as a building which supports utilitarian architecture. The asset therefore gains a great degree of significance from this immediate setting.

- 3.19 The wider setting is made up of the surrounding open landscape. The building, whilst small, is raised up and therefore visible from a number of locations in the landscape. It marks the importance of the reservoir. From the asset there are views available of both the surrounding hillside and the town of Cheltenham. This demonstrates its connection to the natural landscape, which provides water to the Reservoir, and the human built landscape, which the reservoir was constructed to serve. It therefore contributes to the significance of the asset. The Site itself forms a part of the open landscape and creates a buffer between the reservoir and the edge of built development. It also provides a degree of rurality to the asset due to the open nature of the fields which form the Site and this makes the asset stand out as it is isolated within a largely rural landscape. It therefore contributes positively to the understanding and significance of the asset.
- 3.20 The significance of the building derives principally from its architectural interest, with it appearing as an ornamental pavilion for a country house, disguising its connection to the reservoir and its functional purpose as a valve house. It has detailed architectural styling and therefore has a high degree of aesthetic value. Historic value derives from the asset demonstrating how utilitarian architecture in the nineteenth century was often decorative in order to demonstrate status. In addition, the building has group value with the other structures associated with the reservoir.



**Plate 3: Pavilion at Hewlett's Reservoirs**

### **Gates, gatepiers and boundary walls at Hewlett's Reservoir (Grade II, list number: 1104330)**

- 3.21 The Gates and boundary walls at Hewlett's Reservoir were designated as a Grade II listed building in 1983, with amendments in 2015. The gate piers and gates date to 1824 with the flanking walls dating to 1824 and the 1850s. The piers are constructed from limestone ashlar and are approximately two metres high. They have crested, pyramidal capping and inset traceried panels with cusping to each face. Set between the piers are cast iron gates with pyramidal heads to the rails. The walls which flank the piers and surround the entire reservoir site are constructed in red

brick, in some places topped with railings. The brick is laid in an irregular header and stretcher bond. Regularly spaced brick buttresses with offsets and coped tops support the brick wall within the reservoir complex.

- 3.22 As with the other assets falling within the Hewlett's Reservoir complex, the immediate setting of the walls, gate piers and gates is made up of the other structures associated with the reservoir. The contribution that these make to the overall significance of the walls and gates is substantial as it allows for an understanding of the purpose of the walls and gates.
- 3.23 The wider setting is made up of the surrounding open landscape, and beyond to Cheltenham town. The open landscape contributes to the asset as it provides an open and rural backdrop which therefore makes the wall more of a landmark, standing out in the semi-rural context. The connection to the town provides significance to the asset in presenting the demand for the complex, with the continued expansion of Cheltenham providing the need for further clean water. The Site itself forms a part of the open landscape, and as it is located in close proximity to the asset makes a positive contribution to the asset through providing rural character and as discussed above making the wall more of a landmark in the landscape. In addition, it provides separation between the built form of Cheltenham and the reservoir.
- 3.24 The significance of the asset is principally derived from its architectural interest, with the elaborate piers and gates being of high architectural quality and surviving well. As with the pavilion, the quality of the gates do not hint as to their functional purpose and connections. The walls also share group value with the other structures at the reservoir, which provide the historical understanding of the asset.

### **Bouncer's Lane Cemetery Registered Park and Garden (Grade II, list number: 1000855) and Associated Listed Buildings**

- 3.25 The Bouncer's Lane Cemetery is designated as a Grade II Registered Park and Garden. There are a number of listed buildings within the boundary of the Registered Park and Garden, which due to their limited individual intervisibility with the Site will be considered as part of the RPG. The Chapels on Site will be considered individually due to the clear visibility of them from the Site. Therefore, as part of this section the designated assets which will be considered are:
- Bouncer's Lane Cemetery Registered Park and Garden (Grade II, list number: 1000855)
  - Main Entrance to the Cemetery (Grade II, list number 1386766)
  - Cemetery Lodge (Grade II, list number: 1386765)
  - Inner Gateway to Cemetery (Grade II, list number: 1386764)
  - Octagonal Lodge approximately 15 Metres North West of Cemetery Chapels, Cheltenham Cemetery (Grade II, list number: 1386767)
  - Tomb of Thomas Champion, Cheltenham Cemetery (Grade II, list number: 1386768)
- 3.26 The cemetery dates to the mid-nineteenth century and is laid out to the designs of W H Knight, a Cheltenham architect. The expanding population of Cheltenham in the early nineteenth century led to an increased requirement for a large graveyard, and whilst one was built in the town in 1829, this did not provide adequate provision. In 1861 a competition was put in place for the design of the new cemetery proposed at Bouncer's Lane, which was won by Knight. The cemetery was laid out in 1863, with the buildings being constructed between 1862 and 1864. The cemetery was extended to the east in 1883, again in 1926 and again in the late twentieth century. In 1938 a crematorium was added to the east of the south Chapel.
- 3.27 The site of the cemetery measures approximately 17.5 ha and is separated from residential and commercial properties by hedges and fences to the north and west, whilst to the east and south-east the cemetery is bounded by open agricultural land. The cemetery is located on level ground, although surrounding the asset to the east the Cotswold escarpment rises steeply providing an



open and semi-rural backdrop, and creating a sense of rurality despite the location on the edge of a settlement.

