

Coln Residential

Stroud District Local Plan Review

Pre-Submission Draft Local Plan Consultation

Representations prepared by Savills on behalf of
Coln Residential

Introduction

1. These representations have been prepared by Savills on behalf of Coln Residential (CR) in response to the consultation on the Pre-submission Draft Stroud District Local Plan (Draft LP) which ends on 21 July 2021.
2. This submission is made in respect of CR interests in land at Rooksmoor Mills, North Woodchester (see Appendix I). CR, a housebuilder with geographical coverage across the South West of England, have a proven track record in delivering high quality homes. CR have particular expertise in previously developed land and sites that have a degree of heritage significance (either designated or non-designated), where viability can often be a constraint to development.
3. CR is already invested in the redevelopment of the Rooksmoor Mill site, which, in itself, provides high quality redevelopment of a former redundant employment site, as well as an enhancement to the character of the Industrial Heritage Conservation Area in which the site is located. CR also takes an active interest in development across the wider area as part of the Development Plan process.
4. These representations also respond to general development management policies pertinent to the land under CR's land interests in the District.
5. It is hoped that these representations are of assistance to Stroud District Council (SDC) in preparing the next stages of the Stroud Local Plan Review.

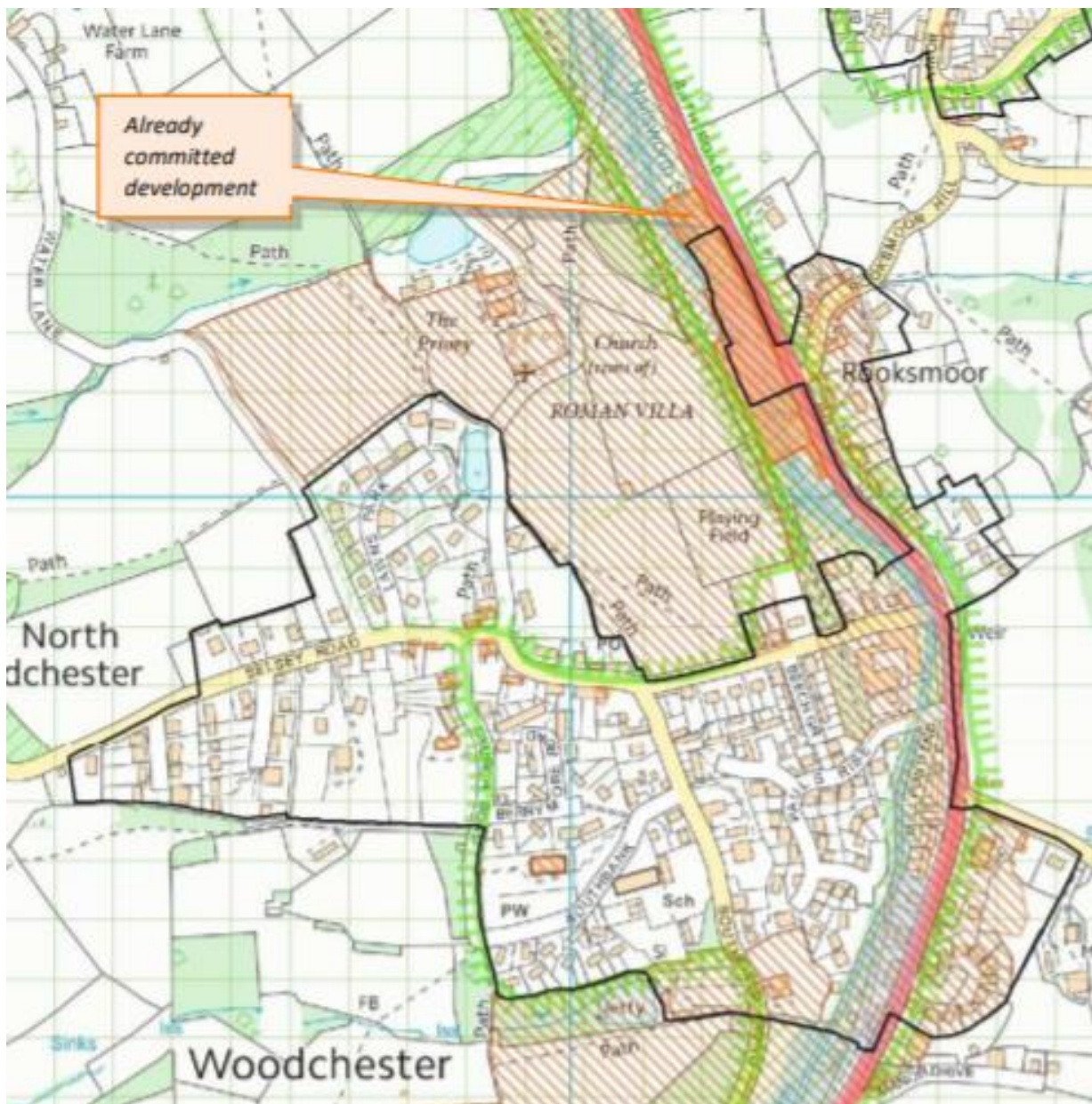
Planning Policy Context: Plan-making

6. The National Planning Policy Framework (NPPF, published July 2021) sets out the government's guidance towards the preparation of local plans.
7. The NPPF establishes that plans should apply a presumption in favour of sustainable development. For plan-making this means that (a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and (b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.
8. As part of the plan-making section of the NPPF (Chapter 3), the document states at Paragraph 16 that plans should: *"be prepared positively, in a way that is aspirational but deliverable"* and *"contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals"*.
9. NPPF Paragraph 31 sets out that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
10. Paragraph 35 of the NPPF establishes that when a plan is submitted for examination it will be assessed to confirm that it is *"sound"*; this includes a plan that is positively prepared; justified; effective and consistent with national policy.
11. The following representations have regard to the tests of soundness outlined above.
12. The online Planning Practice Guidance (PPG) is an online resource which provides additional advice and guidance towards the preparation of local plans. The PPG is referenced within these representations, and wider submission documentation where relevant.

SDLP Pre-submission Draft – Policy Review

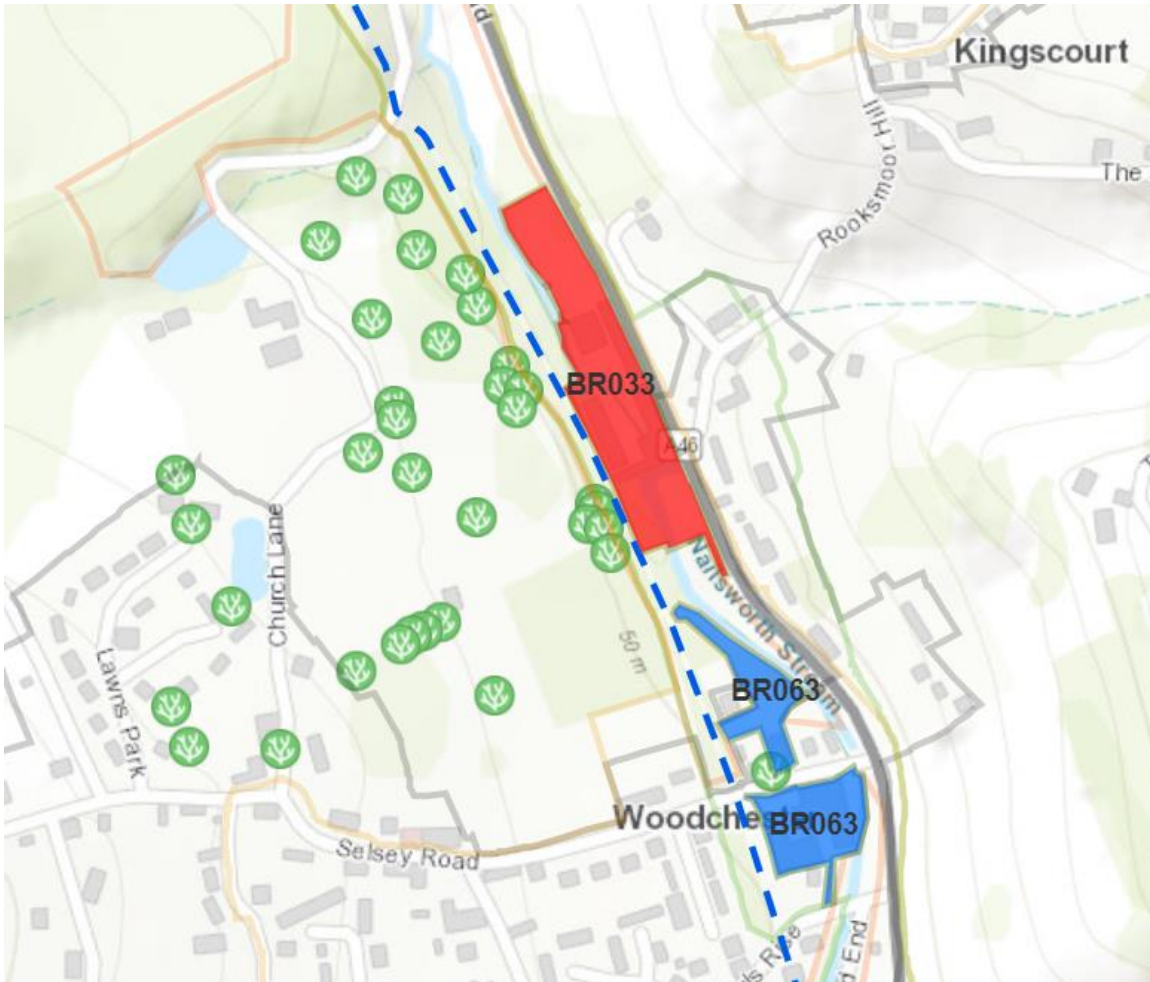
Approach to development in North Woodchester

