

APPLICATION NO: 21/02364/FUL & LBC		OFFICER: Miss Claire Donnelly
DATE REGISTERED: 26th October 2021		DATE OF EXPIRY : 25th January 2022
WARD: Charlton Park		PARISH: CHARLK
APPLICANT:	Spirax Sarco Engineering plc	
LOCATION:	Charlton House Cirencester Road Charlton Kings	
PROPOSAL:	Demolition of mid-20th Century Wing and Erection of a Replacement Extension to the Office Building	

REPRESENTATIONS

Number of contributors	33
Number of objections	31
Number of representations	0
Number of supporting	2

20 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HT

Comments: 24th November 2021

This proposal will be a blot on the landscape in the middle of a very attractive residential area. Any new building should blend in rather than dominate it's surroundings.

I was at school when Eagle Tower was built and fearful that this extension will become another eyesore in our beautiful town.

5 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HS

Comments: 2nd December 2021

Firstly, I agree with all of the comments suggested by the myriad objectors to this scheme as proposed by Spirax Sarco.

I believe it is overly high and of a design that couldn't be more out of keeping with the largely residential area. It would be better suited to Milton Keynes or even Bracknell

My property Charlton Lodge, is one of the first houses in the conservation area, built in 1806 and is directly impacted by the overbearing height of the proposed building some 150 meters away. I believe I will suffer visual intrusion increased noise and potential light pollution from the proposed scheme as well as an increase in traffic especially during construction.

The scheme appears to be a rehash of many other developments around the UK and if Spirax were serious about being part of the community it would be better to involve more sensitive architects to provide a design more in keeping with Cooke-Higgs' masterpiece in Charlton House and the church he built at Holy Apostles. It would also be good to include ourselves as good and invested neighbours to help shape a more empathetic design for the building.

Traffic volumes which have become a real issue in Cudnall St in my 25 years here will be worsened by this scheme. I thoroughly concur with the objection raised from No. 25 and would note that I have raised this issue with Matt Babbage and received no response thus confirming my suspicion that the Cudnall Street conservation area would be better re-named as a conversation area as councillors only talk about our rat-run concerns.

As a serious counter proposal, and as Prince Charles might say, this monstrous carbuncle would be a glorious addition to the Cyber park proposed between GCHQ and the M5 and in relocating there, Spirax staff would be closer to some of production facilities in Kingsditch as well. Charlton House could then remain as say a training and conference facility which is obviously important to the management.

In closing, many thanks for allowing me to raise my concerns over this proposal.

Heatherleigh
Charlton Drive
Cheltenham
Gloucestershire
GL53 8ES

Comments: 24th November 2021

Historic England reference IOE01/02082/08 captures a great picture of Charlton House frontage as a listed building of great historical interest. The new proposal would degrade the frontage appearance significantly with the out of proportion design - especially the new higher roofline and the large glass bowl proposed to be attached to Charlton House. In conclusion the new proposal is unsympathetic to the surrounding neighbours and not in keeping with the historic and conservation area around it and consequently the proposal should be refused outright.

98 Cirencester Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DG

Comments: 31st January 2022

Design is not in keeping with surrounding buildings
Height is excessive and will impact privacy of the properties nearby
Old building should be retained as in keeping with area- this is not in an industrial area and any design needs to be in keeping with the local community.
Parking will be overstretched- the increase in footprint will increase employees and the staff will park in the surrounding streets - application should allow for additional parking.
In these grounds I object

Charlton Park Cottage
St Edwards Walk
Cheltenham
Gloucestershire
GL53 7RS

Comments: 25th November 2021

We are writing to object to the proposal in 21/02364/FUL to demolish the mid-20th Century wing and to erect a replacement extension to the office building Charlton House which is on Cirencester Rd. Charlton Kings, GL53 8ER.

The reasons for our objection are as follows:

Whilst we like several aspects of the proposed development, its scale is out of keeping with both the original Charlton House building and the local area which is primarily residential and includes a conservation area.

The proposed extension is significantly taller than the current extension, while its shuttered roof also exceeds the height of Charlton House. It is therefore in no way subordinate to Charlton House which it will dwarf in terms of both overall scale and height.

We also note that the projected number of staff for the site is going to be less than half its current level and we wonder why the extension needs to be so substantial. In addition, if the number of staff is decreasing, the number of parking spaces will also decrease, thereby freeing up land for lower profile developments potentially.

We ask that the Council rejects the present proposal in its current form. However, we agree that the current extension is not fit for purpose for Spirax, and neither is its design in any way sympathetic to the surrounding area and buildings. We would therefore be supportive of a proposal which did not involve a building of such height and scale, and which was more sympathetically designed to be in keeping with this historic part of Charlton Kings.

1 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9BS

Comments: 21st November 2021

I walk through this pleasant residential area regularly and am concerned that the proposed development will be totally out of character and will dominate the surrounding private houses and attractive street scene.

There are already masses of new build empty offices in Cheltenham without building more. The last thing we want is Charlton Kings very own " Eagle Tower" blot on the landscape.

Mead Lodge
35 Cirencester Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8EX

Comments: 21st December 2021
Letter attached

Comments: 30th November 2021
Letter attached

Comments: 20th December 2021

We write further to our email of Saturday 27 November 2021 to provide details of our objection to the above-named planning application.

We are not experts in the building field and therefore take at face value the contention that the current building is no longer fit for purpose and cannot be made fit for purpose in any other way than demolition and rebuild; we trust Cheltenham Borough Council (CBC) Planning Dept/Town planners with the appropriate expertise will make this important assessment.

Our objection here falls into two principal areas:

- the scale for the proposed extension, and
- the fabric of the proposed extension.

These principal objections relate to the re-development, and not the other consideration of the environment and impact of the demolition and build process. We have yet to read and reflect on all the documentation, especially as new documents were only added on Friday 26th November and the Park House letter is blank when opened/downloaded. This lead on to our significant concern about communication and the planning application process; therefore, we have some opening remarks regarding this.

Communication and Planning Process

Our property is less than 50 meters from Spirax on Cirencester Road. We can see the current building from most rooms from the predominate aspect of the house, at both ground floor and first floor level, and also from our main recreational garden area. This view includes the rooms which are used on a daily and continual basis. And yet we were not notified formally of this application by the Planning Department, Parish Council, or Spirax? Indeed, as mentioned in our earlier email, we only became aware of this application as a result of a neighbour. This is why our comments are late, and we trust

this will not prejudice the acceptance of our comments in the Planning Departments consideration. It is also why we have focused on just two key areas for our Objection.

Additionally, our personal lack of notification raises the question of which other households have not been notified since the current notification area does seem small. The proposed extension impacts many households on Cirencester Road, and in addition Cudnall Street, Chancel Way, and those on Holy Apostle's land off London Road, because of the massively changed façade on a substantial building within their residential domain and the of disruption during the demolition and build process. The CBC Planning Portal suggests that, as part of the planning process, a Charlton Drive Resident Consultant Meeting was held on 4th November; why was a similar meeting not extended to other affected residents at this time?

Objections - Initial Response

1. Scale for the proposed extension - Height, Scale and Mass

The current extension blends into the neighbourhood in two ways - scale and fabric. The current building is, in scale, sympathetic to its surroundings. It follows the topography of the land and is in every respect subservient to the Listed Building it abuts (Charlton House - the "House"). This is particularly seen in the 'Existing Drawings' which clearly show the current. extension roofline at the level of the bottom of the highest windows in the House. This is particularly important because, along with its façade, it allows the building to blend in with, and be part of, its neighbouring environment.

The proposed extension is of a magnitude significantly larger than the current extension with the roofline overpowering and dominating its surrounding environment. We must remember that, despite this office currently being here, it does in fact sit within a leafy suburban residential area not a business park. The proposed extension is entirely out of keeping and character with this wider environment and we are very disappointed that Spirax has not recognised this nor taken it into account in its proposed plans; they appear not to have taken the holistic view we would have expected of a good corporate neighbour. The application really only considers and addresses the extension from the aspect of the House and not from the opposite direction, where the building is at its most visible to the road, evidenced by the noticeable lack of Proposed View Images (PVI) provided within the application from the Cirencester Road and Cudnall Street elevation. Again, it is very disappointing behaviour, from a respected local and global organisation, to apparently choose to hide the true impact of their proposed development.

One has to wonder why a building of the proposed scale is needed, given the reduction in number of employees. This raises a further concern; if in the future the corporate need requires the number of employees on the site to increase, it could well be to a level that cannot be accommodated by the local infrastructure. Once the extensive re-development as proposed is built, this employee increase and infrastructure pressure would be very hard to prevent. The proposed extension size cannot be "driven by the Applicant's operational requirements" when the staff numbers in the current building are halving, if driven by operational requirements then a building half the size would be appropriate.

We have noted Spirax's comments (and thinly veiled threats) about this being the international HQ of a large company, but the 'beauty' and aura of a building appropriate to its status as HQ does not mean it has to be a monstrosity that needs scale. The 'threat' of 'give us planning permission or risk us moving away from Cheltenham' is repeated

several times in the documents and displays a very distasteful attitude from the company each time read. Which of their customer, people, and investors, would they lose if they chose to re-develop the extension with consideration to the neighbourhood in which it sits, the conservation of materials, and minimalizing the impact on the environment and climate?

The proposed extension, particularly at the Cirencester aspect to the House, where the new roofline is at its most invasive, is domineering and entirely out of keeping with its surrounding residential environment. We note that the local Parish Council shares this opinion, and it is a view shared, we believe, by all objections received. One only has to look at the Before and After elevations in the 'Design and Access Statement' document to appreciate the hugely negative impact.

2. Fabric of the proposed extension - Façade

The current extension is in keeping with its residential neighbourhood in that it could easily, for example, be the façade for a block of residential apartment rather than an office - the render, the windows, the scale all make this true - and this is what helps the building blend into its neighbourhood and historic environment and listed principal property, Charlton House.

The proposed extension throws this aesthetic away, and instead puts a significantly glazed and concrete block facade in its place. As said above, this building is not located on a business park or similar commercial environ; and therefore the façade of the proposed extension needs to be in keeping with its leafy, suburban, residential location, and very close proximity to the Cudnall Conservation area, particularly the listed Langton Lodge. The status of an international HQ can be realised with a significantly more sympathetic building. There are many properties and structures of listed/historical consideration within meters of this development which have not been considered by the Spirax application e.g. Charlton Park Cottage, Holy Apostles, Church, Old School. Bell Tower, and various listed and historic curtilages in the vicinity. Surprisingly these structure, together with Charlton House and Cudnall Bridge which were mentioned by the Spirax report, were omitted from the adjacent conservation areas when it was set, despite their significance.

Conclusion

We take the statements in respect of the need to replace rather than renovate the existing extension at face value; renovating the existing building would be our preferred outcome. Notwithstanding that...

We Object to the proposed application because of the:

1. Massive increase in scale and mass of the proposal and the impact its new roofline will have on its neighbours and the area generally; and the
2. Proposed façade not being in keeping with its suburban and residential location, and the listed Charlton House which it abuts.

We respectfully request the Planning Committee takes our comments, along with the comments made in the other Objections, and reject the plans as proposed and suggest a

more appropriate appearance and scale of extension, where the roofline is no higher than the height of the existing extension, be designed and submitted.

Comments: 28th November 2021

We live at Mead Lodge, 35 Cirencester Road, Charlton Kings; our property is within feet of this development, we can clearly see the existing building from many windows in our property as well as our garden, and we were not notified by the Planning Department of this application being submitted and therefore we were not aware of any initial deadlines for submissions in relation to it. We only became aware of this application due to a neighbour.

This is a brief email to say that we will be sending a more detailed response to the Planning Application 21/02364/FUL, ahead of the Planning Committee Meeting and would be grateful if you could advise by return exactly when this meeting will be held.

As we were not informed of this application, and I am now aware of at least one other effected resident who was also not advised, how many other residents in Cirencester Road, Cudnall Street, Chancel Way, and the properties on the Holy Apostles land off London Road, have not been contacted and given the opportunity to view and comment on the proposal?

3 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HS

Comments: 23rd November 2021

I object. Mainly:

- the plans are not in keeping/sympathetic with the current building. The fact that extension is higher than the original means that what was once hidden by the old lovely building will now be on show
- The proposed design is not subordinate to the main house, as required.
- as a direct neighbour the extension will ruin a lovely view that we have enjoyed for years.

3 Langton Place
Cheltenham
Gloucestershire
GL53 8HW

Comments: 16th January 2022

OBJECT For consideration at planning decision meeting 20 January 2022

Having studied the Project Oak proposal and updated drawings provided by Spirax Sarco and Robert Limerick Architectures following the Neighbours Event held 8 December 2021, we have the following objections to the application as stands;

1. The new proposed wing is significantly higher than initially alluded to in the consultation letter sent by McLoughlin Planning on 26 October 2021. At over five metres higher than the current wing, the new wing will be significantly higher than Charlton House and not be subservient to this original structure. The whole building, both Charlton House and the current 1970's wing, is Grade II listed. Spirax Sarco intend to demolish part of the listed building to build a significantly higher wing which is overbearing and does not fit with the fabric of the local residential and neighbouring conservation areas.

2. Why would a company build a larger building to house less people? The plans show a significant increase in square footage but a reduction in workforce; the applicant's planning application sets out that the building is intended for 133 full-time employees, plus visitors. This is disingenuous and only hides that the site has limited parking. At the neighbours consultation evening it was advised that there would be 300 plus employees in the future. In time, other areas of the new wing could be reconfigured to office space such as the Wellbeing/Reflection Room and Atrium. As the workforce grows, the building could have an occupancy of upwards of 300 with car parking for only 150 employees; the remaining staff will have no option but to seek overspill parking in the surrounding residential areas.