- 3.28 The Grade II listed entrance comprises stone quadrant walls of crenelated outline, with ornamental cast iron railings with fleur-de-lis finials. At the entrance gateway there are a pair of monumental circular stone piers, topped with drum caps and cruciform bronze finials. The gates are cast iron and similar in design to the railings.
- 3.29 The Lodge is a Grade II listed two-storey gabled building constructed in rough-faced rubble stone with a fish-scale tiled roof. The building is Tudor Gothic in style and it therefore has an impressive presence on entering the Cemetery. The gables are irregular in layout, with a number of gables adjoining the main building. To the south two gables have pointed windows with pairs of mullions and transomed lights topped by carved panels. The west gable, fronting the road, has a two-storey angled bay window with four centre arched lights, mullions and transoms. The doorway is a chamfered arched doorway with a pointed timber plank door. To the south-east of the building there is a one bay extension with a barge-boarded gable.
- 3.30 On entering the gates there is a large straight drive leading to the second set of gates, which has wide grass verges and with the remnants of an avenue of conifers. This provides an initial understanding of the open and greened nature of the Cemetery. Along this approach there are mid-twentieth century service buildings which do not contribute to the significance of the cemetery. The inner entrance, which is also listed at Grade II, is similar in design to the initial entrance. There is a pair of stone piers surmounted by drum and cone cappings with cruciform stone finials. The pair of cast iron gates are also like those at the main entrance.
- 3.31 On entering the cemetery the layout is of two concentric curvilinear drives which create an elliptical shape. A formal drive extends from the outer drive to the Chapel buildings at the centre of the Site (these are discussed in detail below in their own section). Within the driveways there are large irregularly shaped burial areas which are laid to grass and planted with a large number of mature trees and shrubs. The graves are regularly spaced within these areas.
- 3.32 Within the Registered Park and Garden is the tomb of Thomas Champion which is separately listed as Grade II. It dates to the late nineteenth century and was designed by Knight in order to suit the cemetery. It is constructed in High Victorian Gothic Style and is a stone canopied tomb with columns constructed from polished granite at each of the four corners, topped with leaf capitals. The two larger arches have scallop and leaf enrichment to the roll moulds. The four gables are crocketed and there were originally four corner statues of the four evangelists on column pedestals, although some of these are now missing. At the centre of the tomb lies a wide table tomb. The tomb is a particularly fine example within the graveyard and is therefore an important part of the Registered Park and Garden, particularly given that it was designed by Knight who designed the entire site.
- 3.33 To the north-west of the Chapels there is an octagonal lodge which is listed as Grade II. It dates to the mid-nineteenth century and is constructed in timber with a metal roof. The lodge has alternate sides open, and within each quarter there are benches which form a central cross. Above the benches there are glazed windows linking the different areas. The metal roof is surmounted by finials. It is a relatively plain building however it represents an almost unique survival of a nineteenth century cemetery shelter and therefore possesses value in this uniqueness.
- 3.34 The setting of the cemetery is made up of the properties which surround it to the north, west and part of the south; although, from within the cemetery, its treed nature means that these residential and industrial structures have very little impact on the tranquillity of the cemetery. The edge-of-town environment contributes to the significance of the cemetery as it is the expansion of Cheltenham that led to the increased requirement for a larger burial ground. The immediately surrounding properties postdate the cemetery and the cemetery was initially sited in a more isolated location, however the continued expansion of Cheltenham has represented the continued need for the Cemetery and demonstrates its importance in the town. Whilst these properties do not



contribute positively architecturally or historically they do make a functional contribution to the communal value of the asset. Historically therefore the cemetery is reliant on this expansion.

- 3.35 The cemetery also has views to the surrounding hills and landscape, which contributes to the significance of the asset through providing a more remote and isolated character, despite its placement within so much built development. This reinforces the significance as a cemetery as it helps to place the cemetery in its historic context as a Cemetery on the edge of the settlement. It therefore contributes to its historic illustrative value and significance. When looking towards the Site from the cemetery, trees on the Site can be seen, although there is no appreciation of this being an open space, with only the trees themselves being visible. Whilst the Site would once have contributed through historically forming part of the rural context of the asset, this is no longer appreciable from the asset and therefore the Site is not considered to contribute to the overall significance of the asset.
- 3.36 The cemetery has a high level of significance derived from the aesthetic value of the complex, in addition to the architectural value. It was designed by W H knight, who also designed several other cemeteries which share architectural characteristics with the Bouncer's Lane Cemetery. The high standard of the cemetery's design and architecture, with a symmetrical layout with a high degree of planting and notable architecture contributes to its significance. The Cemetery has historical value, demonstrating the growth of Cheltenham in the early nineteenth century.



**Plate 4: Bouncer's Lane Cemetery Registered Park and Garden**

### **Two Cemetery Chapels, Cheltenham Cemetery (Grade II, List Number: 1386763)**

- 3.37 The Cemetery Chapels at the centre of the cemetery are formed of one building which contains two symmetrical Chapels. For the purposes of this report it is considered as one building. The asset was designated as a Grade II listed building in 1983, with amendments in 1998.