- 13. The Pre-submission Draft Local Plan correctly acknowledges the committed development at Rooksmoor Mill (LPA ref: S.20/1209/VAR) as ‘already committed development’, yet it fails to extend the Settlement Development Limit for North Woodchester around the extent of that site (see the black line on the plan below which doesn’t extend around the committed development).



Source: Pre-submission Draft Local Plan 2021

14. Paragraph 121 of the NPPF requires LPAs to take a proactive role in identifying and helping bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers, using the full range of powers available to them. SDC has done that in identifying land at Rooksmoor Mill as being suitable for housing development on its Brownfield Land Register 2020 (ref: BR033 of the plan below).



Source: SDC’s Brownfield Land Register 2020

15. Having regard to sub-text supporting the paragraphs relating to ‘Landscape Sensitivity’ in North Woodchester, CR acknowledge that the Draft Local Plan considers that *“the only potential for employment growth may be to the north, where very small commercial premises may be acceptable adjoining the existing buildings”*. It is not clear whether this statement accounts for land beyond CR’s extant planning permission at Rooksmoor Mill. CR recommend that SDC provide clarification on this statement and for the wording to include the land to the north of the *“already committed development”* rather than *“existing building”*.

16. CR has concerns that the ‘Development Strategy’ for North Woodchester is overly prescriptive and does not allow sufficient flexibility for development outside of the Settlement Development

Limit to potentially come forward based on its own merits. It refers to the already committed development at Rooksmoor Mill, expressly stating that there is planning permission for 54 dwellings plus employment units, and that that permission will provide for the future needs of the settlement [over the plan period]. Whilst CR broadly welcomes the support of development at Rooksmoor Mill in the Development Strategy, the text is overly prescriptive and does not, on face value, permit other development or appropriate uses to come forward on this site. Indeed, it may be possible that market signals regarding the requirement for, or otherwise, employment development at Rooksmoor Mill within or beyond the SDL may change over the course of the plan period. CR recommends that SDC reviews the Landscape Sensitivity and Development Strategy text to ensure that it has sufficient flexibility to allow the committed site, and land beyond it to the north, the ability to meet a range of potential future uses for North Woodchester over the Plan Period.

17. In that context, although not a function of plan-making *per se*, CR question the appropriateness and scope of the Industrial Heritage Conservation Area; in particular, whether all of the designated area continues to serve a meaningful purpose. Paragraph 53 of the NPPF requires the use of Article 4 directions to in all cases, be based on robust evidence, and apply to the smallest geographical area possible.
18. It is reasonable to raise this point at this juncture on the basis that the remaining undeveloped land to the north of Rooksmoor Mill is previously developed land which benefits from an employment use. The land is of limited heritage value and its significance has been diminished through the evolution of its use as employment storage over time. The use associated with the historic employment buildings has changed from owing to the committed development. Should the extent of the Industrial Heritage Conservation Area remain the same, it is possible that development on the land to the north of Rooksmoor Mill would preserve, and possibly even enhance, the character of the conservation area.
19. Consequently, there is sound justification for SDC to extend the SDL boundary for North Woodchester to include the land at to the north of Rooksmoor Mill.

