

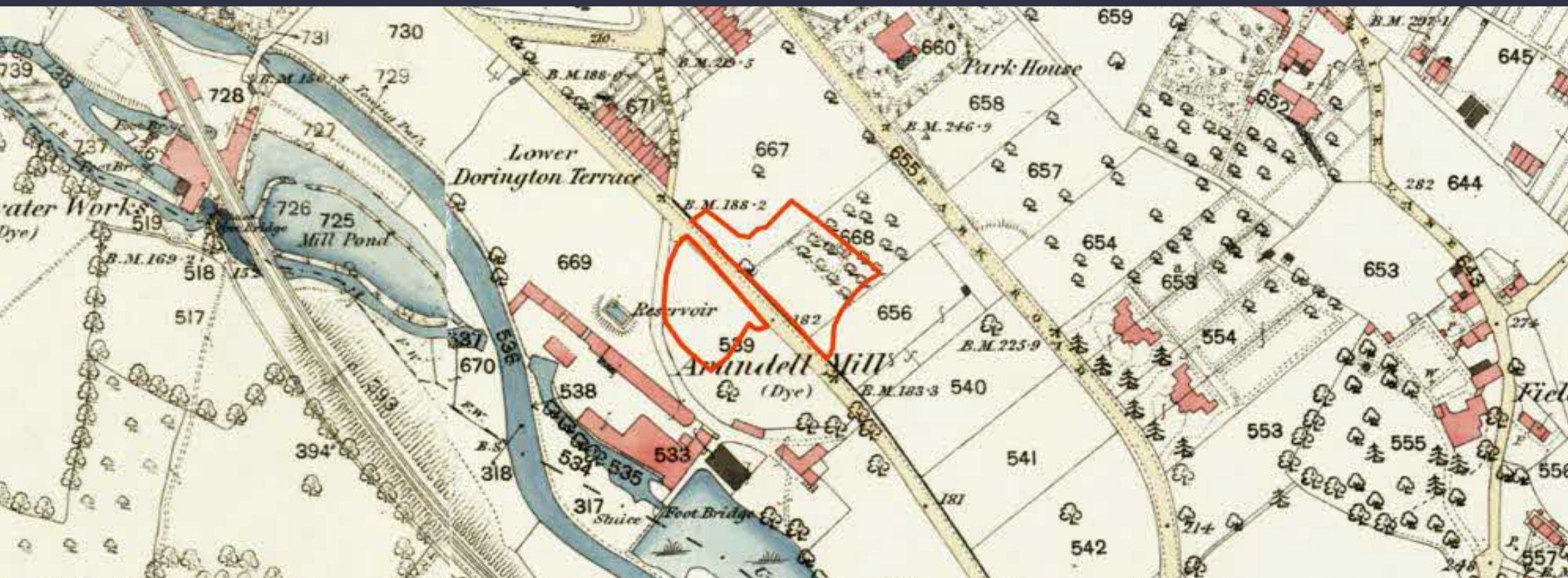
Built Heritage Statement

Former Ford Stroud Motors, London Road, Stroud, GL5 2AX

On behalf of Altus Homes.

Date: 29/04/2024 | Pegasus Ref: P23-1266

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NPPF, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.

16. As required by paragraph 200 of the *NPPF*, the detail and assessment in this Report is considered to be "*proportionate to the assets' importance*".²

Pre- application Advice

- 1.7. Pre- application advice was received from Stroud District Council on 2nd November 2023. While the Conservation Officer had no objection in principle to development on the Site, the following comments were made with regard to the pre- application scheme:

The Site is viewed in conjunction with the Industrial Heritage Conservation Area (IHCA) in short- to long-range views, alongside the Top of Town Conservation Area and Town Centre Conservation in long- range views.

The Site is located at a pivotal point along London Road with views of the surrounding landscape readily seen to the south and east. These wider views are an important consideration in contributing towards the understanding and appreciation of the conservation areas and their context.

The Site is located at a key gateway to the town, with westerly views of Lower Dorrington Terrace, a key Victorian roadside development, and the foot of

Spring Lane, a historic packhorse trail which ran from Lower Street at the top of town to Arundell Mill.

The former servicing garage to the southern parcel is of interest. Stroud lacks Art Deco buildings and this is one of the notable ones amongst the few that are present. It also forms something of a landmark. The building is nearly 100 years old and due to its unusual nature can be considered a non- designated heritage asset. Its loss should not therefore be taken as read.

The proposals to the northern parcel were raised as a concern due to their design and scale, while the roadside building line was identified as ambiguous and requiring further consideration.

Concerns regarding the design and scale of the proposals to the southern site were also raised, and were identified as taking reference from less successful examples of late 20th- century development in the surrounding vicinity rather than the wider context, including the surrounding heritage assets. The design to the rear of the buildings were identified as key given their prominence in long- range views to the south.

- 1.8. It should be noted that the pre- application request was submitted at an early stage of the design process and included limited information regarding detailed design, instead focusing upon the principle of development. The proposals have therefore been developed further and have been informed by the advice received during the

² DLUHC, *NPPF*, para. 200.



pre- application process. A summary of the adopted design approach with respect to the surrounding heritage context is provided at **Section 7**.

2. Proposed Development

2.1. Full planning permission is sought for the demolition of all existing buildings and redevelopment of the Site for residential use, alongside access, parking, landscaping and associated infrastructure.

2.2. The description of development is as follows:

“Demolition of existing car dealership garage and the redevelopment of the site for residential use, along with access, parking, landscaping and associated infrastructure.”

2.3. The proposed works comprise:

Construction of 35no. dwellings, comprising 9no. houses, 9no. maisonettes and 17no. apartments;

Creation of two vehicular access points, from London Road (northern parcel) and Arundell Mill Lane (southern parcel), with surface car parking to the rear of the proposed buildings; and

Soft and hard landscaping, including private gardens to the houses, shared courtyard amenity spaces to the apartments and maisonettes, and additional landscaped areas adjacent to the site boundaries.

2.4. A copy of the Proposed Site Layout Plan is provided at Plate 2.



Plate 2: Proposed Site Plan.

2.5. **Section 7** of this Report presents an analysis of the impact of the proposed development on identified heritage assets discussed in **Section 6**.

3. Methodology

3.1. The aims of this Report are to assess the significance of the heritage resource within and surrounding the Site, to assess any contribution that the Site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant. This assessment considers built heritage only.

Sources

3.2. The following key sources have been consulted as part of this assessment:

The National Heritage List for England for information on designated heritage assets;

The Gloucestershire County Council Historic Environment Record (HER) for information on the recorded heritage resource and previous archaeological works;

Historic maps and documentary sources held by the Gloucestershire Archives;

Aerial photographs available online via Historic England's Aerial Photo Explorer and Britain from Above;

Old photographs accessible via the Historic England Architectural Red Box Collection;

Other archival information, including historic maps, as available via online sources;

Planning history records held by Stroud District Council; and

Other online resources including Ordnance Survey Open Source data; geological data from the British Geological Survey and Cranfield Soil and Agrifood Institute; and Google Earth satellite imagery.

Site Visit

3.3. A site visit was undertaken by a Heritage Consultant from Pegasus Group on 8th January 2024, during which the Site and its surrounds were assessed.

Photographs

3.4. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the site or development proposals nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption.

Assessment Methodology

- 3.5. Full details of the assessment methodology used in the preparation of this Report are provided within **Appendix 7** However, for clarity, this methodology has been informed by the following:

*Historic Environment Good Practice Advice in Planning: 2 - Managing Significance in Decision-Taking in the Historic Environment (hereafter GPA:2);*³

Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) - The Setting of Heritage Assets, the key guidance of assessing setting (hereafter GPA:3);⁴

Historic England Advice Note 1 (Second Edition) - Conservation Area Appraisal, Designation and Management (hereafter HEAN:1);⁵

Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets (hereafter HEAN:12);⁶ and

*Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment.*⁷

Consideration of Harm

- 3.6. It is important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "substantial harm" or "less than substantial harm" to the identified designated heritage assets, in the context of paragraphs 207 and 208 of the NPPF.⁸ With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 209 of the NPPF.⁹
- 3.7. The PPG clarifies that within each category of harm ("less than substantial" or "substantial"), the extent of the harm may vary and should be clearly articulated.¹⁰
- 3.8. The guidance set out within the PPG also clarifies that "substantial harm" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development which is to be assessed.¹¹ In

³ Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment (GPA:2)* (2nd edition, Swindon, July 2015).

⁴ Historic England, *Historic Environment Good Practice Advice in Planning Note 3 - The Setting of Heritage Assets (GPA:3)* (2nd edition, Swindon, December 2017).

⁵ Historic England, *Historic England Advice Note 1 - Conservation Area Appraisal, Designation and Management (HEAN:1)* (2nd edition, Swindon, February 2019).

⁶ Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets (HEAN:12)* (Swindon, October 2019).

⁷ English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

⁸ DLUHC, *NPPF*, paras. 207 and 208.

⁹ DLUHC, *NPPF*, para. 209.

¹⁰ DLUHC, *Planning Practice Guidance (PPG)*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

¹¹ DLUHC, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).



addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would:

*"..have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced."*¹²

¹² EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council.

4. Site Description and Planning History

Site Description

- 4.1. The Site extends to an area of c.0.44 hectares and comprises two parcels of land separated by the A419 (London Road). It lies approximately 800m to the south-east of Stroud Town Centre.
- 4.2. The northern parcel is occupied by a disused car sales showroom (the former Ford Stroud Motors) with brick and tarmac forecourt to the south and tarmac car park to the north. The showroom comprises a modern, single-storey, flat-roofed building which has been boarded up following cessation of the car sales operation in 2023.
- 4.3. The southern boundary of the northern parcel is defined by a low concrete block wall, while a mixture of low walls, fences and mature vegetation define the remaining boundaries. The northern parcel is accessed directly from London Road to the south-east and south-west, with metal security gates installed to prevent unauthorised use of the forecourt. The south-eastern access, which also provides access to the rear car park, is understood to be shared with Deben House to the north.
- 4.4. The southern parcel was operated as the servicing centre associated with Ford Stroud Motors and is occupied by a part one-, part two- storey former servicing garage with Art Deco- style rendered principal façade. The wider plot comprises low- quality tarmac hardstanding previously used for car parking associated with the garage. The northern boundary treatment comprises a low rendered concrete block wall which sits above the principal façade at street level and a low wooden fence, while the

remaining boundaries are defined by fences and mature vegetation. Access is again provided directly from London Road to the north-eastern corner of the parcel.

- 4.5. Both parcels slope downwards from north to south, following the topography of the valley side, with the building so the southern parcel sitting approximately 3m below street level.



Plate 3: Northern parcel as viewed from London Road to the south.



Plate 4: Southern parcel as viewed from London Road to the south-east.

Site Development

4.6. Stroud lies at the confluence of five valleys formed by the River Frome and its tributaries. Although the most ancient habitations were at the manors of Over and Nether Lypiatt and at Paganhill, the parish took its name from the settlement which grew up by the Frome in an outlying part of Over Lypiatt which lay at the centre of important communication routes. The settlement was first recorded in 1221 as *'la Strode'*, believed to refer to a piece of marshy ground at the confluence of the Frome and the Slad brook. By 1248 the settlement at Stroud was accorded the status of a vill and by 1279 it had a church which became the ecclesiastical centre of the parish in 1304. A total of ten houses were recorded at Stroud in 1477.

4.7. From the 16th century onwards, the town developed rapidly with the late 17th century being a particular time of growth. The production of woollen cloth centred on the mills along the streams was by then the dominant industry of the parish, but Stroud town also became the commercial and social centre for the wider cloth-producing region of the surrounding valleys. Improved road communications and the canals, which linked Stroud to the Severn in 1779 and to the Thames in 1789, stimulated the growth of the town into the early 19th century, and the arrival of the railways in 1845 catalysed further development. During the 19th century the town roughly doubled in extent and its position as the focus of an important industrial region was recognized in 1832 when it was made the centre of a parliamentary borough.

4.8. By the end of the 19th century the Stroud Valleys cloth industry was in terminal decline, having lost its dominance to competition from Yorkshire. However, adaptation of the disused mills to a variety of light industrial purposes maintained growth during the 20th century.

4.9. At its peak, there were 14 mills, roughly one every 300m, along the stretch of the River Frome in Stroud. One of these was Arundell Mill, named after the Arundell family who owned it from at least 1557 until 1830 (albeit there is believed to have been a mill on the site as early as the 14th century). A millpond was constructed in the 1790s – 1800s. Further detail regarding Arundell Mill is provided at **Section 6** below.

4.10. Arundell Mill is recorded directly to the south and west of the southern parcel in the earliest detailed cartographic representation of the Site dating to 1835 (Plate 5). The northern extent of the present-day Arundell Mill Lane had

been established to the north and west, and is understood to have historically formed part of the Spring Lane packhorse trail which ran down the valley side from Lower Street to Arundell Mill. The alignment of the present-day London Road, then labelled as *'Chatford Road'*, bisected the northern and southern parcels, the latter of which formed part of a rectangular undeveloped plot at this time.



Plate 5: Extract from Enclosure Map of 1835, with approximate site boundary outlined in red.

4.11. Both parcels remained largely undeveloped by the time of the 1st Edition Ordnance Survey Map of 1885 (Plate 6, albeit an area of orchard with a small building was present to the north-western section of the northern parcel. Arundell Mill continued to be recorded adjacent to the southern parcel.

4.12. The historic route of London Road bisected the two parcels, while the surrounding previously agricultural area appears to have been laid out as formal rectangular plots, including that of Surrey Lodge. The urban area of Stroud had extended towards the Site, while the extant terraced houses along London Road and Park Road, labelled as *'Lower Dorington Terrace'* and *'Upper Dorington Terrace'*, lay to the north-west. Bowbridge remained a separate settlement to the south of Stroud at this time, while the land along the canal and river corridor was characterised by industrial sites, predominantly dye works and woollen mills.

4.13. By 1902, the northern parcel fell within the grounds of a large, detached villa labelled *'Surrey Lodge'*, with three additional small buildings to its north-western extent (Plate 7). The area of orchard appears to have been removed to allow construction of the dwelling. Both land parcels and the surrounding vicinity remained unaltered by 1923 (Plate 8).

