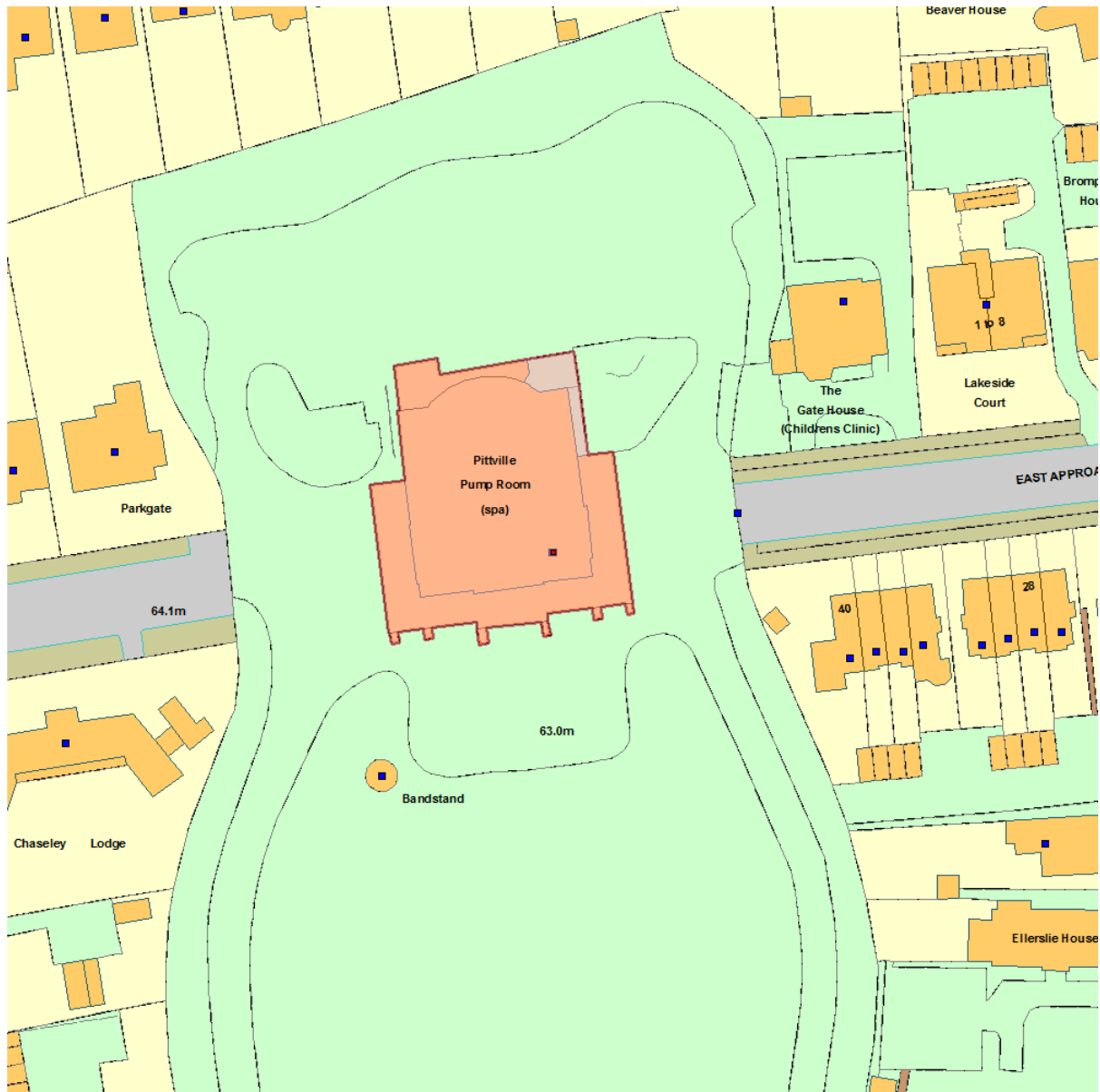


## Officer Report

<b>APPLICATION NO:</b> 25/00954/LBC	<b>OFFICER:</b> Mr Peter Ashby
<b>DATE REGISTERED:</b> 20th June 2025	<b>DATE OF EXPIRY:</b> 15th August 2025
<b>DATE VALIDATED:</b> 20th June 2025	<b>DATE OF SITE VISIT:</b> 20th August 2025
<b>WARD:</b> Pittville	<b>PARISH:</b> -
<b>APPLICANT:</b>	Cheltenham Borough Council
<b>AGENT:</b>	-
<b>LOCATION:</b>	Pittville Pump Room East Approach Drive Cheltenham
<b>PROPOSAL:</b>	Removal of existing deck to the main floor, installation of a new floor deck.

**RECOMMENDATION:** Grant



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## 1. DESCRIPTION OF SITE AND PROPOSAL

- 1.1 Pittville Pump room was constructed 1825-30 by the architect John Forbes. It is one of the finest buildings in Cheltenham and is constructed in ashlar stone over brick with a prominent slate and copper dome.
- 1.2 The building is situated in a prominent and slightly elevated setting within Pittville Park (Grade II Registered Park and Garden) as well as within a Conservation Area. Being of the highest heritage significance and incorporating wide-ranging heritage value, it is designated Grade I, and as such is in the top 2.5 % of listed buildings.
- 1.3 The application involves the strengthening of supporting sleeper walls within the existing floor void and the replacement of the existing floor deck in the principal area.
- 1.4 In 2023, the Pump Room was closed following a plasterwork survey indicating the building was unsafe, due to cracks and delamination of the internal plasterwork. Repairs were undertaken to address the defects throughout the main hall, ceilings and dome by specialist conservators and the building was made safe and reopened in 2024.