- 3.38 The building dates to around 1864 and was designed as part of the wider complex by WH Knight described above. It is constructed from coursed rough-faced rubble stone with ashlar dressings and the roof is constructed from hard glazed tiles with fishscale bands. The Anglican and Non-conformist Chapels are laid out symmetrically, linked by two three-bay link blocks and a large central entrance set underneath a two-stage tower with stone spire. The building is in decorated Gothic style, with carved steps and string course and large geometric windows. The link passage is set back, with central bayed breaks which have two-light windows with quatrefoil heads. These windows run along the entirety of the link building. The parapet is pierced and the tower has diagonal buttresses and an arcaded belfry stage. The spire has arched vents with lucarnes and canopied pedestals at the corners. The Chapels themselves are four bays with gablets above foiled oculi above each window. To the north and south facing outer sides of the Chapels there are projecting gabled porches which have plank doors in trefoil headed openings.
- 3.39 The immediate setting of the asset is made up of the surrounding cemetery which is separately listed as a Registered Park and Garden. This creates a parkland setting which is well treed and verdant in character. It contributes to the significance of the asset, through providing a tranquil environment, but also through its historical association of both having been designed by Knight. It is considered that this immediate setting makes a great deal of contribution to the asset.
- 3.40 The wider setting is made up of the surrounding landscape, including hills to the north-west and to some degree the Site. However, from the Chapels there is no visibility of the Site and whilst there are return views to the spire of the Chapel from the Site, it reads as a parish church rather than as a cemetery Chapel. It is therefore considered that the Site makes no contribution to the significance or understanding of the asset. The wider setting of the asset also includes the residential areas of Cheltenham both immediately surrounding the cemetery and further afield. As this provides the purpose of the cemetery and its Chapels, it makes a degree of contribution to the significance and understanding of the Chapels.
- 3.41 The building has a high degree of architectural and aesthetic interest, and Historic England state that it is the finest surviving Victorian cemetery Chapel in England. It stands at the centre of the cemetery and its architectural detailing shows the status of the building. It also derives value from



**Plate 5: Chapels at Cheltenham Cemetery**



being designed by Knight who designed the rest of the graveyard. It possesses communal value, with it representing an important place of worship for the families of those being buried in the cemetery.

### **Cheltenham Central Conservation Area**

- 3.42 The Cheltenham Central Conservation Area has 19 different character areas and due to the scale of the settlement these areas are diverse in building style, type and function. The Conservation Area is therefore assessed in this report in terms of the appreciation available from the Site. There are hundreds of listed buildings within the area, most notably churches, which can be seen from the Site, however most of these cannot be picked out individually due to the vast sprawling townscape. Those that can are still read as part of the whole and so are considered within this assessment of the Central Conservation Area. From the western field parcel there are clear views over the majority of the Conservation Area. From here, the settlement is experienced as a broad roof-scape, with a predominance of white render buildings. A number of church spires are dominant features within the views, including those of Cheltenham St Mary's, St Gregory the Great and Christ Church, and these are predominantly constructed from Cotswold stone. The church spires do stand out, however these read largely as part of the wider roof-scape of Cheltenham, rather than as isolated buildings. Most other buildings are not individually discernible, although some, such as the Pitville Pump Rooms and Cheltenham Library, can be identified due to their sheer scale and, in the case of the pump rooms, their isolation. These are still read from the Site as part of the wider townscape, and their individual merit is hard to discern due to distance from the Site.
- 3.43 The Conservation Area is defined by its historic and architectural values, embodied within the stock of fine architecture, dating in a large part to the Regency period. The settlement grew up as a Spa town and retreat, and therefore the history associated with this development contributes greatly to the significance of the Conservation Area. The architecture reflects this, and the range of buildings, from large detached villas to small residential terraces, represents the contrasting wealth of the settlement.
- 3.44 The Site does provide views to the Conservation Area, however from the Conservation Area any views back to the Site will be of glimpses of open space. This will, in some very limited locations, form an open backdrop to the built form of Cheltenham. Whilst the Site allows for some appreciation of individual assets within the Conservation Area, it is not considered that this contributes to the overall significance and understanding of the Conservation Area, which is defined by its architectural and historic special interest, is at very most negligible.



**Plate 6: Cheltenham Central Conservation Area**

### **Prestbury Conservation Area**

- 3.45 Prestbury Conservation Area was designated in 1971, and from 1974 was under the management of Tewkesbury Borough Council, although management again reverted to Cheltenham Borough Council in 1991. A Conservation Area Appraisal and Management Plan was adopted for the area in June 2009.
- 3.46 The Conservation Area covers the historic core of the village of Prestbury, which has generally retained its historic planform. It is defined by Mill Street and High Street running east–west and by the Burgage to the west end of the village, running north-south. There are a large number of listed buildings within the Conservation Area, which is predominantly residential in character, although there are a number of community buildings present within the village centre.
- 3.47 Plot sizes within the historic core of Prestbury are varied, as is the positioning of buildings upon their plots. The Burgage has narrow plots and back-of-street frontages illustrative of its historic formation, and this has an echo in the fine-grained development of the properties along High Street (see below). There are a number of larger detached buildings situated on open plots. These buildings form landmarks within the Conservation Area and generally constitute the village's most important buildings, these being the Church, the manor house (now the Hayes) and the public houses. These buildings form key elements of views into and out of the Conservation Area.
- 3.48 The setting of the Conservation Area is made up of both the built development to the south-west, and the open land to the north, south and east. From the majority of the Conservation Area views out to the surrounding landscape are limited, as the enclosed nature of the village prevents outward views, however to the north-west there are views to the fields and hills beyond.
- 3.49 From the Conservation Area, there is very limited appreciation of the Site. The Church and a small number of other buildings are visible when looking from the Site towards the Conservation Area, however in most cases these views are simply of the roof-scape. The Site forms a very small part

of the open land around the asset, however there is a high level of modern development between the Site and the Conservation Area. It is therefore considered that other views out of the Conservation Area contribute more to the significance, with the Site making no legible contribution to the overall significance of the Prestbury Conservation Area.

- 3.50 The significance of the Conservation Area is principally derived from the distinctive village character of the settlement, despite the area being subsumed into Cheltenham. It contains historically and architecturally important buildings, with a diverse mix of type, style, age and function of the assets. The Site does not contribute to the overall significance of the Conservation Area.