3. At the Neighbours Event on 8 December 2021, Spirax Sarco advised that the site enabled the company/employees to 'connect with nature' with the promotion of well-being for its employees cited as an important theme for the new build. We applaud the consideration of employees wellbeing being central to any consideration, and hope this consideration is extended to its neighbours. We heard about the development of biodiverse areas within the grounds of the site and the 10m squared Well-being/Reflection Room within the wing. The design was promoted as 'maximising views across Cox's Meadow' with the building of the new wing; Cox's Meadow itself being an area of biodiversity with access for all, only a few minutes walk from the site. With the proposed 5.2m increase in building height local residents will not experience a 'maximised view' unless you consider excessive glazing and concrete facades as such. Neighbours, who number far in excess of the stated 133 employees, will not only have diminished views and skylines, but perhaps most importantly diminished privacy. This is before any consideration of noise pollution during and after the build(due to plant operation) is taken into account.

4. We have touched on the crucial aspect of the level of parking available for any potential increase in staffing levels in the future, and while this must remain a priority for this planning application we would like ceiling height and recreational facilities to be considered. Cumulative ceiling height contributes significantly to the height of the proposed new wing. The current wing's floor to ceiling height was disclosed at the neighbours event as 3.2m with the new wing's floor to ceiling height proposed at 4.5m for optimum natural light. With residential property having floor to ceiling heights averaging 2.4m, and offering optimal/adequate natural light in which to work from home, we question the need for 4.5m heights. Furthermore, with an employee gym based at Northcott House just a short distance further along the Cirencester Road, we question the need for a full floor gym/changing facilities. With the reduced workforce having developed home working patterns and being encouraged by Spirax Sarco to progressively work from home, both the consultation planning letter and consultation

evening stated it anticipated a 60~70% office occupancy at any one time. Perhaps a more altruistic approach would be to provide a gym at St Edwards School for the local community to utilise outside priority access for Spirax Sarco employees. This would reduce floor levels of the proposed rebuild, and provide an enviable outreach project. Similarly, gym and Well-being/Reflection Room facilities may well be better considered for the bio- diversity areas around the site grounds; as previously built for Spirax Sarco's dining facilities.

For the current application we hope the Planning Committee will not accept as currently stands.

Original objection raised 24 November 2021:

OBJECT

We object to this proposal for the redevelopment of the Spirax Sarco HQ as it fails to preserve the historic fabric of this residential area and, significantly, abuts a Conservation Area. We believe the proposed redevelopment principally breaches the requirement for any development to be subservient to the Listed Historic Principal Building (Charlton House) and is unsuitable for a residential area.

1 HEIGHT

The proposed new wing's height, including the services plant at the highest levels, will be considerably higher than the current build and potentially higher than Charlton House. We asked McLoughlin Planning to provide an illustration of the redevelopment superimposed over the current build. This has not been forthcoming, but this would be a useful illustration for all future considerations. This would, we anticipate, demonstrate the impact from Drawing 1200922 where the large structure labelled 6 rises to approx 15 feet above the roof line of Charlton House, rendering Charlton House subservient to the new wing.

2 DESIGN AND APPEARANCE

The proposed redevelopment is a highly glazed building whose scale is perhaps more suited to an open 'out of town' area, not the historic conservation residential area in which it would sit. The artists impressions remove any local housing from the illustration which gives the impression of little or no impact to local residents; this is not the case. They also fail to show the new building in direct comparison to the current building to show the scale of the new development. The plans do not show the view from the North where its overbearing size will be most apparent.

3 OVERLOOKING AND LOSS OF PRIVACY

The proposed development is significantly higher than the current building and the design includes significant glazing which overlooks, with associated loss of privacy, residential properties on Cudnall Street, Birch Mews, Langton Place and St Edwards Walk.

4 SIZE OF THE BUILDING VERSUS STAFF LEVELS.

The proposal states the new build will have fewer employees than are currently housed at this location. While this is a strange concept for a significantly larger rebuild, the maximum workforce capacity of the new building must be articulated in order to

understand whether the current car park is large enough for to accommodate all workforce vehicles should the new building reach full capacity. This must be considered as part of this planning application because by stating that workforce numbers will be lower, this might avert scrutiny from the potential capacity of this site. Currently the car park has a capacity of circa 185 vehicles but any further burden on the parking capacity of the site will be felt in the surrounding areas, adding pressure to an already busy residential area. We believe the surrounding residential roads are currently used by the Spirax Sarco workforce.

With the proposal for a decreased workforce-on site due to anticipated future working from home patterns, it is difficult to see the new build need for such an increase in footprint, ceiling height and extensive gym facilities that would be provided.

For the reasons above, we urge the Council to REJECT the Application.

Comments: 24th November 2021

OBJECT

We object to this proposal for the redevelopment of the Spirax Sarco HQ as it fails to preserve the historic fabric of this residential area and, significantly, abuts a Conservation Area. We believe the proposed redevelopment principally breaches the requirement for any development to be subservient to the Listed Historic Principal Building (Charlton House) and is unsuitable for a residential area.

1 HEIGHT

The proposed new wing's height, including the services plant at the highest levels, will be considerably higher than the current build and potentially higher than Charlton House. We asked McLoughlin Planning to provide an illustration of the redevelopment superimposed over the current build. This has not been forthcoming, but would be a useful illustration for future considerations. This would, we anticipate, demonstrate the impact from Drawing 1200922 where the large structure labelled 6 rises to approx 15 feet above the roof line of Charlton House, rendering Charlton House subservient to the new wing.

2 DESIGN AND APPEARANCE

The proposed redevelopment is a highly glazed building whose scale is perhaps more suited to an open 'out of town' area, not the historic conservation residential area in which it would sit. The artists impressions remove any local housing from the illustration which gives the impression of little or no impact to local residents; this is not the case. The illustrations also fail to show the new building in direct comparison to the current building, indicating the scale of the new development. The plans do not show the view from the North where its overbearing size will be most apparent.

3 OVERLOOKING AND LOSS OF PRIVACY

The proposed development is significantly higher than the current building and the design includes significant glazing which overlooks, with associated loss of privacy, residential properties on Cudnall Street, Birch Mews, Langton Place, Charlton Drive and St Edwards Walk.

4 SIZE OF THE BUILDING VERSUS STAFF LEVELS.

The proposal states the new build will have fewer employees than are currently housed at this location. While this is a strange concept for a significantly larger rebuild, the

maximum workforce capacity of the new building must be articulated in order to understand whether the current car park is large enough for to accommodate all workforce vehicles should the new building reach full capacity. This must be considered as part of this planning application because by stating that workforce numbers will be lower, this might avert scrutiny from the potential future capacity of the site. The car park currently has a capacity of circa 185 vehicles. Any further burden on parking capacity of the site will be felt in the surrounding areas, adding pressure to an already busy residential area. We believe the surrounding residential roads are already used by the Spirax Sarco workforce.

With the proposal for a decreased workforce-on site, with anticipated future working from home patterns, it is difficult to see the need for such an increase in footprint, ceiling height and extensive gym facilities that would be provided.

For the reasons above, we urge the Council to reject the Application.

Park House
St Edwards Walk
Cheltenham
Gloucestershire
GL53 7RS

Comments: 26th November 2021
Letter attached

Comments: 23rd December 2021

My house - Park House, St Edwards Walk - abuts the Spirax Sarco car park. In fact we share the same boundary wall. As a result I will be amongst the worst affected by the massive increase (approx 18 ft) in height of the new building.

I strongly object to the new building for the following reasons:

1. The proposed height increase. The extra height (18 ft) will enable the office staff to not only gaze into my garden but also the kitchen, conservatory and principal bedroom
 2. The extra personnel and the impact on the car park. We have been clearly advised that there will be no increase in traffic as the proposed staff numbers will be retained at approx 150-160 personnel. However, we have since discovered that Spirax Sarco intends to have 300 staff on site. There will be a dramatic increase in car noise early in the morning and, especially, late at night. Where will all the extra vehicles be parked??
 3. Charlton House is Grade 11 listed, a lovely Regency building and in character with Cheltenham. The architects drawings distinctly show that the new construction will dwarf Charlton House and completely overwhelm it. In the same way as the Eagle Star building is totally incompatible so also will this new structure be completely inappropriate
- Kindly request Spirax Sarco to go back to the proverbial drawing board and reduce the height of the new edifice

1 Langton Place
Cheltenham
Gloucestershire
GL53 8HW

Comments: 20th November 2021

I object to the proposed development, in the main, due to the substantial scale not being appropriate for the residential area.

The proposal is substantially higher than the existing building and will create windows overlooking my property, and others, causing a significant loss of privacy.

The building view 8 1200703 is completely mis-leading as it has deliberately removed my property and others on Langton Place from the scene.

The current building needs modernising and I would support a similarly aesthetic improvement to that proposed but it would need to be 2 stories lower to prevent loss of privacy and to blend more sympathetically within the residential area.

I strongly urge the Council to reject the application as it stands.

Langton Lodge
2 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HT

Comments: 24th November 2021

Letter attached.

4 Birch Mews
Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DT

Comments: 20th December 2021

One of my initial concerns to the proposed application, which was stated in my original objection letter, submitted 20th November 2021, was the size and height of the proposed building, for what appeared to be a reduced number of employees (from 277 to 133).

However having attended the Neighbours Event, organised by Spirax Sarco, the Spirax-Sarco Group HR Director (and executive sponsor for Project Oak) stated at the Neighbours Event that "the current facility won't allow us to grow", "we need to future proof", "our current forecast is 165 employees", and "we have grown, we are growing and we will continue to grow."

Additionally it was stated by the Spirax-Sarco Project Oak Project Manager "we expect that the building could accommodate 250-300 employees."

The Q&A PDF from the Neighbours Event states: "The new building gives us sufficient space for 150 workstations, which allows capacity for growth of our Group functions over the lifetime of the building, while also providing an environment where we can flex the workspace considering the changes to the ways we might work in the future."

It therefore appears with closer scrutiny this is not a decrease in the number of employees but a potential increase and I am concerned of the impact on the immediate residential surrounding area. If these projected figures are taken into account, we then have to consider proposed car parking spaces to accommodate these figures. Currently this site provides 216 car parking space with no new parking spaces planned.

Furthermore the proposed gym facilities at the site, which will presumably be open to ALL employees of Spirax Sarco across their several sites in Cheltenham, will cause not only a further increase in traffic congestion, but potentially lead to cars being unable to park on site and being parked in nearby residential streets. In the last year, 4 road accidents have occurred between the front and rear access of this site. It is a dangerous part of the Cirencester Road and the impact of the proposed plans need to be given further consideration. I would also like to reiterate the points of concern raised by our neighbour at 25 Cudnall Street regarding the misuse of Cudnall Street, which will only be exacerbated by the current proposed plans.

Comments: 20th November 2021

I wish to object to the above planning application for the following reasons:

Charlton Kings is a village, which adjoins Cheltenham. It is a predominantly residential area. The current 1970's extension is landscaped with established trees and hedgerow, which allows in its current form, to blend with the immediate environment.

The Cirencester Road is an important approach road into Cheltenham. However, Cudnall Street is a conservation area. Both of these roads are of a very close proximity to proposed development. Therefore it is vitally important for the need of a more sympathetic approach to any further development, in what is a predominantly residential and conservation area.

Whilst I have no objection in principle to an extension, it is the height of the proposed building. Its close proximity to the conservation area, does not facilitate the enhancement and the preservation of Cudnall Street and its surrounding area. Indeed the proposed second floor will dominate this part of Charlton Kings. It is totally out of character with the immediate environment.

The illustrations indicate the proposed building will run in line with the height of the existing original grade listed building. The extension projects out towards and above the Cirencester Road, leading to a loss of privacy and intrusion to the immediate surrounding homes that the proposed extension will overlook. Furthermore, none of the illustrations indicate how the ventilation air handling units, air conditioning units and the PV panels on the top of the proposed building will further impact on the skyline? To accommodate such installations would suggest they would be higher than the existing roof line of Charlton House.

The planning Application indicates there will be a substantial increase in the amount and size of windows. This will cause a considerable lack of privacy to nearby residents in the day. Furthermore the working hours are from 7am until 8pm at night, thereby causing further intrusion with a substantial amount of light pollution both in the morning and at night.

Finally, I note from Section 21 of the planning application form, the existing number of full time employees is currently 277. After the completion, the proposed number of employees is 133. I am perplexed as to why Spirax Sarco need to build such a large and obtrusive extension for a reduced number of employees?

I am therefore asking the Council to refuse this planning Application in its current form.

If the application was made less obtrusive and allowed to blend more sympathetically with the immediate environment, I would support the application.

3 Birch Mews
Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DT

Comments: 21st November 2021

We are writing to object to the proposal to demolish the mid-20th Century wing and to erect a replacement extension to the office building Charlton House which is on Cirencester Rd. Charlton Kings, GL53 8ER.

The reason for our objection are as follows:

The proposed development is a stylish, modern building but its design and its scale are out of keeping with the local area. This part of Charlton Kings is almost entirely residential, adjoining the Cudnall St. conservation zone. While the proposed development would be appropriate for an edge-of-town business park, its size will dominate the local area and have a negative impact upon the people living here.

The height of the proposed development means that it will overlook neighbouring properties resulting in a substantial loss of privacy to local residents.

There is also the question of light pollution. Charlton House often has lights on late into the evening and sometimes seems to leave them on all night. Given the size of the proposed development this will further increase the impact upon local residents.

Please consider the impact of the proposed development upon an area which has several historic old buildings. Charlton House itself was rebuilt in 1825. While the 20th Century wing is nothing special, it is at least of a suitable size and scale. Nearby properties include Langton Lodge, built in 1807, Abbotsdene, built in 1795, Ivy Cottage built in 1808 and Charlton Lodge built in 1806. The whole area would be dominated by the proposed development.

We would ask the Council to reject the present proposal.

However, we would be supportive of a proposal which did not involve a building of such height and which was designed to be more in keeping with this historic part of Charlton Kings.