- 1.5 The proposed floor strengthening work will enable high level access via a Mobile Elevating Work Platform (MEWP) to high level internal historic fabric throughout the Pump Room main hall. This is required to conduct condition surveys, close-up inspections and conservation monitoring of historic fabric. Previously, this was only possible with extensive platform scaffolding, which being both costly and time-consuming has meant access has been infrequent. With the use of the MEWP, an essential biennial close-quarter plasterwork survey and remedial work will be delivered effectively with flexible access to localised areas of disrepair as they arise. The floor strengthening will allow for effective delivery of repairs and maintenance to the Pittville Pump Room, ensuring its longevity in terms of both building condition and safe use of the building.
- 1.6 Access via a MEWP is deemed too heavy for the existing floor loading.
- 1.7 The proposed scope of works includes three stages – a) Removal and disposal of the existing floor deck in the main hall, b) Floor strengthening works in the floor void including installation of further joists and building up of sleeper walls. c) Installation of a new floor deck.
- 1.8 The application is before the Planning Committee because Cheltenham Borough Council is the applicant.

## 2. CONSTRAINTS AND RELEVANT PLANNING HISTORY

### Constraints:

Conservation Area  
Listed Buildings Grade 1  
Principal Urban Area

### Relevant Planning History:

#### **24/01008/PREAPP 2nd October 2024 CLO**

Future of the Orangery at the Pump Room expiring on 1st November 2024 - Siting of catering van for cafe use and retention of existing storage and toilet facilities in car park. An extension of time on the temporary consent is required.

