



The Planning Policy Team
Sandwell Council
PO Box 2374
OLDBURY
B69 3DE

11th November 2024

BY EMAIL

To Whom it May Concern,

SANDWELL LOCAL PLAN REGULATION 19 CONSULTATION: SOHO FOUNDRY AND MINT, SMETHWICK

On behalf of Chance Heritage Trust ('CHT'), Iceni submit representations to the Draft Regulation 19 Sandwell Local Plan Consultation in respect of the Soho Foundry and Mint, Smethwick (referred to as 'the site', identified in Figure 1 below).

a. Executive summary

The purpose of the representations is summarised below:

- The Soho Foundry – an internationally significant heritage asset - is in a current state of disrepair requiring significant financial capital to ensure its protection and future;
- The designation of Soho Foundry as a Local Employment Area under draft policy SEC3 will restrict the use of the Site to employment/ industrial use only, which presents a significant barrier to its restoration;
- This is in direct conflict with NPPF paragraph 196 which aims to protect significant heritage assets, emphasising the role of Local Plans in setting a positive strategy for the conservation of those assets most at risk of neglect and decay, as well as draft policy SHE3 which seeks to protect listed buildings and heritage assets, noting that "every attempt should be made to secure the asset";
- The designation of the Site for employment-use only also contradicts the regeneration aims of Sandwell/ Smethwick as outlined in policy SDS2 which specifically identifies the opportunity of Soho Foundry in creating a mixed-use facility to attract visitors and revitalise the borough; and
- It is alternatively proposed that the Site is afforded a bespoke mixed-use site-specific allocation. This will enable CHT to explore a range of avenues of funding in generating the significant capital required to successfully regenerate the building and ensure the future and protection of the highly internationally significant heritage asset Soho Foundry.

b. Introduction

CHT aims to enrich the community of Sandwell through placemaking and the restoration and protection of buildings and assets of cultural and heritage importance; championing the advancement of education concerning the social, economic and architectural history and heritage of the buildings in the area. The overarching vision of the Trust is to regenerate two significant sites within Sandwell, the

Soho Foundry and Mint, and the Chance Glassworks (each subject to its own representations), which in-turn will create two unique places for community enjoyment. Their aim is to protect and celebrate the highly significant industrial heritage of the area and to act as a beacon of hope and create a new vibrant, urban community that generates employment, training, learning and leisure opportunities for all.

The Soho Foundry and Mint hold pivotal historical importance to Sandwell, the United Kingdom, and the world. It was established in 1775 as the world's first purpose-built steam engine manufactory and was the first gas lit factory in the world. Today, the Soho Foundry is one of a handful of Foundry's that survive today; however, the Grade II* Listed Buildings are presently on the Heritage at Risk register, which necessitates an urgent positive policy response to ensure their survival, restoration and use. CHT wish to stress that the maintenance, up-keep and restoration of the Site can only be achieved if it is technically feasible and financially possible to do so. Furthermore, it relies on funding which may be jeopardised if the allocation does not support a mix of uses.

Whilst there are some technical constraints to bring the Site forward for regeneration, it must be acknowledged that the negatives of not bringing the Site forward, such as decay of significant heritage assets, are too significant for inaction. The CHT have signed a Memorandum of Understanding with the Council, to support the regeneration of the Chance Glassworks and Soho Foundry sites. There is a commitment between both parties in working collaboratively with one another, in realising the potential of Sandwell's heritage assets, and their role in making a positive economic impact on the regeneration of the area and benefitting the local community through placemaking and cultural enterprise. This demonstrates the commitment at a senior Council level to the regeneration of these important sites.

Dialogue between CHT and Sandwell Council remains ongoing. Sandwell Council has established a Smethwick Partnership Board, who progress and monitor key regeneration initiatives in Smethwick, comprising several key stakeholders including representatives of the community, business, public sector and councillors. A separate CHT Project Board has also been established by Sandwell Council whose members include the West Midlands Combined Authority (WMCA), Canal & River Trust and the National Trust. Sandwell Council's commitment to restoring these significant heritage assets and working collaboratively with both CHT in the regeneration of the Soho Foundry does, however, not seem to be reflected in the emerging Local Plan, including the designation of the Site for industrial employment use only.