**Plate 7: Prestbury Conservation Area**

### **Stone Lodge, Hewlett Reservoir**

- 3.51 Stone Lodge at Hewlett's Reservoir backs on to the Site, and the rear is therefore visible from the Site. It is not listed however it is considered to be worthy of non-designated heritage asset status. Only small parts of the asset are visible from the Site and the rest can only be seen from within the Hewlett's Reservoir complex which is private, so the following description is based only on what can be seen from the Site.
- 3.52 The building is of an L-shaped plan, with two gabled elements abutting each other at right angles. From the rear of the property one gable is visible that is constructed from coursed limestone. The adjoining wing is rendered and painted cream. The building has a gabled roof covered in plain tiles, and there are a number of large brick chimney stacks. The one window which is visible from the site has been replaced with a late twentieth century metal sash which is not sympathetic to the historic character of the asset. There is a large brick wall which surrounds the Hewlett's Reservoir complex and therefore none of the ground floor of the asset is visible.



## BUILT HERITAGE STATEMENT

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- 3.53 The immediate setting of the heritage asset is made up of the other structures associated with Hewlett's Reservoir, and as already mentioned these make a great deal of contribution to the overall significance of the Stone Lodge. It is considered that the immediate setting of the asset is integral to its significance.
- 3.54 The wider setting is largely made up of the open land which surrounds it, including the Site. There is limited visual connection with the Site, due to the large wall which surrounds the asset and the lack of windows facing out on to the Site, but nonetheless, the relatively remote location does make a contribution. It is therefore considered that the Site makes a minor positive contribution to the overall significance of the non-designated Stone Lodge as part of the open land forming its wider setting.
- 3.55 The significance of the asset principally derives from its historical connection to the reservoirs, and the group value it shares with the other structures forming part of the reservoir complex. There is some limited architectural value in the building with it being reminiscent of a lodge of the early-mid nineteenth century.



**Plate 8: Stone Lodge at Hewlett's Reservoir**

### **Agricultural Buildings at Oakley Farm**

- 3.56 There is a cluster of agricultural buildings located at the northern extent of the Site which appear on the first edition Ordnance Survey map (fig 2) and which are considered to be worthy of non-designated heritage asset status. They still serve an ancillary purpose however they are in a poor condition and it appears that they have not been used for some time.
- 3.57 The main building has several elements. The main element of the building is a long rectangular timber framed barn with timber plank walls over the majority, but also some brick work at the lower level of the building. The roof is gabled with it partially covered in tiles and partially covered in

slate, and there are capped vents allowing for air circulation in the building. It has several large barn style openings. Abutting this to the south-west is a perpendicular gabled brick building with a corrugated iron roof, and perpendicular to this a Nissen hut-style building with brick walls and a curved corrugated iron roof. There are cut out openings in the corrugated iron. Adjoining the main building to the north-east there is a further single bay gabled building with a single storey offshoot. This is a brick building with a tiled roof and a number of timber openings. All elements of the building are in a poor state of repair, and in some places appear to be structurally unsound.

- 3.58 The immediate setting of the assets are made up of the complex of farm buildings, in addition to the immediately surrounding land. These buildings form a part of the Site and therefore some elements of the Site form this immediate setting. The setting contributes to the assets by placing them within their agricultural and rural context. The wider setting includes further areas of open space, which the farm buildings would have served, and which therefore contributes to the significance of the asset. The entirety of the Site is within this wider setting. The wider setting has been degraded by the addition of modern buildings around the farm buildings, removing the rural isolation of the assets and altering their understanding as isolated farm buildings. The Site itself has a positive impact, representing the last area of open space associated with the buildings.
- 3.59 The significance of these agricultural buildings is principally derived from their architectural and historical value in demonstrating agricultural practices of the nineteenth century. Aesthetically they possess some value however this is diminished because of the poor state of repair of the buildings. The presence of the Nissen hut-style building demonstrates architectural practices in the early twentieth century, and the use for agricultural purposes rather than its intended military use demonstrates the far-reaching influence of these buildings. It is also possible that this was relocated from a military site, with a Ministry of Defence site existing immediately to the north.



**Plate 9: Agricultural Buildings at Oakley Farm**



## 4 PROPOSALS AND ASSESSMENT OF IMPACT

### Proposals

- 4.1 The full plans and description can be found in the planning application which this document accompanies. The proposed development is for a 250 unit residential development focussed within the northern two thirds of the Site. Most existing trees will be retained as part of the scheme, and there will also be a high level of new tree and hedgerow planting, particularly at the southern edge of development. The principal site access will be off Harp Hill. Bordering the southern extent of development will be a dense area of tree planting, and beyond this an area of open land with a network of footpaths within it.

### Assessment of Impact

- 4.2 This section assesses the potential impacts of the proposed development on the heritage assets significance.

#### **No.1 and No.2 Reservoirs**

- 4.3 The two reservoirs at Hewlett's Reservoir Complex will be impacted in the same way and to the same extent so are considered together here. The proposed development will be located in the north of the Site and as such an area of open land will be retained immediately adjacent to the reservoirs. The development will however remove some of the land which separates the built-up edge of Cheltenham from the Reservoirs, and will therefore result in the loss of some of the rural context in which the assets are presently situated. This has already taken place to some extent with previous development to the north of the Reservoir complex. The significance of the assets is principally derived from their illustrative value as impressive feats of early-nineteenth century engineering, rather than from their setting, and this will not be impacted in any way. It is therefore considered that the proposed development will result in a less than substantial degree of harm, and that this will amount to a minor degree of harm to the overall significance of the assets.