1 Birch Mews
Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DT

Comments: 22nd November 2021

I object to the above planning application on the following grounds:

1. The application proposes to introduce a large piece of contemporary architecture into a residential setting that will have a detrimental impact on the neighbouring homes and surrounding area by being totally out of character, particularly with the nearby Cudnall Street conservation area. Whilst the design, if considered in isolation, is somewhat attractive, it is more appropriate to a campus style business park.
2. It's height & breadth will totally dominate nearby homes and reduce privacy by overlooking them. If the height were reduced to that of the existing 1970's extension, then it might become acceptable.
3. As noted in Para 3 Section 5 page 18 of Heritage Report 1200663, a built heritage assessment is required to enable the planning authority to meet their obligations under Para 190-198 of the National Planning Policy Framework. This has not been supplied, consequently the application should be rejected.
4. The large size of the building would allow, at some future time, a considerable increase in personnel working in the building (despite statements to the contrary in the application), and requiring access, on a corner which has a track record of accidents. I am aware of 4 accidents (the latest today 22nd Nov) occurring in the last year alone, all serious enough to require police attendance. These are in addition to the accidents noted in the Transport Statement 1600662. If this application or a later one were to be approved, it should be conditional upon the number of staff working at this site not exceeding that stated in the application.
5. The present building's occupants regularly have lighting on all night, presumably for security reasons. The large number of additional windows, together with their size & height, will considerably increase light pollution in the area, since this practise is likely to continue in the proposed extension.

Comments: 20th December 2021

Further to my objections in my 22 Nov 21 statement, I would like to register the following additional points of objection:

1. Contrary to statements in the original application, as stated in Spirax-Sarco CEO's email to Alex Chalk MP, the new extension has been designed with future growth in mind.
2. The increase of staff numbers consequent upon such growth would exacerbate the traffic problems on a corner with an existing bad accident history.
3. As stated in answers to neighbours questions at the Spirax-Sarco event on 8 Dec. 21, the new extension will be 5.2 meters higher than the existing extension to Charlton House. Furthermore, this does not include Solar Panels & housing for the lift motors. This will be out of character & totally dominate the old house. It will also overlook and severely reduce the privacy of many nearby homes & gardens.

2 Birch Mews
Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DT

Comments: 24th November 2021

I am writing to OBJECT to the Proposed Development on the following grounds:

1. The area in which the Application site is located is almost exclusively residential in nature comprising a large number of characterful (many historic) houses, schools, a church and a small number of retail premises.
2. Indeed, the 'Cudnall Street Conservation Area' is located just a short distance (around 50 metres) from the northern boundary of the Application site. The grassy 'green triangle' framed by Cudnall Street and Cirencester Road is surrounded by many beautiful mature trees from nearby properties and the vicinity has a very leafy, residential feel (harking back to Charlton Kings' past as a rural village).
3. It is submitted that the existing offices broadly 'fit' within the local context because of their relatively 'low rise' design (especially when viewed from the northern boundary), as well as sympathetic hard and soft screening, which largely enables them to blend into an area which is overwhelmingly residential in character.
4. Seemingly acknowledging the character of the area, other newer buildings on the Application site have been sympathetically designed i.e. the 'Canteen' and 'Steam Technology Centre' which are very low in height and almost completely invisible from surrounding properties and the highway.
5. Visual Impact: The design of the Proposed Development does not follow that sympathetic approach and is highly inappropriate to the character of the area:
 - a. the new building is too large and too tall: it would be considerably larger than the existing building and, in particular, substantially taller, with the height of the new building to be significantly greater than the existing building - given the Applicant's claimed reduction in staff numbers, the design seems particularly unnecessarily massive;

- b. at points, the drawings indicate that elements of the new building will even be materially higher than the roofline of historic Charlton House;
 - c. in part because of this increase in height, the new building would visually dominate the local area in a way that the existing structures do not, negatively affecting the amenity of the surrounding area, particularly the pleasant 'green triangle';
 - d. further, the proposed finish features a preponderance of glasswork and metal louvres, which is inconsistent with all buildings in the surrounding area;
 - e. in particular, this modern 'glass and steel' tone is completely at odds with the appearance of historic Charlton House, which is Grade II listed and deserves to be protected and treated sympathetically;
 - f. overall, the visual impact of the new building would dominate, to the detriment of, the local area and appears to be something that would sit better in an out-of-town business park (e.g. Waterwells).
6. Loss of Privacy: Because of the significant increase in building size, and in particular height, the Proposed Development would also have a serious impact on the privacy of the surrounding existing residential properties.
7. In particular, the new building would considerably overlook and intrude upon the privacy of houses along St. Edwards Walk, Langton Place and the western end of Cudnall Street.
8. As a minor comment, I would point out that the Application seems to contain some inaccurate and misleading information. For example, in section 20 of the form, it appears to be stated that the Proposed Development would result in a net reduction of office floor space of over 10,000 square feet! Given the size of the new building, that sounds extremely unlikely.

For the reasons above, I would urge the Council to reject the Application.

In closing, I would add that if the Applicant was to submit a revised Application which was designed to be less obtrusive, and more sympathetic to the local area, and in particular with a roof line consistent with the existing office, I would most likely be supportive.

Comments: 22nd December 2021

I note that the Gloucestershire Highways Planning Liaison Officer (the "Highways PLO") has now provided his input on the Application.

The Application and its supporting documents state that the Proposed Development will result in 100 fewer staff on site (e.g. box 21 of the Application form indicates that employee numbers will reduce by 144).

The Highways PLO appears to have relied on such statements, concluding that the Proposed Development will result in fewer journeys to and from the Application site and so, therefore, causes no concerns.

Unfortunately, the Applicant and/or its agents appear to have provided misleading information in the Application:

o in correspondence with Cheltenham's MP, Alex Chalk, the Applicant's CEO confirmed that the Proposed Development, being over 10% larger than the building intended for replacement, was designed "with future growth" in mind. Given that this was stated in the context of a paragraph regarding floor space and facilities, the only sensible inference is that he means growth in employee numbers.

o further, at the local resident's consultation meeting on 8 December 2021, the Applicant's HR Director and project manager similarly stated that the Proposed Development was intended for future growth in employee numbers.

This is not surprising and is the logical explanation for the size and mass of the Proposed Development: why would any business, prudently utilising its capital, spend money on a significantly bigger building if it's going to halve employee numbers? The light density of workstations and large volume of un/under-filled spaces in the design drawings suggest that much greater staff numbers would easily be accommodated.

It ought to be reasonably concluded, therefore, that the true intention of the Applicant is to materially increase (not decrease) staff numbers at the Application site and the Application should be viewed accordingly.

The upshot of this is that, relying on the misleading statements in the Application, the Highways PLO has proceeded on a flawed basis and should be requested to re-consider his submission, taking into account:

o full utilisation of all existing car parking spaces (currently under-utilised based on visual inspection);

o additional journeys to the Application site from employees based at other Cheltenham sites (such as Northcroft House and Runnings Road) and customers and suppliers, to attend conferences, training sessions and other meetings at the Proposed Development's c. 50 seater dedicated auditorium (see Proposed Ground Floor drawing) and numerous meeting rooms.

I presume that the Planning Office will consider whether the Applicant should be required to re-submit their Application to correct the misleading information that has been supplied. Thank you for giving this your consideration.

Heatherleigh
Charlton Drive
Cheltenham
Gloucestershire
GL53 8ES

Comments: 23rd November 2021

The additional height and large expanse of glass make this a very prominent new building, greatly overshadowing the existing grade II original part of the house. The proposed extension is not in keeping with the original part of the house and not suitable within a residential area.

Given that the proposed extension is both significantly higher than the current extension and has significantly more window area this means the privacy of surrounding properties will be greatly reduced and the new building will look directly over our garden and patio and into the windows on the back of our house.

Something smaller and lower would be more appropriate.

Roman Hackle
Charlton Drive
Cheltenham
Gloucestershire
GL53 8ES

Comments: 25th November 2021

We object to the proposals for the following reasons:

Although the footprint of the proposed extension is roughly the same as the existing extension, the additional height will make it look like a significant modern office block in the middle of a residential area, particularly with the amount of glass proposed in the design. This also does not seem to blend sympathetically with the regency style of Charlton House.

The increased height of the proposed extension will also result in:

1. Loss of privacy at the rear of our house and that of our adjacent neighbours. There will be a direct sight line into our dining area, rear bedrooms, patio and garden,
2. A greater dominance by the building on our view of the hills and countryside to the east,
3. Potentially an increase in noise from plant machinery on the roof, (particularly air conditioning units needed for the south facing, glazed frontage) which would be at a higher level and above the current tree line between us and the building,
4. An increase in light pollution with more and larger windows illuminated at night from internal security or other lighting.

Southbank
Charlton Drive
Cheltenham
Gloucestershire
GL53 8ES

Comments: 23rd November 2021

I object to the proposals for the following reasons:

1. The size of the proposed extension overwhelms that of the original Regency villa. The visual 'heart' of the Spirax Sarco site is the Regency villa and it is not unreasonable to expect that any extension should be subordinate to the original villa. Clearly, this is not the case with the proposed extension.

2. Whilst the footprint of the proposed extension is not dissimilar to the existing structure, the height of the proposed structure is significantly more than the existing structure. The parapet of the existing extension is approximately level with the first-floor window heads

of the original Regency villa, but the proposals seek to increase this in excess of 50% in relation to the height of the Regency villa. Such an increase in height will have the following detrimental effects:

a. Loss of visual 'skyline'. Currently, I, and other residents, are able to view the hills in the distance but the proposed extension would obliterate this.

b. Loss of privacy. The increased height of the extension will overlook adjacent properties, thus compromising the privacy of residents.

3. The proposals do not appear to have any consideration for the residential environs immediately around Spirax Sarco. The site is surrounded on all sides by domestic dwellings and, as such, the sheer size and visual impact of the proposed extension is not sympathetic to the residential 'feel' of the area. Such a proposal would be more suited within a dedicated office/industrial development of similar proportioned structures.

In summary, If the height of the proposed extension was the same as the existing structure, then I feel this would be far more acceptable.

Rahnala
Charlton Drive
Cheltenham
Gloucestershire
GL53 8ES

Comments: 25th November 2021

We understand that there has been some problems maintaining the existing structure and that a rebuild is necessary.

The proposed extension is too large to fit in with existing manor house and is not subordinate to it. It is too tall and spoils the privacy of the houses next to it in Charlton Drive which were built in the 1930s.

It is a most unwelcome suggestion.

Birdhurst
Charlton Drive
Cheltenham
Gloucestershire
GL53 8ES

Comments: 23rd November 2021

The visual impact is unsuitable, privacy - glass dominance will impact surrounding neighbours, conservation & heritage - design not in line with historic nature of building and area.

The roofline has been interfered with in terms of being higher which is unacceptable in nearly all normal planning applications and due to position of building and surrounding properties should by no means be allowed to happen.

The Brick House
Charlton Drive
Cheltenham
Gloucestershire
GL53 8ES

Comments: 24th November 2021

The massive size of the proposed block is completely out of scale to this residential area on an important access route to Cheltenham.

If allowed to go ahead we will have another, later regretted, Eagle Tower.

There are Interesting differences in the treatment, or non-treatment, of external views of the proposed new block as viewed from the Cirencester Road / Cudnall Street direction. The view in Site Character section 02.4 has no equivalent in Proposed 3D Images in section 03.2, and conversely, the images in 03.2 have no equivalents in 02.4. It is therefore IMPOSSIBLE to accurately judge the visual impact of the proposal from the east !

As a matter of principle, neither the total volume of the proposed development nor its footprint should exceed or be outside those of the existing building.

If other comments are correct, then I would oppose the inclusion of Keep Fit facilities in this development.

The property ownership boundaries shown on all the plans that I have consulted are not accurate in terms of Spirax's ownership alongside the River Chelt and at the western edge of the site. In many cases the real ownership falls outside the present boundary fence.

The Biodiversity analysis and proposals are basically fluff. Why not give up the heavily managed existing lawn or plant shrubs vegetate patches of the car park ?

2 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HT

Comments: 21st December 2021

Following the Spirax-Sarco Neighbours' Event held on 8 December 2021, I wanted to provide additional commentary (beyond that set out in my Objection letter dated 22 November) for consideration by the Planning Committee with respect to HEIGHT & MASSING - and the misinformation and misrepresentation of fact by the applicant (Spirax-Sarco) that increases my opposition to their plans for the 'Demolition of mid-20th Century Wing and Erection of a Replacement Extension to the Office Building' of Charlton House.

The applicant's planning application includes several statements that clearly give the impression, or indeed are stated as evidence, that the new extension will be sympathetic to the Grade II Listed Mansion House, the location of the site in a residential area and the heritage of the surrounding area. For example:

"Concerns were raised [by the Conservation Officer] regarding the scale and massing of the extension and the Conservation Officer warned that if they were too great it could detract from the significance of the heritage asset." (Planning Statement, page 13)

"Any such proposal will need to be very carefully considered as any extension to Charlton House should appear subordinate to the main house. Given that the mass of the new building is likely to be greater than that of the main house ... this may be hard to achieve without the building being lesser in height ... with the focus again being on ensuring that it appears subordinate to the main body of Charlton House and does not detract from the refined elegance of its Regency design, particularly that of the principal elevation." (Heritage Report, p17)

The Q&A PDF from the 8 December Neighbours' Event (shared with local residents) states: "Spirax-Sarco Engineering plc's brief to the Architects included "...the new extension is to be sympathetic to the Old House and will need to consider... neighbours ... prestigious and modern feel appropriate for a global precision engineering business ... without diminishing the relevance or standing of the Old House.""

However, it would be my opinion that the applicant's planning application and active engagement with the planning committee (including the hosting of several Councillors on site at Spirax-Sarco) is not based on fully accurate facts and is not submitted in good faith.

The materiality of this misinformation is best shown by highlighting that the Spirax-Sarco chief executive wrote in an email to Alex Chalk QC MP that "[the] neighbours are correct to point out that the new building is taller than the current extension(s), but it is not taller than the roof line of the Old House" and "we've had to increase the height of the new build extension from 3.2m to 4m". However, the Spirax-Sarco project architect confirmed at the Neighbours Event' that "we expect that the roofline of the new extension will be higher than the existing roofline by 5-10cm" and the Neighbours' Event Q&A PDF shared after the event states that "The height of the current extensions' roof line is 13.25m at its tallest point from ground level. The proposed new building roof line is 18.45m at its tallest point from ground level, so there is a 5.2m maximum difference in height."