CHT consider that the proposed employment allocation in the draft Local Plan does not provide sufficient flexibility to bring about the regeneration of the Site to preserve this distinctive heritage asset. As such, to realise the potential of the Site, it should instead be allocated under a bespoke and flexible policy allocation for mixed-use development. This will in-turn promote the utilisation of a currently disused brownfield site, as well as celebrate and bring to life a highly nationally important heritage asset, upholding the key aims of the National Planning Policy Framework (NPPF) including Chapter 11: Making effective use of land; and Chapter 16: Conserving and enhancing the natural environment.

As outlined in the following sections, the adopted policy has not worked in bringing about the regeneration of these assets, therefore the proposed draft policy which is more restrictive and less favourable is likely to limit the opportunity to deliver redevelopment of the Site. The Council must recognise that a shift in policy is imperative to thwart the ongoing decay, and to safeguard this unique and highly significant heritage asset for future generations.

These representations outline the Site and its surrounding context; provide an overview of existing and emerging policy; outline key elements of the development proposal; and responds to all policies within the consultation document that are relevant to the regeneration of the Site.

Figure 1: Soho Foundry and Mint site, Smethwick (site boundary in red)



c. Site description

The Soho Foundry and Mint is located on Foundry Lane in Smethwick, close to the canal/railway line. The Site is located east of Sandwell Local Authority and comprises Grade II* listed, former industrial building Soho Foundry and Mint, Grade II listed towpath bridge at Soho Foundry, a Scheduled Monument, associated hardstanding, and small woodland.

The Site is bound by Birmingham Canal (south) and Foundry Lane (north). Adjacent comprises a metal scrapyards (west) and a traditional warehouse/ manufacturing/ industrial building (east) associated with Avery Weigh-Tronix (AWT).

The Site is not in any flood risk area, although some small parts of the Site are vulnerable to surface water flooding. There are no Tree Protection Orders on the Site, nor any ecological designations.

d. Heritage & context

The Foundry was constructed in 1795 for the manufacture of steam engines and was of pivotal importance to the industrial revolution and evolution of mass production techniques. It was closely associated with the pioneering endeavours of Boulton, Watt and Murdoch and subsequently the Site became the home to a new mint building in 1860. Both the Foundry and Mint are Grade II* listed buildings. Whilst the Foundry and Mint buildings are now unused, the wider site was acquired by AWT in 1895 who continue to operate from the adjoining buildings. In 2009, a Historic England and Sandwell Local authority grant aided a temporary roof to protect its structure. The roof continues to protect the core of the historic building; however, the building will require significant work and funding to fully restore and protect the building for future generations. Other than the installation of the temporary roof – the Site has been largely left to decay.

The listed buildings are in varying states of deterioration and disrepair (included on the Heritage England's 'Heritage at Risk Register 2023') which needs to be arrested imminently to avoid irreparable damage being sustained. The Site is part of the Black Country UNESCO Global Geopark, designated in 2020 in recognition of the international importance of its natural and cultural heritage which helped to shape the industrial revolution and the world.

The Site comprises a Scheduled Monument by virtue of the significant areas of archaeological survival that are known to still exist within the Site, including the bases of up to six furnaces and associated major tunnels and flues.

The Site is highly significant nationally and internationally for:

- Becoming the first purpose-built steam engine manufactory in the world.
- Being the first factory to be lit by gas.
- Its association with Boulton, Watt and Murdoch.
- Its association with the Soho Manufactory.
- Its involvement in the development of steamships.
- The great surviving documentation of the Soho archive in Birmingham Library.
- The site's rarity, with so much historic fabric having already been demolished.