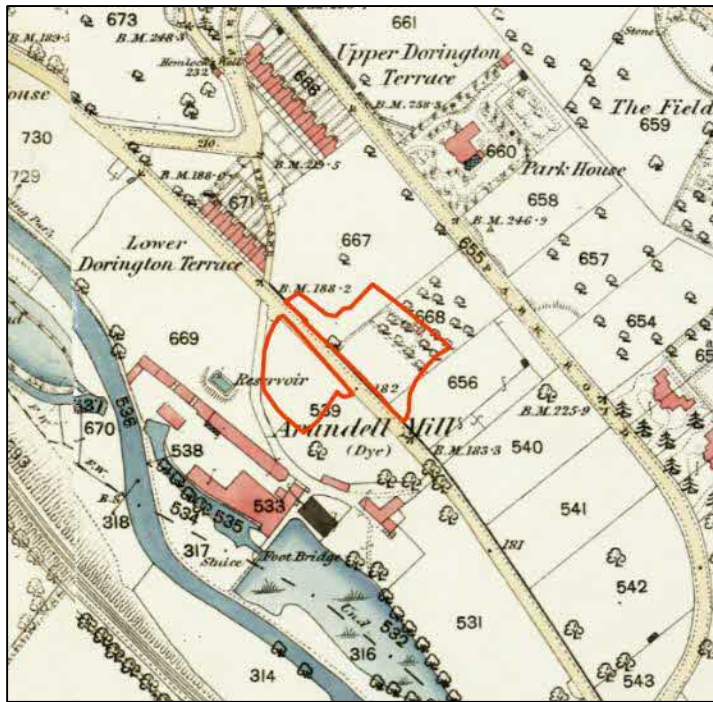


Plate 6: Extract from 1st Edition Ordnance Survey Map of 1885, with approximate site boundary outlined in red.

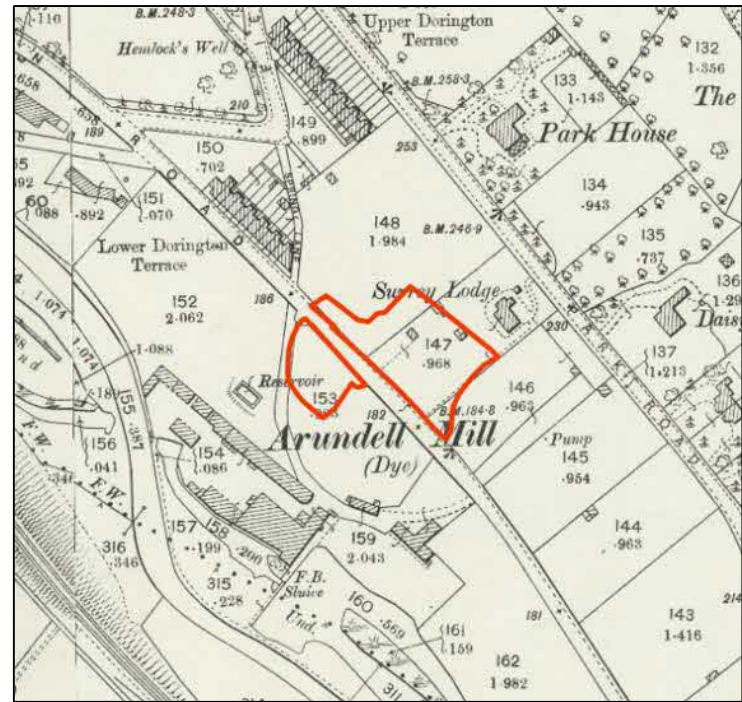


Plate 7: Extract from 2nd Edition Ordnance Survey Map of 1902, with approximate site boundary outlined in red.

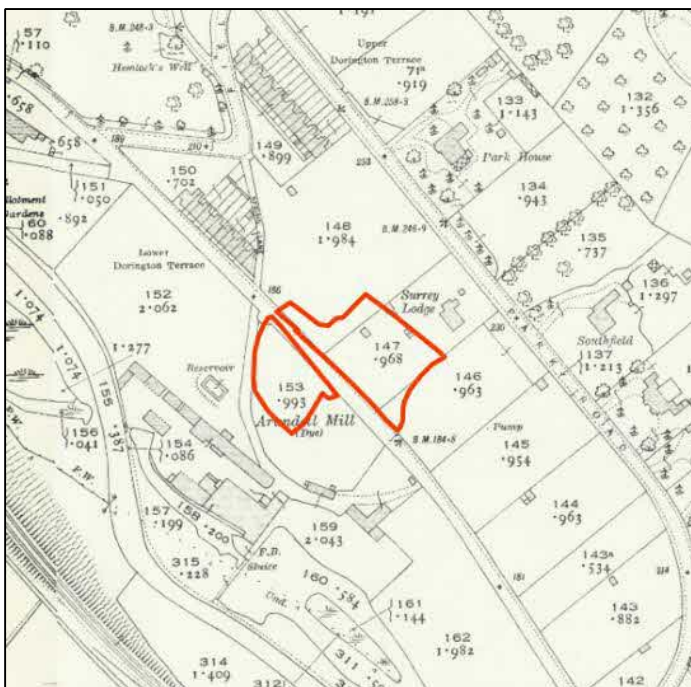


Plate 8: Extract from 3rd Edition Ordnance Survey Map of 1923, with approximate site boundary outlined in red.

4.14. The southern parcel remained undeveloped by 1938 (Plate 9), with Arundell Mill continuing to be recorded to the south. An area to the south of the northern parcel also appears to have been separated from the larger curtilage of Surrey Lodge, now labelled under its extant name of 'Deben House', albeit it remained associated with the property. The access to Deben House from London Road was also recorded. The southerly expansion of Stroud and northerly expansion of Bowbridge had resulted in convergence of the two settlements by this time.

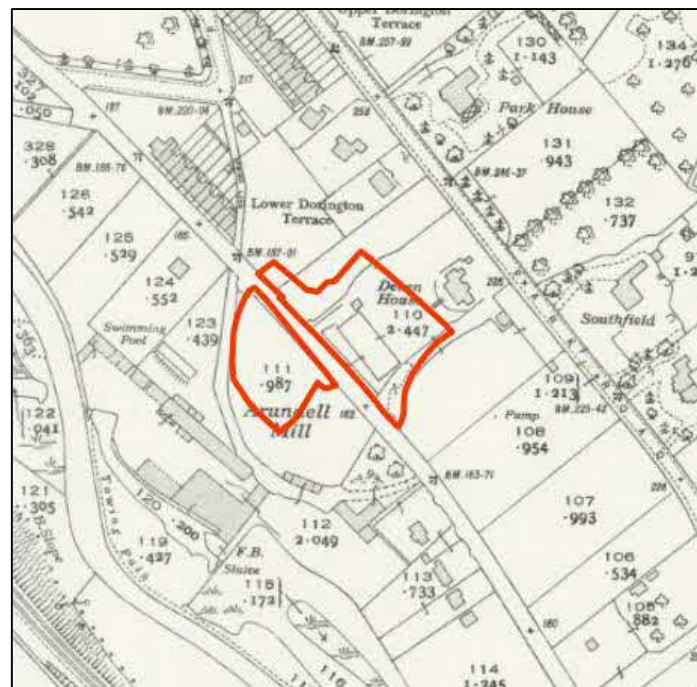


Plate 9: Extract from Ordnance Survey Map of 1938, with approximate site boundary outlined in red.

4.15. An aerial image captured in 1946 shows a building present to the southern parcel which appears to represent the core of the extant former servicing garage (Plate 10). The additional boundaries recorded in the 1938 map are discernible within the southern parcel, while the east and west boundaries of the garden to Deben House (within the northern parcel) were defined by mature trees. A wall also appears to separate the plot from London Road to the south.

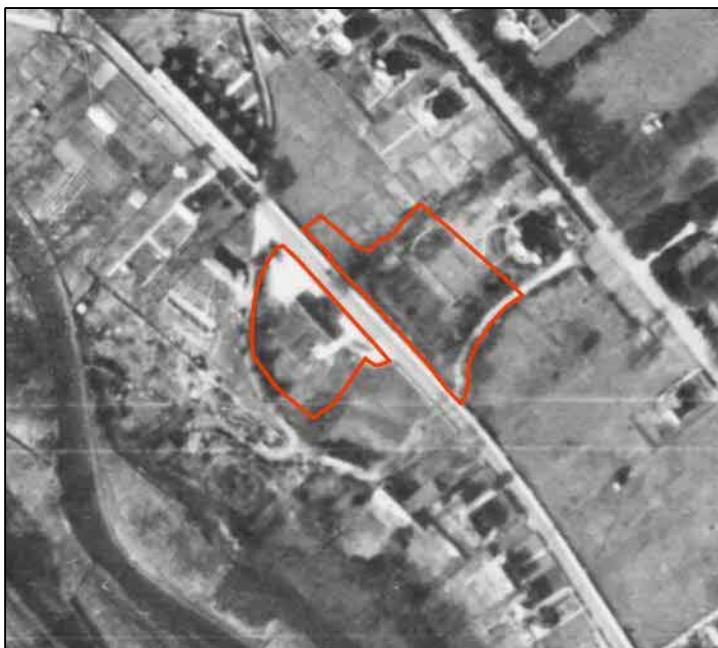


Plate 10: Extract from aerial photograph captured in 1946, with approximate site boundary outlined in red.¹³

- 4.16. By 1954 Arundell Mill was no longer recorded and the associated buildings had largely been removed (Plate 11). This is understood to have occurred following requisitioning of the mill house by the RAF during the Second World War.
- 4.17. The northern parcel continued to fall within the grounds of Deben House, while the wider area was largely

characterised by detached residential dwellings set within large plots.

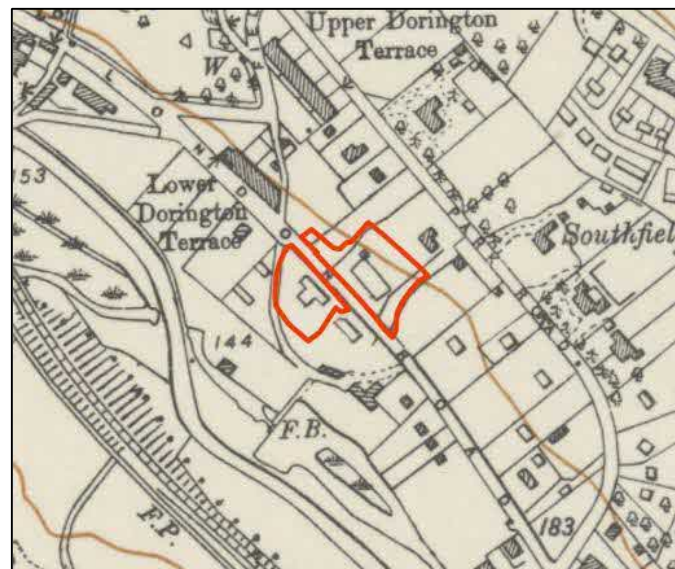


Plate 11: Extract from Ordnance Survey Map of 1954, with approximate site boundary outlined in red.

- 4.18. By the 1970s the buildings within both land parcels were labelled as 'Garage' (Ordnance Survey map not reproduced due to copyright restrictions). The northern parcel was now separated from Deben House to the north, with the two extant access points and forecourt present. The present-day layout of the southern parcel had also been established. The surrounding area remained largely unaltered, characterised by detached houses within large private plots, while a Coal Yard was

¹³ Historic England: RAF/3G/TUD/UK/102.

present to the south of the southern parcel at the location of the demolished Arundell Mill buildings.

- 4.19. Aerial images captured at the end of the 20th century confirm that the northern parcel was occupied by a larger degree of built form than existing, with historic Google Street View photographs confirming that this represented a former petrol station forecourt and canopy (Plate 12). The existing residential area to the north-west and west of the southern parcel was under construction at this time, while the terraced properties at Bishop's Close were present to the south.



Plate 12: Extract from aerial photograph captured in 1999, with approximate site boundary outlined in red.

- 4.20. Aerial images confirm that the petrol station canopy and forecourt to the northern parcel were removed between 2014 and 2017, with its extant layout established at this

time. The southern parcel and its immediate environs remained unchanged following construction of the residential area at Arundell Mill Lane (Plate 13).

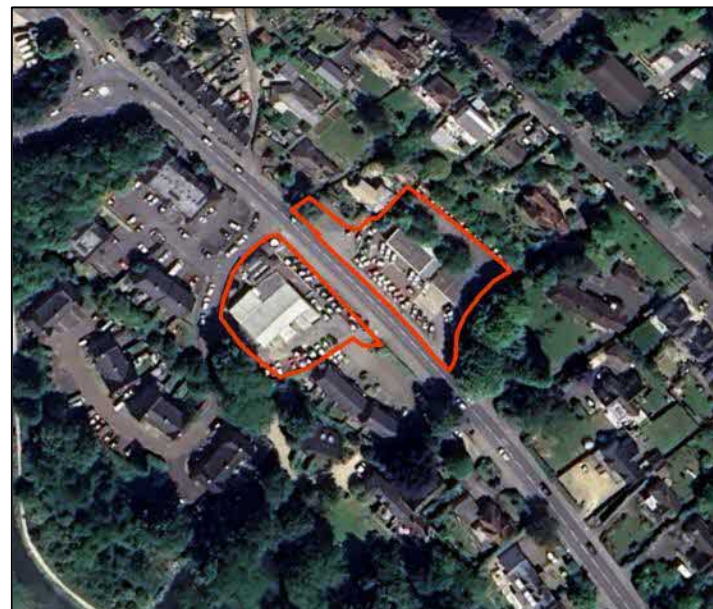


Plate 13: Extract from aerial photograph captured in 2024, with approximate site boundary outlined in red.

Planning History

- 4.21. A review of Stroud District Council's planning register has identified the following relevant planning history relating to the Site:
- 4.22. **S.15/2570 /FU L** | Full planning application for the demolition of petrol filling station canopy, refurbished fascia to existing building and installation of replacement window. | Planning Permission granted 19th January 2016.
- 4.23. **S.05/0262/ADV** | Advertisement Consent application for the erection of partly illuminated signage. (Resubmission following Refusal S.04/2317/ADV). | Advertisement Consent granted 24th March 2005.
- 4.24. **S.04/2317/ADV** | Advertisement Consent application for the erection signage. | Advertisement Consent refused 22nd December 2004.

5. Policy Framework

Legislation

- 5.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.¹⁴
- 5.2. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.¹⁵
- 5.3. Full details of the relevant legislation are provided in **Appendix 2**.