Additionally, the photo montages provided (in a PDF document) to a small number of neighbours by the Spirax-Sarco project manager after the Neighbours' Event clearly show that the new building is of significant mass that overwhelms (and is neither subordinate or subservient to) the Mansion House; will directly impact the privacy of the residents north, east and south of the site; will impose upon the view from Cox Meadow; and takes no account of either the heritage of the Grade II Listed Mansion House, the mix of residential buildings in the surrounding area, and the Cudnall Street (Charlton Kings) Conservation Area (designated in October 1989, with boundary revisions in November 2001). I would encourage the Planning Committee to review the photo montages and to consider the proposed buildings from all angles and ground level at the nearest points to the site.

(It is also worth noting that NO measurements / scale were provided in the Applicant's planning application, and the aforementioned Q&A PDF has only been shared with a small number of residents and not provided to the Borough Council Planning team. Equally, the drawing of the eastern elevation was only uploaded after the deadline for comments, and no photomontage of the eastern side has been provided to the Council or residents, despite this being the side of the site most visible to everyone.)

Furthermore, the impression is given in the applicant's planning application material and subsequent documents that the current extension is not Grade II Listed. For example, pages 5 and 7 of the 'Project Oak Neighbours Event RL Slides' includes diagrams that only mark the Mansion House as the Listed Building, and not the rest of the building. This is materially incorrect as the whole building (the old Mansion House and the current extension) is Grade II Listed.

Finally, the consultation around the proposed development has been very limited (~20 residents / homes) and gives every impression of a plan that is being rushed through. When the scale and mass of the proposed new building is considered through the lens of the photo-montages and the additional documentation provided at and after the 8 December Neighbours' Event, it becomes obvious how many further residents are impacted - for example, Langton Grove Road, the length of Charlton Drive, Marlborough Close, the full length of Chancel Way, the properties on / adjacent to the Holy Apostles Church land, and London Road (between Haywards Road and Charlton Court Road - and these residents have a reasonable right to be consulted around the plans.

Comments: 20th December 2021

Following the Spriax-Sarco Neighbours' Event held on 8 December 2021, I wanted to provide additional commentary for consideration by the Planning Committee with respect to TRAFFIC & PARKING - and the misinformation and misrepresentation of fact by the applicant (Spirax-Sarco) that increases my opposition to their plans for the 'Demolition of mid-20th Century Wing and Erection of a Replacement Extension to the Office Building' of Charlton House.

The applicant's planning application sets out that the building is intended to be for 133 full-time employees, plus visitors. For example, the applicant's Transport Statement says (paragraph 4.3): "The existing building to be demolished currently provides office space to accommodate 250 staff. The proposed building will provide office space for 150 staff. As a result of the redevelopment proposals approximately 100 staff currently based at the Charlton House site will relocate to Northcroft House, an existing office building which has recently been acquired by Spirax-Sarco Ltd and is located on the A435 Cirencester Road, approximately 1.5 kilometres south of the Charlton House site."

The current parking is 216 on-site parking spaces, and no new parking is planned. This is stated in paragraph 4.8 of the Transport Statement: "The redevelopment proposals will result in reduction in car parking provision to 170 spaces to reflect the lower level of parking demand, while still ensuring sufficient provision to prevent overspill parking."

Furthermore, the applicant's Transport Statement (prepared by Transport Planning Associates (TPA) on behalf of Spirax-Sarco) states (paragraph 4.17): "Given that the redevelopment proposals will result in a reduction of approximately 100 staff based at the Charlton House site, it is considered the development proposals will result in a reduction in trip attraction to the site and will therefore not be of detriment to the operation of the local transport network. Further capacity assessments are therefore not required."

It was not unsurprising therefore that the 'GCC Highways Planning Liaison Officer' comment (17 December) concluded: "There are no alterations proposed to the existing access arrangements, and the application will result in an overall decrease in the number of trips to and from the site. As such, the proposal is not perceived to arise a detrimental impact on the operation and safety of the adjacent network."

However, the stated intentions by the applicant are misrepresented and not accurate. For example:

The Spirax-Sarco chief executive wrote in an email to Alex Chalk QC MP that "the new building has a slightly larger floor area + (10.1%) because it has been built with future growth in mind".

The Spirax-Sarco Group HR Director (and executive sponsor for the redevelopment) stated at the Neighbours' Event (8 December) that "the current facility won't allow us to grow", "we need to future proof", "our current forecast is [already] 165 employees", and "we have grown, we are growing and we will continue to grow".

The Spirax-Sarco project manager stated at the Neighbours' Event that "we expect that the building could accommodate 250-300 employees" and in the Q&A PDF that he shared after the event it states that "the new building gives us sufficient space for 150 workstations, which allows capacity for growth of our Group functions over the lifetime of the building, while also providing an environment where we can flex the workspace considering the changes to the ways we might work in the future".

The obvious impact of the above is therefore an INCREASE not decrease to traffic in and out of the site (additional full time employees plus the visitors to the auditorium), increase in parking demand (but no increase to the onsite parking, so will cause parking issues in the residential areas surrounding the site), and increased traffic at peaks times (including school run in the morning) which will back up along Cirencester Road (both directions, up past St Edwards School and towards the city centre) causing tail-backs in what is already an accident blackspot (see the 22 accidents listed in Appendix B of the applicant's Transport Statement).

As such any traffic assessment based on the current application of 133 employees should be considered null and void (as based on inaccurate data), and new assessments / risk analysis should be undertaken on an increased headcount of 300 full-time employees PLUS up to 50 visitors (to the auditorium).

Little Orchard
Charlton Drive
Cheltenham
Gloucestershire
GL53 8ES

Comments: 24th November 2021

The existing extension is nonedescrypt but innocuous. The new one is modern and dominant. The question is "Is that change appropriate to character of the residential area surrounding it?"

From the drawing and information it is difficult to judge if the new extension is significantly higher - and therefore more intrusive than the existing building.

We do applaud the upgrading of the premises and regard Spirax as a good neighbour but we are concerned regarding the visual impact of the extension and do feel that it should not be significantly taller than the one it is replacing.

25 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HS

Comments: 24th November 2021

I have no objection to the building, but I do object to the lack of consideration for the traffic issues associated with Cudnall Street. In the report I find Cudnall Street described as "with minimal throughtraffic, [it] has a peaceful, residential character.", which is not the case. Cudnall Street acts as a cut through for traffic between the Cirencester Road and London Road (& vice versa), avoiding the lights by Holy Apostles church. The traffic lights at Holy Apostles Church do not currently accommodate traffic turning right from the Cirencester road to the London road, so Cudnall Street bears the brunt of this. Any increase in capacity of the new building will compound an existing issue on our road which cannot currently deal with the traffic volume. Again from the report : "Much of the Conservation Area is characterised by a strong sense of enclosure on account of its narrow streets". We see frequent accidents, most commonly wing mirrors being broken off, along with road rage as motorists struggle to pass one another.

We have been contacting Matt Babbage at the council for approaching three years on the issue without any action being taken. We have young children like several other families on the street, and I believe we share a collective concern for their safety due to the speed and volume of traffic we endure. I would be very grateful if as part of this planning application further research could be done on the impact to the street and some proposed action taken to reduce and safeguard the residents of this conservation area.

1 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HS

Comments: 23rd November 2021

The scale and in particular the height of the design of the proposed building is not compatible with its location in a residential area and will overlook and overshadow the neighbouring properties.

1 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HS

Comments: 20th November 2021

I am writing to OBJECT to the Proposed Development on the following grounds:

1 GOVERNMENT POLICY

The Built Heritage Assessment - Heritage Report 1200663.pdf included in the application does not provide sufficient information or assessment to support a planning application.

The document supplied is only appropriate for the initial assessment of the site typically useful in pre-application consultation. Paragraph 189 of the National Planning Policy Framework (NPPF) requires a built heritage assessment. Additionally, see page 18 paragraph 3 of the Heritage report.

The built heritage assessment is required to enable the planning authority to meet their obligations under Para 190 - 198 of the NPPF amongst others.

It is noted that the applicant has significant resources and has employed a professional planning organisation to make the planning application.

In these circumstances, the Local Planning Authority cannot adequately assess the proposal on the information provided and either the application must fail or the applicant must withdraw the application and resubmit with the appropriate supporting documentation.

2 DESIGN AND APPEARANCE

The proposed development is an attractive building but its scale is suited to open parkland or business park, not the leafy residential area in which it would sit.

Its design is not sympathetic to its context in a residential area and adjacent conservation zone. Indeed, the applicant's own proposal shows the proposed building in a parkland setting, not an established residential area.

See the applicant's Proposed Building View 8 1200703 which shows the site sitting comfortably in a parkland setting with the houses and buildings in Langton Place conveniently absent. Building views 5 and 6 show the building placed in similarly attractive but unrepresentative locations.

3 OVERLOOKING AND LOSS OF PRIVACY

The proposed development is significantly higher than the current building and the design includes windows that overlook and cause an associated loss of privacy for the residential properties at the western end of Cudnall Street, Birch Mews, Langton Place and St Edwards Walk.

4 EFFECT ON LISTED BUILDINGS AND CONSERVATION AREA

The height and size of the proposed development negatively affects Charlton House. The proposed building is attached to the grade 2 listed building and materially higher than the existing roofline.

Grade 2 listed Langton Lodge is a significant building and its context in the surrounding area along with the amenity it provides will be adversely affected by the proposed scale and design of the proposed new building.

For the reasons above, I would urge the Council to reject the Application.

I would support a design that was of lower overall height and that sat more sympathetically in its surroundings,

The implied threat in paragraph 1.2 of the planning statement is unnecessary and purile given the proposed much reduced employment on that site.

Comments: 23rd November 2021

I object to this proposal as it fails to preserve the heritage in the area.

Specifically the proposed erection will make Charlton House subservient to the new addition for the following reason.

1 Despite the applicants assertion to the contrary, that the proposed extensions roof line including all the plant on top of it will be lower than the roof line of Charlton House. It is in-fact considerably higher. See proposed elevation Drawing 1200922 where the large structure labeled 6 rises to approx 15 feet above the roof line of Charlton House.

2 The volume of the extension is an order of magnitude greater than the original house.

Comments: 24th November 2021

I note that the Heritage statement required by the full planning application was added only on the 19th of November and replaces the previous one that was not suitable.

No indication that this document was added has been made and consequently there is insufficient time for suitable consideration or comment on any additional or changed evidence

This goes to the heart of public consultation and fairness. How can we comment if the documents arent there when we look?

Consequently I encourage the council to reject this flawed application on the grounds of fairness and equity.

Comments: 20th December 2021

I am bringing to your attention information that demonstrates that the applicant has provided misleading information that is material to the decision.

Specifically, the application and the supporting heritage and traffic surveys are based on a use case that is inconsistent with the planned, expected and actual use of the building.

Misleading information summary: Use of building

1.1. Section 21 of the application form describes the employment use of the building as being 133 people, down from 277 previously. Many of these people were transferred to Northcroft House, a new office building.

1.2. The transport statement used in support of the application at 4.3 states "The existing building to be demolished currently provides office space to accommodate 250 staff. The proposed building will provide office space for 150 staff. As a result of the redevelopment proposals approximately 100 staff currently based at the Charlton House site will relocate to Northcroft House, an existing office building which has recently been acquired by Spirax-Sarco Ltd and is located on the A435 Cirencester Road, approximately 1.5 kilometres south of the Charlton House site."

1.3. S4.6 goes on to say "It proposed that the redevelopment proposals will be served in accordance with the site's existing access arrangements. Given the reduction in staff numbers associated the access arrangements are considered to be appropriate."

2.1 Jim Devine, the Group HR Director and Project Sponsor, held a meeting for residents on Wednesday 8th December 2021 where he revealed that the overriding reason for the massive expansion is to accommodate future growth. At this meeting he used a phrase on three occasions "we have grown, we are growing and we will continue to grow" and confirmed that to be the case by confirming that there are already 165 staff now allocated to the site.

2.2 A maximum building capacity was discussed at that meeting and whilst no firm number was given, an indication that it would be possible to house c300 people was mentioned.

2.3 The Group HR Director confirmed that the new building would be easily reconfigured to accommodate growth. Presumably, contemplation and thinking zones and studios are easily reconfigured to accommodate more people.

2.4 The supplied transport statement used by the highways team to assess the application neither reflects the current situation (already at 165 people) nor the stated goal of accommodating future growth.

3.1 Accordingly, s4.6 of the transport statement regarding the suitability of access arrangements which was contingent on lowering the employees based at the site and which was used by the Councils Highways team no longer supports the assumption that the arrangements are adequate or appropriate. Highways' recommendation should be withdrawn and reassessed after submission of an accurate transport statement.

3.2 The transport statement was supplied during an ongoing recruitment drive and as the Group HR Director is the project sponsor it is reasonable to believe he should have been aware of the disparity.

In summary, I believe the applicant or its agents have presented evidence to support its application that does not reflect reality, the applicant's true intentions or the potential of the building.

Any suggestion that the "future of work" will be mostly remote is ridiculous given:

1) No one can see into the future and current working practices would have seemed alien just two years ago.

2) The HR Director's recognition of the difficulties that home working brings in terms of talent retention and development and against a backdrop of increased staff turnover across the sector.

3) If the applicant is building for a future of homework and a smaller workforce there would be no need for a building of this size and it would be nonsensical to build, heat and maintain a large barely used office block. NOTE. The applicant has already exceeded the number of staff it forecasts in its application.

The planning system requires planning authorities to make decisions on information provided and the Applicants must provide accurate information. In this instance, the applicant has demonstrably not done so.

In the circumstances, it would be appropriate for the planning authority to refuse planning permission because information provided by the applicant fails to accurately describe the nature and anticipated impacts of the proposed development.