Incredibly, few foundries from this era survive, making the Soho Foundry rare and of major national and international importance. Working buildings usually need to adapt to new requirements and so tend to be heavily altered, demolished or in recent times converted to new uses. It is thought that only a dozen or so surviving foundries have been surveyed across Britain. Therefore, the specialness of Soho Foundry is in part attached to its rarity as a type, as well as its significance to the history of human technological advancement at a key turning point. The Site therefore presents a once in a generation opportunity for Sandwell to deliver a sensitive, heritage-led, mixed-use regeneration which will bring these internationally significant heritage assets, back into use.

Working arrangement between the AWT and CHT mean that CHT acquire such heritage assets in their current state of disrepair. Likewise, given the exceptional heritage value of the Site and its local significance within the context of Sandwell/ Birmingham's industrial history, as well as the state of the current assets, the Site will need to be fully restored which will require a substantial financial capital and investment to bring it into a new, sustainable use. It is important to note that in order to achieve its regeneration, CHT are reliant on funding from multiple streams of investment, which is likely to be jeopardised if the allocation does not support flexible uses. The designation of the Site for predominantly single, industrial employment use only would limit this opportunity, and would pose significant risk and uncertainty to the restoration of the Soho Foundry – a highly significant and unique heritage asset.

e. Adopted Policy Considerations

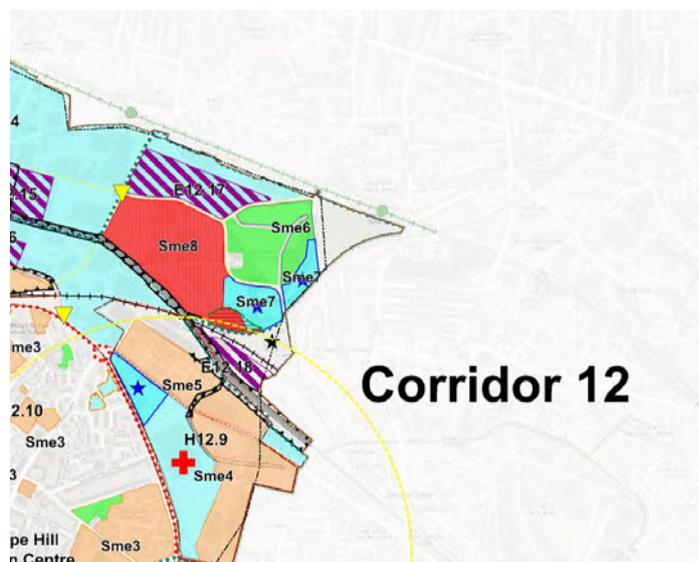
CHT are considering several options comprising a mixture of leisure, tourism, education and conference facilities, along with employment. This aligns with the Sandwell Regeneration Strategy 2022-2027 which sets four key priorities:

1. Accelerate: Deliver new development across regeneration areas promptly and to a high quality;
2. Amplify: Develop our key opportunity sites efficiently, making the best and most creative use of the land available;
3. Curate: Develop each site, and each town, to its full potential, promoting clean and green environments; and
4. Deliver: Use the council's position and powers to unlock sites attractive to investment and uphold quality.

On the Soho Foundry specifically, the Sandwell Regeneration Strategy (2022-2027) identifies the "regeneration of unique heritage assets in Sandwell" as a key priority, committing to "reviving them for modern uses". In doing so, Sandwell Council commits to developing each site to its full potential, by "working with local partners, including businesses and community groups, to explore ideas for local areas".

At present, the Site is allocated in Sandwell Site Allocations and Development Management Plan (2012) under Smethwick Area 8 – North Smethwick Canalside, for mixed-use development within Corridor 12. The area North Smethwick Canalside has a potential residential site capacity of 400 dwellings.