Draft LP Policies

Core Policy 1: Delivering Carbon Neutral by 2030 and Policy ES1: Sustainable Construction and Design

20. CR understands that the requirement for Stroud District to become carbon neutral is more ambitious than the Government's own aspirations to achieve net-zero greenhouse gas emissions by 2030. To echo the Draft VA, building to increased standards will inevitably lead to higher costs and we suggest that SDC carefully consider this approach.
21. The Draft Viability Assessment hints that a limited level of evidence has been prepared to support this commitment. During the summer 2020 consultation, no details were provided as to how SDC would deliver a carbon neutral district by 2030, just eight and a half years away.
22. CR is concerned that the main aim of this policy has the potential to constrain any meaningful level of planned development across the district. This could lead to housing land supply issues in the short and medium terms, therefore allowing more speculative residential development to come forward.
23. To summarise, such requirements will need to be factored into viability appraisals for strategic allocations when establishing what other contributions the development can support.

Core Policies 4: Place Making

24. CR supports the principle of integrating new development into neighbourhoods, place-shaping and creating safe streets, homes and workplaces, as set out within Core Policy 4.

Core Policy 6: Infrastructure and Developer Contributions

25. CR supports the commitment for SDC to ensure infrastructure will be in place at the right time. We encourage SDC to work with the development sector as part of delivering key infrastructure.
26. The provision of strategic and local sites across the District needs to be evolved alongside the emerging local plan to ensure that what is required by policy is realistic, having particular regard to viability, the infrastructure requirements/costs and how they are to be funded.

Core Policies 7 and 8: Achieving Healthy and Inclusive Communities and New Housing Development

27. The general principles of this policies are supported and is considered to comply with paragraph 61 of the NPPF, stating that the size, type and tenure of housing for different groups in the community should be reflected in planning policies.

Core Policies DCP2: Supporting Older People and People with Mobility Issues

28. CR supports the principle of providing a bespoke policy to address the needs of older people and people with mobility issues in the District. The delivery of such provision in accessible locations is supported.

Core Policy 9: Affordable Housing

29. CR supports the principle of new residential development delivering an appropriate proportion of affordable housing within the scheme subject to viability.

Policy DHC1: Meeting housing need within defined settlements

30. CR supports the principle of Policy DHC1 (Meeting housing need within defined settlements), although they would, as per paragraphs 19 to 24 of this representation, encourage SDC to review the SDL for North Woodchester so that it includes, as a minimum, the extent of the already committed development, and potentially the existing employment land to the north.

Policy HC3: Self-build and custom-build

31. The requirement for a provision of 2% of self-build and custom-build homes at Policy HC3, subject to demand, is supported on the basis that it shows flexibility in accordance with NPPF objectives.

Policy HC4: Exception sites

32. CR welcomes the amendment to criterion 3 of Policy HC4 (Exception sites), ensuring that all affordable homes coming forward on exception sites are available in perpetuity.

Policy DH3: Live-work development

33. CR supports the principle of having an independent policy for live work units.

Policy HC1: Detailed criteria for new housing

34. In regard to Policy HC1, it is important for the detailed requirements of this policy to promote high quality design. This draft policy does not, however, have to include the opening part of the first policy: *“Housing Development within limits, and other limited housing development specifically allowed for by other policies in the Plan at locations outside of the settlement limits”*, on the basis that the policy is evidently self-fulfilling. SDC could simplify this wording.

35. The requirement for proposals to “*not appear as an intrusion into the countryside*” could be subject to wide variations of interpretation. Whilst we understand the Council’s intentions here, this could be positively addressed through good design and landscaping.
36. In accordance with the NPPF, we encourage that this policy is redrafted to promote flexibility for developers in bringing forward their schemes.

Policy DHC7: Open Space Provision

37. Some of the open space typologies presented in Policy DHC7 could be considered to overlap. The policy does not clarify where the distinction arises between ‘Amenity Green Space’, ‘Parks and Recreation Grounds’ and ‘Natural Green Space’, which can all have common characteristics. The number of typologies presented in this policy could cause significant confusion for developers.
38. Such requirements will also need to be factored into viability appraisals for strategic schemes when establishing what contributions the development can support.