Comments: 1st December 2021

1 The Application as made did not include the required heritage statement and should not have been accepted. The heritage statement being a material document. The required document appeared 3 days before public consultation expired

2 The building was first listed on 14/12/83 at which point the extension and adjoining buildings were already present and as such are listed, The principles being If an object is fixed to the principal building in such a way that it would be considered a fixture in the usual land-law sense (i.e. would be conveyed with the property on sale unless expressly excluded), it would be protected by the listing. Any structure fixed to the building (however large, including whole other buildings) will be protected if it was ancillary to the principal building at the date of listing (or possibly at 1 January 1969 for list entries that pre-date).

The listed 20th century part of the building is not adequately referenced, if at all in the application.

There is NO mention of the impact of redevelopment on the immediate neighbour, a Grade 11 listed Villa under the shadow of the proposed building.

For these reasons I believe the application is flawed and should be rejected.

12 St Edwards Walk
Cheltenham
Gloucestershire
GL53 7RS

Comments: 24th November 2021

I object to the proposed plans primarily due to the significant increase in height of the main building.

The proposed structure would dominate the neighbouring buildings, which are predominantly 2 storey residential dwellings and include a listed building and the nearby conservation area.

Additional to this, with the large increase in glazing, this will result in a loss of privacy for many properties in the immediate area.

10 St Edwards Walk
Cheltenham
Gloucestershire
GL53 7RS

Comments: 24th November 2021

I am writing to OBJECT to the planning application based on the following planning considerations:

1. Privacy - the proposed extension roof height appears to be much higher than the existing 20th century extension, indeed it appears to be as high as the original mansion house. This would have a detrimental impact on our right of privacy as a family in a residential building within 40 yards of the Charlton House site.
2. Visual Impact - the proposed extension would be much more imposing than the current 20th century extension, because of its proposed height, this is unacceptable to us as our garden and property would be much more overlooked than is currently the case.
3. Conservation and Heritage - the proposed extension certainly does not appear to address Heritage concerns for it to be subordinate to the the original mansion house because of the proposed extension roofline being very similar to that of the mansion house.

I am not averse to a rebuild of the 20th century extension or aesthetic improvements but believe it's roofline height should be no higher than the existing extension as it stands today and work within it's existing footprint.

2 Chancel Way
Cheltenham
Gloucestershire
GL53 7RR

Comments: 17th December 2021

The proposed development improves the privacy of the surrounding houses. Aesthetically, it also enhances the area and blends better with the Regency house than the existing building.

This comment was originally submitted and acknowledged on 14 November.

4 Birch Mews
Cudnall Street
Charlton Kings Cheltenham
Gloucestershire
GL53 8DT

Comments: 20th December 2021

One of my initial concerns to the proposed application, which was stated in my original objection letter, submitted 20th November 2021, was the size and height of the proposed building, for what appeared to be a reduced number of employees (from 277 to 133).

However having attended the Neighbours Event, organised by Spirax Sarco, the Spirax-Sarco Group HR Director (and executive sponsor for Project Oak) stated at the Neighbours Event that "the current facility won't allow us to grow", "we need to future proof", "our current forecast is 165 employees", and "we have grown, we are growing and we will continue to grow."

Additionally it was stated by the Spirax-Sarco Project Oak Project Manager "we expect that the building could accommodate 250-300 employees."

The Q&A PDF from the Neighbours Event states: "The new building gives us sufficient space for 150 workstations, which allows capacity for growth of our Group functions over the lifetime of the building, while also providing an environment where we can flex the workspace considering the changes to the ways we might work in the future."

It therefore appears with closer scrutiny this is not a decrease in the number of employees but a potential increase and I am concerned of the impact on the immediate residential surrounding area. If these projected figures are taken into account, we then have to consider proposed car parking spaces to accommodate these figures. Currently this site provides 216 car parking space with no new parking spaces planned.

Furthermore the proposed gym facilities at the site, which will presumably be open to ALL employees of Spirax Sarco across their several sites in Cheltenham, will cause not only a further increase in traffic congestion, but potentially lead to cars being unable to park on site and being parked in nearby residential streets. In the last year, 4 road accidents have occurred between the front and rear access of this site. It is a dangerous part of the Cirencester Road and the impact of the proposed plans need to be given further consideration. I would also like to reiterate the points of concern raised by our neighbour at 25 Cudnall Street regarding the misuse of Cudnall Street, which will only be exacerbated by the current proposed plans.

Comments: 20th November 2021

I wish to object to the above planning application for the following reasons:

Charlton Kings is a village, which adjoins Cheltenham. It is a predominantly residential area. The current 1970's extension is landscaped with established trees and hedgerow, which allows in its current form, to blend with the immediate environment.

The Cirencester Road is an important approach road into Cheltenham. However, Cudnall Street is a conservation area. Both of these roads are of a very close proximity to proposed development. Therefore it is vitally important for the need of a more

sympathetic approach to any further development, in what is a predominantly residential and conservation area.

Whilst I have no objection in principle to an extension, it is the height of the proposed building. Its close proximity to the conservation area, does not facilitate the enhancement and the preservation of Cudnall Street and its surrounding area. Indeed the proposed second floor will dominate this part of Charlton Kings. It is totally out of character with the immediate area.

The illustrations indicate the proposed building will run in line with the height of the existing original grade listed building. The extension projects out towards and above the Cirencester Road, leading to a loss of privacy and intrusion to the immediate surrounding homes that the proposed extension will overlook. Furthermore, none of the illustrations indicate how the ventilation air handling units, air conditioning units and the PV panels on the top of the proposed building will further impact on the skyline? To accommodate such installations would suggest they would be higher than the existing roof line of Charlton House.

The planning Application indicates there will be a substantial increase in the amount and size of windows. This will cause a considerable lack of privacy to nearby residents in the day. Furthermore the working hours are from 7am until 8pm at night, thereby causing further intrusion with a substantial amount of light pollution both in the morning and at night.

Finally, I note from Section 21 of the planning application form, the existing number of full time employees is currently 277. After the completion, the proposed number of employees is 133. I am perplexed as to why Spirax Sarco need to build such a large and obtrusive extension for a reduced number of employees?

I am therefore asking the Council to refuse this planning Application.

If the application was made less obtrusive and allowed to blend more sympathetically with the immediate environment, I would support the application.

26 Highland Road
Cheltenham
Gloucestershire
GL53 9LT

Comments: 17th January 2022

Well done Spirax Sarco. Cheltenham needs some new designs and this is exciting and the colour matches the old Charlton House.

1 Birch Mews
Cudnall Street
Charlton Kings Cheltenham
Gloucestershire
GL53 8DT

Comments: 22nd November 2021

I object to the above planning application on the following grounds:

1. The application proposes to introduce a large piece of contemporary architecture into a residential setting that will have a detrimental impact on the neighboring homes and surrounding area by being totally out of character, particularly with the nearby Cudnall Street conservation area. Whilst the design, if considered in isolation, is somewhat attractive, it is more appropriate to a campus style business park.

2. It's height & breadth will totally dominate nearby homes and reduce privacy by overlooking them. If the height were reduced to that of the existing 1970's extension, then it might become more acceptable.

3. As noted in Para 3 Section 5 page 18 of Heritage Report 1200663, Para 189 of the National Planning Policy Framework requires the submission of a built heritage assessment. This has not been supplied, consequently the application should fail or be withdrawn for resubmission with the necessary additional documentation.

4. The large size of the building would allow, at some future time, a considerable increase in personnel requiring access (despite statements to the contrary in the application), on a corner which has a track record of accidents. I am aware of 4 accidents occurring in the last year alone on this corner, all serious enough to require police attendance. These are in addition to the accidents noted in the Transport Statement 1600662

5. The present building's occupants regularly have lighting on all night, presumably for security reasons. The large number of additional windows, together with their size & height, will considerably increase light pollution in the area, since this practice is likely to continue in the proposed extension.

Comments: 20th December 2021

Further to my objections in my 22 Nov 21 statement, I would like to register the following additional points of objection:

1. Contrary to statements in the original application, as stated in Spirax-Sarco CEO's email to Alex Chalk MP, the new extension has been designed with future growth in mind.

2. The increase of staff numbers consequent upon such growth would exacerbate the traffic problems on a corner with an existing bad accident history.

3. As stated in answers to neighbours questions at the Spirax-Sarco event on 8 Dec. 21, the new extension will be 5.2 meters higher than the existing extension to Charlton House. This is not slightly higher as we were repeatedly told during the evening. The true figure was withheld until Spirax-Sarco were pressed to give an actual figure. Furthermore, this does not include Solar Panels & housing for the lift motors. This will be out of character & totally dominate the old house. It will also overlook and severely reduce the privacy of many nearby homes & gardens.

Charlton Kings
Cheltenham
Gloucestershire
GL53 8HS

Comments: 22nd November 2021

I object. Mainly:

- the plans are not in keeping/sympathetic with the current building. The fact that extension is higher than the original means that what was once hidden by the old lovely building will now be on show
- The proposed design is not subordinate to the main house, as required.
- as a direct neighbour the extension will ruin a lovely view that we have enjoyed for years.

25 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HS

Comments: 24th November 2021

I have no objection to the building, but I do object to the lack of consideration for the traffic issues associated with Cudnall Street. In the report I find Cudnall Street described as "with minimal through traffic, [it] has a peaceful, residential character.", which is not the case. Cudnall Street acts as a cut through for traffic between the Cirencester Road and London Road (& vice versa), avoiding the lights by Holy Apostles church. The traffic lights at Holy Apostles Church do not currently accommodate traffic turning right from the Cirencester road to the London road, so Cudnall Street bears the brunt of this. Any increase in capacity of the new building will compound an existing issue on our road which cannot currently deal with the traffic volume. Again from the report : "Much of the Conservation Area is characterised by a strong sense of enclosure on account of its narrow streets". We see frequent accidents, most commonly wing mirrors being broken off, along with road rage as motorists struggle to pass one another.

We have been contacting Matt Babbage at the council for approaching three years on the issue without any action being taken. We have young children like several other families on the street, and I believe we share a collective concern for their safety due to the speed and volume of traffic we endure. I would be very grateful if as part of this planning, application further research could be done on the impact to the street and some proposed action taken to reduce and safeguard the residents of this conservation area.

2 Cudnall Street
Charlton Kings
Cheltenham
Gloucestershire
GL53 8HT

Comments: 20th December 2021

Following the Spriax-Sarco Neighbours' Event held on 8 December 2021, I wanted to provide additional commentary (beyond that set out in my Objection letter dated 22

November) for consideration by the Planning Committee with respect to HEIGHT & MASSING - and the misinformation and misrepresentation of fact by the applicant (Spirax-Sarco) that increases my opposition to their plans for the 'Demolition of mid-20th Century Wing and Erection of a Replacement Extension to the Office Building' of Charlton House.

The applicant's planning application includes several statements that clearly give the impression, or indeed are stated as evidence, that the new extension will be sympathetic to the Grade II Listed Mansion House, the location of the site in a residential area and the heritage of the surrounding area. For example:

"Concerns were raised [by the Conservation Officer] regarding the scale and massing of the extension and the Conservation Officer warned that if they were too great it could detract from the significance of the heritage asset." (Planning Statement, page 13)

"Any such proposal will need to be very carefully considered as any extension to Charlton House should appear subordinate to the main house. Given that the mass of the new building is likely to be greater than that of the main house ... this may be hard to achieve without the building being lesser in height ... with the focus again being on ensuring that it appears subordinate to the main body of Charlton House and does not detract from the refined elegance of its Regency design, particularly that of the principal elevation." (Heritage Report, p17)

The Q&A PDF from the 8 December Neighbours' Event (shared with local residents) states: "Spirax-Sarco Engineering plc's brief to the Architects included "...the new extension is to be sympathetic to the Old House and will need to consider... neighbours ... prestigious and modern feel appropriate for a global precision engineering business ... without diminishing the relevance or standing of the Old House.""

However, it would be my opinion that the applicant's planning application and active engagement with the planning committee (including the hosting of several Councillors on site at Spirax-Sarco) is not based on fully accurate facts and is not submitted in good faith.

The materiality of this misinformation is best shown by highlighting that the Spirax-Sarco chief executive wrote in an email to Alex Chalk QC MP that "[the] neighbours are correct to point out that the new building is taller than the current extension(s), but it is not taller than the roof line of the Old House" and "we've had to increase the height of the new build extension from 3.2m to 4m". However, the Spirax-Sarco project architect confirmed at the Neighbours Event' that "we expect that the roofline of the new extension will be higher than the existing roofline by 5-10cm" and the Neighbours' Event Q&A PDF shared after the event states that "The height of the current extensions' roof line is 13.25m at its tallest point from ground level. The proposed new building roof line is 18.45m at its tallest point from ground level, so there is a 5.2m maximum difference in height."

Additionally, the photo montages provided (in a PDF document) to a small number of neighbours by the Spirax-Sarco project manager after the Neighbours' Event clearly show that the new building is of significant mass that overwhelms (and is neither subordinate or subservient to) the Mansion House; will directly impact the privacy of the residents north, east and south of the site; will impose upon the view from Cox Meadow; and takes no account of either the heritage of the Grade II Listed Mansion House, the mix of residential buildings in the surrounding area, and the Cudnall Street (Charlton

Kings) Conservation Area (designated in October 1989, with boundary revisions in November 2001). I would encourage the Planning Committee to review the photo montages and to consider the proposed buildings from all angles and ground level at the nearest points to the site.

Furthermore, the impression is given in the applicant's planning application material and subsequent documents that the current extension is not Grade II Listed. For example, pages 5 and 7 of the 'Project Oak Neighbours Event RL Slides' includes diagrams that only mark the Mansion House as the Listed Building, and not the rest of the building. This is materially incorrect as the whole building (the old Mansion House and the current extension) is Grade II Listed.