Figure 2: Soho Foundry and Mint site (Sme8)



The Site is also allocated in the Smethwick Area Action Plan (2008) for 'primarily industrial (B1 uses) but with potential to include elements of Community, Leisure and Educational uses' under Policy SME8. Any redevelopment of the Site must have due regard to the Soho Foundry, a Grade II* Listed Building as well as the other Listed structures located within the Site. In the adopted Smethwick Area action plan, the supporting text to Policy SME8 states:

- The restoration proposal of the Site should be comprehensive and not phased.
- It is essential the site is dealt with as a whole to ensure that any short-term development can be sustained, as well as taking consideration the longer-term vision.
- The potential for additional community, leisure and educational uses is recognised as a way to re-use of Soho Foundry.
- Development of this site will also promote more usage of the canalside which may necessitate a commuted sum for improvement to the canal infrastructure.
- The allocation for B1 uses sought to improve the environmental quality of the area by removing heavy industrial operations.
- Recycling uses will not be permitted within the boundaries of the site – they are more appropriate to a general industrial area and will not be permitted.
- The mixed-use allocation has been extended onto land currently occupied by Dunn's to enable a more comprehensive development to come forward should this use relocate in the future.
- Some Community and/or Leisure uses may be considered appropriate for the building as well as educational facilities to highlight the importance of the historic site and buildings and to act as a catalyst for future development.

The principle of use of the Site for mixed-use development was further supported within the now withdrawn draft Black Country Plan (2039).

However, within the emerging policy context, the allocation and protection of the Site for mixed-use development has not been sustained. There are instead three draft policies outlined within the Sandwell Regulation 19 Local Plan that are relevant to this Site and are addressed in-turn in the proceeding section:

1. Policy SEC3: Foundry Lane Local Employment Area;
2. Policy SDS2: Regeneration in Sandwell; and
3. Policy SHE2: Development in the Historic Environment.

f. Proposed Use

The Site is ideally suited for mixed-use development, occupying an accessible location close to employment centres within the District and along the canal. CHT considers that the delivery of employment and/or leisure, tourism, education or conference facilities, or a mix of all these types of development, could unlock the heritage regeneration of these assets and provide an important contribution to Sandwell that would become a celebrated community facility, that will bring activity and a sense of place and life to the area.

Detailed proposals will be formulated in due course, taking account of a thorough study of the Site's constraints and opportunities, and having regard to a wide range of forthcoming technical work to support the emerging plans for this site. CHT are in the early stages of preparing detailed proposals for submission as part of a future planning application and will undertake extensive consultation and seek to work closely with the Council, statutory consultees and other stakeholders to ensure that the final proposals are entirely acceptable with regard to all relevant considerations.

An Options Appraisal has been undertaken, to consider which mix of uses is the most suitable in enabling the Site to come forward for development. This has considered the following four options:

- Option 1 – retention of industrial uses.
- Option 2 – an activity centre, making use of larger industrial spaces for various indoor activities and entertainment such as a roller rink, skate park and indoor climbing centre.
- Option 3 – exhibitions spaces, rentable office/ workshop space and outlets combined with dining and entertainments facilities.
- Option 4 – varying conference facilities including large banquet halls, theatres, exhibition halls and catering facilities.

It is common ground between CHT and Sandwell Borough Council that the Site is not suitable for residential development.

The four various options were tested under the Community Renewal Funding work, with the preferred option emerging as the enterprise-led space. This was driven by several factors:

- The canal side location of the site provides opportunity for environmental uses and element of public realm
- The location and environmental context lend itself to uses that could include environmental technologies and research;
- The size and scale of the building enables the space to be used for a variety of uses that can be utilised by a range of stakeholders and host of activities;
- The historic and architectural quality of building once restored should be able to be enjoyed by all; and
- A mixed-use allocation would enable CHT to pursue funding from multiple streams of funding to ensure the building is fully restored to a high-quality.

In this regard, it will clearly be important that any future allocation and policy relating to this site is sufficiently flexible to enable the emerging proposals to be duly formulated as the masterplanning

exercise progresses, having regard to technical advice and with input from and collaboration with relevant stakeholders as appropriate.

g. Response to Sandwell Local Plan Regulation 19 Consultation

It appears from the draft Sandwell Local Plan that the mixed-use allocation of the Site is being dropped and the Site will only retain a Local Employment Area allocation. This would wholly undermine the regeneration of the heritage assets on the Site, which require a flexible and adaptive policy position to support the most appropriate regeneration approach to the heritage assets.