#### **Pavilion at Hewlett's Reservoir**

- 4.4 The Pavilion at Hewlett's Reservoir stands out in the landscape and is a focal point due to its raised position and general isolation. It appears as a pavilion for a country house and therefore has a grand character. As with the reservoirs themselves, development will be kept to the north of the pavilion, however the more exposed and raised nature of the pavilion means that there will be slightly more impact on its overall significance. The isolation of the pavilion will be impacted and therefore so too will the statement it makes. However, the significance of the asset principally derives from its connection to the rest of the Reservoir Complex, rather than its rural location. In addition, the architectural and aesthetic qualities of the asset will not be impacted. It is therefore considered that the proposed development will result in a less than substantial degree of harm, and within this spectrum of less than substantial harm the overall harm will be minor.

#### **Gates, Gate piers and Boundary Walls at Hewlett's Reservoir**

- 4.5 The Gates, gate piers and boundary walls at Hewlett's Reservoir principally derive their significance from the group value they share with other assets at the Reservoir and this group value will not be impacted. The walls and gates are particularly grand and suggest a country estate rather than a functional complex, and this grandeur therefore adds to their architectural special interest. This use of grand styling in functional architecture demonstrates the styles of the early nineteenth century. Whilst the proposed development will detract from the rural nature of the asset, therefore removing its perceived country estate character, the contribution that this makes to the overall significance of the asset is limited. The area immediately adjacent to the walls will be retained as open land, which will reduce the level of harm to the asset, allowing for the asset to stand out in the landscape. The proposed development will therefore cause a less than



substantial, minor degree of harm to the overall significance of the walls, Gates and Gate piers at Hewlett's Reservoir.

### **Bouncer's Lane Cemetery Registered Park and Garden and the associated listed buildings**

- 4.6 There are a number of listed buildings within Bouncer's Lane Cemetery which have no visual or functional link individually with the Site. These are therefore considered as part of the wider Registered Park and Garden. From parts of the Site the Registered Park and Garden can be seen, with trees in the RPG standing out in views across the landscape. In return views from the Cemetery there are glimpses of the Site and the trees within it, however this makes very little contribution to the understanding or significance of the asset, with other views over open hillside being much more important. Any views to the Site are seen in the context of other built development. It is considered that whilst the proposed development will represent a change within the wider setting of the Bouncer's Lane Cemetery Registered Park and Garden, this will not have any harm on the overall significance of the area or its associated listed buildings.

### **Two Cemetery Chapels, Cheltenham Cemetery**

- 4.7 There are some views of the spire of the Cemetery Chapels from the Site, however these views provide limited understanding of the significance of the asset. There are no return views from the Chapels to the Site and therefore it does not contribute to the understanding or significance of the asset, with the wider setting of the residential areas of Cheltenham being a much more important part of the wider setting of the asset. It is therefore considered that the proposed development will not result in any harm to the overall significance of the Cemetery Chapels.

### **Cheltenham Central Conservation Area and Prestbury Conservation Area**

- 4.8 The Cheltenham Central Conservation Area and Prestbury Conservation Area are visible in views from the Site, with a number of church spires and large buildings, such as Pittville Pump Rooms, visible on the skyline. These views allow for a wider appreciation of the settlement of Cheltenham and Prestbury. The proposed development will remove these views, and presumably from upper storeys within the Conservation Areas may remove some views of the open fields of the Site. Although these views are currently available, it is not considered that they make any contribution to the overall significance of the Conservation Areas. Therefore the loss of these views, whilst representing a change within the wider setting of the Conservation Areas, will not result in any degree of harm to the significance of the Cheltenham Central Conservation Area or the Prestbury Conservation Area. In addition, the proposals retain an open area with footpaths at the most elevated part of the Site to the south, and some views will therefore be retained.

### **Stone Lodge, Hewlett Reservoir**

- 4.9 The Stone Lodge at Hewlett's Reservoir has some visual connection with the Site, although views from the Lodge will be limited due to the high brick wall surrounding the Reservoir Complex and the lack of windows facing on to the Site. The proposed development of the Site will be retained within the northern part of the Site and as such there will be an open area left around Stone Lodge. It will still represent an encroachment into the isolated rural setting of the non-designated asset. It is therefore considered that the proposed development will result in a minor degree of harm to the asset, which should be weighed against the low local significance of the asset in accordance with the NPPF.