National Planning Policy Guidance

- 5.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework* (NPPF), an updated version of which was published in December 2023. The NPPF is also supplemented by the national *Planning Policy Guidance* (PPG) which comprises a full and consolidated review of planning practice guidance

documents to be read alongside the NPPF and which contains a section related to the Historic Environment.¹⁶ The *PPG* also contains the *National Design Guide*.¹⁷

- 5.5. Full details of the relevant national policy guidance is provided within **Appendix 3**.

The Development Plan

- 5.6. Applications for Planning Permission within the District are currently considered against the policy and guidance set out within the Stroud District Local Plan (adopted November 2015).
- 5.7. The draft new Stroud District Local Plan was submitted for Examination in October 2021, with the Hearings held in Spring 2023. The Inspectors wrote to the Council in August 2023 setting out three specific areas of concern regarding soundness. The Council is in the process of addressing these concerns. Given the advanced stage of preparation, the draft policies included within the emerging Local Plan may be given limited weight in the determination of planning applications within the District.
- 5.8. Details of the policy specific relevant to the application proposals are provided within **Appendix 4**.

¹⁴ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

¹⁵ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

¹⁶ Department for Levelling Up, Housing and Communities (DLUHC), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23rd July 2019),

<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

¹⁷ Department for Levelling Up, Housing and Communities (DLUHC), *National Design Guide* (London, January 2021).

6. The Historic Environment

- 6.1. This section provides a review of the recorded heritage resource within and surrounding the Site. As outlined at **Section 1** the former Ford Stroud Motors servicing garage within the southern parcel is regarded by Stroud District Council as a potential non-designated heritage asset. The Site is not located within the boundaries of a Conservation Area or any other area of heritage designation.
- 6.2. With regard to additional heritage assets in the vicinity of the Site, Step 1 of the methodology recommended by the Historic England guidance *GPA 3: The Setting of Heritage Assets* is to identify which designated heritage assets might be affected by the works.
- 6.3. Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.
- 6.4. Consideration was therefore made as to whether any heritage assets with the surrounding area may include the Site as part of their setting which contributes to their overall heritage significance, and thus may potentially be affected by the works.
- 6.5. This assessment has concluded that the heritage assets which have the potential to be sensitive to the proposed development comprise:
- The Stroud Industrial Heritage Conservation Area, which extends to the north, west and south, c.5m from the southern site and c.10m from the northern site at its closest point; and
 - Grade II Listed Arundell Mill and Arundell Mill Cottage (NHLE ref. 1239617), c.55m and c.65m to the south-east of the northern and southern parcels, respectively.
- 6.6. All other heritage assets within a 500m radius of the Site have been excluded from further assessment on the basis of distance and lack of intervisibility with the Site, as confirmed during the site walkover. Should any intervisibility exist, this would be at most heavily glimpsed, wholly incidental and viewed within the context of the existing varied urban character of both London Road and the intervening townscape. Furthermore, no known historic or functional relationship with the Site has been identified. Taken together, it is considered that the proposed development would not alter any aspect of the setting of these assets and will therefore result in no harm to any elements that contribute towards their significance. This includes the Stroud Top of Town and Town Centre Conservation Areas, with which only extremely long-range, heavily filtered intervisibility and co-visibility is possible. Any such intervisibility and co-visibility relates to the rooflines of the existing buildings, at the very most, which are viewed within the context of the surrounding built form within Stroud's urban fringe.
- 6.7. A map of all designated heritage assets within a 500m radius of the Site is included at **Appendix 5**.

Former Ford Stroud Motors Servicing Garage

6.8. As discussed at *Section 4*, the southern parcel is occupied by a disused servicing garage associated with the former Ford Stroud Motors which, on the basis of historic cartographic analysis, was constructed between 1938 and 1946 with later alterations and additions.

Illustrated Description

6.9. The former Ford Stroud Motors servicing garage occupies a rectangular footprint and comprises a part one- part two- storey building constructed of concrete blocks with corrugated sheet- metal covered gable roof to the core wing, alongside a mixture of gabled and flat roofs also with corrugated sheet- metal covering to the abutting wings.

6.10. The principal northern façade is rendered and has a restrained geometric Art Deco form with stepped and coped raised parapet. The northern extent of the east and west return elevations are also rendered, while the remaining areas are of painted or bare brick. A painted sign with the word 'GARAGE' set within a white banner is present to the exposed brick of the core wing's rear elevation, albeit the white paint is heavily faded. Dwarf buttresses are also present to the south elevation of the core wing, likely to provide support against the sloping topography of the valley side.

6.11. Later additions are present to the north, east and west elevations and comprise various concrete block elements and metal- framed canopies. Modern fascia boards associated with the building's former use remain present, alongside plastic rainwater goods and modern electrical

fittings. Concrete ramps to the east and south elevations provide vehicular access to the building.

6.12. Window and door openings across all elevations are characterised by a mixture of steel and concrete lintels. Possibly original metal- framed Crittall- style windows, albeit with heavily deteriorated frames and missing glazing panes, are present to the south elevation of the core wing, alongside a further painted- over Crittall- style window to the southern extent of the east elevation. The windows to the south elevation of the abutting western wing are modern. All other openings have been fitted with fibreboard to prevent trespassing.

6.13. Internally the walls are rendered while the floor is of exposed concrete. The steel trusses of the gable roof are also exposed, while modern electrical and services equipment has been fitted throughout. The only possible surviving original features are two sets of deteriorated timber and glazed folding doors to the north and west elevations.

6.14. The wider plot comprises low- quality tarmac and concrete hardstanding previously used for car parking associated with the garage. The northern boundary treatment comprises a low rendered concrete block wall which sits above the principal façade at street level and a low wooden fence, while the remaining boundaries are defined by fences and mature vegetation.

6.15. The plot slopes downwards from north to south, following the topography of the valley side, with only the upper extent of the building experienced at street level.

6.16. Photographs of the existing building are included at Plate 14 to Plate 27, below.



Plate 14: Principal north elevation as viewed from the north.



Plate 16: East (right) and south (left) elevations as viewed from the south.



Plate 15: East elevation as viewed from the south-east.



Plate 17: South elevation as viewed from the south-west.



Plate 18: South elevation as viewed from Arundell Mill Lane to the south-west.



Plate 19: West elevation as viewed from junction between London Road and Arundell Mill Lane to the north-west.

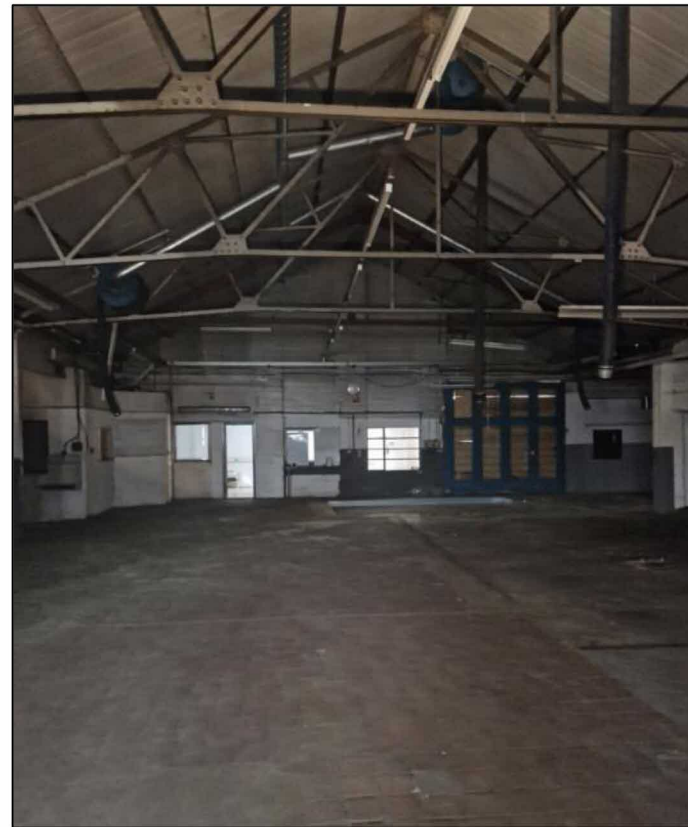


Plate 20: Interior looking north.

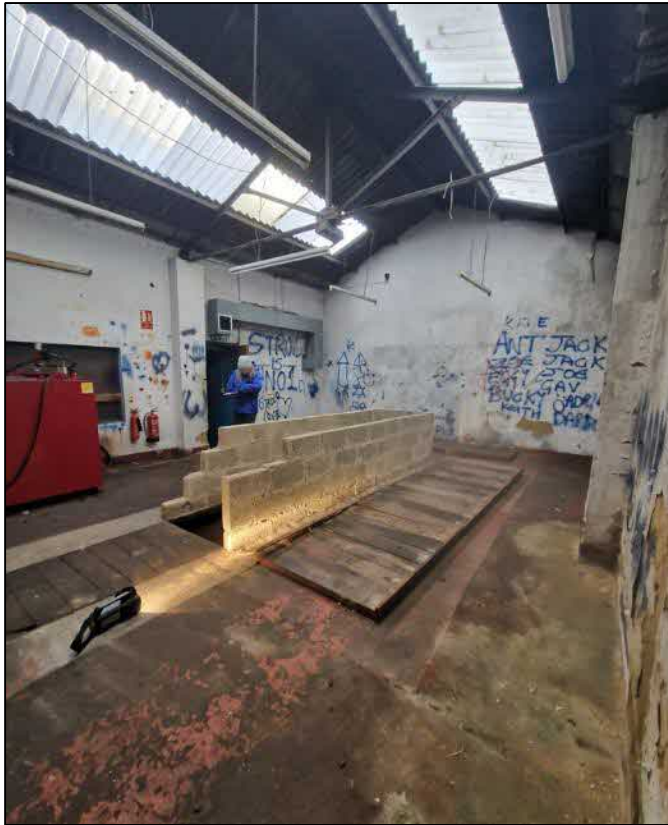


Plate 21: Interior to western wing.

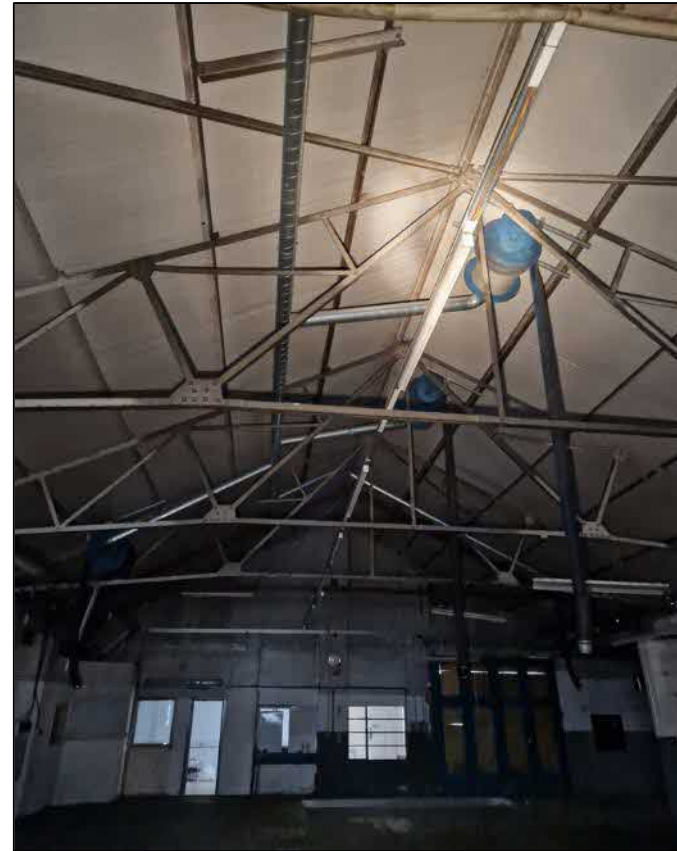


Plate 22: Exposed steel truss roof.



Plate 23: Timber and glazed folding doors to west elevation.



Plate 25: View looking north across tarmac hardstanding to the eastern section of the plot.



Plate 24: View looking south-east along northern boundary.



Plate 26: View looking north-west across tarmac hardstanding to southern section of the plot.



Plate 27: View looking north-east along western boundary of plot.

Statement of Significance

- 6.17. As noted above, the former Ford Stroud Motors servicing garage is not statutorily or locally listed, however it has been identified by Stroud District Council as a potential non-designated heritage asset.
- 6.18. On the basis of the information set out within this Section, an independent assessment of the heritage significance of the building is provided below. This assessment has been informed by the general principles of selection for Listed Buildings, as set out in the Department for Digital, Culture, Media & Sport's (DCMS) 'Principles of Selection for Listed Buildings' and Historic England's '*Industrial Buildings Listing Selection Guide*', since these documents provide useful benchmarks for evaluating significance.

- 6.19. As a mid-20th century purpose-built motor servicing garage, the building is one of a large number of similar structures constructed both locally and nationally. It is not therefore immediately of an age or rarity to warrant preservation, and selectivity is essential.
- 6.20. While the geometric Art Deco form of the principal façade has been retained, it is of a much more restrained and undecorated style compared with examples found elsewhere both nationally and locally, including the Co-operative Building and Burton Chambers in Stroud Town Centre. The historic openings have also been infilled while external alterations have removed all evidence of original signage except possibly the heavily faded '*GARAGE*' mural to the south elevation. Taken alongside the numerous modern accretions, the building is overwhelmingly experienced as a modern structure within the wider streetscene of London Road.
- 6.21. Internally, only two sets of deteriorated timber and glazed folding doors have been retained.
- 6.22. Where present, those areas of surviving historic fabric are standard in their construction and do not exhibit any innovations with regard to materials, technology, or engineering, nor particularly early, late or rare examples of architectural features. As such, the building falls well short of being considered one of the better-preserved and high-quality examples either at the local or national level. Any intrinsic architectural interest that it may be considered to possess is at most extremely minor.
- 6.23. In terms of historic interest, the building has no known association with a notable architect or any other locally or nationally prominent individual. While the building's Art Deco form is illustrative of the movement's historic

prominence during the 20th century, it should again be reiterated that it does not represent a particularly high-quality or well-preserved example of this architectural style, even at the local level. As a result, any intrinsic historic interest is considered to be extremely minor at most.

6.24. Elements of the setting of the building illustrate its origins as a suburban light industrial building, most notably its spatial relationship with London Road and the thoroughfare's varied character. Its relationship with the northern parcel, including the former car sales showroom, also contributes towards articulation of the building's historic use and the visual and spatial dominance of the former Ford Stroud Motors complex within the wider London Road streetscape. There are, however, no distinguishing features of note when compared with the numerous other contemporary examples of mid- 20th century car dealership and servicing complexes.