The CHT request further consideration into the Local Employment Area designation and that the policy designation be removed in this location (area outlined in red in Figure 1 below). It is instead recommended that this is replaced with a bespoke site-specific allocation for mixed-use development. This will allow for greater flexibility of the Site use, enabling different uses and options to be explored, and in-turn ensure the future and protection of these highly significant heritage assets, as outlined below.

Policy SEC3 – Local Employment Areas

The Site forms part of the Foundry Lane (south) SEC3 Local Employment Area Allocation. Accordingly, under this proposed policy, only industrial uses (B2, B8 and E (g)(iii)), and some ancillary employment-generating uses including childcare facilities and food and drink outlets that are demonstrated to support the LEA's function.

The rationale for this policy is stated in the supporting text. It notes that LEAs play an important role in the local economy as they offer a source of mainly low-cost industrial units that provide local jobs. The supporting text notes that one of the key characteristics of LEAs is *"a critical mass of active industrial and service uses and premises that are fit for purpose".* Other characteristics are:

- Good access to local-markets suppliers and employees;
- The existing or potential use and/ or traffic generated by the use does not have an unacceptable impact on the amenity of surrounding land uses or the highway network; and
- Good public transport accessibility.

The financial feasibility of restoring the heritage assets on the Site is significantly compromised within the framework of this allocation. The allocation is tailored for generic industrial spaces, trade, haulage or logistics related uses, which is unlikely to generate the significant financial investment required for CHT and/or others to support and deliver the successful restoration of this site. Currently, the heritage assets on the Site are not in active industrial use and the restoration of the assets for these uses is not the optimal viable use, nor are these uses suitable for the existing buildings and structures on the Site. The only hope for the restoration of this internationally recognised heritage asset undoubtedly relies on the support of the public sector.

In reference to the Soho Foundry, the Council's own response to March 2023 representation (published September 2024) states *"It is accepted that the future of the site is somewhat dependent on introducing a high quality, **mixed use, heritage led, regeneration programme**".* There is a clear acceptance from the local authority that the future of the Soho Foundry and its restoration is dependent on the Site being allocated for mixed-use. This is somewhat in conflict with the allocation and limitation of the Site for traditional industrial employment use and presents a significant policy hurdle and blocker to CHT's aims and objectives of regenerating this site. Notwithstanding, the proposed sole employment use allocation is not considered to accord with Chapter 16 of the NPPF Conserving and enhancing the historic environment, and more specifically paragraph 196 which establishes that:

196. Plans should set a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk of neglect, decay and other threats. This strategy should take into account:

Requirement	How the current draft Local Plan policy SEC3 does not uphold NPPF paragraph 196
a) <i>the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation</i>	Through the limitation of the Site for employment use only, the heritage asset will remain in a poor state of repair, vacant, and rundown.
b) <i>the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation</i>	The restriction of the of the Site to employment use only, would limit any social, cultural and environmental benefits of the proposal, limiting its accessibility and utilisation to private use/ employees.
c) <i>The desirability of new development making a positive contribution to local character and distinctiveness; and</i>	The restriction of the Site for employment use only, will limit the likelihood of the Site coming forward for development and making a positive contribution to local character. This is due to the funding arrangements of CHT, which is conditional on an element of flexibility in the Sites use, to enable CHT to engage with a range of stakeholder interests and streams of funding.
d) <i>Opportunities to draw on the contribution made by the historic environment to the character and place.</i>	The restoration of the Site and its ability to contribute to the historic environment, character and place is dependent on significant finance that is unlikely to be achieved without a site-specific mixed-use allocation.

CHT, a trust which is driven by the protection, restoration, and celebration of the Soho Foundry buildings, consider that the inclusion of the Site within the wider employment allocation will render it undeliverable, and provides a significant barrier to the restoration of the Site.