#### **07/00362/LBC 25th May 2007 GRANT**

New gates and railings at East Approach entrance and West approach entrance to Pittville Pump Rooms and park

**07/01529/LBC 22nd January 2008 GRANT**

Removal of maple boarding on battens laid over original pine boarding and replacement with oak boarding on plywood underlayment over pine boarding, with reinstatement of existing heating system to Main Hall and Spa Room and addition of solar panel assembly mounted on external parapetted flat roof over Oval Room

**19/00485/LBC 4th June 2019 GRANT**

To remove asbestos cement promenade tiles from the flat roof to the rear of the Pittville Pump Rooms 1960 extension, repair existing asphalt covering and overlay with liquid applied waterproof membrane colour to match existing, renew 10 nr circular skylights using white GPP to match existing profiles, with triple skin polycarbonate skin to adjacent existing leads and copper flashings to suit

**20/01702/LBC 21st December 2020 GRANT**

Investigate survey to open up three sections of the balcony

**20/01899/LBC 29th April 2021 DISPOS**

Installation of 8no. speakers located under the colonnade to supply music and announcements to the colonnade area of the Pump Rooms.

**21/00579/LBC 21st May 2021 GRANT**

To replace six cracked and unsafe slabs like for like

**21/01391/DISCON 23rd June 2021 DISCHA**

Discharge of conditions 3 (Details of materials) of planning permission 21/00579/LBC to replace 6 cracked slabs

**21/01687/LBC 17th September 2021 GRANT**

Installation of new gates and railings at East and West Approach Drives and associated alterations, and restoration of c19th steps to the front of the Pump Rooms

**21/01687/FUL 17th September 2021 PER**

Installation of new gates and railings at East and West Approach Drives and associated alterations, and restoration of c19th steps to the front of the Pump Rooms

**21/01874/LBC 1st November 2021 GRANT**

Removal of defective insulation and roof covering on the balcony, timber repairs, repointing of stone steps, addition of rodding point

**21/02449/DISCON 8th November 2021 DISCHA**

Discharge of conditions 3 (Repair and maintenance works) and 4 (Roofing material) of listed building consent ref. 21/01874/LBC

**21/02560/FUL 23rd February 2022 WDN**

Installation of 2 no. temporary buildings and associated services for a period of 3 years on existing hardstanding adjacent to the Pittville Pump Room, to comprise a storage unit and public WC unit to be associated with the existing outdoor cafe and associated events.

**21/02560/LBC 22nd November 2021 NOTREQ**

Installation of 2 no. temporary buildings and associated services for a period of 3 years on existing hardstanding adjacent to the Pittville Pump Room, to comprise a storage unit and public WC unit to be associated with the existing outdoor cafe and associated events.

**21/02618/FUL 3rd December 2021 WDN**

Proposal to retain the current temporary Orangery structure on a permanent basis

**21/02618/LBC 25th November 2021 NOTREQ**

The proposal seeks to retain the current temporary structure and confirms the layout and arrangement within the application for further detail (retrospective)

**22/00340/LBC 22nd April 2022 GRANT**

Various repairs works

**22/01439/FUL 21st October 2022 REF**

Temporary change of use of land for up to two years for the siting of an orangery structure to be used as a cafe and the siting of ancillary toilets and storage facility

**23/00372/FUL 16th June 2023 PER**

Temporary change of use of land for up to 20 months for the siting of an orangery structure to be used as a cafe and the siting of ancillary toilets and storage facility (Revised submission to 22/01439/FUL)

**25/00380/FUL 22nd August 2025 PER**

Temporary change of use of land for the siting of a trailer/vehicle as a servery and retention of ancillary mobile toilets and store, plus over-cladding of toilets and store.

### **3. POLICIES AND GUIDANCE**

#### **National Planning Policy Framework**

Section 2 Achieving sustainable development

Section 3 Plan-making

Section 4 Decision-making

Section 16 Conserving and enhancing the historic environment

#### **Adopted Cheltenham Plan Policies**

D1 Design

#### **Adopted Joint Core Strategy Policies**

SD3 Sustainable Design and Construction

SD8 Historic Environment

### **4. CONSULTATIONS**

#### **Gloucestershire Centre For Environmental Records**

*27th June 2025* - Report available to view in documents.

#### **Historic England**

*28th August 2025* - Thank you for your letter of regarding further information on the above application for listed building consent. On the basis of this information, we offer the following advice to assist your authority in determining the application.