6.25. Any intrinsic interest that the building does possess is therefore exceptionally low and derived wholly from survival of the Art Deco style proportions of its principal elevation. If it is Stroud District Council's position that the building be regarded as a non-designated heritage asset, it would equate to an asset at the lowermost end of the scale of significance for non-designated heritage assets (with the uppermost end representing an asset of almost listable quality).

Stroud Industrial Heritage Conservation Area

6.26. The Stroud Industrial Heritage Conservation Area was designated by Stroud District Council in September 1987 to both serve as a link between the various outstanding historic mill complexes (designated as eight separate

Conservation Areas) within the Stroud Valleys and to preserve the surrounding infrastructure and context which embodies the social, economic and cultural history of the Valleys. It is a linear designation centred upon the river valleys with a length of approximately 23km stretching from Chalford to Saul and an area of 6.3km² or 630 hectares.

6.27. Since its original designation in 1987, the Conservation Area boundary has been extended at several locations. A copy of the current adopted designation boundary is included at **Appendix 6**.

6.28. A Conservation Area Statement (adopted November 2008) has been prepared to define the character and articulate the special interest of the designation, identify elements that detract from its character and appearance and guide future development. The Statement comprises four volumes, comprising:

Volume 1: Summary and Character Overview

Volume 2: Character Parts

Volume 3: Conservation Area Management
Proposals Supplementary Planning Document (SPD)

Volume 4: Design Guide Supplementary Planning
Advice (SPA)

Historic Background

6.29. The historic prosperity of the Stroud Valleys owes much to the production of cloth, an industry that can be traced back to at least the 13th century. The district had several natural aids to the industry's success, namely its

proximity to sheep raised on the Wolds, the fast-flowing rivers and streams that could power the mills to process the raw wool and finish the cloth, and the geology which provided an abundant supply of Fuller's Earth. The consistent dye quality and fineness of Stroud cloths gained the area international renown.

- 6.30. While the fledgling cloth industry was all but decimated by the Black Death during the 14th century, it saw a resurgence during the 16th century spurred on by the redistribution of wealth and land following the dissolution of the monasteries. The burgeoning cloth industry went on to influence the appearance, form and siting of development within the Stroud Valleys over the following centuries.
- 6.31. The 18th century saw significant expansion and diversification of the cloth trade in the valleys, and by the end of the century all aspects of the cloth industry (including spinning, fulling, weaving and dying) became centred in the mills to the valley bottoms. Sometimes the mill owners, known as clothiers, operated several mill sites each dealing with a particular element of the cloth-manufacturing process.
- 6.32. Industrial progress at this time was slowed to a degree by the poor condition of the roads across the district and the lack of direct infrastructure linking the mills along the valley floors. Following much effort by local clothiers and London merchants who wanted a link to the Midlands industries, two canals (the Stroudwater and Thames and Severn) were constructed during the late 18th century. Significant road improvements were also made during this time and into the 19th century. While the arrival of the Great Western Railway in 1845 was of limited use to the mill industry given its location above the Chalford Valley

floor, the sidings of the Midland Railway, constructed during the 1860s, led directly to the valley bottom mills and provided a cheaper and easier method of transporting goods and coal. Bucking the downward turn in the cloth industry, the Midland Railway again brought prosperity to the mills and a further wave of rebuilding and expansion took place. The Stroudwater Canal was, however, badly hit by the resulting loss of local trade.

- 6.33. The railways greatly altered the appearance of the area, with their haulage capabilities leading to an influx of red brick and Welsh slate which were significantly cheaper than local limestone. This allowed a number of local industrialists to build affordable housing for their workers, with Stroud gaining numerous red brick terraces at this time.
- 6.34. However, by the end of the 19th century the Stroud Valleys cloth industry was in terminal decline, having been beaten by competition from Yorkshire. Many of the mills ceased operation at this time or were adapted to new industries, including the manufacture of needles, pins, machine parts, bobbins and reels, alongside ready-made clothing.
- 6.35. As evidenced in the below character summary, the capacity of the Stroud Valley industries to diversify and meet shifting socio-economic requirements is embodied within the rich and varied built environment seen today across the Conservation Area.
- Character and Appearance
- 6.36. While the three 'legs' of the Conservation Area (west of Stroud, east of Stroud and south of Stroud) have unique character traits, they possess a number of strong

common elements. Within each leg, distinct pockets also have strongly identifiable differences in character, ranging from sparsely populated rural extremities to the dense rows of red brick buildings lining stretches of the 19th- century road network. Together these sub- areas, defined as ‘Character Parts’, contribute towards the distinctive character and special interest of the Conservation Area as a whole.

- 6.37. The below summary of character and appearance focuses upon the south and east legs of the designation which captures the Stroud Valleys.

The South and East Leg: The Stroud Valleys

- 6.38. From Stonehouse eastwards the landscape is increasingly characterised by the steep hillsides and constrained valleys to the south and east of Stroud in which dispersed weavers’ and mill workers’ hamlets cluster along the valley sides. These are often on the routes of winding historic pack horse trails that connected the mills in the valley bottoms.
- 6.39. The 19th- century valley- bottom roads, which run above the industrial and agricultural valley bottoms, are well-populated. In these areas, early to mid- 19th- century ‘polite’ stone and stucco detached houses within large plots sit alongside red- brick roadside terraces constructed during the late 19th and early 20th centuries. As seen at London Road, the residential plots historically developed above the road, with industrial sites below.
- 6.40. Historic mills lie at regular intervals alongside the River Frome, Nailsworth Stream and Toadsmoor Stream. The often tree- lined watercourses follow a sinuous course through the valley, carving up valley bottom meadows

and frequently splitting into branches, some of which have been engineered as mill leets or to feed millponds. This includes the weir and millpond at Arundell Mill which has been restored in recent years to create a wildlife and wetland area.

- 6.41. The snaking path of the natural watercourses strongly contrast with the straighter, engineered route of the canal corridor. The courses frequently come into close contact with one another, creating distinct narrow slivers of land sometimes little wider than the canal towpath.
- 6.42. Between the 16th and 18th centuries, a strong local vernacular based upon the ready supply of limestone emerged. The influence of the burgeoning textile industry, alongside the steeply sloping topography and valley climate, is also evident in the physical appearance, form and siting of buildings. This included very steep roof pitches to ensure effective water shedding and stone mullion windows to help divert rainwater.
- 6.43. From the 18th century, however, the distinctive features of the early vernacular were increasingly abandoned as the influence of polite and international architecture grew. Whilst continuing to exploit the high- quality local limestone, buildings constructed during the 18th and 19th centuries were characterised by large, dressed ashlar blocks, distinctive stone arched window and door heads, and sash windows.
- 6.44. While stone was used almost exclusively for three hundred years, the occasional brick building began to appear from the mid- 18th century and appears to have been the construction material of choice between the

late 19th and early 20th centuries following the arrival of the railways. Now the large stock of red- brick terraces and houses from this period provide a lively visual contrast when experienced alongside the older stone buildings.

- 6.45. The valley- bottom mills follow wider trends in local vernacular, often constructed of local limestone with a long- narrow form, steeply pitched roofs, and repetitive fenestration. Many have also experienced phases of expansion and alteration in response to advances in manufacturing technologies and transport infrastructure.
- 6.46. Remnants of small- scale mill complexes are often visually tucked away, including at Arundell Mill in which the surviving buildings are somewhat ‘disguised’ by their domestic appearance and vernacular style. Often these former industrial buildings sit side- by- side with other uses, and in many cases are squeezed into backland within dense, urban areas.
- 6.47. The spine of the Conservation Area comprises a green corridor ranging in character from wooded railway embankments to sport fields and former wasteland, to the high- quality meadows of the rural Frome Vale and secluded valleys at the extremities of the southern and eastern legs. The green spaces are as important to the designation’s character as the built environment, acting not only as a visual setting for the buildings but providing an insight into the historic co- existence between agricultural and industry in the area.
- 6.48. Historically the water meadows to the valley floor have remained undeveloped and thus preserve the visual and historic distinction between industrial sites and nearby settlements along the route of the valleys. As such, the

distinctive, rhythmic pattern of mills located at intervals along the linear route is best appreciated from the route of the rivers and canal. By contrast, as along London Road, many main roads within the settlements have largely been developed and thus blurs the appreciation from these areas.

The Green Corridor: Central Belt

- 6.49. The Green Corridor: Central Belt Character Part captures the valley corridor within the central section of the Conservation Area, which passes alongside numerous settlements of varying size (including Stroud). This area includes the watercourses and surviving mill ponds, the canal and railway line. It also includes the surrounding green spaces which, as outlined above, range from wooded railway embankments, sport fields and former wasteland, alongside largely overgrown meadows. The area immediately surrounding the watercourses are generally characterised by mature vegetation, with wildlife areas created at a number of locations.
- 6.50. The southern parcel is located c.5m north of area ‘5.5: *Capel Mill to Bowbridge*’, which is reflective of the wider Character Part. At this location the River Frome and canal run alongside one another, separated by the towpath and dense mature vegetation, while the banks to either side are characterised by mature vegetation. Arundell Mill lies to the north- east of the river corridor, which at this location has been reconfigured to create a mill pond. As discussed further below, only the mill house, abutting workshop and two mill cottages survive and have been converted to residential use with domestic curtilages. The mill pond has been restored and rewilded to create a habitat area bound by further mature vegetation. Modern built form along London Road to the north is heavily

filtered by vegetation in views taken from the corridor and thus preserves a distinct verdant, rural character. While modern housing has been constructed along the route of Bowbridge Wharf to the south, this is again heavily filtered by intervening vegetation while the materiality, form and fenestration has been designed to respond to the historic industrial character of the valley bottom mills.



Plate 28: View along the River Frome corridor to the south of Arundell Mill Lane.



Plate 29: View along Thames and Severn Canal corridor from towpath to the south of Arundell Mill Lane.



Plate 30: View looking north-west along the canal corridor towards Capel Mill.



Plate 31: Arundell Mill Pond as viewed from the canal towpath.



Plate 32: Mill house at Arundell Mill as viewed from the south.¹⁸



Plate 33: Cottages at Arundell Mill as viewed from the south.¹⁹

Main Roads

- 6.51. The Main Roads Character Part is centred upon the main roads that developed from the 19th century onwards. As outlined above, these areas are characterised by a mixture of ‘polite’ stone and stucco detached houses within large plots alongside late 19th- and early 20th- century red- brick roadside terraces, and modern development. As seen at London Road, the residential plots historically developed above the road, with industrial sites below.
- 6.52. The northern and southern parcels lie c.25m to the south- east and c.30m to the south of ‘16:5 Dorrington Terraces’ respectively. Constructed at the turn of the 20th century, Torrington Terraces are an exemplar of the red-

¹⁸ <https://www.stroudpreservationtrust.org.uk/arundel-mill-house.html>

¹⁹ <https://www.stroudpreservationtrust.org.uk/arundel-mill-house.html>

brick roadside terraces that appeared along the main roads during this time. While the terraces may historically have been experienced alongside the earlier detached stone houses at Bowbridge Lane in long-range views across the northern valley side, they now lie within the overwhelmingly modern context of London Road.



Plate 34: Lower Dorrington Terrace as viewed from the south.



Plate 35: Upper Dorrington Terrace as viewed from the south-west.

Approaches, Views and Setting

- 6.53. There are numerous approaches to the Conservation Area, which is crossed by various bridges and can be entered via boat, foot, and car.
- 6.54. Key views within the Conservation Area principally arise from the sequential experience of the interspersed mills and their historic valley-side setting, which changes and unfolds as one travels the linear corridor. Several bridges that cut across the natural watercourses and canal also offer important vantage points and tableaux that enable the historic infrastructure to be appreciated in conjunction with landmark mills and the surrounding landscape.
- 6.55. As outlined above, the watercourses meander, following the contours of the valley landscape, with many bends. This meandering route gives rise to short-range vistas,

and occasionally surprising views where a group of buildings or a bridge comes into view.

6.56. The stretch between Capel Mill and Bowbridge is representative of this wider viewscape, with the presence of mature vegetation to either side of the river and adjacent canal directing views inwards along the linear route of the valley bottom. While the historic buildings at Arundell Mill are also largely filtered by vegetation, filtered short-range views of their limestone construction and early industrial form, experienced alongside the mill pond, contribute towards articulation of the historic development of this locality.

6.57. Due to the level of alteration that has occurred to the character of London Road, no important views within or beyond the designation boundary from Lower Dorrington Terrace were identified. Meanwhile, by virtue of its higher elevation, dynamic views of the southern valley side from Upper Dorrington Terrace help to retain legibility of the prevailing rural character of the valley at the time of their construction. While modern built form now screens views towards the valley bottom, this arguably contributes towards understandings of the degree of growth that has taken place within the Stroud Valleys from the 19th century onwards.

Statement of Significance

6.58. The Character Conservation Area Statement identifies the special interest of the Stroud Industrial Heritage Conservation Area as being derived from the following components:

“The harnessing of waterpower and the exploitation of local natural resources – from wool for cloth

production, to building materials for houses and mills. These local resources have influenced the siting of buildings, what they were used for, and what they look like; the steep valley sides have been colonised with terraces of dry stone, and water has been manipulated, with mill ponds and leets which changed the shape of the landscape.

The way that evolving transport infrastructure has influenced the distribution of buildings, their orientation, date and appearance; the expansion of settlements or mill groups; and how the various phases of infrastructure have layered over each other – pack horse tracks, river navigation, canals, turnpike roads, railways.

The differences in character between the western ‘leg’ of the Study Area (“the Vale”) and the eastern and southern legs (“the Valleys”) – notably in terms of the appearance of buildings, typical materials and the shape of the landscape.

The juxtaposition of industry with agriculture and the natural environment, which has resulted in a very attractive and richly varied character in this part of the District.

The historic diversification of industry: although the cloth industry has a long history, mills were continually changing ownership and adapting to other uses, from low key flour milling to high-tech iron manufacture and engineering; these often left physical legacies by way of new buildings or alterations.

Evolving industrial processes – from cottage industry, to the factory system – and how each development

has impacted on our built environment: providing new structures, altering old ones or even abandoning them to other uses.”

- 6.59. It is the interaction of these components, which are inextricably linked to the natural and manmade landscape within and surrounding Stroud, that has resulted in the unique character of the Conservation Area.

