

Our ref: 2565 [REDACTED]

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Local Plan Review  
The Planning Strategy Team  
Stroud District Council  
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**BY EMAIL ONLY:** [local.plan@stroud.gov.uk](mailto:local.plan@stroud.gov.uk)

Dear Sir/ Madam

## **STROUD DISTRICT LOCAL PLAN REVIEW CONSULTATION MAY 2021 REPRESENTATIONS TO PRE-SUBMISSION DRAFT LOCAL PLAN FOR PUBLICATION**

We write in response to the current consultation being undertaken on the Stroud District Pre-Submission Draft Local Plan Review, May 2021.

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 permission, the redevelopment of Ham Mills is subject to exceptional constraints and costs due to its former uses, heritage conservation, environment protection, flood risk mitigation, amongst other conditions. The on-going uncertain economic market has also deferred the delivery of the scheme. Furthermore, the detailed planning permission expired in March 2020 and the Listed Building Consent expired in August 2019.

Our detailed comments are set out below.

### **Local Economy and Jobs (page 41)**

The Development Strategy for Local Economy and Jobs supports new employment together with new housing to create sustainable communities and to reduce the potential for further out commuting; the Development Strategy also supports the regeneration of under-utilised or low value employment sites for other uses, provided this does not undermine key employment sectors.

RPS welcomes these approaches to optimise mixed use development in sustainable locations. However, it should be noted that on certain previous developed employment sites (such as Ham Mills in the Stroud Industrial Valley), that site constraints such as listed buildings and environmental factors, in addition to prevailing economic conditions, may well result in no employment use or a residential-led scheme with either employment or other appropriate alternative uses.

### **Core Policy CP2 Strategic Growth and Development Locations (page 53)**

Core Policy CP2 seeks to deliver at least 12,600 additional dwellings, and at least 79 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. Core Policy CP2 states local development sites in Brimscombe & Thrupp will deliver 190 units (cumulative total).

RPS welcomes this approach and considers 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 of circa 100 dwellings at Ham Mills should be included as part of the allocated growth in the settlement of Brimscombe and Thrupp under Core Policy CP2. The table on page 53 should therefore be updated **to circa 290 units for local development sites in Brimscombe & Thrupp.** (new text in red and bold)

### **Core Policy CP3 Settlement Hierarchy (pages 56-57)**

Core Policy CP3 states that new development should be located in accordance with the District's settlement hierarchy and the use of previously developed land and buildings within settlements will be given substantial weight. Brimscombe & Thrupp is identified as 'Tier 3a - Accessible Settlements with Local Facilities'. The diagram on page 57 states that site allocations will be at the higher performing and most accessible Tier 3a settlements, with infill and re-development (including housing, employment, live-works, tourism/leisure and community uses) within the Settlement Development Limits. The diagram also states that within Tier 3a and 3b settlements and including on allocated sites, there should be at least 30% affordable housing on all sites capable of providing 4 or more dwellings.

RPS welcomes this approach which supports the redevelopment of previously developed land and buildings within the settlement boundary. However, the diagram on page 57 should be consistent with Core Policy CP9 and the national policy guidance on affordable housing requirement, that the **affordable housing threshold for development in Tier 3a and 3b settlements should be 10 or more dwellings**, rather than 4 dwellings, and **the provision of affordable housing should be subject to negotiation underpinned by viability.** (new text in red and bold).

### **3.0 Making Places – Shaping the future of The Stroud Valleys – Draft Site Allocations (page 75)**

The Draft Local Plan Review 2021 Key Issues (page 13) acknowledges that the current Local Plan identified the Ham Mills site in Thrupp 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 under Policy E12 – Site ER3. Ham Mills 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 account of 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 2021, ensuring the opportunity to unlock this important

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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 Site Allocations in Brimscombe & Thrupp as **'Site PS03 Ham Mills, for circa 100 units of 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 226)

This new policy supports developments which increase the range of available housing options with care and support services in accessible locations, to support older people living in the District.

RPS welcomes this approach to support older people living in the District. RPS recommends 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.

#### **Core Policy CP9 Affordable Housing** (page 229)

This policy states that planning permission will be granted for residential (including extra care) development providing an appropriate density for the site context. In areas outside the designated rural parishes and AONB, 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.

RPS welcomes that the affordable housing threshold (of those areas outside the rural parishes and AONB) is to be changed from 4 to 10 units 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 negotiations underpinned by viability.'** (new text in red and bold)

#### **New Delivery Policy DHC3 Live-work development** (page 236)

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

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

#### **Delivery Policy E12 Regenerating existing employment sites** (page 257)

In the adopted 2015 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 residential-led mixed-use scheme. Therefore, the Ham Mills site should be retained as a former employment site suitable for regeneration under Policy E12 for a mixture of commercial / other appropriate uses and substantial housing development.

Delivery Policy E12 Paragraph 5.23 states that this policy aims to regenerate sites which would otherwise could remain under-used or might potentially be lost entirely to alternative uses, such as housing, to aid the provision of both homes and jobs within the area. Paragraph 5.24 states that *'mixed-use redevelopment will be expected to provide important community and/or regeneration benefits; the development should aim to provide at least*

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*the same employment opportunities as existing when the employment space was previously used, subject to viability and the site specific circumstances. In circumstances of site vacancy over a long time period, an employment densities guide should be used as a basis to model traffic generation related to the last authorised employment uses. An appropriate model shall be agreed with the Council.'*

RPS welcomes the continued allocation of Site ER3 Ham Mills in Brimscombe & Thrupp as one of the allocated employment sites for regeneration in Delivery Policy EI2.

#### **Delivery Policy ES1 Sustainable construction and design (page 279)**

This policy requires net-zero carbon within new development unless it can be clearly demonstrated that this impacts on its viability. 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 applied flexibly 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 283)**

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 a communal heating system.

#### **Delivery Policy ES4 Water Resources, Quality and Flood Risk (page 285)**

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.

The requirement for upstream rural SuDS projects outside of an application 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 request that the [reference to a contribution to an upstream rural SuDS projects be omitted from Policy ES4.](#)

#### **Delivery Policy ES6 Providing for Biodiversity and Geodiversity (page 290)**

This policy states that development should provide a minimum of 10% net gain in biodiversity through enhancement and creation of ecological networks. 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 take priority, RPS therefore recommends that this policy should allow greater flexibility on the development of strategic ecological networks, where appropriate.

#### **Delivery Policy ES10 Valuing Our Historic Environment and Assets (page 297)**

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 feature. However, the protection and enhancement of these landmark features will depend on site specific circumstances and other site constraints. RPS therefore recommends that this policy should allow for greater flexibility on the development of landmark features.

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**New Delivery Policy DES2 Green Infrastructure** (page 301)

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 systems and networks.

RPS recommends that this policy should recognise the site-specific circumstances and constraints when considering the development of green infrastructure at development sites.

**Appendix C Parking Standards** (pages 322 – 324)

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 welcomes the flexible approach to vehicle parking provision as a matter of negotiation.

**Summary**

Our client is committed to deliver the regeneration and renovation of the key heritage assets on the Ham Mills site, to bring the site back into active and beneficial use and deliver new sustainable residential and commercial accommodation. Notwithstanding 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 provide certainty and facilitate the regeneration of the site in the future going beyond 2021, 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.

Yours faithfully,

RPS

**RPS Group**  
**On behalf of Stroud Corporation NV**

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