“Following our site visit last week, we can confirm that it is very unlikely that the retained pine floor under the existing floor finishes is original and judging from the underside appearance and board widths is likely to be 19th or early 20th century. Its contribution to overall significance of the Pump Rooms is relatively low.

Given that the proposals provide an opportunity to replace the existing light floor finish with something more befitting and recognising the rationale for the new floor to gain easier access for ceiling repairs, its loss is justified.

There was discussion over the treatment of the floor edges, where a gap is required for tolerances and whether beading would be the most appropriate solution. We consider that beading may appear untidy and this could only be used along straight edges and not around columns. Therefore, a similar solution to that used for the existing modern floor would be satisfactory.

Subject to suitable sample for the floor finish to be agreed, we support the proposals, recognising the purported benefits of the scheme”.

#### Planning Legislation & Policy Context

Central to our consultation advice is the requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 in Section 66(1) for the local authority to "have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses".

When considering the current proposals, in line with paragraph 207 of the NPPF (December 2024), the significance of the asset requires consideration. The significance of materials that make up the existing floor of the Grade I building needs to be properly understood.

Paragraph 212 states that in considering the impact of proposed development on significance, great weight should be given to the asset's conservation and that the more important the asset the greater the weight should be. The Pittville Pumproom is Grade I, a heritage asset of the highest significance. Paragraph 213 goes on to say that clear and convincing justification is needed if there is loss or harm.

Historic England's advice is provided in line with the importance attached to significance and setting with respect to heritage assets as recognised by the Government's revised National Planning Policy Framework (NPPF) and in guidance, including the Planning Practice Guidance (PPG), and good practice advice notes produced by Historic England on behalf of the Historic Environment Forum (Historic Environment Good Practice Advice in Planning Notes (2015 & 2017)).

The significance of a heritage asset can be harmed or lost through alteration or destruction of the asset or development within its setting. As heritage assets are irreplaceable, any harm (whether substantial or less than substantial) is to be given great weight, and any harm to, or loss of, the significance of a designated heritage asset (or site of equivalent significance) should require clear and convincing justification.

#### Recommendation

Historic England has no objection to the application on heritage grounds. We consider that the application meets the requirements of the NPPF, in particular paragraph numbers 212 and 213. In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

#### Historic England

*8th July 2025* - Thank you for your letter of 23 June 2025 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

## Historic England Advice

### Significance of Designated Heritage Assets

Pittville Pump room of 1825-30, with restorations and alterations of 1949-60 was designed by John Forbes for William Pitt. Considered to be the finest in Cheltenham and constructed in ashlar over brick with slate roof and copper dome, the details based on Stuart and Revett's engravings of the Temple of Illissus.

It is situated in Pittville Park (Grade II Registered Park and Garden) and the Cheltenham Conservation Area. Being of the highest heritage significance and holding wide-ranging heritage value, it is designated as grade I, and as such is in the top 2.5% of listed buildings. Therefore, greater weight should be given to its conservation. The National Planning Policy Framework (NPPF) defines 'conservation' as 'the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance'.

### Summary of proposals.

The application proposes the replacement of the existing floor deck in the main part of the pump rooms.

### Impact of the Proposed Development

While the submitted Heritage Statement does not provide a proportionate account of the significance of the Grade I building, we understand that the existing top floor layers are modern and were overlayed over what may be the original pine floor. This work was approved in 2008 (ref: 07/01529/LBC). Some further investigation into the significance of this floor construction would be useful to inform the impacts. The existing cross sections show that the supporting brick walls, upon which the floor joists are laid, are supported on concrete foundations, which may indicate that the entire floor construction has been replaced, although possibly re-using the historic floor boards?

The proposed replacement floor deck would be composed of three layers to match the existing depth of the existing floor, with two layers of flooring grade plywood finished with solid oak floorboards. The loss of potential historic fabric could be harmful to significance and given the Grade I status of the Pump Rooms, it is highly sensitive to change.