If the Site remains in a predominantly industrial allocation, CHT may have no choice but to abandon the Site, which begs the question as to whether a commercial developer or industrial business will be willing to take on this financial cost and afford equal priority to the history and celebration of these assets. CHT agree that some employment uses could form part of the mix of uses proposed, but if the policy position is overly restrictive, as currently set out in the Reg 19 Local Plan, then it is likely that funding availability to restore the site will be limited.

Policy SEC3 Response – Site specific allocation

To facilitate the regeneration of the Site, it is essential to carve out a specific site allocation that caters solely and explicitly to the Soho Foundry buildings, so it is viable and not hinged upon the wider industrial-led regeneration of the area. This bespoke allocation should provide the flexibility needed to explore a range of uses that align with heritage-led regeneration, enabling CHT to achieve its mission without the constraints imposed by the Policy SEC3 framework.

There is a clear policy rationale at the national level for a new approach to be considered in the next Local Plan. Paragraph 126 of the NPPF emphasises the need for planning policies to reflect changes in demand for land. Given the prolonged lack of progress under the existing policy, it is prudent to reassess and reallocate the land for a more deliverable use. The proposed draft policy hinders the ability of the site to be restored and fulfil alternative needs, including the restoration and celebration of unique heritage assets of national value.

The rationale for a bespoke application is also supported by NPPF Paragraph 212, which outlines the importance of seeking opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. In the case of the Soho Foundry buildings, their status as

a heritage asset is indisputable, and therefore supports the Council's rationale to explore opportunities that can increase their significance.

The Soho Foundry buildings, being part of a Conservation Area, require a nuanced strategy that goes beyond a generic allocation for industrial redevelopment. A bespoke allocation would allow for careful consideration of the heritage significance and a tailored approach to development, ensuring that the setting is preserved and, where possible, improved to better reveal the historical importance of the site. Moreover, unlike industrial uses, the alternative uses proposed in this representation would make the buildings open to the public which would promote their significance.

Overall, there is a clear rationale for the site to be removed from Policy Allocation SEC3 and granted a bespoke allocation which better reflects the circumstances of the site.

Policy SHE1 – Listed Buildings and Conservation Areas

Policy SHE1 outlines several key aims and objectives in preserving listed buildings and conservations areas as detailed below:

1. Impact of development proposals on the significance of Sandwell's heritage assets and their setting will be considered with case law, legislation and the NPPF
2. Proposals should protect the significance of heritage assets and conserve and enhance local character and aspects of heritage assets together with their settings. The general presumption will be retaining and protecting assets from adverse impacts
3. Proposals should demonstrate how they respond to the significance of heritage assets
4. Council will conserve and enhance the settings on listed buildings through exercising appropriate control over development
5. Proposals must respect the historic character and architectural style, considering building scale, grouping, materials and fenestration
6. The loss of any historic asset/ historic feature will be resisted, and every attempt should be made to secure the asset in as complete form as possible.

It is clear that the policy aims to take every measure in the protection of Sandwell's heritage assets. This is significantly outlined in art 6 of Policy SHE1, which notes that "every attempt should be made to secure the asset". This indicates that the alternative uses proposed in this representation could be supported by the Council, however, as the site is designated under Policy SEC3, development of the site is restricted to industrial uses indicating that there is an inherent policy conflict for the site.

For the reasons outlined in the previous section, CHT consider that the existing allocation on the site fails to recognise the unique circumstances of the site. To reflect the aspirations of Policy SHE1, a bespoke allocation should be provided in the emerging Local Plan to enable adaptive reuse options to be explored so that the historic asset can be preserved whilst remaining financially viable.

To address this inherent conflict, there is a pressing need for the Site to be removed from policy allocation SEC3 and for the site to have its own bespoke allocation, which would allow for the exploration of alternative uses under the principles outlined in Policy SHE1. This would result in a more balanced approach that not only preserves and enhances the unique heritage embodied by the Soho Foundry buildings, but also make it deliverable within the plan period.

