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Your reference: 2200521LBC  
Our reference: 181957

17<sup>th</sup> March 2023

Dear Sir/Madam,

**RE: 2200521LBC Alteration, including partial demolition, restoration, development and extension of Downings Malthouse and the High Orchard Street Warehouse, plus the creation of a new basement level in Downings Malthouse accessed from Merchants Road to provide car parking, together with an extension and bridge link to Downings Malthouse Extension to provide 49 residential units on the ground and upper floors and 60m<sup>2</sup> of commercial floorspace for use for Class E purposes on the ground floor. The development of a new building comprising basement ground and nine upper floors on the site of the former Silo and the retention of the remaining portion of the High Orchard Street Kiln containing basement car parking, a ground floor plaza, reception and ancillary accommodation linking the building to Downings Malthouse, and 68 residential units on the ground and upper floors together with additional ancillary parking to the south of Downings Malthouse Extension, access, turning and landscaping all at Bakers Quay Merchants Road/High Orchard Street Gloucester.**

Thank you for consulting the Victorian Society on this application. The proposals were considered by the Society's Buildings Committee, a group of architects, historians and heritage professionals. Following their advice we make this **objection**.

The former Downings Malthouse and associated buildings are significant Grade II listed buildings neighbouring the Docks Conservation Area. Until recently the buildings were substantially intact, and despite some decay they retained much of their interiors, following the trend of successful redevelopment of the Docks in recent years, approval was given in 2016 to redevelop this site and restore the listed buildings. Unfortunately, this scheme was not fully implemented and the listed buildings were allowed to decay further to a point where they underwent significant demolition on grounds of safety.

This proposal now envisages the retention, but heavy alteration, of what survives of the listed buildings, with new residential development behind the retained facades, including a 10 storey tower, all of which are extremely concerning.

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Following recent demolitions the surviving fabric of the listed buildings and their legibility is compromised. However, this means what does survive is now of increased significance and it is essential it is preserved as fully as possible. The proposals envisage substantial alterations to all the surviving elevations with increased and enlarged fenestration, and infill construction. In a building that was still intact this would not be an acceptable form of development for a listed building due to the harm it would cause to the architectural integrity and historic legibility of the building. In a building which has been as compromised as the Malthouses, where the surviving significance is so sensitive, it is completely unacceptable. Redevelopment of Gloucester Dock's historic buildings has been sensitive thus far and is a marked success in the reuse of historic buildings, this proposal would represent a marked departure from this success.

The proposed tower also marks a departure from the hitherto successful redevelopment of the Docks area. Thus far redevelopment has always respected the existing scale of historic buildings. This proposal would introduce an alien scale and idiom to the area at odds with its special character. Neighbouring the Docks Conservation Area it would have a serious effect on the its setting, the setting of the listed Malthouse, and other nearby listed buildings. It would overpower the existing medium scale historic buildings, increasing the negative contribution already manifested by the Gloucester Quays development. It is also unclear how the scale of the tower would interact with the prominence of the Grade I listed Cathedral in the cityscape, and while we note that Gloucester possesses two C20 tall buildings, neither are considered positive contributors to the character of the city. It is unlikely a third will be considered differently.

Ultimately, the scheme as proposed would cause substantial harm to the significance of the listed buildings due to the proposed major alterations to what remains of historic fabric, and the imposition of a tower on the site which would overpower the medium scale of the historic buildings.

Considering the 2016 consent envisaged the restoration of the historic buildings we find no compelling reason why this cannot still be implemented, even if it means substantial reconstruction (something which has taken place already elsewhere within the Docks). The applicant claims that the changing financial situation makes the original proposed uses of the site no longer viable, but the application documentation contains no compelling evidence to support this. Considering that this proposal would cause increased harm to significance, it is unacceptable when a less harmful scheme is already approved.

### **Policy**

The National Planning Policy Framework emphasises the desirability of sustaining and enhancing the significance of heritage assets (paragraph 190a). Furthermore:

*199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation*

*200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.*

*206. 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.*

This proposal would not result in the conservation of the significance of the listed building, or the setting of the Docks Conservation Area and nearby listed buildings. Considering a less harmful proposal was approved previously there is no clear or convincing justification why this cannot be implemented.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

Connor McNeill

**Conservation Adviser**