Policy EI12: Promoting Transport Choice and Accessibility

39. The requirement for new development to be planned in accordance with the Sustainable Transport Hierarchy in Policy EI12 is supported.

Policy E14: Development at existing employment sites in the countryside

40. CR is supportive of the emphasis of this policy in principle.

Core Policy CP14: Quality Design and Development

41. CR supports SDC’s aspirations for high quality design in accordance with the NPPF.
42. It is recommended that further clarity is required at criterion 12: what is the ‘larger area’ referred to within this strand of the policy and how is ‘comprehensive’ measured? The Draft Plan should set out the purpose of this criterion.
43. We suggest a minor amendment to criterion 14, replacing “*motor car*” with “*private vehicular transport*”.

Core Policy CP15: A quality living and working countryside

44. CR is broadly supportive of the intentions of this policy. However, when undertaking the assessment of the development potential of land which falls outside of a SDL, the default position is to consider for land to be deemed 'open countryside'. At criterion 9 of this Policy, it is not, therefore, considered necessary to limit the potential to deliver up to 9 dwellings to Tier 3b, 4a or 4b settlements. The policy should be amended by deleting reference to this policy being specific to tiers within specific tiers.

Policy ES6: Biodiversity and Geodiversity

45. We consider that this policy should be applied pragmatically in the event of much needed improvements to natural resources and biodiversity, and should not act as a hindrance to applicants within the determination of planning applications.

Policy ES7: Landscape character

46. CR supports the principle of this policy. However, there is a clear conflict with guidance at paragraph 177 of the NPPF and the wording of this policy in regard to the assessment of planning applications where the development falls in to Areas of Outstanding Natural Beauty. For clarity, the reference to "*national interest*" in the final sentence of the first paragraph of this policy should be amended to read: "*Major development will not be permitted unless it is demonstrated to be in the public interest and there is a lack of alternative sustainable development sites*". As drafted, the policy test is substantial and far exceeds the hurdle presented in national policy.

Policy ES8: Trees, Hedgerows and Woodlands

47. CR supports the Council's aspirations for enhancing the district's tree, hedgerow and woodland resource, but considers that the policy requirement for "*no net loss of hedgerow*" is not flexible.

48. Developers will soon be legally required to deliver a measurable biodiversity net gain and this obligation alone will be sufficient to boost Stroud District's hedgerow and ecological resource. In addition, there may be circumstances where the specific hedgerow is dying or is in declining condition which warrants removal as part of new development. This paragraph should therefore be removed from the draft policy.

Conclusion

49. CR has land interest at Rooksmoor Mills, North Woodchester, Stroud District. CR has invested heavily in the redevelopment of this previously developed site which has resulted in the delivery of a high quality and successful housing scheme. The committed development includes the delivery of highway upgrades leading on to A46 Bath Road and any development on land to the north of Rooksmoor Mill would benefit from those works.
50. These representations also provide commentary on the draft policies which have the potential to influence the redevelopment of that land. Particular regard has been given to policies where they require greater flexibility in order to ensure that the plan is able to adapt quickly to changing markets. It is clear from the evidence base behind the Pre-submission Draft Local Plan that there is a requirement for older persons provision, live-work development and employment floorspace in the District. Either a single or combination of these uses are considered suitable for delivery on land at Rooksmoor Mill.
51. North Woodchester is an accessible settlement, in close proximity to Stroud which provides a good range of services and facilities. North Woodchester is constrained on all four sides and there are no other previously developed sites within the SDL. Land at Rooksmoor Mill provides the sole opportunity to utilise previously developed land for the provision of new development that may be required to meet the needs of the settlement over the plan period. Accordingly, it is proposed that CR's land at Rooksmoor Mill, which forms the already committed development, as well as the remnant employment land to the north is included within the SDL for North Woodchester. Extending the SDL to include this land will provide the Council with greater certainty over the principle of where new development that is needed to support the settlement of the plan period would be directed, as well as scope for the potential additional land for which may arise as a result of market signals.
52. Going forward, CR is keen to engage in further stages of the Stroud Local Plan Review, including the examination of the plan.

Appendix I – Land at Rooksmoor Mill

