

**Ms Caroline Townley  
Gloucester City Council  
Development Control  
Herbert Warehouse  
The Docks  
GLOUCESTER  
GL1 2EQ**

17 May 2016

Dear Ms Townley,

**TOWN AND COUNTRY PLANNING ACT 1990**

**Planning Application 14/00848/FUL - Consultation on Amended Plans - erection of two commercial units, to serve a mixture of Class B1 (Business) and B8 (Storage and Distribution) uses on land at Hemmingsdale Road, Gloucester.**

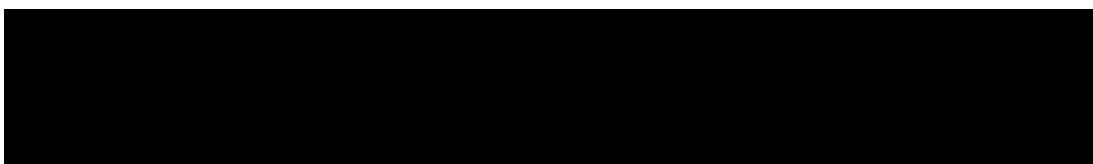
Thank you for re-consulting the Llanthony Secunda Priory Trust (LSPT) on the amended plans received in respect of this application. Given the passage of time (the application was lodged in 2014), we had rather assumed that the application had been abandoned.

As you may recall, LSPT set out its concerns about this proposal in its letter of 8 September 2014 (copy attached for convenience). You will also be aware that Historic England (then English Heritage) expressed similar concerns (its letter of 10<sup>th</sup> October 2014).

The Trust has now studied the amended plans. Unfortunately, our view is unchanged and the revisions do little if anything to address our concerns. Indeed, the photomontage images produced by the Applicant appear to us as pictorial 'reasons for refusal'. It is simply not appropriate to impose utilitarian trading estate 'architecture' on the doorstep of such an important and sensitive heritage site.

It is worth reminding that Llanthony is a site of national and, indeed, international heritage significance. It has been neglected and abused through the twentieth century and its survival is remarkable. The site is a scheduled monument and contains no less than six Grade 1 listed buildings.

You will also be aware that LSPT has now secured a £3,194,400 Heritage Lottery Fund grant for the Llanthony Secunda Re-formation Project. This project will see the major heritage buildings – the Medieval Range, Victorian Farmhouse and Brick Range



all repaired, restored and brought back into active and vibrant use. The grounds will also see the first phase of the Trust's landscape masterplan implemented. There is an ambitious plan of activities including a wide range of involvement for College students and the local community, with outdoor events and plenty of opportunities to engage with the site in different ways.

Llanthony is now set to become one of the most significant heritage sites in Gloucester and this underlines the importance of protecting its setting.

The current proposals under 14/00848/FUL do not protect its setting and would cause substantial harm to it. It is a large, boxy, utilitarian structure and the only relief from the expansive clad Llanthony Road elevation is provided by a series of narrow brick piers.

LSPT notes that the Council's Urban Design officer recognises that there will be an impact on Llanthony, but seems to think that the amended scheme is acceptable and will set a 'benchmark'. I am afraid that LSPT must disagree. LSPT considers that an approach of 'it's a bit better than Bikini Bathrooms' is just not good enough and fails to recognise the nationally important status of the Llanthony heritage assets.

Our position is fully supported by Chapter 7 of the NPPF, which requires 'good design', and by Chapter 12 that sets out the imperative of conserving and enhancing the historic environment. Indeed, the Framework could not be clearer with paragraph 132 stating that '*great weight*' should be given to such considerations and that '*...the more important the asset, the greater the weight should be*'.

I would be grateful if you would acknowledge this letter and keep LSPT informed of any further revisions to the submitted application. We would stress again that we are not opposed to development on this site, but the design needs to be much improved and past mistakes must not be repeated.

Yours sincerely,

*Philip Staddon*

Director Trustee – Llanthony Secunda Priory Trust

Enclosure: Letter of 8 September 2015

Copy to: Melanie Barge, Historic England

