

Our ref: 13954/KJ/SW

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Local Plan Review
The Planning Strategy Team
Stroud District Council
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BY EMAIL: local.plan@stroud.gov.uk

Dear Sir/ Madam

STROUD DISTRICT LOCAL PLAN REVIEW REPRESENTATIONS TO DRAFT LOCAL PLAN FOR CONSULTATION, NOVEMBER 2019

We write in response to the current consultation being undertaken on the Stroud District Draft Local Plan Review, Draft Plan for Consultation November 2019.

Our client, Stroud Corporation NV, owns the Ham Mills site in Thrupp. The 2 hectare site is allocated within the adopted Stroud Local Plan 2015 under Policy SA1c 'Stroud Valleys' for 100 dwellings and employment use. The site is also identified as an existing employment site for regeneration under Policy E12 – Site ER3 Ham Mills. The site is within the Stroud Industrial Heritage Conservation Area.

Planning permission (ref: S.15/1751/FUL) and the associated listed building consent (ref: S.15/1752/LBC) on the site were granted in March 2017 and August 2016 respectively for the '*Restoration of the listed mill building and redevelopment of the site for a mixed use development of 100 new homes, 686 sqm of office (B1) floor space and 283 sqm of flexible floor space (A1/A2/A3/A4/B1/B2/D1/D2), provision of a new pedestrian route across the site and associated access, servicing, parking, amenity space and landscaping.*'

Notwithstanding the planning permissions, the redevelopment of Ham Mills is subject to exceptional constraints and costs due to its former uses, heritage conservation, environment protection, flood risk mitigation, against other conditions. The on-going uncertain economic market has also deferred the delivery of the scheme. The actual implementation of the scheme is therefore taking longer than expected. The regeneration process will go beyond the lifespan of the planning permission, which is due to expire in March 2020 with the Listed Building Consent having already expired in August 2019.

2.5 Draft Core Policy CP2 – Strategic Growth and Development Locations (pages 48, 52)

The Draft Local Plan's development strategy seeks to deliver at least 12,800 additional dwellings, 650 additional care home bedspaces and at least 50 hectares of additional employment land to meet the needs of the District for the period 2020-2040. The draft development strategy seeks to manage growth that is sustainable and proportionate to each settlement's functionality, capacity and character, taking account of each settlement's relative constraints and opportunities.

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For the village of Brimscombe & Thrupp, the draft strategy envisages modest developments to focus on meeting local housing needs and on enhancing or delivering new services and facilities.

RPS welcome this approach and consider that development on sites should be optimised with careful consideration to their context. Ham Mills is an allocated site within the adopted Local Plan. The development circa 100 dwellings at Ham Mill should be considered as allocated growth in the Tier 3a villages of Brimscombe and Thrupp under Core Policy CP2 (Draft Local Plan page 48). The table in page 52 should reflect the national policy guidance on affordable housing requirement in Tier 3a and 3b settlements to be 30% affordable housing on all sites capable of providing 10 or more dwellings, rather than 4 dwellings.

2.63 Local Economy and Jobs (page 39)

The draft employment strategy seeks to deliver new employment together with new housing to create sustainable communities and encourages the regeneration of under-utilised or low value employment sites for other uses, provided this does not undermine key employment sectors.

RPS welcome this approach to optimise development in sustainable locations.

3.0 Making Places – Shaping the future of The Stroud Valley – Draft Site Allocations (page 64)

The Draft Local Plan Review 2020 Key Issues (page 16) acknowledges that the current Local Plan identified Ham Mills as one of several regeneration sites to intensify employment provision and other uses, but the lack of progress on site demonstrates how challenging the delivery of brownfield redevelopment can be.

Ham Mills is allocated within the adopted Local Plan 2015 under Policy SA1c Stroud Valleys for 100 dwellings and employment use, and as an existing employment site for regeneration unit Policy E12 – Site ER3.

The Ham Mills site is currently identified in the Brownfield Land Register 2019 (site ref: BR071) as a deliverable site with planning permission for 100 units. However, the implementation of the scheme and the timescale of delivery is dependent on overcoming the exceptional constraints of the site, associated development costs and the wider economic climate. The retention of listed historical buildings on site is also a significant constraint on its regeneration. In this respect, there may be a requirement for a revised scheme and new planning permission on the site to achieve a deliverable scheme. The site allocation for Ham Mills should therefore adopt a flexible approach to the quantum and types of housing in addition to other uses, to take into account site specific considerations and to maximise the development potential of the site.

We therefore recommend that the Draft Local Plan should retain Ham Mills as an allocated site to ensure the regeneration of the site in the future going beyond 2020, ensuring the opportunity to unlock this important heritage site and create a sustainable mixed-use legacy for the Stroud Valleys as a whole. The regeneration of this site requires a long-term approach and an allocation in the emerging Local Plan would facilitate its delivery going forward.

Therefore, the Ham Mills site should be retained as one of the Draft Site Allocations in Brimscombe & Thrupp as **'Site PS03 Ham Mills, for circa 100 units residential development or similar and a mixture of commercial and other uses, where appropriate. Development should focus on achieving the conservation and adaptation of the historic mill and enhancement of its setting'**. (new text in red and bold)

New Core Policy DCP2 Supporting Older People (page 150)

This new policy support developments which increase the range of available housing options with care and support services in accessible locations, and increase older people's engagement in community life, including through hubs.

RPS welcome this approach to support older people living in the District. RPS recommend that homes for older people, including sheltered, enhanced sheltered, extra care, registered care provision should be recognised as a form of housing in the housing strategy.