Finally, the consultation around the proposed development has been very limited (~20 residents / homes) and gives every impression of a plan that is being rushed through. When the scale and mass of the proposed new building is considered through the lens of the photo-montages and the additional documentation provided at and after the 8 December Neighbours' Event, it becomes obvious how many further residents are impacted - for example, Langton Grove Road, the length of Charlton Drive, Marlborough Close, the full length of Chancel Way, the properties on / adjacent to the Holy Apostles Church land, and London Road (between Haywards Road and Charlton Court Road - and these residents have a reasonable right to be consulted around the plans.

Park House
St Edwards Walk
GL53 7RS

23rd November 2021

Miss Claire Donnelly
Head of Planning
Cheltenham Borough Council Municipal Offices
Promenade
Cheltenham
GL50 9SS

Dear Miss Donnelly,

Reference: 21/02364/FUL

(Proposed demolition of mid-20th Century Wing and erection of a replacement extension to the office building at Charlton House, Cirencester Road, Charlton Kings, Cheltenham, GL53 8ER).

I am writing to OBJECT to the planning application (reference 21/02364/FUL), made by McLoughlin Planning (agent) on behalf of Spirax Sarco Engineering Plc (applicant).

My objection is based on the following reasons

1. Proximity and privacy

Park House directly abuts the Spirax Sarco car park (Park House and Spirax share the same retaining wall) and the proposed new building will be approx 50m from our house. The proposed plans, which include substantially raising the Spirax office windows by well over 30 ft, will not only enable Spirax staff to look directly into our kitchen and conservatory

but also view straight into our garden. This is a severe infringement on our right to privacy

2. Impact on the heritage building

Presently Charlton House, which is a listed heritage building, stands out in relationship to the Spirax office. This is as it should be since not only does it enhance the importance of the listed building but also relegates the Spirax offices as subsidiary buildings. Given the massive increase in height and size of the new office, the listed building will be dwarfed, will dwindle in importance and be overshadowed by the proposed structure. This is not in the interests of the heritage building and is certainly not in the interests of Cheltenham as a Regency town admired for its lovely architecture and history

Furthermore, the Cheltenham planning committee is tasked with ensuring that any new buildings must improve, not detract from, the surrounding environment and landscape setting. Otherwise Cheltenham would rapidly become a town full of concrete carbuncles. The proposed building, whilst not a carbuncle, should be scaled back in size so that Charlton House can continue to stand out as a listed heritage site

3. Cudnall Street

Cudnall Street and the nearby lanes have many listed homes and a rich and ancient history. The planning committee must ensure that any proposed new building does not affect the significance of any other listed houses. This is clearly not the case as Langton Lodge, a Grade II listed house, will clearly be impacted. Similar to Park House the new Spirax office will overlook the house and garden of Langton Lodge

4. Recommendations

I have no objection to the present structure being demolished. However, given the loss of privacy to Park House and other homes by the dramatic

increase in the height of the proposed new building I recommend the following

- a) Maintain the height of the new building at the same level of the old building. Spirax has an office facility up the Cirencester road from which employees could easily work (if not already working from home) so a floor could safely be removed from the plans
- b) Better utilise the car park facilities by constructing a small office and/or sports facility/gym
- c) Build deeper rather than higher thus ensuring that no one's homes are overlooked

The Committee should request Spirax Sarco and the architects submit revised drawings taking the objections of myself and my neighbours into account

Yours Sincerely,

I

Langton Lodge
2 Cudnall Street
Charlton Kings
Cheltenham
GL53 8HT

Miss Claire Donnelly
Head of Planning
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SS

22 November 2021

Dear Miss Donnelly,

Reference: 21/02364/FUL

*(Proposed demolition of mid-20th Century Wing and erection of a replacement extension to the office building at **Charlton House**, Cirencester Road, Charlton Kings, Cheltenham, GL53 8ER).*

I am writing to **OBJECT** to the planning application (reference 21/02364/FUL), made by McLoughlin Planning (agent) on behalf of Spirax Sarco Engineering Plc (applicant).

Our objection is based on the planning considerations that we have set out below and that we ask for Cheltenham Borough Council to assess fully and respectfully in order to preserve the character and historical significance of the Conservation Area in direct proximity to Charlton House, our right to privacy as owners of our family house directly opposite Charlton House, and the visual impact of the proposed designs to an office building set in the middle of a residential area.

At the outset we note that the following statement in the 'DESIGN_AND_ACCESS_STATEMENT-1200728' report is false: "The building is surrounded by predominantly 2 storey residential properties with a mix of materials. **All** of which are reasonably modern (C20) buildings." One of the nearest properties to Charlton House is Langton Lodge which is a Grade II Listed building built in 1807, and further houses in close proximity of Charlton House were also built before the 20th century.

1. Privacy

The proposed plans have significant and detrimental impact on our right of privacy as a family in a residential building within 40 yards of the Charlton House site. Our house (Langton Lodge) is the nearest property to the eastern boundary of Charlton House and is circled in red in the picture below:



Privacy impact at first floor level

The impact to our privacy to us as a family on the first floor of our house is shown below. Note that the first floor of the house includes bedrooms and bathrooms for our family, including children.



The **top left** diagram shows the **existing** Charlton House building, from the south side elevation (as no East Side elevation diagram or original plan can be found in any of the planning documentation submitted by the applicant's agent). The red line is the roof line of the old Mansion House, the yellow line the roof line of the existing office extension.

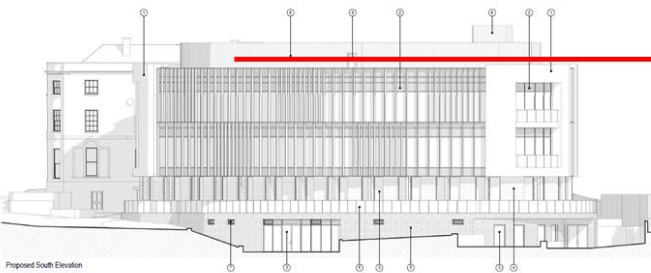
The **top right** picture shows the view of Charlton House **today** from a bedroom window in our house (and which cannot and will not be frosted or altered as that is not in keeping with our property as a Grade II Listed building built in 1807 and would be detrimental to our quality of life). The red and yellow lines are lined up to be equivalent in terms of roof lines between the diagram and photo.

The **bottom left** diagram shows the **proposed** Charlton House building, from the south side elevation (as no East Side elevation diagram or proposed plans can be found in any of the planning documentation submitted by the applicant's agent). The red line is the roof line of the planned office extension, with the proposed plant equipment on the roof being higher than the red line.

The **bottom right** picture shows how we would see the **new extension** from our first floor bedroom window, with the **pink box** indicating the second floor of the new extension. The red line is the roof line of the planned office extension, with the proposed plant equipment on the roof being higher than the red line. The proposed extension to Charlton House would be predominantly glass, and so the 133 full-time Spirax Sarco Engineering employees and their guests would have a direct view into our bedroom from these new windows – and this is a direct invasion of our right to privacy. No tree screening could be provided to the height needed.

Privacy impact at ground floor level

The impact to our privacy to us as a family on the ground floor of our house is shown below. Note that the side of the house that faces towards Charlton House includes our kitchen and outdoor terrace, where as a family (including children) we spend a significant amount of our time.



The **top left** diagram shows the **existing** Charlton House building, from the south side elevation (as no East Side elevation diagram or original plan can be found in any of the planning documentation submitted by the applicant's agent). The red line is the roof line of the old Mansion House, the yellow line the roof line of the existing office extension.

The **top right** picture shows the view of Charlton House **today** from a kitchen window in our house (and which cannot and will not be frosted or altered as that is not in keeping with our property as a Grade II Listed building built in 1807 and would be detrimental to our quality of life). The red and yellow lines are lined up to be equivalent in terms of roof lines between the diagram and photo.

The **bottom left** diagram shows the **proposed** Charlton House building, from the south side elevation (as no East Side elevation diagram or proposed plans can be found in any of the planning documentation submitted by the applicant's agent). The red line is the roof line of the planned office extension, with the proposed plant equipment on the roof being higher than the red line.

The **bottom right** picture shows how we would see the **new extension** from our kitchen window, with the **pink box** indicating the second floor of the new extension. The red line is the roof line of the planned office extension, with the proposed plant equipment on the roof being higher than the red line. The proposed extension to Charlton House would be predominantly glass, and so the 133 full-time Spirax Sarco Engineering employees and their guests would have a direct view into our kitchen (and the outdoor terrace that runs alongside it) from these new windows – and this is a direct invasion of our right to privacy. No tree screening could be provided to the height needed.

2. Visual Impact

The applicant's agent's heritage report ('HERITAGE_REPORT-1200725') sets out that: "It is understood to be desirable for the new building to address the poor relation between the floor levels in main body of Charlton House and the existing extensions, and to potentially connect to the top floor of Charlton House to improve accessibility (as to be expected, there are no lifts within Charlton house itself). However, to achieve these aims it would be necessary for the new building, or part of the new building, to be of a greater height than the existing twentieth-century extensions, and potentially of the same or similar height to the main part of the listed building. Any such proposal will need to be very carefully considered as any extension to Charlton House should appear subordinate to the main house. Given that the mass of the new building is likely to be greater than that of the main house- as is the case with the current extensions – this may be hard to achieve without the building being lesser in height."

The applicant's agent also addresses this matter – “**height and massing**” – in the submitted planning statement ('PLANNING_STATEMENT-1200726'):

4.15. Paragraph 201 of the NPPF was highlighted in the previous section because the test in heritage terms is whether the proposal would result in less than substantial harm to the heritage asset. Clearly, the proposal will have a degree of impact on the heritage asset because the entire building is listed, not just the 19th century part. However, the pre-application response confirmed that the Council is generally supportive of the proposal, although the Conservation Officer felt it was not possible to fully assess the heritage impact as the information submitted with the pre-application enquiry was not sufficiently detailed.

Concerns were raised regarding the scale and massing of the extension and the Conservation Officer warned that if they were too great it could detract from the significance of the heritage asset. Notwithstanding this, the Conservation Officer did accept the principle of replacing the 20th century extensions with a new purpose-built extension.

4.16. The detailed design drawings show that the second (uppermost) storey is set lower than that of Charlton House and the plant material on the roof is no higher than the highest part of the parent building. The topography of the site is helpful in terms of the proposed extension remaining subservient as the land slopes away and when viewed from the principal elevation the extension will be read as a subservient structure. Moreover, the fact the extension curves away reduces the massing in terms of its overall width, which is something the current angular wings fail to achieve.

We are firmly of the view that the applicant and their agent have **not reasonably addressed the concerns** raised by the Conservation Officer above, nor have they satisfied the concerns in the updated heritage statement or other planning materials.

For example, paragraph 4.16 above states that the “topography of the site is helpful in terms of the proposed extension remaining subservient as the land slopes away and when viewed from the principal elevation the extension will be read as a subservient structure”. However, that statement does not hold true when the elevation of Cirencester Road that runs to the east to the Charlton House site. The photos below show this elevation, with the photo on the left showing the increase in gradient up the hill (in the direction of Cheltenham town-centre) and the right-hand photo showing the same area of road but from the top of the hill downwards (in the direction of Cirencester):



For the proposed extension to satisfy the height and massing concerns, the building should be sympathetic to the change in elevation with the rooflines reflecting that. However, the proposed plans do **the exact opposite** as the actual extension will be greater in height than the original Charlton House manor house as the south eastern end of the site is ~5-10m below the level of the land at the northern end of the site.

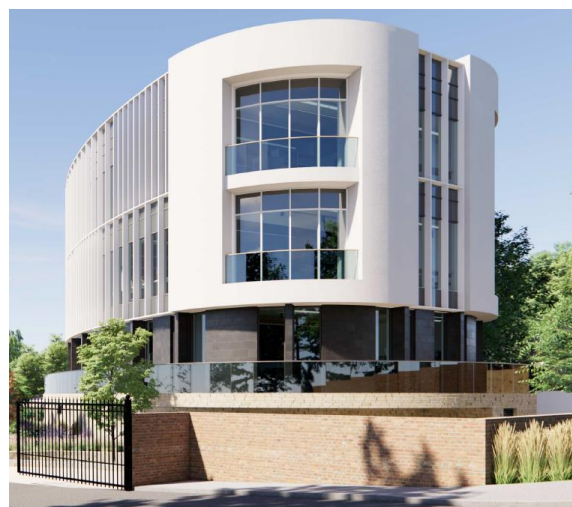
Secondly, whilst paragraph 4.16 states that “the extension curves away reduces the massing in terms of its overall width, which is something the current angular wings fail to achieve”, it fails to mention the dominant façade at the western end of the proposed building which has the appearance of **significantly greater ‘mass’** (right hand picture below) than the current building (left-hand picture).



The submitted planning statement (‘PLANNING_STATEMENT-1200726’) also notes (at paragraph 3.22) that the ‘National Planning Policy Framework (Ministry of Housing, Communities and Local Government), published February 2019, updated June 2019)’ (NPPF) paragraph 130 seeks to ensure that any new developments are “sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change”.

We are firmly of the view that the proposed extension does not pass the test of this framework principle, with an overbearing and dominant design (see picture above right) that is neither sympathetic to the local character and history of the area nor to the fact that the Charlton House site is in the middle of a residential area.

And perhaps the greatest tragedy of all is that the proposed design (right-hand photo below) with its vast scale and domineering height and mass is not in any way sympathetic to the architecturally magnificent and feature rich original Mansion House (left-hand photo below) that the extension is built on to. Indeed, as stated in the applicant’s agent’s own report (‘HERITAGE_REPORT-1200725’), “any such proposal will need to be very carefully considered as any extension to Charlton House should appear subordinate to the main house.” The proposed design is absolutely **not** “**subordinate**” to the **main house**”, it dwarfs it.



3. Historical & Conservation Significance

The proposed plans have a particularly negative historical and conservation impact, considering the location of the Charlton House site in the middle of a residential area and its proximity to the Cudnall Street (Charlton Kings) Conservation Area (designated in October 1989, with boundary revisions in November 2001).

