



Historic England

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## Stroud District Local Plan Review Draft Plan November 2019

Dear Sirs

Thank you for providing an opportunity to consider a further iteration of the emerging Local Plan. I note the District Council's response to our previous correspondence; our comments are made within this context and continue to be relevant.

### Proposed Allocations

The Plan has been informed by robust evidence in respect of the historic environment. This considers how proposed allocations might protect the significance of affected heritage assets or indeed enhance them.

The Sustainability Appraisal and SALA Heritage Impact Appraisals highlight a number of contentious proposed allocations<sup>1</sup>. The latter recommends how the impact of development can be minimised, to an acceptable level (we assume), and also how development might enhance those assets, reflecting the expectations of legislation, national policy and guidance.

It will therefore be important for the next (Submission) version of the plan to include those expectations in the body of the document to ensure those policies are clear to all, justified and in accordance with national policy. Those conditions may have an impact on their capacity.

For example, with regard to **Policy PS34** Land west of Renishaws, Kingswood, amongst its recommendations the LP evidence base (SALA Heritage Impact Appraisals (October 2018) ) concludes that *"The impact on the setting and significance of the listed buildings would be likely to preclude built development on some key areas of the site, and constrain the developable area by up to half, in order to protect some key views and to retain a sense of the open rural landscape context of both the mill and the farm."*

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<sup>1</sup> PS05 East of Tobacconist Road, Minchinhampton; PS10 Railway land / car parks, Cheapside, Stroud; PS10 Railway land / car parks, Cheapside, Stroud; PS13 Central river / canal corridor, Stroud; PS13 Central river / canal corridor, Stroud; PS21 Land adjacent to Tilsdown House; PS34 Land west of Renishaws, Kingswood



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With regard to **Policy PS10**, the SALA recommends “*re-use of existing historic buildings and limited opportunities for infill at the eastern extreme of the site (etc)*”.

**Policy G2** Land at Whaddon. The SALA indicates, “*If the whole site were to be developed, the impact on the heritage assets in the area, on their collective setting and their individual significances, would be very damaging*”. How should the Plan and the capacity of the site to accommodate development respond to this? Presently Policy G2 makes no reference to the Grade II\* Listed St Margaret’s Church. It is vital to consider at an early stage the requirements of S66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the weight to be applied to the conservation of the significance of a heritage asset.

### Other matters

Could we request removal of any reference to the historic environment or heritage asset being a “constraint”; a dated reference contrary to the positive emphasis in national policy. The historic environment/ heritage assets should be seen as a positive place shaping matter, an attribute that helps define local identity. It should be considered as a positive characteristic to inform change, not a constraint.

The Sustainability Appraisal emphasises that a significant number of heritage assets within the District are ‘at risk’. How might the Plan positively address such matters to accord with NPPF paragraph 185?

Appendix A and B maps are titled as “*suitable areas for renewable energy*”. Mindful of the caveats/conditions within the related policy it may be helpful to rephrase as “*Potential suitable areas for renewable energy*”.

Sincere regards