Any Contribution Made by the Site

- 6.60. The Stroud Industrial Heritage Conservation Area extends to the north, west and south, lying c.5m from the southern parcel and c. 15m from the northern parcel at its closest point.

- 6.61. It was confirmed during the site walkover that short-range intervisibility exists between the southern parcel and a small section of the designation at Arundell Mill (Plate 36 to Plate 38). While it was not possible to assess reciprocal views during the site walkover, by virtue of prevailing topography, it is anticipated that only the southern section would be appreciable in views taken from the west elevations of the buildings at Arundell Mill and small sections of their domestic curtilage (discussed further below). Views from the river corridor immediately to the south of the mill complex are wholly screened by mature vegetation.



Plate 36: View towards section of Conservation Area at Arundell Mill from the south-eastern corner of the southern parcel.



Plate 37: View towards section of Conservation Area at Arundell Mill (roof of mill buildings outlined in red) from the centre of southern boundary to southern parcel.



Plate 38: View towards section of Conservation Area at Arundell Mill (roofline of cottages visible only) from the centre of eastern boundary to southern parcel.

6.62. Filtered visibility of the upper extent of the former servicing garage to the southern parcel was also identified in northerly views taken from a small section of the river corridor to the south of Arundell Mill Lane (Plate 39). Such visibility was, however, heavily filtered and limited to the gap between modern built form at Arundell Mill Lane.



Plate 39: View towards southern parcel from the River Frome corridor to the south of Arundell Mill Lane, with glimpsed visibility of existing servicing garage outlined in red.

6.63. The southern parcel is also experienced in medium-range south-easterly views from the designation boundary at Lower Dorrington Terrace, albeit the sloping topography reduces the prominence of the servicing garage within this view (Plate 40). It is also experienced within the context of modern built form to both the north and south of London Road and becomes wholly screened as one travels north along the public highway (Plate 42). The southern half of the northern parcel is also experienced as a heavily filtered element in views to the south of London Road and is again viewed within the context of modern built form, including the two intervening modern houses, Sunnyside and Grey Walls, to the north of London Road (Plate 41).



Plate 40: View looking south-east towards the southern parcel from adjacent to Lower Dorrington Terrace.



Plate 41 View looking south-east towards the northern parcel from adjacent to Lower Dorrington Terrace.



Plate 42: View looking south-east along London Road towards Site from section of Conservation Area to the north of Lower Dorrington Terrace, with heavily glimpsed visibility of existing servicing garage outlined in red.

6.64. Both the northern and southern land parcels are also co-visible with the section of the Conservation Area adjacent to Lower Dorrington Terrace in long-range views on the easterly approach along London Road (Plate 43). The existing buildings are again, however, experienced as modern additions within an overwhelmingly modern streetscape. Meanwhile, given the spatial separation afforded by intervening built form to the north and south of London Road, alongside the extremely small section of the designation that falls within these views, any such co-visibility is not considered to make any contribution towards articulation of the asset's special interest. Furthermore, Lower Dorrington Terrace, upon which this section of the Conservation Area is centred, has a southward-facing orientation and thus its contribution

towards the special interest of the wider Conservation Area cannot be appreciated within inward-facing views along London Road.

- 6.65. Finally, both the northern and southern parcels are also visible in partially-filtered medium-range north-westerly views from the small section of the designation boundary that extends to London Road to the south-east of Bishop's Close (Plate 44). The existing land within both parcels is again experienced as modern elements within a varied, modern streetscene.



Plate 43: View looking north-west along London Road towards section of Conservation Area at Lower Dorrington Terrace, with northern and southern parcels to right and left, respectively.



Plate 44: View looking north-west along London Road towards northern (right) and southern (left) parcels from small section of designation boundary to the south-east of Bishop's Close.

- 6.66. It was confirmed that both land parcels are wholly screened in views from all other locations within the designation by virtue of spatial separation, alongside intervening topography, built form and vegetation.
- 6.67. Notwithstanding the above, it should also be reiterated that the special interest of the Conservation Area largely derives from the preservation of the character of the valley landscape and the manner in which this allows articulation of the historic textile industries that developed within the area since at least the Medieval period. As identified by Stroud District Council, key components therefore comprise the historic mill complexes and their spatial relationship, evidence of evolution and diversification as technologies changed, the juxtaposition of industry with the natural environment

and the associated transport infrastructure. This special interest is therefore best experienced within inward-facing linear views along the valley bottom corridor.

- 6.68. While it is acknowledged that London Road comprised one of the key roads established during the early 19th century to improve connectivity between the mill complexes, the section within which the Site is located has been overwhelmingly modernised and is in any event visually separated from the valley bottom itself by mature intervening vegetation and modern built form. Any contribution that this element of the Conservation Area's setting may once have held has therefore been substantially eroded and now primarily relates to the intangible historic functional association between the road and valley bottom.
- 6.69. It should also be recognised that, where intervisibility has been identified, both parcels are experienced as wholly modern additions within the wider streetscape, which itself has been significantly altered. As such, they cannot be considered to contribute towards the appreciation or understanding of the historic industrial landscape that developed within the Stroud Valleys, and thus the special interest of the Conservation Area as a whole.
- 6.70. Overall, the Stroud Industrial Heritage Conservation Area is best experienced from within its boundaries, from where the components that contribute towards its special interest are best experienced and articulated. While both land parcels within the Site are intervisible and co-visible with the Conservation Area, this pertains to extremely small elements to the designation boundary. Meanwhile the existing land parcels are experienced as wholly modern additions within the context of an extensively altered streetscape. Taken together, the Site

is considered to make a neutral contribution, via setting, towards the special interest of the Stroud Industrial Heritage Conservation Area.

Grade II Listed Arundell Mill and Arundell Mill Cottage

- 6.71. The asset comprises a 17th-century mill house and adjoining workshop alongside two cottages to the west. Occupying a T-shaped footprint, the mill house is constructed of hammer dressed limestone with pitched roof characterised by gabled dormers and stone mullioned windows. The pair of semi-detached cottages are of the same construction, albeit with a modern red-brick mono-pitch extension to the rear north elevation.
- 6.72. While there is believed to have been a mill at this location as early as the 14th century, the earliest documented evidence dates to 1585 when two fulling mills and a corn mill were granted to local landowner Richard Arundell. Later renamed Arundell Mill from its earlier name of Chapman's Mill, it remained in the family until the early 19th century. The mill fell within the expansive Field estate owned by the Arundell family which comprised much of the northern valley side immediately to the east of the then settlement boundary of Stroud.
- 6.73. The complex was described as a fulling mill with gig mill, dyehouse and grist mill carrying out cloth finishing work during the 17th century, while a millpond was added to the south-west during the 1790s - 1800s.
- 6.74. Having reached a peak in its fortunes during the 1770s, Arundell Mill along with the wider Field estate was inherited by ██████████ of Oxfordshire on ██████████'s death in 1813. Her estate was managed jointly by her husband and mother,

Reverend [REDACTED] and [REDACTED]. This is reflected in Wood's Map of 1835 which records the Field estate (including the mill) as under the ownership of her husband, Reverend [REDACTED]. This continued to be the case at the time of the 1841 Tithe Survey, which records the complex as 'Arundells Mill, Garden, Yards, Buildings and Water' owned by Reverend [REDACTED] and occupied by a [REDACTED].

6.75. Despite the change in ownership, clothmaking continued at Arundell Mill and in 1837 four power looms were inserted. However, as steam mechanisation began to dominate, the mill's size precluded the installation of new, larger machinery and thus its ability to remain competitive. It was therefore bought by the [REDACTED] in 1865 and began to be used as a dyehouse.

6.76. The dyeing operation continued until the mill house was requisitioned by the RAF during the Second World War, with many of the ancillary buildings demolished shortly thereafter. As such, the only surviving buildings comprised the mill house, adjoining workshop and two cottages, which had fallen into a ruinous state by the late 20th century. The buildings were subsequently purchased by Stroud Preservation Trust in February 1990 who restored and converted the mill house and workshop to provide three and two dwellings, respectively, alongside restoration of the two cottages and construction of the rear extension. The associated mill pond and sluice gate to the south-west were also restored as part of the Stroud Valleys Project.

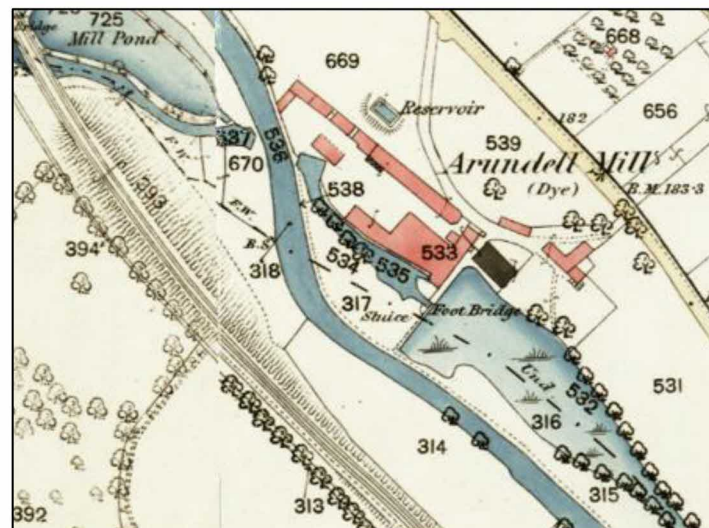


Plate 45: Built form at Arundell Mill recorded in the 1st Edition Ordnance Survey Map of 1885.



Plate 46: Mill house at Arundell Mill as viewed from London Road to the north-east.



Plate 47: Arundell Mill cottages and mill house beyond as viewed from Arundell Mill Lane to the north-west.

6.77. Arundell Mill and Arundell Mill Cottage was added to the National List, at Grade II, on 13th August 1967, with a later amendment to change the Listing name on 24th June 1974. The List Entry describes the asset as follows:

“C17, with C18 extension. Former dyeworks; now part carpenter’s shop, and part dwelling. Hammerdressed stone. Pitched stone roof. T-shaped plan. Stone mullioned windows.”

6.78. A full copy of the List Entry is included at **Appendix 7**.

6.79. As the List Entry was last updated in June 1974, it does not capture the restoration project undertaken during the 1990s. The reference to *“part carpenter’s shop, and part dwelling”* is therefore no longer accurate.

Statement of Significance

6.80. As a Grade II Listed structure, Arundell Mill and Arundell Mill Cottage represents a designated heritage asset of less than the highest significance. This significance is principally derived from its architectural, historic and archaeological interests, alongside its group value between its constituent parts and with other surviving mill buildings occupying the Stroud Valleys, and can be summarised as follows:

- **Architectural:** the asset is a well-preserved example of a 17th-century textile mill, the limestone construction and steep gabled roofline of which is typical of those seen throughout the Stroud Valleys. The character of the mill cottages and their spatial relationship with the mill house also contributes towards understandings of the operation of early (16th, 17th and 18th century) mill sites, in which the clothiers lived close to their mills in cottages of similar construction to the mill itself. The asset’s architectural interest is especially appreciable when viewed from within its immediate curtilage, from where the original design intent of the constituent elements can be best appreciated.
- **Historic:** the asset holds strong illustrative historic value by virtue of its role within the historic textile industry that occupied the bottoms of the Stroud Valleys from the Medieval period onwards. Further illustrative value is derived from its documented change from clothmaking to dyeing, which resulted from the increased spatial requirements associated with mechanised processes from the late 18th century. The asset’s requisitioning by the RAF during the Second World War is also illustrative of the

widescale requisition of land and property that took place nationally in support of the war effort.

Archaeological: there is potential for buried archaeological remains associated with the asset's former industrial use within the immediate curtilage. The fabric of the buildings themselves may also contain archaeological information concerning construction techniques and chronology of uses.

Group value: strong illustrative group value exists between the constituent elements of the asset which, when experienced together, mutually reinforces legibility of the buildings' original design intent. The asset also holds a degree of illustrative group value with other surviving valley bottom mills within the Stroud Valleys. While this association is intangible, due to spatial separation, it is considered to strengthen legibility of the importance of the textile industry to the town's economy from at least the Early Medieval period onwards.

- 6.81 The setting of Arundell Mill and Arundell Mill Cottage also contributes towards its significance, albeit the significance derived from setting is less than that from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its 'setting') which are considered to contribute to its heritage significance predominantly comprise its immediate environs, namely:

The designed interrelationship between the surviving component elements of the mill complex, including the mill house, workshop and cottages, alongside the mill pond and sluice gate to the south-west, which preserve a degree of legibility of the asset's original

design intent. This contribution has, however, been eroded to a degree through residential conversion of the buildings and creation of a domestic curtilage, alongside removal of the ancillary buildings during the 20th century.

The designed physical interrelationship with adjacent landscape features, most notably the River Frome to the south-west from which water was drawn to power the mill and medium-range glimpsed views of the wider valley bottom which preserve articulation of the asset's historic context. In turn, this contributes towards articulation of the asset's role in the development of the Stroud Valleys textile industry.

Extensive mature vegetation both within the property curtilage and to the wider valley sides which help to preserve legibility of the landscape character within which the asset was constructed, alongside providing a sense of separation from modern built form to the north.

- 6.82. The asset is considered to derive limited significance from its setting to the north, which has experienced significant alteration from the largely undeveloped northern valley side at the time of its original construction. This includes the prevailing modern suburban character of London Road. In any event, the sloping topography of the valley side and mature vegetation is such that northward-facing views are limited.
- 6.83. Overall, the heritage significance of the Grade II Listed Arundell Mill and Arundell Mill Cottage is largely derived from its architectural, historic and archaeological

interests, alongside the illustrative group value between its constituent parts and with other surviving valley bottom mills, with a lesser contribution from elements of its setting.

Any Contribution Made by the Site

6.84. As outlined above, Arundell Mill was owned by the Arundell family until the early 19th century when, due to a lack of heir, it transferred to relatives in Oxfordshire who leased it out. Wood’s Map of 1835 suggests that the mill was owned by [REDACTED] who, along with his wife [REDACTED] also owned the swathes of agricultural land to the north of the river at this time (including the Site) which fell within the Field Estate. This is confirmed by the 1841 Tithe Apportionment, which records the complex as ‘Arundells Mill, Garden, Yards, Buildings and Water’ owned by [REDACTED] and occupied by a [REDACTED]

6.85. As the Arundell estate in its entirety was inherited by [REDACTED] (prior to her marriage to Reverend [REDACTED] following the death of [REDACTED] it is possible that land within the Site was associated by ownership with the mill complex from at least the 16th onwards when the estate was acquired by the Arundell family.