Our house and garden – Langton Lodge, 2 Cudnall Street – sits at the western end of the Cudnall Street Conservation Area and is within 40 yards of the Charlton House site. The Langton Lodge plot has been occupied since before 1154 when it was a Cheltenham manor freehold. Langton Lodge (previously called both Charlotteville and Langton Villa) was built in 1807 for Colonel McLeod with an original entrance by a drive from the ‘new’ Cirencester Road. The buildings (4 Cudnall Street) alongside Langton Lodge date further back to c1800 when three cottages were built by Thomas Billings, as was 6 Cudnall Street which he built in 1795 (and was originally called Raisey House, now Abbotsdene).

There is a wonderful history of Langton Lodge, including as a weekend house in the early 1800’s for Princess Charlotte (the Prince Regent’s daughter and heir to the throne), a Ladies’ Seminary between 1837 to 1847, its subsequent ownership by Mr Charles Norman (a local china merchant), the birth at the house of Victoria Cross recipient James Forbes -Robertson in the early 1900’s, and the significant renovations during the 1980’s to restore the building to its former Regency Villa qualities.

Langton Lodge was Grade II Listed in 1986. Seventeen of the trees within the boundary of Langton Lodge are under Tree Preservation Orders (TPOs). Equally, further properties along Cudnall Street are also Grade II Listed and the Cudnall Street (Charlton Kings) Conservation Area is of historical importance.

The ‘**Planning (Listed Buildings and Conservation Areas Act) 1990**’ sets out that 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. 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 the exercise of planning functions, to the desirability of preserving or enhancing listed buildings and their setting.

The ‘**National Planning Policy Framework (Ministry of Housing, Communities and Local Government)**, published February 2019, updated June 2019) (NPPF) is the principal document that sets out the Government’s planning policies for England and how these are expected to be applied. 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. More specifically:

- Section 16 of the NPPF specifically relates to ‘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’. For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 (of the NPPF) 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.
- 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.
- 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

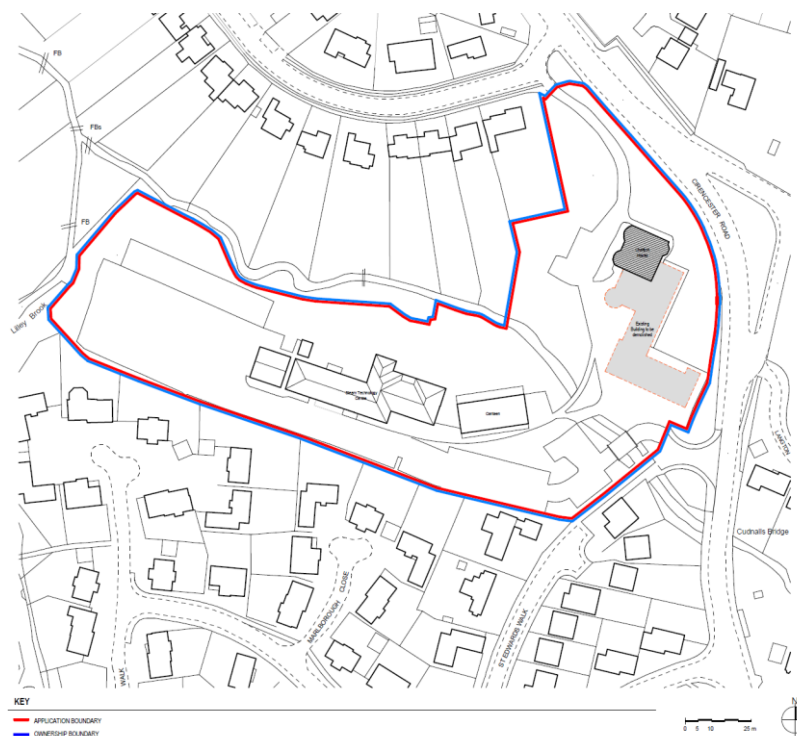
substantial harm is identified paragraph 196 requires this harm to be weighed against the public benefits of the proposed development.

- 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.
- 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.
- 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.

We are firmly of the view that the heritage of the area beyond the Charlton House site has **not been taken into account** by the applicant or their agent in the course of their preparation of their plans.

Indeed, **we can only find two passing references to Langton Lodge** (in 'HERITAGE_REPORT-1200725' p16, and 'UPDATED_HERITAGE_STATEMENT-1208790' p17) **in any of the planning documents** submitted by the planning applicant's agent. Page 14 of the HERITAGE_REPORT-1200725 document states "Charlton House is a typical Regency villa, of which a good number of examples survive nationally" – yet here it fails to mention the nearest one to Charlton House, namely Langton Lodge.

Further, there are no drawings of existing or planned from the eastern side of Charlton House, and there are only two recent picture/map that even shows Langton Lodge and the western end of the Cudnall Street (Charlton Kings) Conservation Area (pages 3 and 11 of the 'HERITAGE_REPORT-1200725'. For example, the 'EXISTING_BLOCK_PLAN-1200745' report shows the residential dwellings north and south of Charlton House, but deliberately omits any properties to the east – this is shown in a copy of the report below:



Additionally, the 'UPDATED_HERITAGE_STATEMENT-1208790' report states that “the only heritage assets within the area that are potentially affected by the proposed development of the Site are the Grade II listed Cudnall Bridge, c.50m to the south of the extension; Cudnall Street (Charlton Kings) Conservation Area, c.30m to the east at its nearest point from the Charlton House Extension; and the Grade II listed Charlton House itself, attached to the current proposed extensions. No other assets are likely to have their significance affected by the development proposal.” (paragraph 3.28).

It goes on to describe in more detail (paragraphs 3.50-3.59) the Cudnall Street (Charlton Kings) Conservation Area. Whilst it records that the “Conservation Area contains a high number of statutory and locally listed buildings, allowing the area to be rich in historic and architectural interest”, it also records that “the north-eastern edge of the Site appears in views eastwards along Cudnall Street, but lacks prominence in these views, contributing only a sense of distant enclosure.” (paragraph 3.58). This is a **false statement**, as evidenced by the photos included in section 1 of this letter above.

When we therefore we consider the principles in the ‘National Planning Policy Framework (Ministry of Housing, Communities and Local Government), published February 2019, updated June 2019’ (NPPF) as the principal document that sets out the Government’s planning policies for England and how these are expected to be applied, **we would determine that the threshold for several of these key principles (documented further above) is not met:**

NPPF Principle	Does the proposed design meet the principle threshold?
Section 16	No – Heritage assets are ‘an irreplaceable resource and should be conserved in a manner appropriate to their significance’, and yet the design of the proposed extension is overwhelming, dominant and out of character to the existing Mansion House; and no regard has been given by the applicant or their agents to the heritage assets (including Grade II Listed Langton Lodge) in the proximity of Charlton House. Equally, significant detail has not been provided proportionate to the area (including but not limited to elevation plans for the East side, English Heritage report, accurate maps that include equal area around the site prior to consultation, and a design that shows how it is not impacting privacy of the houses around the site).
Paragraph 195	No – As above, supported by the commentary on previous pages.
Paragraph 197	No – As above, supported by the commentary on previous pages.
Paragraph 200	No – As above, supported by the commentary on previous pages. The proposed design does not “preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset”.
Paragraph 201	No – As above, supported by the commentary on previous pages. The proposed design does not consider “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”; indeed, the two heritage reports are inaccurate, incomplete and do not fairly capture the history and environment of the Cudnall Street (Charlton Kings) Conservation Area as a whole.

4. Recommendations

We recognise that the current extension of Charlton House needs renovation, and welcome of course the inclusion of a new biodiversity area along with the additional sustainability initiatives in the proposed plans (for example, the inclusion of electric car charging points).

However, we **object to the current plans** for the reasons we have set out in detail above.

We would ask that Cheltenham Council other at this stage of the planning process in its consideration of the proposed plans submitted by McLoughlin Planning (agent) on behalf of Spirax Sarco Engineering Plc (applicant) – and prior to any decision being made.

We would suggest that the **following two options must be considered** as a part of this process:

- 1) **Reject the proposed plans and limit the applicant's 'upgrades' to the building to cosmetic changes to the building only**, but without any external structural changes or demolition, recognising that the whole property is protected by its Grade II Listing. *OR*
- 2) **Reject the proposed plans and allow the demolition and rebuild or the extension, but with the extension at a height (the roofline) no higher than the height of the existing extension.** There is scope for doing this by changing the design of the planned extension. For example:
 - The design could be re-worked to set the building lower down into the ground so that the gym, studio and mail-room are underground. This design would better utilise the gradient change across the 1.8 hectare campus.
 - Remove the gym and studio from the design all together, as Spirax Sarco Engineering employees could instead use the gym less than a mile away at the DoubleTree Hilton hotel (Cirencester Rd, Charlton Kings, Cheltenham GL53 8EA). As such, the second floor of the proposed design would not be needed.
 - Spirax Sarco Engineering could transition further employees from the Charlton House site to the more modern offices at Runnings Road and Northcroft House (both located in Cheltenham), as is already the plan for 144 employees moving to these offices / taking the opportunity to work from home following ways of working changes brought in by Spirax Sarco Engineering through the COVID-19 pandemic. As such, the second floor of the proposed design would not be needed.

Thank you for taking the time to read this letter and for your consideration of the above facts and proposed recommendations. We would of course welcome the chance to discuss further and can attend any of the Committee meetings prior to any decision being reached as you so require.

We trust that you will be fair and balanced in your review, and therein will recognise that the plans as currently proposed cannot and **should not be approved** by Cheltenham Borough Council.

Yours sincerely,

20th December 2021

Dear Miss Donnelly

Planning Reference 21/02364/FUL | Demolition of mid-20th Century Wing and Erection of a Replacement Extension to the Office Building- OBJECT

We write further to our original objection as **new information** has been received; our previous objection letter remains relevant, and this letter is in addition to it. The new information covers, Parking and Traffic, Scale for the proposed extension, and Communication and Planning Process.

New Information - Overview

Parking and Traffic

1. Spirax-Sarco Project Manager states that ‘we expect that the building could **accommodate 250-300 employees**’
2. The redevelopment **proposals outline a reduction in car parking spaces** to 170 to reflect the lower level of parking demand.”
3. The **Spirax-Sarco CEO**, in an email to Alex Chalk MP states “...the new building has a slightly larger floor area + (10.1%) because **it has been built with future growth in mind.**”
4. Spirax-Sarco Group HR Director states that ‘the current facility won’t allow us to grow’, ‘we need to future proof’, ‘our current forecast is 165 employees’, and ‘we have grown, **we are growing and we will continue to grow**’.

Scale for the Proposed Extension - Height, Scale and Mass

1. The **Spirax-Sarco CEO**, in his email to Alex Chalk MP states “[the] neighbours are correct to point out that **the new building is taller than the current extension...**”, “**we’ve had to increase the height of the new build extension from 3.2m to 4m**”.
2. The Project architect states “the new extension will be 18.4m high’ **so 5.15m higher than the current extension. This excludes the lift shaft ‘which is a further 6 feet**”.
3. The Neighbours Event Q&A PDF states: “The proposed new building roof line is 18.45m at its tallest point from ground level, so there is a **5.2m maximum difference in height.**” **This should correctly read ‘maximum increase in height’**

Communication and Planning Process

1. From Spirax information - the proposed **extension height is an increase of over 5m**; this absolutely affects more residents in the neighbourhood than already formally contacted by CBC Planning Department.

2. From Spirax information - the expected **staff increase to 250-300** staff will substantially increase parking need and traffic flow. This fundamental change to the application requires a wider neighbourhood catchment plus **reassessment by the GCC Highways Planning Liaison Officer**. There is only **1 bus per hour along Cirencester Road** with no stop adjacent to Spirax.
3. **Failures in the application process**, including (but not exclusively) the late submission of documentation by Spirax, material inaccuracies in said documentation, affected properties not being formally notified, lack for email responses from CBC Planning Committee Members, two applications on planning sites adding confusion for those considering commenting, no guidance that comments can be submitted for consideration after the date on the planning site, and lack of honest/realistic information provided of true impact of development by Spirax.

As a result, we believe that the Planning Committee should reject the plans as proposed and that stipulations for a revised application include:

- a. **An extension roofline no higher than the existing extension**
- b. **A legally enforceable condition restricting number of employees permanently located at the site to 150 staff to contain future impact of traffic and neighbourhood parking**
- c. **A wider neighbourhood catchment area with full presentation including realistic images and key facts**

Existing and New Information - Detailed Presentation

Parking and Traffic - The existing planning application states that the building is **intended to be for 133 full-time** employees, plus visitors, **a reduction from the 277 current employees**.

- The applicant's Transport Statement states (para 4.3) states: "The existing building to be demolished currently provides office space to accommodate 250 staff. The proposed building will provide office space for 150 staff. As a result of the redevelopment proposals approximately 100 staff currently based at the Charlton House site will relocate to Northcroft House, an existing office building which has recently been acquired by Spirax-Sarco Ltd and is located on the A435 Cirencester Road, approximately 1.5 kilometres south of the Charlton House site."
- The current on-site parking is 216 spaces, and no new parking space provision is detailed in the application. In fact, the opposite intention is stated in the applicants Transport Statement (para 4.8): "The **redevelopment proposals will result in reduction in car parking provision to 170 spaces** to reflect the lower level of parking demand, while still ensuring sufficient provision to prevent overspill parking."
- The traffic analysis and the 'GCC Highways Planning Liaison Officer' report / assessment will have been based on the data provided in the planning application. The GCC Highways Planning Liaison Officer's comment (17 December) concluded: "There are no alterations proposed to the existing access arrangements, and the application will result in an overall decrease in the number of trips to and from the site. As such, the proposal is not perceived to arise a detrimental impact on the operation and safety of the adjacent network."

