



STROUD DISTRICT LOCAL PLAN REVIEW

Written Statement – February 2023

In response to the Matters, Issues and Questions for the Examination in Public, Matter 6b

On behalf of K. Yateman and Sons

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- 1.4 The lawful uses on our clients land includes both commercial as well as residential properties in the Counting House. The surrounding land uses consists of a mixture of industrial/commercial uses but which becomes increasingly residential as you move out from the site.

- 1.5 The current allocation, and proposed re-allocation is linked with the wider restoration of the Cotswold Canal, which in combination with the re-development of Brimscombe Port and this site will completely regenerate the area for both residential development and other mixed uses including tourism and employment.

2.0 Question 17 of Matter 6b

2.1 Question 17 of Matter 6b asks:

The site is allocated for 40 dwellings, employment uses and associated community and open space uses and enabling infrastructure.

a) What type and scale of employment use is proposed?

Response: In recent discussions with the Council at pre-application stage, 1 commercial unit and 2 mixed use buildings were proposed. The commercial/mixed use units are likely to be Class E uses or other commercial type uses that are compatible with the new residential on the site.

2.2 **b) What type and level of community and open space uses and enabling infrastructure would be required or are these covered by other policies?**

Response: During work undertaken to inform pre-application discussions on our clients land, it was identified that a new access off the A419 would be needed. The site layout and other uses would need to be informed by a detailed Flood Risk Assessment at application stage. It was not proposed as part of the pre-application discussion to include community facilities within our clients land. We understand new community facilities are proposed as part of the Brimbscombe Port development.

c) Are the requirements to restore the mill pond and create a new or improved access from Brimbscombe Hill/A419 justified and viable?

Response: As mentioned under part b, a new access from A419 is needed, and our client considers this would be viable as part of works to bring forward development on this site following consultation with a Transport Consultant and Gloucestershire

County Council Highways team. An ecologist has also been engaged as part of the pre-application work and their findings identified that restoring the mill pond would be viable. Both suggested works are being proposed within our clients plans for the development of the site.

2.3 **d) Which heritage assets need to be conserved and enhanced and is the wording in the policy consistent with national policy?**

Response: Through the pre-application discussions with the Council, the heritage officer identified buildings they would prefer to see retained, which the future planning application would seek to include as part of any scheme coming forward to re-develop this site. It was felt that existing buildings on the site make a positive contribution to the setting of the Industrial Heritage Conservation Area, especially the Counting House, which would be preserved for its heritage merit.

2.4 **e) The policy states that 'local biodiversity' issues need to be addressed for this site. A list of ecological issues has been provided by the Gloucestershire Wildlife Trust, who also advise that the allocation contains part of the River Frome Local Wildlife Site. Why have these specific issues not been included in the policy or supporting text and should they be, for effectiveness?**

Response: We are aware of the biodiversity constraints of this site. As part of the pre-application work, an ecologist was commissioned to ensure that issues identified on-site can be addressed in an appropriate way at application stage. Detailed surveys, as identified through the pre-application are being commissioned to inform a future planning application.

- 2.5 **f) As design and flooding are covered by other policies is it necessary for these issues to be duplicated in this policy? Are there any specific site reasons for this?**

Response: This is a matter for the Council to consider. However, we do recognize the constraint of the site being located partially within the flood zone, and intend for a detailed flood risk assessment to be undertaken to inform site layout and design and to accompany a planning application in the future. As such we would like to see the wording of the policy changed regarding the potential residential capacity of this site to allow some flexibility, as this will need to be informed by the flood risk assessment. We would suggest the wording be changed to:

“Land at Brimscombe Mill, as identified on the policies map, is allocated for a development of approximately 40 dwellings and employment uses...”

- 2.6 **g) The supporting text to the policy at paragraph 3.1.6 of the Plan sets out specific restrictions for the site’s development relating to the adjoining Cotswold Canal and a flood risk assessment, by these are not set out in the policy. What are the reasons for this and are the restrictions justified? What impact does this have (if any) on the viability and deliverability of the site?**

- h) We understand this is a previously allocated site. Why has it not been successfully developed and do those same reasons exist now?**

Response: In response to both parts g and h of the question. The Cotswold Canal restoration project has not yet reached as far as this site, and therefore in order to achieve a sustainable development aligned with wider projects such as the restoration of the canal and proposed re-development of Brimscombe Port, the site has not yet been developed. Furthermore, planning applications on the neighbouring

site which have recently been decided have had an impact on the ability to develop this site. However, now that those applications have been decided, this is no longer a barrier. Our clients remain committed to this site coming forward, having undertaken a significant amount of technical feasibility work and formal pre-application discussions with the Council in early 2022. They also have been in constant dialogue with the owners of the land which forms part of the wider allocation site with a view to bringing the site forward as soon as possible. Current work includes working towards pre-application discussions with the Environment Agency, and work towards a second pre-application with the Council.

3.0 Summary and Conclusion

- 3.1 In conclusion, our client remains committed to the redevelopment of this site, having engaged positively with the Council through pre-application discussions and considers that the delivery of this site is achievable.
- 3.2 We are aware of the constraints on this site and aim to work with the Council to identify appropriate resolutions in order to avoid issues with flooding, heritage and ecology.
- 3.3 In response to the Inspectors questions, we have suggested a minor amendment to the allocation of this site, in order that any future application proposal can be guided by a detailed flood risk assessment, which will inform the residential capacity which could be increased or decreased slightly depending on the flood modelling work.
- 3.4 We have confirmed to the Programme Officer that we would like to attend the Hearing session regarding this matter and will be happy to answer any further questions the Inspectors may have about the site.

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