6.86. Notwithstanding the above, beyond falling within the Field estate there is nothing to indicate that there was any functional relationship between the undeveloped fields within which the Site fell, and the mill complex, which would have functionally been associated with the river to the south-west. In any event, the historic association between the asset and Site had been severed by the late 19th century. The Site is now in separate ownership,

occupied by modern buildings and separated from the asset by intervening built form and mature vegetation, while the asset now occupies an overwhelmingly domestic curtilage. The historic relationship is therefore only appreciable via archival sources.

6.87. It was confirmed during the site walkover that, as a result of intervening built form, vegetation and topography, only the ridgeline of the northern wing of the asset mill house was visible in south-easterly views from the southern boundary of the northern parcel (Plate 48 and Plate 49). It is therefore reasonable to assume that reciprocal views from all windows within the asset and from within its curtilage are wholly screened.



Plate 48: View looking south-east towards Arundell Mill (mill house roofline outlined in red) from southern boundary of northern parcel.



Plate 49: View towards Arundell Mill from London Road to the north-east illustrating lower topographic aspect.

- 6.88. With regard to the southern parcel, short-range views of the rear north elevation and west side elevation of the mill cottages, the former comprising a modern extension and the latter a blind façade, were identified from within the car park to the southern extent of the Site during the site walkover (Plate 50 to Plate 52). The west elevations of the mill house were also visible in medium-range views from the same section of the southern parcel. Views towards the cottages from the northern extent of the parcel were identified as wholly screened by the intervening modern built form at Bishop’s Close, while only heavily filtered views of the roofline to the mill house were possible (Plate 53). It is therefore anticipated that reciprocal views towards the northern extent of the Site from all windows and the property curtilage are wholly screened.



Plate 50: View towards mill house (left) and cottages (right) at Arundell Mill from the south-eastern corner of the southern parcel.



Plate 51: View towards Arundell Mill (roofline of mill house visible only, outlined in red) from the centre of southern boundary to southern parcel.



Plate 52: View towards section of Arundell Mill (roofline of cottages visible only) from the centre of eastern boundary to southern parcel.



Plate 53: View towards Arundell Mill (roofline of mill house visible only, outlined in red) from north-eastern corner of southern parcel.

6.89. Notwithstanding any filtered intervisibility from the north and west elevations of the mill house and cottages, both buildings' southerly orientation is such that designed views capture the adjacent river and mill pond with which they were functionally associated. It is these elements of the asset's setting from which the asset's significance is overwhelmingly derived. By contrast, filtered views towards the southern parcel of the Site would be wholly incidental, with nothing to suggest that such views were of any importance to the original design intent of the asset. In any event, the Site itself is now occupied by a modern former servicing garage and surface car parking, thus any historic visual connection or functional association is no longer appreciable within these views. Taken together, any glimpsed views of the southern parcel are considered to make no discernible contribution towards the appreciation, understanding or significance of the asset.

6.90. Both parcels were identified as being co-visible with the roofline of the mill house in partially-filtered long-range north-westerly views along London Road (Plate 54). However, due to the asset's lower topographical aspect comparative with the public highway, only its roofline is appreciable within these views. Meanwhile both land parcels within the Site are experienced as wholly modern additions to the wider varied modern townscape that characterises this section of London Road.



Plate 54: View looking north-west along London Road with roofline of mill house and cottages at Arundell Mill (left), southern parcel (centre) and northern parcel (right).

- 6.91. Overall, Arundell Mill and Arundell Mill Cottage is best experienced from within its immediate curtilage, from where its special architectural, historic and archaeological interest can be best appreciated and understood. In light of any functional association being long severed, alongside the modern character of the southern parcel and visual separation afforded by the intervening modern built form and topography, this element of the Site is considered to make a neutral contribution towards the asset's significance, via setting. In light of intervisibility being wholly screened and the cessation of any functional association, the northern parcel is considered to make no contribution towards the asset, via setting.

7. Impact Assessment

- 7.1. This section addresses the heritage planning issues that warrant consideration in the determination of the planning application, with respect to the proposed development set out in Section 2 of this Report.
- 7.2. The Planning and Compulsory Purchase Act (2004) requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policy guidance set out within the NPPF is considered to be a material consideration which attracts significant weight in the decision-making process.
- 7.3. The statutory requirement set out within the Planning (Listed Buildings and Conservation Areas) Act 1990, at Section 66(1) directs that considerable weight should be given to the preservation of the historic and architectural interest of Listed Buildings and their settings.
- 7.4. In addition, the NPPF states that the impact of development proposals upon the particular significance of heritage assets such as Listed Buildings and Conservation Areas should be considered. It is also important to consider whether the proposals cause harm to the significance of these assets. If they do, then one must consider whether any such harm represents *"substantial harm"* or *"less than substantial harm"* to the identified designated heritage assets, in the context of paragraphs 207 and 208 of the NPPF.
- 7.5. The PPG clarifies that within each category of harm ('less than substantial' or 'substantial'), the extent of the harm may vary and should be clearly articulated.
- 7.6. The guidance set out within the PPG states that substantial harm is a high test, and that it may not arise in many cases. The PPG makes it clear that it is the degree of harm to the significance of the asset rather than the scale of development which is to be assessed. In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would *"have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced"*.
- 7.7. With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 209 of the NPPF. As set out in **Appendix 3**, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss be articulated.
- 7.8. With regard to Conservation Areas, Section 72(1) of the Act confirms that special attention should be paid to the desirability of preserving or enhancing the character or appearance of the asset, as well as the protection of the character and appearance of a Conservation Area. Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention. Given the site is outside of the boundaries of the Conservation Area, Section 72 does not apply in this case. It is, however, important to consider the potential impact of the proposed development upon elements of the asset's setting that contribute towards its overall significance.

7.9. The impact of the proposed development upon the historic environment is assessed below.

Former Ford Stroud Motors Garage

7.10. The proposed development will require the demolition of Former Ford Stroud Motors Garage. As outlined at **Section 6**, the building is one of a large number of similar structures constructed both locally and nationally. It is not therefore immediately of an age or rarity to warrant preservation, and selectivity is essential.

7.11. While the geometric Art Deco form of the principal façade has been retained, it is of a much more restrained and undecorated style compared with examples found elsewhere both nationally and locally. The historic openings have also been infilled while external alterations have removed all evidence of original signage except possibly the heavily faded ‘GARAGE’ mural to the south elevation. Taken alongside the numerous modern accretions, the building is overwhelmingly experienced as a modern structure within the wider streetscene of London Road.

7.12. Where present, those areas of surviving historic fabric are standard in their construction and do not exhibit any innovations with regard to materials, technology, or engineering, nor particularly early, late or rare examples of architectural features.

7.13. In terms of historic interest, while the building’s Art Deco form is illustrative of the movement’s historic prominence during the 20th century, it should again be reiterated that it does not represent a particularly high- quality or well-preserved example of this architectural style, even at the local level.

7.14. Notwithstanding the above, if the building were to be regarded as a non- designated heritage asset, a balanced judgement would be required having regard to the scale of any harm or loss and the significance of the heritage asset, in accordance with paragraph 209 of the NPPF. In this case, there would be total loss of the building; however, it has been demonstrated that, at most, it possesses an exceptionally low level of intrinsic architectural and historic significance. As part of a balanced judgement, the public benefits of the scheme should be considered, which includes the provision of new housing.

7.15. Prior to demolition, the fabric of the building could be documented through an appropriate level of photographic building recording. This could be secured by way of a suitable planning condition.

Surrounding Heritage Assets

7.16. As a general comment, it is recognised that the proposed development would significantly alter the character and appearance of the Site, via demolition of the existing buildings and construction of 35 new dwellings. However, as outlined at **Section 6**, the existing buildings and associated landscaping have a low visual quality while neither parcel is considered to contribute in any appreciable way towards the significance of the surrounding heritage assets. Their removal and replacement therefore provides an opportunity to introduce a sensitively designed residential development that effectively assimilates with the wider streetscene of London Road, thus preserving and possibly enhancing the significance of the assets.

7.17. The adopted design approach can be summarised as follows:

Scale and massing: the scale and massing has been designed to reflect both the varied architecture of London Road and the sloping topography of each parcel. The buildings to the southern parcel will therefore adopt a split-level design, similar to the existing servicing garage, with an additional storey to the rear. Meanwhile the car park and landscaped areas to the northern parcel will be banked and terraced to address the change in level.

Form: the proposed form has also been designed in response to the varied character of London Road, alongside the Site's pivotal location at a key transition from the denser urban grain to the north and lower-density suburban grain to the south. The design therefore seeks to mark this transition through the juxtaposition of terraced housing, reflecting that to the north and south, with larger, detached apartment buildings that will act as gateway features to the urban centre. Hipped roofs have, however, been incorporated to soften their visual prominence when viewed as part of the wider streetscene. Meanwhile the projecting central bay with raised pedimented-parapet to Apartment Building 1 references the Art Deco form of the servicing garage's principal façade, and will thus speak to the Site's existing visual presence within the streetscene.

Layout: the proposed layout has been designed to respond to the roadside location and sloping topography of both parcels. The primary frontage to each parcel faces directly onto London Road, albeit

set behind low boundary walls as seen elsewhere along the throughfare, with amenity space and car parking provided to the rear. This will both assimilate with the existing character of this section of London Road and, with respect to the southern parcel, offset the built form from the Conservation Area and Listed Building to the south.

Materiality: use of red-orange and red-brown multi-brick facing directly responds to the prevailing vernacular of the later phases of development within the Stroud Valleys, including London Road which developed from the early 19th century onwards. Meanwhile the inclusion of small areas of stonework to a number of windows cills and heads will provide a visual contrast and reference the earlier predominant use of stone, including to the Listed Arundell Mill and Arundell Mill Cottage to the south-east.

Fenestration: inclusion of a geometric industrial-style fenestration pattern references the historic industrial activities that dominated the Stroud Valleys and helps to enhance legibility of the historic functional relationship between London Road and the valley-floor mill complexes below, which is now largely intangible.

Detailing: sparing use of architectural detailing reflects the industrial history of the Stroud Valleys, while the use of small areas of stonework references the prevalence of local limestone prior to the arrival of the railways and resulting influx of brick during the 19th century. The inclusion of brick-infilled blind window openings to the apartment buildings also references the ongoing precedent throughout the

valleys for repurposing and adaptation of buildings as industrial processes and transport infrastructure evolved.

Landscaping: alongside the provision of shared courtyard amenity space and private gardens to the apartments and houses, respectively, the existing boundary vegetation will be retained and extended, including retention of existing tree planting. This will both contribute towards the suburban yet verdant character of London Road, reflecting its valley- side location, and provide greater screening from surrounding heritage assets. Construction of brick boundary walls surmounted by railings also reflects the wider prevalence of boundary walls of a variety of forms and materiality along London Road.

7.18. Taken together, the detailed design is considered to both sensitively respond to and complement the character and form of the surrounding built form and urban grain.

7.19. The potential impact of the proposed development upon each of the identified heritage assets is assessed below.

Stroud Industrial Heritage Conservation Area

7.20. When considering potential impacts of the proposed development on the special interest of the Stroud Industrial Heritage Conservation, it is important to recognise that the designation covers a large area and includes a variety of elements with differing characters. As noted at paragraph 213 of the NPPF, it is therefore necessary to consider the relevant significance of the element which has the potential to be affected and its contribution significance of the designation as a whole,

i.e. would the application proposals undermine the significance of the Conservation Area as a whole?

7.21. With regard to northerly views from small sections of designation to the south of the Site, on the basis of the baseline and scale of the proposals, visibility of the proposed development would be anticipated to comprise heavily filtered views of the new built form within the southern parcel only. Any such visibility would be viewed within the context of modern built form at Arundell Mill Lane and Bishop's Close, while the proposed form and materiality will echo the prevailing suburban character of London Road. The industrial- style fenestration will also contribute towards articulation of London Road's historic relationship with the valley floor below, which has largely been eroded.

7.22. Furthermore, as outlined at **Section 6**, the existing rear elevation to the servicing garage, with which intervisibility is anticipated to exist, is of low visual quality and does not therefore represent a positive element of outward-facing views. By contrast, the proposed development will represent a sensitively- designed and contextually- appropriate addition to the varied streetscene. The degree of alteration to these views would also be minimised through direction of the built form to the north of the parcel. Meanwhile the south- western extent, with which greatest intervisibility exists, will be characterised by surface car parking and soft landscaping which would in any event be wholly screened by the proposed new boundary fence and existing trees.

7.23. The proposed development would also be visible in partially- filtered medium- range north- westerly views from the designation boundary that extends to London Road to the south- east of Bishop's Close. The new built

form would again be experienced as a sensitively designed and contextually- appropriate modern addition to the already varied streetscene within these views. Indeed, given the existing low- quality character of the Site, most notably to the northern parcel, the proposed development may be considered to represent a minor enhancement in views from and towards this small section of the Conservation Area.

7.24. With regard to views from and towards the Conservation Area boundary along London Road, it should again be reiterated that the proposed development would be experienced as part of the surrounding varied streetscene of London Road, which includes numerous modern buildings. Taken alongside the existing baseline, the proposed change is not anticipated to impact upon the overall experience of views from and towards the asset, nor the appreciation or understanding of the asset when viewed as part of them. Indeed, given the existing low- quality, informal character of the both parcels, introduction of high- quality, contextually- appropriate built form that engages positively with the streetscene could be considered an enhancement to such views.

7.25. Notwithstanding the above, as outlined at *Section 6*, it should also be reiterated that the special interest of the Conservation Area largely derives from the preservation of the character of the valley landscape and the manner in which this allows articulation of the historic textile industries that have developed within and shaped the extant settlement patterns within the Stroud Valleys since at least the 13th century. Key components therefore comprise the historic mill complexes and their spatial relationship, evidence of evolution and diversification as technologies changed, the juxtaposition of industry with the natural environment and the associated transport

infrastructure. The interrelationship between these components are therefore best experienced within inward- facing linear views travelling along the valley bottom.

7.26. While it is acknowledged that London Road comprised one of the key roads established in the early 19th century to improve connectivity between the mill complexes, the section within which the Site is located has been overwhelmingly modernised and is in any event visually separated from the valley bottom itself by mature intervening vegetation and modern built form. Any contribution that this element of the Conservation Area’s setting may once have held has therefore been substantially eroded and now primarily relates to the intangible historic functional association between the road and valley bottom.