The new information suggests that the applicants' intentions, as stated in the application, are at best misleading and at worst designed to obfuscate. This is evidenced by the following:

- The Spirax-Sarco CEO, Mr Anderson, in an email to Alex Chalk MP on or around 08/12 states “...the new building has a slightly larger floor area + (10.1%) because it has been built with future growth in mind.”
- Spirax-Sarco Group HR Director (and executive sponsor for Project Oak) stated at the Neighbours Event on 08/12 that ‘the current facility won’t allow us to grow’, ‘we need to future proof’, ‘our current forecast is 165 employees’, and ‘we have grown, we are growing and we will continue to grow’.
- Spirax-Sarco Project Oak Project Manager stated at the Neighbours Event that ‘we expect that the building could accommodate 250-300 employees’.
- The Q&A PDF from the Neighbours Event states: “The new building gives us sufficient space for 150 workstations, which allows capacity for growth of our Group functions over the lifetime of the building, while also providing an environment where we can flex the workspace considering the changes to the ways we might work in the future.”
- The applicant’s Transport Statement (prepared by Transport Planning Associates (TPA) on behalf of Spirax-Sarco) states (para 4.17): “Given that the redevelopment proposals will result in a reduction of approximately 100 staff based at the Charlton House site, it is considered the development proposals will result in a reduction in trip attraction to the site and will therefore not be of detriment to the operation of the local transport network. Further capacity assessments are therefore not required.” This is clearly at odds with the intended future expansion plans.
- When was asked at the Neighbours Event where the new parking would go, the architect responded to the effect of Spirax-Sarco will come back to us in a couple of years and ask us for a design for an **additional storey in the car park**; this is not explained in the current application.

Clearly the above does not correlate to the previous written submissions by Spirax Sarco, meaning that the Planning Committee do not, as yet, have all the facts for consideration.

There will be an increase, not decrease, to traffic in and out of the site requiring an increase to parking demand. There is a proposed decrease in the onsite parking in the application, which will cause major parking issues in the residential areas surrounding the site.

In addition to parking issues, the increased traffic particularly at peaks times (including school run in the morning) which will back up along Cirencester Road (both directions, up past St Edwards School and towards the city centre) causing tailbacks in what is already an accident blackspot (see the 22 accidents listed in Appendix B of the applicant’s Transport Statement). This will be compounded by cars being parked along Cudnall Street, Charlton Drive, the various Chancel Way/St Edwards roads, the Cudnall Street/Cirencester Road slip road, and the Cirencester Road.

We believe that the Planning Committee should reject the application as proposed as the development will have a materially adverse impact on the roads and residential areas surrounding the site. To proceed, there should be a legally enforceable condition as to the number of employees permanently located at this site which should be capped at the 150 staff Spirax-Sarco states in its application.

Scale for the Proposed Extension - Height, Scale and Mass - The planning application includes several statements that clearly give the impression, or indeed are stated as evidence, that the new extension will be sympathetic to the:

- Grade II Listed Mansion House
- location of the site in a residential area, and
- heritage of the surrounding area.

For example:

- “The pre-application response confirmed that the Council is generally supportive of the proposal, although the Conservation Officer felt it was not possible to fully assess the heritage impact as the information submitted with the pre-application enquiry was not sufficiently detailed. Concerns were raised regarding the scale and massing of the extension and the Conservation Officer warned that if they were too great it could detract from the significance of the heritage asset.” (Planning Statement, page 13)
- “Any such proposal will need to be very carefully considered as any extension to Charlton House should appear subordinate to the main house. Given that the mass of the new building is likely to be greater than that of the main house - as is the case with the current extensions – this may be hard to achieve without the building being lesser in height. Materials – Careful consideration will also need to be given to the materiality of the new built form, with the focus again being on ensuring that it appears subordinate to the main body of Charlton House and does not detract from the refined elegance of its Regency design, particularly that of the principal elevation.” (Heritage Report, p17)
- The Q&A PDF from the Neighbours Event states: “Spirax-Sarco Engineering plc's brief to the Architects included "...the new extension is to be sympathetic to the Old House and will need to consider...neighbours ... prestigious and modern feel appropriate for a global precision engineering business ... without diminishing the relevance or standing of the Old House.”

The position taken by the applicant are again at best misleading and at worst misrepresented as evidenced by the following:

- The Spirax-Sarco CEO, Mr Anderson, in his email to Alex Chalk MP states “[the] neighbours are correct to point out that the new building is taller than the current extension(s), but it is not taller than the roof line of the Old House” and “we’ve had to increase the height of the new build extension from 3.2m to 4m”.
- Spirax-Sarco Project Oak Project architect stated at the Neighbours Event that ‘we expect that the roofline of the new extension will be higher than the existing roofline by 5-10cm’ and ‘the new extension will be 18.4m high’ so 5.15m higher than the current extension. This excludes the lift shaft ‘which is a further 6 feet’.
- The Q&A PDF from the Neighbours Event states: “The height of the current extensions’ roof line is 13.25m at its tallest point from ground level. The proposed new building roof line is 18.45m at its tallest point from ground level, so there is a 5.2m maximum difference in height.”

The photo montages (PDF) provided to a small number of neighbours by the Spirax-Sarco Project Oak Project Manager after the Neighbours Event clearly shows that the new building is of significant mass, which

- overwhelms the Mansion House (so is neither subordinate nor subservient to it)
- will directly impact the privacy of the residents north, east and south of the site

- will impose upon the view from Cox's Meadow, and
- takes no account of either the heritage of the Grade II Listed Mansion House, the mix of residential buildings in the surrounding area, and the Cudnall Street (Charlton Kings) Conservation Area (designated in October 1989, with boundary revisions in November 2001).

Note that the above-mentioned photo montages were based on selected views determined by the Architect, and the PDF has not been submitted as part of the applicant's planning application.

We believe that the Planning Committee should reject the plans as proposed and suggest a more appropriate scale of extension, where the roofline is no higher than the height of the existing extension.

Communication and Planning Process - We raised last time our concerns about the process that was being followed and the very small number of households formally advised of the application. The comments above in respect of both the scale of the new building and the impact on surrounding areas from a parking and traffic perspective means that the lack of consultation with a wider catchment is a material omission. As admitted by Spirax itself, the new extension increases height by over 5m, and this absolutely affects more than the 28 houses that Spirax-Sarco contacted.

Alongside this is the process itself where there have been failures in the application process, including the late submission of documentation, material inaccuracies in the documentation, process not followed, and lack of information provided i.e. the application process portrays the proposed development in the most favourable light to Spirax-Sarco and does not provide a realistic picture to residents.

We believe that the Planning Committee should reject the plans as proposed so that the timescales for the process and consultation can be extended due to the wider neighbourhood catchment area necessitated by the full presentation of the facts commensurate with the increase impact of this proposed development due to the increased height, traffic and parking, and new information.

In Conclusion - We continue to **Object** to the proposed application and this objection is stronger because of the new information now available, as we have outlined above.

We again, respectfully request the Planning Committee takes our comments of objection here, together with our earlier objection and the comments of other interested parties, and reject the application as proposed. With the recommendation that a proposed extension of a subordinate dimension appropriate to the listed mansion house, where the roofline is no higher than the height of the existing extension, be designed and submitted with due provision being made for the increase in employees, traffic, and parking, as now expected at the site and neighbourhood.

Yours sincerely

Mead Lodge, 35 Cirencester Road, Charlton Kings, GL53 8EX

**Mead Lodge, 35 Cirencester Road,
Charlton Kings, Cheltenham
GL53 8EX**

Miss C Donnelly
Head of Planning
Cheltenham Borough Council
Municipal Offices
The Promenade
Cheltenham
GL50 9SS

29 November 2021

Dear Miss Donnelly

Planning Reference 21/02364/FUL | Demolition of mid-20th Century Wing and Erection of a Replacement Extension to the Office Building- **OBJECT**

We write further to our email of Saturday 27 November 2021 to provide details of our **objection** to the above-named planning application.

We are not experts in the building field and therefore take at face value the contention that the current building is no longer fit for purpose and cannot be made fit for purpose in any other way than demolition and rebuild; we trust Cheltenham Borough Council (CBC) Planning Dept/Town planners with the appropriate expertise will make this important assessment.

Our objection here falls into two principal areas:

- the scale for the proposed extension, and
- the fabric of the proposed extension.

These principal objections relate to the re-development, and not the other consideration of the environment and impact of the demolition and build process. We have yet to read and reflect on all the documentation, especially as new documents were only added on Friday 26th November and the Park House letter is blank when opened/downloaded. This lead on to our significant concern about communication and the planning application process; therefore, we have some opening remarks regarding this.

Communication and Planning Process

Our property is less than 50 meters from Spirax on Cirencester Road. We can see the current building from most rooms from the predominate aspect of the house, at both ground floor and first floor level, and also from our main recreational garden area. This view includes the rooms which are used on a daily and continual basis. And yet **we were not notified formally of this application** by the **Planning Department, Parish Council, or Spirax?** Indeed, as mentioned in our earlier email, we only became aware of this application as a result of a neighbour. This is why our comments are late, and we trust this will not prejudice the acceptance of our comments in the Planning Departments consideration. It is also why we have focused on just two key areas for our Objection.

**Paul & Emma Kingscott
Mead Lodge, 35 Cirencester Road,
Charlton Kings, Cheltenham
GL53 8EX**

Additionally, our personal lack of notification raises the question of which other households have not been notified since the current notification area does seem small. The proposed extension impacts many households on Cirencester Road, and in addition Cudnall Street, Chancel Way, and those on Holy Apostle's land off London Road, because of the massively changed façade on a substantial building within their residential domain and the of disruption during the demolition and build process. The CBC Planning Portal suggests that, as part of the planning process, a Charlton Drive Resident Consultant Meeting was held on 4th November; why was a similar meeting not extended to other affected residents at this time?

Objections – Initial Response

1. Scale for the proposed extension - Height, Scale and Mass

The current extension blends into the neighbourhood in two ways – scale and fabric. The current building is, in scale, sympathetic to its surroundings. It follows the topography of the land and is in every respect subservient to the Listed Building it abuts (Charlton House – the “House”). This is particularly seen in the ‘Existing Drawings’ which clearly show the current extension roofline at the level of the bottom of the highest windows in the House. This is particularly important because, along with its façade, it allows the building to blend in with, and be part of, its neighbouring environment.

The proposed extension is of a magnitude significantly larger than the current extension with the roofline overpowering and dominating its surrounding environment. We must remember that, despite this office currently being here, it does in fact sit within a leafy suburban residential area not a business park. The proposed extension is entirely out of keeping and character with this wider environment and we are very disappointed that Spirax has not recognised this nor taken it into account in its proposed plans; they appear not to have taken the holistic view we would have expected of a good corporate neighbour. The application really only considers and addresses the extension from the aspect of the House and not from the opposite direction, where the building is at its most visible to the road, evidenced by the noticeable lack of Proposed View Images (PVI) provided within the application from the Cirencester Road and Cudnall Street elevation. Again, it is very disappointing behaviour, from a respected local and global organisation, to apparently choose to hide the true impact of their proposed development.

One has to wonder why a building of the proposed scale is needed, given the reduction in number of employees. This raises a further concern; if in the future the corporate need requires the number of employees on the site to increase, it could well be to a level that cannot be accommodated by the local infrastructure. Once the extensive re-development as proposed is built, this employee increase and infrastructure pressure would be very hard to prevent. The proposed extension size cannot be “driven by the Applicant’s operational requirements” when the staff numbers in the current building are halving, if driven by operational requirements then a building half the size would be appropriate.

We have noted Spirax’s comments (and thinly veiled threats) about this being the international HQ of a large company, but the ‘beauty’ and aura of a building appropriate to its status as HQ does not mean it has to be a monstrosity that needs scale. The ‘threat’ of ‘give us planning permission or risk us moving away from Cheltenham’ is repeated several times in the documents and displays a very

**Paul & Emma Kingscott
Mead Lodge, 35 Cirencester Road,
Charlton Kings, Cheltenham
GL53 8EX**

distasteful attitude from the company each time read. Which of their customer, people, and investors, would they lose if they chose to re-develop the extension with consideration to the neighbourhood in which it sits, the conservation of materials, and minimalizing the impact on the environment and climate?

The proposed extension, particularly at the Cirencester aspect to the House, where the new roofline is at its most invasive, is domineering and entirely out of keeping with its surrounding residential environment. We note that the local Parish Council shares this opinion, and it is a view shared, we believe, by all objections received. One only has to look at the Before and After elevations in the 'Design and Access Statement' document to appreciate the hugely negative impact.

2. Fabric of the proposed extension - Façade

The current extension is in keeping with its residential neighbourhood in that it could easily, for example, be the façade for a block of residential apartment rather than an office - the render, the windows, the scale all make this true – and this is what helps the building blend into its neighbourhood and historic environment and listed principal property, Charlton House.

The proposed extension throws this aesthetic away, and instead puts a significantly glazed and concrete block facade in its place. As said above, this building is not located on a business park or similar commercial environ; and therefore the façade of the proposed extension needs to be in keeping with its leafy, suburban, residential location, and very close proximity to the Cudnall Conservation area, particularly the listed Langton Lodge. The status of an international HQ can be realised with a significantly more sympathetic building. There are many properties and structures of listed/historical consideration within meters of this development which have not been considered by the Spirax application e.g. Charlton Park Cottage, Holy Apostles, Church, Old School. Bell Tower, and various listed and historic curtilages in the vicinity. Surprisingly these structure, together with Charlton House and Cudnall Bridge which were mentioned by the Spirax report, were omitted from the adjacent conservation areas when it was set, despite their significance.

Conclusion

We take the statements in respect of the need to replace rather than renovate the existing extension at face value; renovating the existing building would be our preferred outcome. Notwithstanding that...

We **Object** to the proposed application because of the:

1. Massive increase in scale and mass of the proposal and the impact its new roofline will have on its neighbours and the area generally; and the
2. Proposed façade not being in keeping with its suburban and residential location, and the listed Charlton House which it abuts.

We respectfully request the Planning Committee takes our comments, along with the comments made in the other Objections, and reject the plans as proposed and suggest a more appropriate

**Mead Lodge, 35 Cirencester Road,
Charlton Kings, Cheltenham
GL53 8EX**

appearance and scale of extension, where the roofline is no higher than the height of the existing extension, be designed and submitted.

Yours sincerely