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Core Policy CP9 Affordable Housing (page 152)

RPS welcomes that the affordable housing threshold (of those outside the rural parishes and AONB) is to be changed from 4 units to 10 units and 0.5ha to reflect the affordable housing threshold set out in the NPPF paragraph 63.

However, the policy text should clarify that affordable housing is subject to viability and negotiations, to take account of the specific circumstances of individual sites, sites with exceptional development costs, development viability, the availability of public subsidy, or the realisation of other planning objectives which take priority. This is in line with the guideline contained within the NPPF on affordable housing.

Therefore, Draft Core Policy CP9 paragraph 4 should be amended to state that *'In all other areas, sites capable of providing 10 or more dwellings (net), or covering a site area of 0.5 hectares or more, will be required to provide at least 30% affordable housing, **subject to viability.*** (new text in red and bold)

New Delivery Policy DHC3 Live-work development (page155)

This new policy supports live-work development subject to a number of criteria.

RPS welcomes this approach and support for flexible forms of accommodation with employment use.

Delivery Policy E12 Regenerating existing employment sites (page 168)

In the adopted Local Plan Delivery Policy E12 – Site ER3, Ham Mills site is recognised as an existing employment site with opportunity for mixed-use redevelopment including employment-generating uses, subject to viability and site specific circumstances.

As stated above, the adopted Local Plan and the extant planning permission recognise the potential of Ham Mills to create a sustainable mixed-use scheme. Therefore, the Ham Mills site should be retained as a former employment sites suitable for regeneration under Policy E12 for a mixture of commercial use and substantial housing development.

Draft Delivery Policy E12 should therefore include **Site ER3 Ham Mill in Brimscombe & Thrupp** as one of the allocated employment sites for regeneration. (new text in red and bold)

Delivery Policy ES1 Sustainable construction and design (page 181)

This policy requires net-zero carbon within new development unless it can be clearly demonstrated that they are not viable for the development. The policy also requires new development to have an Overheating Risk Assessment, use sustainable sourced materials during construction, provision of internal recycling bins, secured cycle parking and electric vehicle charging points.

RPS welcomes this policy approach to achieve sustainable development. However, RPS recommend that **these standards should be flexible to take account of sites with specific constraints where it is not possible or appropriate to achieve all of the standards.**

New Delivery Policy DES3 Heat Supply (page 183)

This new policy requires a communal low-temperature heating system where viable and development should be designed to allow connection to a local heat network in the future.

The delivery of a communal heating system is subject to site constraints, the availability of connection to a local heat network, and viability. RPS therefore recommend that this policy should allow a greater flexibility in relation to the installation of communal heating system.

Delivery Policy ES4 Water resources, quality and flood risk (page 183)

This policy states that all developments in areas with known surface water flooding issues, appropriate mitigation and construction methods will be required, where appropriate, to include contributions towards upstream rural SuDS projects.

This requirement for upstream rural SuDS projects outside of the development site boundary needs to be tested to be directly related to the development and fairly and reasonably related in scale and kind to the development. We recommend that this reference to contribution to upstream rural SuDS projects be omitted from Policy ES4.

Delivery Policy ES6 Providing for biodiversity and geodiversity (page 186)

This policy states development should provide a net gain in biodiversity and development that would impact on the strategic ecological network causing fragmentation or otherwise prejudice its effectiveness will not be permitted.

RPS recognises the importance of biodiversity enhancement. However, there are development sites where the realisation of other planning objectives which take priority, resulting in a degree of change to the strategic ecological network. RPS therefore recommend that this policy should allow greater flexibility on development of strategic ecological network, where appropriate.

Delivery Policy ES10 Valuing our historic environment and assets (page 188)

This policy now supports proposals which protect and, where appropriate, enhance key views and vistas, especially of locally distinctive landmark features such as mill chimneys.

RPS recognises that mill chimneys can be a locally distinctive landmark features such as the one at Ham Mills. However, the protection and enhancement of these landmark features will depend on site specific circumstances and other site constraints. RPS therefore recommend this policy should allow for greater flexibility on the development of landmark features.

New Delivery Policy DES2 Green Infrastructure (page 190)

This new policy seeks to protect existing green infrastructure, improve access to and connectivity between existing and planned green infrastructure to develop a continuous right of way and greenway network and integrated ecological system/network.

RPS recommends that this policy should allow greater flexibility for the development on green infrastructure to take account site specific circumstances and constraints.

Appendix 2 Parking Standards (page 208 – 209)

The Draft Local Plan seeks to remove the adopted car parking standards and adopt a flexible approach to vehicle parking provision as a matter of negotiation and assessment according to individual circumstances. The draft parking standards seek to introduce a new requirement on electric charging points on all development.

RPS welcome the flexible approach to parking spaces provision as a matter of negotiation. However, the requirement for electric charging points should take account of individual site constraints and subject to viability.

Summary

Our client is committed to deliver the regeneration and renovation of the key heritage assets on the Ham Mills site, bring the site back into active and beneficial use and deliver new sustainable commercial and residential accommodation. Albeit the 2017 planning permission, the implementation and delivery of the scheme is taking longer than expected due to its exceptional constraints and the current uncertain economic market. Therefore, the retention of this site as an allocated site in the Draft Local Plan would facilitate the regeneration of the site in the future going beyond 2020, an opportunity to create a sustainable mixed-use legacy for the site and the Stroud Valleys as a whole.

We trust that the above comments will be taken into account in preparing the Draft Local Plan and we look forward to receiving confirmation of receipt of this letter.

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Yours faithfully,

RPS

**RPS Consulting Services Ltd
On behalf of Stroud Corporation NV**