The proposed strengthening of the brick support walls with ply sheathing is unlikely to have an adverse impact, although without indication of whether the floor void is already, or would be vented, the use of ply may not be the best long-term solution, if this were to be prone to condensation. Your Building Control colleagues may be able to provide some technical advice on this.

Subject to samples, a replacement of a modern oak floor finish would have minor visual impact.

### Planning Legislation & Policy Context

Central to our consultation advice is the requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 in Section 66(1) for the local authority to "have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses".

When considering the current proposals, in line with paragraph 207 of the NPPF (December 2024), the significance of the asset requires consideration. The significance of materials that make up the existing floor of the Grade I building needs to be properly understood.

Paragraph 212 states that in considering the impact of proposed development on significance, great weight should be given to the asset's conservation and that the more important the asset the greater the weight should be. The Pittville Pumproom is Grade I, a heritage asset of the highest significance. Paragraph 213 goes on to say that clear and convincing justification is needed if there is loss or harm.

Historic England's advice is provided in line with the importance attached to significance and setting with respect to heritage assets as recognised by the Government's revised National Planning Policy Framework (NPPF) and in guidance, including the Planning Practice Guidance (PPG), and good practice advice notes produced by Historic England on behalf of the Historic Environment Forum (Historic Environment Good Practice Advice in Planning Notes (2015 & 2017)).

The significance of a heritage asset can be harmed or lost through alteration or destruction of the asset or development within its setting. As heritage assets are irreplaceable, any harm (whether substantial or less than substantial) is to be given great weight, and any harm to, or loss of, the significance of a designated heritage asset (or site of equivalent significance) should require clear and convincing justification.  
Position.

While we are persuaded of the justification to replace the existing floor, which will provide easier and less costly access to repair the higher levels and ceilings of the main space, there is some uncertainty to the heritage values associated with the existing pine floor, which was retained when the floor was last replaced.

While we do not object to oversailing this floor finish with the new floor, which would also protect it, we would be concerned over its loss, if it is discovered that it was the original finish. Therefore, a solution that retains this should be sought.  
Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 212 and 213 of the NPPF. In determining this application you should bear in mind the statutory duty of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

#### **Building Control**

*30th June 2025* - This application may require Building Regulations approval. Please contact Cheltenham and Tewkesbury Building Control on 01242 264321 for further information.

## **5. PUBLICITY AND REPRESENTATIONS**

- 5.1** A site notice was posted on 3<sup>rd</sup> July 2025 and a notice published in the Gloucestershire Echo on the same day.
- 5.2** No representations have been received.

## 6. OFFICER COMMENTS

- 6.1 Unfortunately, there are no as-built records of the original flooring so it is unknown what the original flooring would have been. Current records are not conclusive of the current flooring material, though at least the top and middle layer have been replaced within the last twenty years.
- 6.2 According to a previous Listed Building Consent application (07/01529/LBC), in 2008 the pine layer was overlaid with maple. The application proposed replacement of the maple with plywood and oak on top. From previous inspection of the existing floor deck through small access panels, the existing floor deck is made up of a layer of oak. Below is either two layers of plywood or a layer of plywood followed by the red pine.
- 6.3 The condition of the current floor is deteriorating with some localised splits in places and has been sanded and resealed several times over the years.
- 6.4 The proposed replacement floor deck is composed of three layers to match the existing depth of the deck, with two layers of flooring grade plywood followed by solid oak floorboards on top.
- 6.5 A discreet access hatch flush to the new floor deck will be installed to provide access limited to contractors as access the spa well as needed. This will significantly improve the safety of access and egress to the well.
- 6.6 It is proposed that a small oak perimeter skirting will be carefully installed in addition to the existing early/original skirting board to be retained. The purpose of the perimeter skirting is to cover the expansion/movement gap which is necessary for this type of flooring. The current flooring has no expansion gap and is infilled with cork, which is not considered best practice.
- 6.7 The materials of the floor strengthening works within the void will match existing, such as new timber joists and new brickwork to build up a brickwork sleeper wall as fully detailed within the structural engineer's application drawings. New plywood sheathing will be introduced into the floor void to strengthen the existing timber stud walls. The floor strengthening work will not be visible during everyday use of the building once complete. The sleeper wall works will be entirely covered by the new flooring deck.
- 6.8 The floor strengthening will improve access and enable high level internal access via a MEWP. This will ensure the recommended biennial plasterwork survey and repairs can be conducted comparatively easily and swiftly. The use of the MEWP will also allow for any other high-level maintenance and repair work required, which could include, though is not limited to, cleaning, redecoration, chandelier cleaning and inspections, and internal timber repairs (to dome windows).
- 6.9 By undertaking the flooring works, the original fabric that contributes to the building's significance will be more readily accessible and appropriately conserved. All building fabric will be protected throughout the works.
- 6.10 Historic England raised concerns that the flooring directly under the existing floorboards may be worthy of retention. However, a site visit took place on 20<sup>th</sup> August and the underside of the floor was inspected which addressed their previous concerns. Historic England have subsequently confirmed they have no adverse comments regarding the application.