7.27. Overall, while the proposed development would result in a visible change to the character and appearance of the Site, the proposals have been designed to sensitively respond to and complement the existing varied streetscene of London Road whilst referencing the historic industrial context of the valley bottom to the south. It would not, therefore, impact upon the overall understanding, experience and appreciation of the Conservation Area when viewed from or alongside it. To the contrary, removal of the existing poor- quality built form and landscaping may be considered to represent a minor positive enhancement to views to and from the asset at these locations. Considered within the context of the designation of a whole, the proposed development would preserve the special interest and significance of the Stroud Industrial Heritage Conservation Area and thus result in no harm, by way of changes to its setting.

Grade II Listed Arundell Mill and Arundell Mill Cottage

- 7.28. It is again recognised that the proposed development will alter the character and appearance of the Site through removal of the existing buildings and construction of 35 new dwellings and associated infrastructure.
- 7.29. Development within the northern parcel would be anticipated to be wholly screened in views from and towards the asset by virtue of spatial separation and intervening topography, built form and vegetation.
- 7.30. As outlined at **Section 6**, onsite analysis confirmed that the south- western extent of the southern parcel is visible in medium- range north- easterly views from both the mill house and cottages. Such views are, however, filtered by intervening vegetation and topography, and are possible only from the upper floor windows of the west elevations. The existing rear elevation to the former servicing garage, with which intervisibility is anticipated to exist, is of low visual quality and does not therefore represent a positive element of outward- facing views.
- 7.31. By contrast, the proposed development will represent a sensitively- designed and contextually- appropriate addition to the varied streetscene. The degree of alteration to these views would also be minimised through direction of the built form to the north of the parcel. Meanwhile the south- western extent, with which greatest intervisibility exists, will be characterised by surface car parking and soft landscaping which would in any event be wholly screened by the proposed new boundary fence and existing trees.
- 7.32. On this basis, only the north- western extent of Apartment Block 1 would be visible from the cottages,

with views from the mill house screened by Bishop's Close, and would be experienced within the context of the modern built form at Arundell Mill Lane beyond. While not an especially successful addition to the streetscene, the brick materiality of the proposed development will help to assimilate with the existing buildings at Arundell Mill Lane, thus ensuring that it is not experienced as an incongruous element within these views. Meanwhile the industrial- style fenestration will better respond to the heritage context of its environs, including Arundell Mill, and contribute towards legibility of the historic relationship between London Road and the valley floor below. The same would be true of views along London Road within which the proposed development may be co- visible with the asset.

- 7.33. Notwithstanding the above, it is acknowledged that a historic association has been identified between Arundell Mill and both land parcels. However, beyond falling within the historic Field estate there is nothing to indicate that there was any functional relationship between the undeveloped fields within which the Site fell, and the mill complex, which would have functionally been associated with the river to the south. In any event, the historic association between the asset and Site had been severed by the late 19th century. The Site is now in separate ownership, occupied by modern buildings and separated from the asset by intervening built form and mature vegetation, with the former relationship now only appreciable via archival sources.
- 7.34. Furthermore, by virtue of extensive boundary vegetation and reconfiguration of the assets' curtilage following cessation of their functional use to facilitate residential conversion, the special historic and architectural interest, and group value of the constituent buildings, of the Listed

Arundell Mill and Arundell Mill Cottage is now best experienced at close range from within the associated domestic curtilage. Meanwhile the contribution of the asset's wider setting derives primarily from southerly designed views towards the adjacent mill pond and river with which the mill was functionally associated. By contrast, filtered views towards the Site do not contribute in any specific way towards the asset's heritage significance, via setting.

- 7.35. Overall, the proposed development would not be anticipated to impact upon the special architectural, historic and archaeological interest of the Grade II Listed Arundell Mill and Arundell Mill Cottage, nor the group value of its constituent parts and with other valley bottom mills. As such, no harm would be anticipated to arise via a change in the asset's setting.

8. Conclusions

- 8.1. This Built Heritage Statement has been prepared on behalf of Altus Homes in relation to a full planning application for the demolition of all existing buildings and redevelopment of the Site for residential use, alongside access, parking, landscaping and associated infrastructure, at the former Ford Stroud Motors, London Road, Stroud.
- 8.2. Following an independent survey of the former Ford Stroud Motors servicing garage to the southern parcel, including a site visit and consultation of relevant archival sources, it has been concluded that the existing building possesses an exceptionally low level of intrinsic significance. Should Stroud District Council regard the building as a non-designated heritage asset, it would equate to an asset at the lowermost end of the scale of significance for non-designated heritage assets (with the uppermost end representing an asset of almost listable quality).
- 8.3. In accordance with paragraph 209 of the NPPF, any harm to a non-designated heritage asset should be considered by the Decision Maker in a balanced judgement, having regard to the scale of harm, the significance of the heritage asset and the public benefits of the development proposals. In this case, the development proposals would result in the total loss of a building that possesses an exceptionally low level of intrinsic significance, and the house could be documented through an appropriate level of photographic building recording prior to demolition.
- 8.4. An appropriate and proportionate level of settings assessment has also been undertaken for designated heritage assets within a 50.0m radius of the Site. Having been identified as potentially sensitive to the proposed development, particular consideration has been given to the Stroud Industrial Heritage Conservation Area and Grade II Listed Arundell Mill and Arundell Mill Cottage.
- 8.5. The above assessment, which has been carried out in accordance with Historic England guidance, concludes that, when taking account of the existing baseline and the sensitive design of the proposals, the proposed change is not anticipated to impact upon the overall experience of views from and towards the identified heritage assets, nor the appreciation or understanding of these assets when viewed as part of them.
- 8.6. Overall, whilst it is acknowledged that the proposed development will result in a change to the character and appearance of the Site, this change would not ultimately harm the significance of any of the built heritage assets identified and assessed, by way of alterations to their setting.
- 8.7. Overall, it is considered that the proposed development could be delivered whilst being compliant with Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16 of the NPPF and the Stroud District Local Plan.

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1902	Ordnance Survey Gloucestershire Sheet XLIX.4 (2 nd Edition)
1923	Ordnance Survey Gloucestershire Sheet XLIX.4
1938	Ordnance Survey Gloucestershire Sheet XLIX.4
1954	Ordnance Survey Sheet SO80 SE - A

Aerial Photography References	
30 th March 1946	RAF/3G/TUD/UK/102
1999	Infoterra Ltd & Bluesky (1999)
2024	Airbus (2024)

Appendix 1: Assessment Methodology

Assessment of significance

In the *NPPF*, heritage significance is defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”²⁰

Historic England’s *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.²¹

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage’s *Conservation Principles*.²² These essentially cover the heritage ‘interests’ given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.²³

The *PPG* provides further information on the interests it identifies:

Archaeological interest: *As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*

Architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.

Historic interest: An interest in past lives and events (including pre- historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.²⁴

²⁰ DLUHC, *NPPF*, Annex 2.

²¹ Historic England, *GPA:2*.

²² Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values

are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

²³ DLUHC, *NPPF*, Annex 2; DLUHC, *PPG*, paragraph 006, reference ID: 18a-006-2019072.

²⁴ DLUHC, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

Significance results from a combination of any, some, or all of the interests described above.

Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.²⁵

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

As defined in the *NPPF*:

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”²⁶

Setting is defined as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”²⁷

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.²⁸

In *GPA:3*, a stepped approach is recommended, of which Step 1 is identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at

²⁵ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).

²⁶ DLUHC, *NPPF*, Annex 2.

²⁷ DLUHC, *NPPF*, Annex 2.

²⁸ Historic England, *GPA:3*, p p. 8, 11.

paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.

Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”²⁹

Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

Designated heritage assets of the highest significance, as identified in paragraph 20.6 of the *NPPF*, comprising Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 72 of the *NPPF*;³⁰

Designated heritage assets of less than the highest significance, as identified in paragraph 20.6 of the *NPPF*, comprising Grade II Listed Buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);³¹ and

²⁹ *Catesby Estates Ltd. v. Steer* [2018] EWCA Civ 1697, paras. 25 and 26.

³⁰ *DLUHC, NPPF*, para. 20.6 and fn. 72.

³¹ *DLUHC, NPPF*, para. 20.6.

Non-designated heritage assets. Non-designated heritage assets are defined within the PPG as “*buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets*”.³²

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

Grading significance

There is no definitive grading system for assessing or categorising significance outside of the categories of Designated Heritage Assets and Non-Designated Heritage Assets, specifically with regards to the relative significance of different parts of an asset.

ICOMOS guidance recognises that a degree of professional judgement is required when defining significance:

“..the value of heritage attributes is assessed in relation to statutory designations, international or national, and priorities or recommendations set out in national research agendas, and ascribed values. Professional judgement is then used to determine the importance of the resource. Whilst this method should be used as objectively as possible, qualitative

*assessment using professional judgement is inevitably involved.”*³³

This assessment of significance adopts the following grading system:

Highest significance: Parts or elements of a heritage asset, or its setting, that are of particular interest and are fundamental components of its archaeological, architectural, aesthetic or historic interest, and form a significant part of the reason for designation or its identification as a heritage asset. These are the areas or elements of the asset that are most likely to warrant retention, preservation or restoration.

Moderate significance: Parts or elements of the heritage asset, or its setting, that are of some interest but make only a modest contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that might warrant retention but are capable of greater adaptation and alteration due to their lesser relative significance.

Low or no significance: Parts or elements of the heritage asset, or its setting, that make an insignificant, or relatively insignificant contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that can be removed, replaced or altered due to their minimal or lack of

³² DLUHC, PPG, paragraph 039, reference ID: 18a-039-20190723.

³³ International Council on Monuments and Sites (ICOMOS), *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties* (Paris, January 2011), paras. 4-10.

significance and are areas and elements that have potential for restoration or enhancement through new work.

Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

Substantial harm or total loss. It has been clarified in a High Court Judgement of 2013 that this would be harm that would *"have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced"*;³⁴ and

Less than substantial harm. Harm of a lesser level than that defined above.

With regards to these two categories, the *PPG* states:

"Within each category of harm (which category applies should be explicitly identified), the extent of

***the harm may vary and should be clearly articulated.*"³⁵**

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the *NPPF* requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, *"preserving"* means doing *"no harm"*.³⁶

Preservation does not mean no change, it specifically means no harm. *GPA:2* states that *"Change to heritage assets is inevitable but it is only harmful when significance is damaged"*.³⁷ Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

³⁴ Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

³⁵ DLUHC, *PPG*, paragraph 018, reference ID: 18a-018-20190723.

³⁶ R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

³⁷ Historic England, *GPA:2*, p. 9.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of “*what matters and why*”.³⁸ Of particular relevance is the checklist given on page 13 of *GPA:3*.³⁹

It should be noted that this key document also states:

“Setting is not itself a heritage asset, nor a heritage designation..”⁴⁰

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

“Conserving or enhancing heritage assets by taking their settings into account need not prevent change”.⁴¹

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.⁴²

Benefits

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

As detailed further in **Appendix 3**, the *NPPF* (at Paragraphs 207 and 208) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.⁴³

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 207 to 209.⁴⁴

The *PPG* provides further clarity on what is meant by the term ‘public benefit’, including how these may be derived from enhancement to the historic environment (‘heritage benefits’), as follows:

“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed

³⁸ Historic England, *GPA:3*, p. 8.

³⁹ Historic England, *GPA:3*, p. 13.

⁴⁰ Historic England, *GPA:3*, p. 4.

⁴¹ Historic England, *GPA 3*, p. 8.

⁴² *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

⁴³ DLUHC, *NPPF*, paras. 207 and 208.

⁴⁴ Including - *Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor* [2020] EWHC 2292 (Admin); DLUHC, *NPPF*, paras. 207 and 209.



private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

sustaining or enhancing the significance of a heritage asset and the contribution of its setting

reducing or removing risks to a heritage asset

securing the optimum viable use of a heritage asset in support of its long term conservation.”⁴⁵

Any "*heritage benefits*" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

⁴⁵ DLUHC, *PPG*, paragraph 020, reference ID: 18a-020-20 19 0 7 2 3 .

Appendix 2: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.⁴⁶ It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 66(1) of the Act states that:

“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”⁴⁷

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight”

when the decision-maker carries out the balancing exercise.”⁴⁸

A judgement in the Court of Appeal (‘Mordue’) has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 208 of the current, revised NPPF, see **Appendix 3**), this is in keeping with the requirements of the 1990 Act.⁴⁹

With regards to development within Conservation Areas, Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states:

“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”⁵⁰

Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.

⁴⁶ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁴⁷ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

⁴⁸ Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.

⁴⁹ Jones v Mordue [2015] EWCA Civ 1243.

⁵⁰ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).



In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.⁵¹

⁵¹UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 3: National Policy Guidance

The National Planning Policy Framework (December 2023)

National policy and guidance is set out in the Government's *National Planning Policy Framework (NPPF)* published in December 2023. This replaced and updated the previous *NPPF* (September 2023). The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

"Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
- 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, unless:***
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting***

the overall scale, type or distribution of development in the plan area; or

- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

For decision-taking this means:

- a. approving development proposals that accord with an up-to-date development plan without delay; or*
- b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

 - i. the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”⁵²**

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change.”⁵³ (our emphasis)

The *NPPF* continues to recognise that the planning system is planned and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the *NPPF* as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”⁵⁴

⁵² DLUHC, *NPPF*, para. 11.

⁵³ DLUHC, *NPPF*, para. 11, fn. 7.

⁵⁴ DLUHC, *NPPF*, Annex 2.

The NPPF goes on to define a Designated Heritage Asset as a:

“World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation.”⁵⁵

As set out above, significance is also defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”⁵⁶

Section 16 of the NPPF relates to ‘Conserving and enhancing the historic environment’ and states at paragraph 20 1 that:

“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”⁵⁷

Paragraph 20 3 goes on to state that:

“In determining planning applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c. the desirability of new development making a positive contribution to local character and distinctiveness.”⁵⁸*

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 20 5 and 20 6 are relevant and read as follows:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to

⁵⁵ DLUHC, *NPPF*, Annex 2.

⁵⁶ DLUHC, *NPPF*, Annex 2.

⁵⁷ DLUHC, *NPPF*, para. 201

⁵⁸ DLUHC, *NPPF*, para. 203.

*substantial harm, total loss or less than substantial harm to its significance.*⁵⁹

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a. grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*⁶⁰

Section b) of paragraph 206, which describes assets of the highest significance, also includes footnote 72 of the NPPF, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

In the context of the above, it should be noted that paragraph 207 reads as follows:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities

should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site; and*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.”*⁶¹

Paragraph 208 goes on to state:

*“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*⁶²

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 206 that:

⁵⁹ DLUHC, *NPPF*, para. 205.