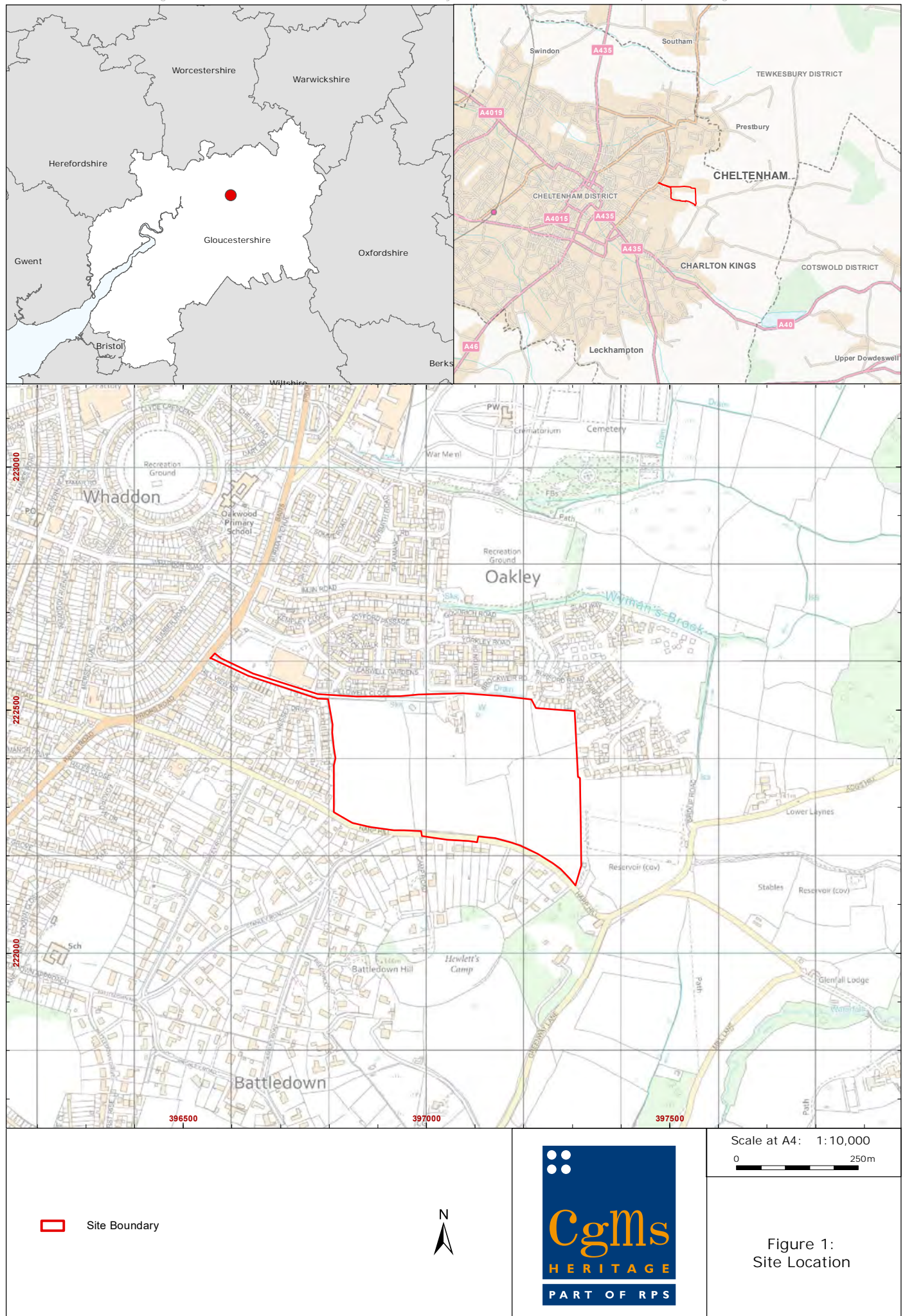
### **Agricultural Buildings at Oakley Farm**

- 4.10 The agricultural buildings at Oakley Farm will be demolished as part of the proposed development, resulting in the total loss of their significance. The significance of these buildings is very low however, and therefore the benefits of the proposed development should be weighed against this harm taking into consideration the low significance of the assets. A programme of building recording would provide some degree of mitigation for the proposed demolition.