## 7. CONCLUSION AND RECOMMENDATION

- 7.1 The proposed works are justified to enable conservation of the high-level historic fabric of the building via MEWP access. The works allow for effective delivery of repairs and maintenance to the Pittville Pump Room. This will ensure its longevity in terms of both building condition, historic high-level fabric and safe use in the future.
- 7.2 The MEWP access will ensure a safe, working from height platform and comply with current Health and Safety Legislation whilst also ensuring the interior of the building remains a safe environment for all users of the building.
- 7.3 In view of the above, provided the conditions are complied with and forthcoming details and approved, it is recommended listed building consent is granted.

## 8. CONDITIONS

- 1 The listed building consent hereby granted shall be begun not later than the expiration of three years from the date of this decision.

Reason: To accord with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 The listed building consent hereby granted shall be carried out in accordance with the approved plans listed in Schedule 1 of this decision notice.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it must be reported in writing immediately to the Local Planning Authority and development shall be halted on that part of the site affected by the unexpected contamination. An investigation and risk assessment must then be undertaken in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR11 and a remediation scheme, where necessary, also submitted. Following completion of measures identified in the approved remediation scheme, a verification report shall be submitted to and approved in writing by the Local Planning Authority before development can recommence on the part of the site identified as having unexpected contamination.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with adopted policy SD14 of the Joint Core Strategy (2017).

- 4 Prior to the commencement of development, including any works of demolition or site clearance, a Construction Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

The approved method statement shall be adhered to throughout the development process and shall, where necessary:

- i) specify the type and number of vehicles expected during the construction of the development;
- ii) allocate space for the parking of vehicles for site operatives and visitors;
- iii) allocate space for the loading and unloading of plant and materials;

- iv) allocate space for the storage of plant and materials used in constructing the development;
- v) specify the intended hours of construction;
- vi) specify measures to control the emission of noise, dust and dirt during construction;
- vii) provide for wheel washing facilities; and
- viii) specify the access points to be used and maintained during the construction phase.

Reason: To minimise disruption on the public highway and to adjacent land users, and accommodate the efficient delivery of goods and supplies during the course of the construction works, having regard to adopted policy INF1 of the Joint Core Strategy (2017). Approval is required upfront because without proper mitigation the works could have an unacceptable highway impact during construction.

- 5 Prior to the commencement of works, details of the proposed oak floorboards (length, thickness, width and finish) and a sample board, together with edge skirting cover trim, shall be submitted to and approved in writing by the Planning Authority.

Reason: In the interests of the special architectural and historic qualities of the Listed Building, having regard to Policy SD8 of the Joint Core Strategy 2017 and Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 16 of the NPPF 2024.