⁶⁰ DLUHC, *NPPF*, para. 206.

⁶¹ DLUHC, *NPPF*, para. 207.

⁶² DLUHC, *NPPF*, para. 208.

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”⁶³

Paragraph 213 goes on to recognise that “*not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance*” and with regard to the potential harm from a proposed development states:

“Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.”⁶⁴ (our emphasis)

With regards to non- designated heritage assets, paragraph 209 of NPPF states that:

“The effect of an application on the significance of a non- designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-

designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”⁶⁵

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

The then Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities (DLUHC)) launched the planning practice guidance web- based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of ‘significance’ in decision taking is important and states:

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to

⁶³ DLUHC, *NPPF*, para 212.

⁶⁴ DLUHC, *NPPF*, para. 213.

⁶⁵ DLUHC, *NPPF*, para. 209.

properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”⁶⁶

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

“In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less

than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.”⁶⁷ (our emphasis)

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

“When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.”⁶⁸

“Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way.”⁶⁹

It goes on to state that:

“Well-designed places and buildings are influenced positively by:

the history and heritage of the site, its surroundings and the wider area, including cultural influences;

⁶⁶ DLUHC, PPG, paragraph 007, reference ID: 18a-007-20 19 0 7 2 3 .

⁶⁷ DLUHC, PPG, paragraph 018, reference ID: 18a-0 18 - 20 19 0 7 2 3 .

⁶⁸ DLUHC, NDG, para. 46.

⁶⁹ DLUHC, NDG, para. 47.

the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;

the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details - see Identity.

Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century.⁷⁰

⁷⁰ DLUHC, *NDG*, paras. 48-49.

Appendix 4: Relevant Development Plan Policies

Applications for Planning Permission within the District are currently considered against the policy and guidance set out within the Stroud District Local Plan (adopted November 2015).

Stroud District Local Plan

The Stroud District Local Plan sets out the long-term vision, objectives and strategy for the District for the period up to 2031

Policy ES10 (Valuing our historic environment and assets) sets out the strategic policy direction with regard to development proposals which would affect the historic environment and states that:

“Stroud District’s historic environment will be preserved, protected or enhanced, in accordance with the principles set out below:

1. Any proposals involving a historic asset shall require a description of the heritage asset significance including any contribution made by its setting, and an assessment of the potential impact of the proposal on that significance, using appropriate expertise. This can be a desk based assessment and a field evaluation prior to determination where necessary and should include the Gloucestershire Historic Environment Record.

2. Proposals and initiatives will be supported which conserve and, where appropriate, enhance the heritage significance and setting of the Districts heritage assets, especially those elements which contribute to the distinct identity of the District.

These include:

A. the 68 sites of national archaeological importance (which are designated as Ancient Monuments), any undesignated archaeology of national significance, and the many buildings that are Listed as having special architectural or historic interest.

B. the stone, bronze, iron age and roman settlements and remains; the medieval settlements including Berkeley Castle; historic houses; historic parks; gardens and villages.

C. the townscapes of the larger towns such as Stroud where the industrial heritage influenced its historic grain, including its street layouts and plot sizes.

D. the District’s historic market towns and villages, many with designated conservation areas, such as Berkeley, Wotton Under Edge, Minchinhampton, Painswick and Dursley.

3. Proposals will be supported which protect and, where appropriate, enhance the heritage significance and setting of locally identified heritage assets, such as buildings of local architectural or historic interest, locally important archaeological sites and parks and gardens of local interest.

4. Proposals will be supported which protect and, where appropriate, enhance key views and vistas,



especially of the spires and towers of historic churches and mills.

5. Any harm or loss would require clear and convincing justification to the relevant decision-maker as to why the heritage interest should be overridden.

A full programme of work shall be submitted with the application, together with proposals to mitigate any adverse impact of the proposed development, and where appropriate, be implemented through measures secured by planning condition(s) or through a legal agreement.”

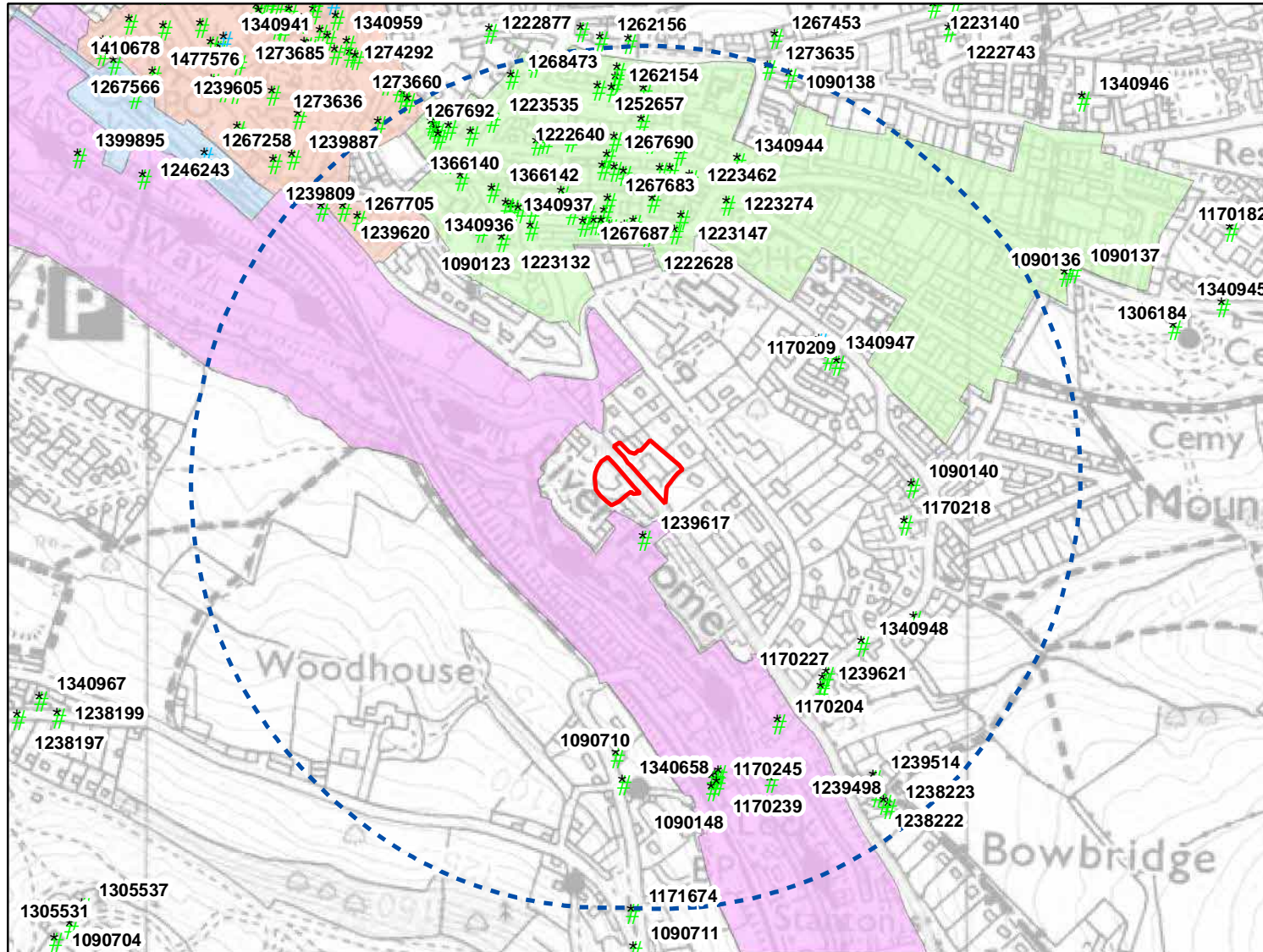
New Stroud District Local Plan

The draft new Stroud District Local Plan was submitted for Examination in October 2021, with the Hearings held in Spring 2023. The Inspectors wrote to the Council in August 2023 setting out three specific areas of concern regarding soundness. The Council is in the process of addressing these concerns. Given the advanced stage of preparation, the draft policies included within the emerging Local Plan may be given limited weight in the determination of planning applications within the District.

Draft Delivery Policy ES10 (Valuing our historic environment and assets) retains the existing strategic policy direction with regard to development proposals which would affect the historic environment.



Appendix 5: Designated Heritage Assets within 500m of Site



KEY

- Site
- 500m Buffer
- # Grade II* Listed Building
- * Grade II Listed Building

Conservation Areas

- Stroud Industrial Heritage
- Stroud Station
- Stroud Top of Town
- Stroud Town Centre

Revisions:
First Issue- 07/08/2023 BH

Figure 1: Designated Heritage Assets

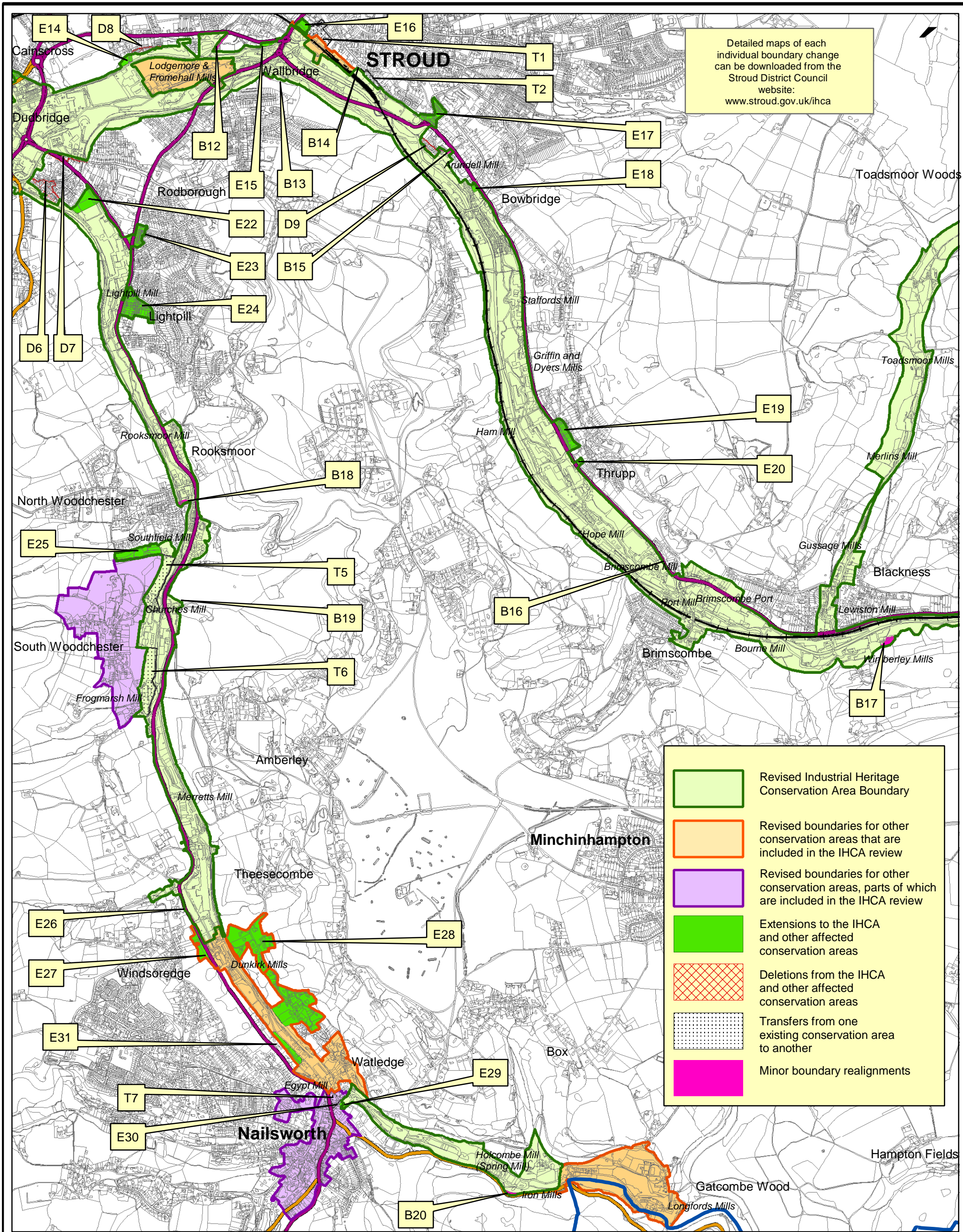
**Former Ford Stroud Motors
London Road
Stroud**

Client: Piper Homes and Blythe Real Estate
 DRWG No: P23-1266_01 Sheet No: - REV: -
 Drawn by: BH Approved by: GS
 Date: 12/04/2024
 Scale: 1:8,000 @ A4





Appendix 6: Stroud Industrial Heritage Conservation Area Boundary



Map 2c (EAST and SOUTH)

Conservation Area boundary changes



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Scale: 1:18,000

IHCA
CONSERVATION AREA
STATEMENT
Nov 2008



Appendix 7: Arundell Mill and Arundell Mill Cottage List Entry

ARUNDELL MILL ARUNDELL MILL COTTAGE

Official list entry

Heritage Category: Listed Building

Grade: II

List Entry Number: 123 9 6 17

Date first listed: 13 - Aug- 1967

Date of most recent amendment: 24- Jun- 1974

List Entry Name: ARUNDELL MILL ARUNDELL MILL COTTAGE

Statutory Address 1: ARUNDELL MILL COTTAGE, LONDON ROAD

Statutory Address 2: ARUNDELL MILL, LONDON ROAD

Location

Statutory Address: ARUNDELL MILL COTTAGE, LONDON ROAD

Statutory Address: ARUNDELL MILL, LONDON ROAD

The building or site itself may lie within the boundary of more than one authority.

County: Gloucestershire

District: Stroud (District Authority)

Parish: Stroud

National Grid Reference: SO 85613 04560

Details

1. LONDON ROAD 5227 (South West Side) Arundell Mill and Arundell Mill Cottage (Formerly listed as Arundell Hill, Bowbridge) SO 8504 6/9A 14.8.67. II 2. C17, with C18 extension. Former dyeworks; now part carpenter's shop, and part dwelling. Hammerdressed stone. Pitched stone roof. T-shaped plan. Stone mullioned windows.

Listing NGR: SO8561304560

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: 4 175 8 4

Legacy System: LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



End of official list entry

Planning (Listed Buildings and Conservation Areas) Act 1990
Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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