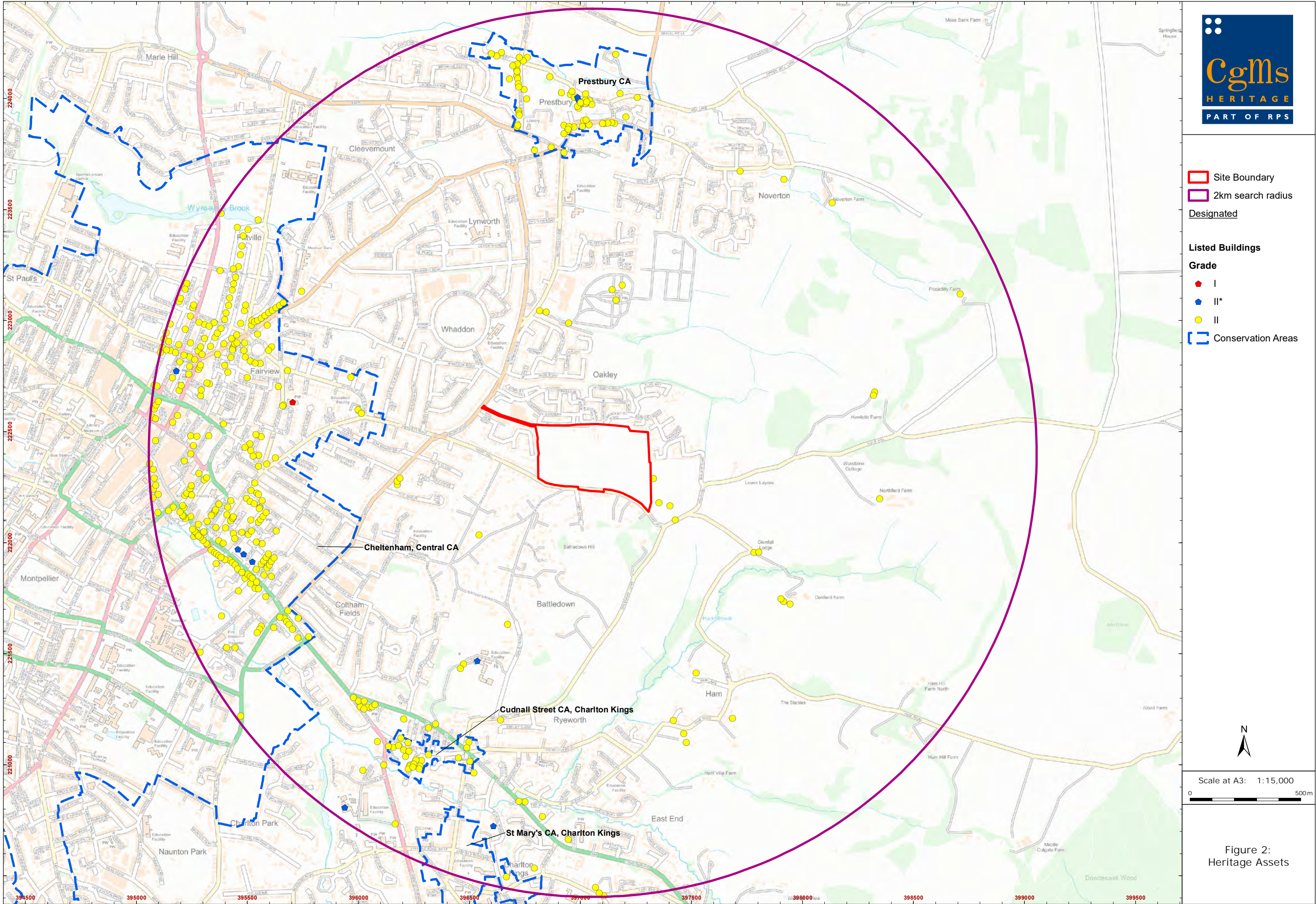
## 5 CONCLUSION

- 5.1 This Built Heritage Statement assesses the potential impact on the historic built environment arising from proposed residential development on land at Oakley Farm, Battledown, Cheltenham.
- 5.2 It has been demonstrated that the proposed development will result in a minor degree of harm on four listed buildings, all associated with Hewlett's Reservoir Complex. This harm should be weighed against the public benefits of the proposals in accordance with paragraph 196 of the NPPF.
- 5.3 Whilst the proposed development represents a change within the wider setting of other listed buildings, a Registered Park and Garden and two Conservation Areas, it is considered that this will result in no impact on the overall significance of the assets which will therefore result in no harm.
- 5.4 Stone Lodge, a non-designated heritage asset which is part of the Hewlett Reservoir Complex will see a minor degree of harm to its significance. The agricultural buildings at Oakley Farm which are considered to be non-designated heritage assets will be demolished as part of the proposed development which will result in total loss of significance and therefore the highest level of harm. This should be weighed against the low local significance of these assets and the benefits of the proposed development in accordance with paragraph 197 of the NPPF. The loss of the buildings at Oakley Farm can be mitigated by a programme of building recording being undertaken to record any significance of the assets.
- 5.5 This Built Heritage Statement meets the requirements of the NPPF and local planning policy and provides sufficient information and assessment to identify the potential impacts arising from the development of the Site on the historic built environment.
- 5.6