Policy SDS2 – Regeneration in Sandwell

Another Policy potentially at odds with Policy SEC3 is Policy SDS2, which also covers the Site. Policy SDS2 designates Regeneration Areas as the primary focus for new development, regeneration, and investment. Specifically focusing on Smethwick, part g of policy SEC3 establishes that the regeneration of Smethwick should be largely driven by the desire to "accommodate new green neighbourhoods on re-purposed employment land" and provide new active travel routes. As noted in part i) of the policy, Rolfe Street is specifically identified as an area to accommodate new residential

community. As noted within the supporting text, paragraph 3.38, funding has recently been granted from the Towns Fund to bring forward residential development at Grove Lane and Rolfe Street. Collectively Rolfe Street Masterplan (approved June 2023) and Grove Land Masterplan were (approved January 2022) will deliver approx. 1,200 dwellings. This represents 46% of the total 2,581 dwelling target set out in SDS2.

Given the emerging residential context, CHT are of the view that the Site should be considered within the wider context, with the Site presenting a valuable opportunity to provide crucial amenity and uses that are compatible with the wider area and residential development.

Notwithstanding, paragraph 3.40 recognises Soho Foundry as playing an important role in the delivery of this aim, noting the “opportunities exist to invest in Soho Foundry and surrounding area, creating mixed-use facility that will attract visitors and revitalise this part of the borough”. The Site is located along the Canal Corridor and contains exceptionally significant buildings which are capable of promoting the area’s unique history and provide significant community facilities for the public. The Site could also be safely accessed by pedestrians from the canal, promoting active travel along this route. Despite this, the inclusion of the Site within Policy SEC3 is in conflict with the aims and objectives of Policy SD2 and supporting text. Policy SEC3 will instead mean that the restoration of the Site would be restricted to industrial uses, which would work against the aspiration to create green neighbourhoods using re-purposed employment land and therefore strongly hinder the public enjoyment of these assets. **Therefore, the Site should be removed from Policy Allocation SEC3 and a bespoke allocation which supports flexible uses included within the emerging Local Plan if the regeneration aims of Policy SDS2 are to be achieved.**

Policy SWA2 – Waste sites and adjoining Employment Land

The Soho Foundry site neighbours an established recycling facility, allocated under Policy SWA2, known as Simm’s Metals. The allocation of this waste facility and the surrounding employment land, for waste and continued employment uses represents a significant missed opportunity to redevelop all the land bound by Foundry Lane, the B4136 and the canal as a wider heritage-led regeneration scheme. It is recommended that the Council considers options for the wider regeneration of this area.

h. Conclusion

In conclusion, the representations put forth by CHT underscore the unique challenges and opportunities associated with the Soho Foundry and Mint site. The Grade II* listed buildings and rich industrial heritage of the site demand a tailored approach that goes beyond the industrial use constraints of proposed Policy SEC3.

Rather than perpetuate the historical ineffectiveness of the prior allocation, a fresh approach is needed to realise the restoration of the Site, in accordance with Paragraph 126 of the NPPF. The Site has significant potential not only to meet the Council’s heritage aims (under Policy SHE1), but also create a substantial regeneration opportunity (in accordance with Policy SDS2). However, without the removal of the Site from allocation SEC3 and the granting of a bespoke site specific and flexible allocation which reflects the unique circumstances of the site, this will never be achieved.

CHT believe that the site could potentially accommodate a range of business, tourism and leisure uses that would foster the public enjoyment of these assets. Further technical work will be prepared in due course to bring forward masterplan proposals for the site.

CHT would like to work with the planning policy team and relevant consultees in this process to ensure a suitable solution is found, which supports the heritage regeneration aspirations of the Trust.

We trust these comments will be taken into consideration and afforded the appropriate level of weight in the next stages of the draft Local Plan. We would be grateful if you could keep us informed on progress of the draft Local Plan, including any further stages of consultation. Should you have any queries in relation to these comments, please do not hesitate to contact me on 07972 894016 or lhannify@iceniprojects.com, or my colleague Georgia Tuttle on 07786731078 or gtuttle@iceniprojects.com.

Yours sincerely,

Leona Hannify
DIRECTOR