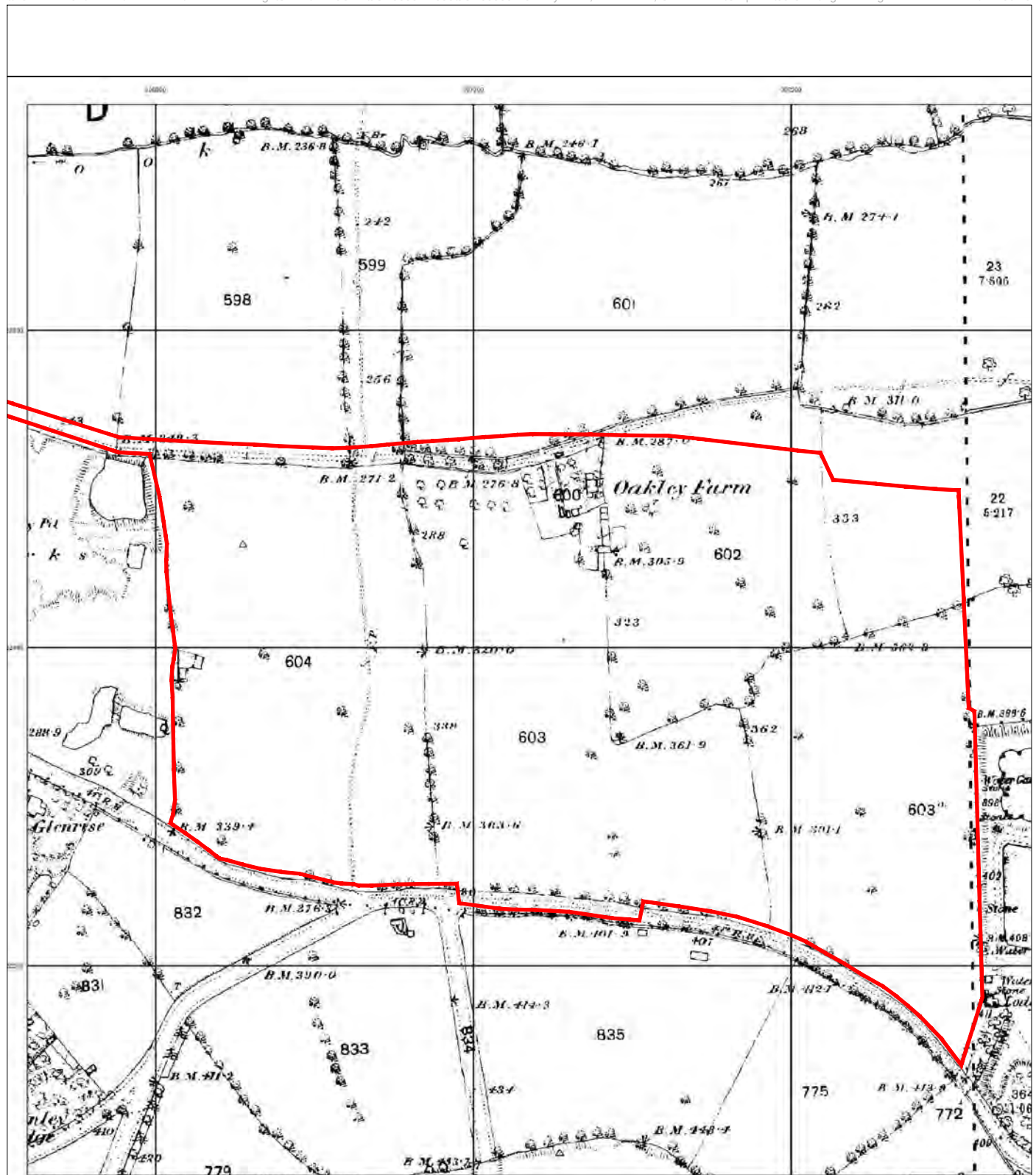
**FIGURES**









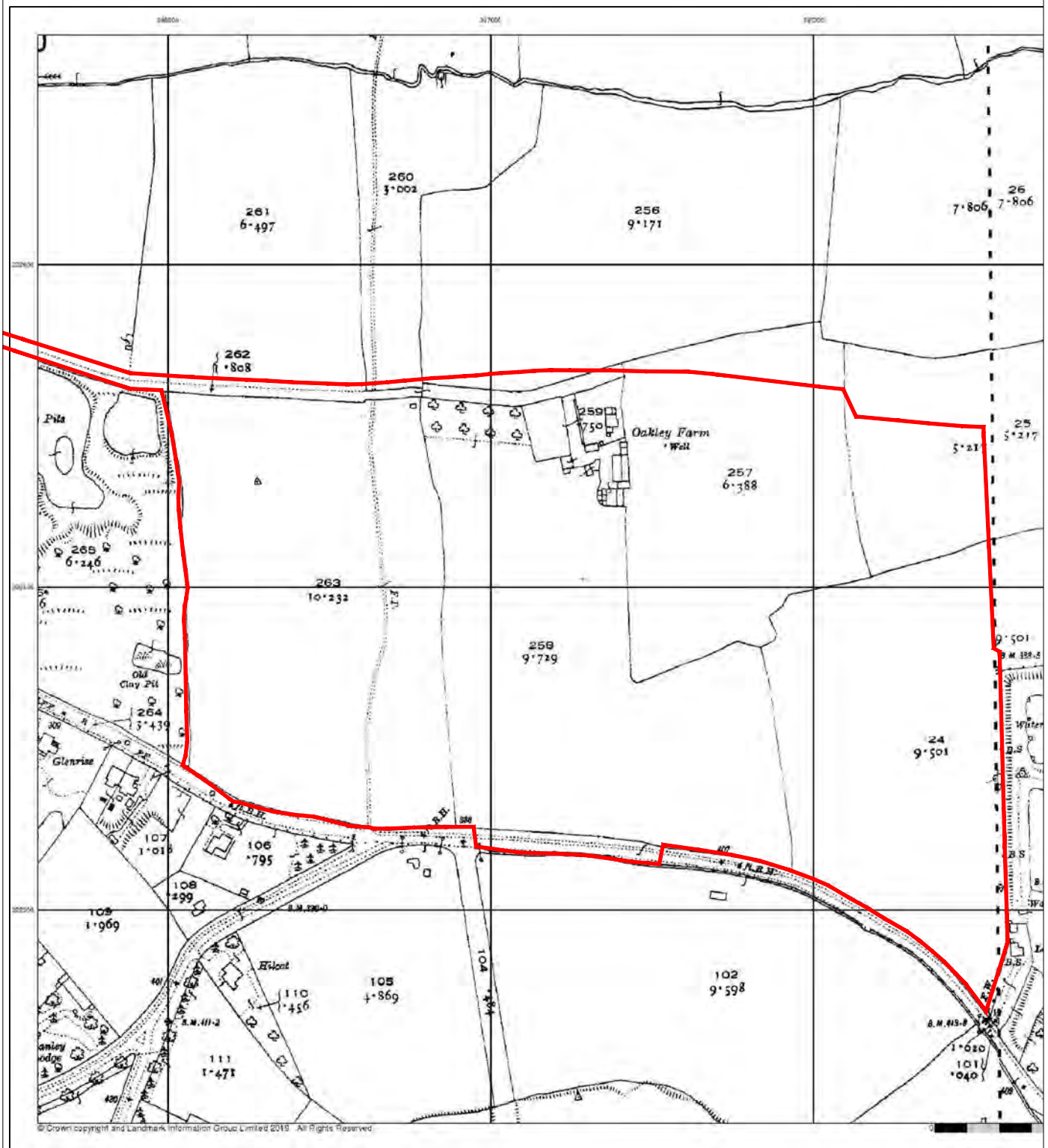


Site Boundary



Not to Scale:  
Illustrative Only

Figure 3:  
1887-1888 Ordnance  
Survey Map



Site Boundary



Not to Scale:  
Illustrative Only

Figure 4:  
1923 Ordnance Survey  
Map



Figure 5:  
1954 Ordnance Survey  
Map





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### General

English Heritage National Heritage List

National Planning Policy Framework

Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council Joint Core Strategy (non-adopted)

Cheltenham Borough Council Local Plan Second Review (2006)



[rpsgroup.com](http://rpsgroup.com)