
Stroud Neighbourhood Plan

Strategic Environmental Assessment



Screening Report - Consultation draft March 2015

The Environmental Assessment of Plans and
Programmes Regulations 2004



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CONTENTS

	Page
1 Summary Statement	2
2 Stroud Town Centre	3
3 Summary of Issues - why the Neighbourhood Development Plan is needed	3
4 Aim, vision, themes and objectives of the Plan	4
5 Screening	6
6 Conclusion	10
Table 1 Plan themes and objectives	5
Table 2 ODPM application of the SEA Directive	8
Table 3 Likely significant effects on the environment	9
Figure 1 Stroud Town Centre NDP area	12
Appendix 1 Habitat Regulations Assessment - Rodborough Common SAC (extract)/Stroud Local Plan Sustainability Appraisal (draft) July 2013	13
Appendix 2 Draft Stroud District Council Local Plan Policy ES6	15

ACRONYMS USED IN THIS DOCUMENT

AONB	Area of Outstanding Natural Beauty
EARDF	European Agricultural and Rural Development Fund
EC	European Community
EIA	Environmental Impact Assessment
EU	European Union
HRA	Habitat Regulations Assessment
LP	Local Plan
NDP	Neighbourhood Development Plan
ODPM	Office of the Deputy Prime Minister
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment

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Stroud Town Council/Charlie Falzon Associates

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1 SUMMARY STATEMENT

1.1 Managing Authority

Stroud Town Council

1.2 Title of the Plan

Stroud Town Centre Neighbourhood Development Plan (NDP)

1.3 Aim of the Plan

To bring about change to the town centre in order address identified weaknesses and to make the most of opportunities that exist, by providing a framework for decision making based on sustainable principles.

To provide an expression of core and spatial policies as set out in the National Planning Policy Framework and in the emerging Stroud Local Plan.

1.4 Period covered by the Plan

2015 - 2035

Once adopted, the NDP will have the status of being part of the statutory development plan for the area. Screening is therefore required by the Environmental Assessment of Plans and Programmes Regulations 2004, regulation 9. **Our opinion is that a full Strategic Environmental Assessment (SEA) is not required because the proposed programme is unlikely to have significant environmental effects beyond a local level.** The environmental dimension will form part of the Sustainability Assessment, whose scope and detail will be discussed as part of the assessment process.

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2 STROUD TOWN CENTRE

- 2.1 The area defined by the Neighbourhood Development Plan (NDP) forms the core of Stroud town centre (see attached map). Stroud is located at the western fringe of the Cotswold Hills, and lies at the confluence of the Chalford, Slad, Nailsworth, Ruscombe and Painswick valleys. It is virtually surrounded by the Cotswold Hills Area of Outstanding Natural Beauty, to within 300 metres of the defined area.
- 2.2 Rodborough Common is a Special Area of Conservation (SAC), a European protected site on account of its important and extensive semi-natural dry grassland habitat. This is particularly sensitive to atmospheric pollution, recreational pressures and over- or under-grazing. The common lies to the south of the town centre, with its northern edge approximately 1 kilometre from the defined plan area. The Stroud Local Plan (LP) Habitat Regulations Assessment (HRA) estimated that 59% of visitors to the Common came from Stroud itself (Table 5 page 49).
- 2.3 A number of listed buildings attest to the centre's history, especially in relation to its function as woollen mill town. As a trading centre it needed links to surrounding towns and cities, supplied firstly by a canal (the Stroudwater Navigation) linking to the Thames and Severn canal network, and subsequently by a rail link to Cheltenham, Gloucester and Swindon.
- 2.4 The A419 runs through the town centre, meeting the A46 just west of the railway station at Merrywalks.
- 2.5 The town is noted for its independent shops and cafes, and amenities include the historic Subscription Rooms, a building that is the focus for entertainment and cultural events, and is the tourist information centre.

3 SUMMARY OF ISSUES - WHY THE NEIGHBOURHOOD DEVELOPMENT PLAN IS NEEDED

- 3.1 The plan sets out to address a number of economic, social and environmental concerns. These include (in no particular order and not necessarily exhaustive):
- Traffic congestion
 - Conflict between cars and other road users

- Surfaces on roads and paved areas
 - No clear sense of arrival to the town
 - Condition of some listed buildings
 - Limited physical and perceptual connectivity between the canal, the railway and the town centre, and with other areas of the town
 - The general appearance of some streets, including a lack of coherence in street furniture
 - Underperformance as a retail and commercial centre
 - Piecemeal development that has been insensitive to the townscape
 - Sporadic opportunities to optimise greenspace for a variety of purposes including water and drainage management, amenity, biodiversity (including connecting sites), ameliorating air pollution, and buffering noise.
- 3.2 In summary, the town centre lacks a coherent strategy for managing development, which the plan aims to address.

4 AIM, VISION, THEMES AND OBJECTIVES OF THE PLAN

4.1 The intention of the NDP is to bring about change in order to address the above concerns and to make the most of the opportunities that exist, by providing a framework for decision making based on sustainable principles. In doing this, it aims to develop and agree a set of core and spatial policies to reflect and to build upon the National Planning Policy Framework and the emerging Stroud Local Plan.

4.2 The NDP's vision is that Stroud Town centre should be:

“a welcoming, healthy, thriving place”. It should be attractive and make the most of its heritage and its diverse cultural character; it should be accessible to all and have a vibrant feel; and it should be an economically, socially and environmentally sustainable place which reflects its bohemian and ‘green’ personality.”

4.3 To achieve the vision the Plan focuses on five cross cutting themes and thirteen objectives as set out in the table below:

TABLE 1 - PLAN THEMES AND OBJECTIVES

Theme	Objectives*
Improving accessibility	<p>To make the town centre accessible by all modes of transport, using safe, convenient and well designed routes.</p> <p>To improve the links between the town centre and the canal and Stratford Park.</p> <p>To mark the main entry points to the town centre (gateways) and provide a sense of 'arrival'.</p>
Sustaining the economy	<p>To diversify the economy of the town centre so that it is an active place throughout the week, at weekends and in the evening.</p> <p>To welcome and support new and existing businesses and provide a good range of high quality accommodation for businesses to establish and grow.</p> <p>To make the town centre a welcoming place where people are encouraged to spend time.</p> <p>To maximise opportunities to develop or redevelop land within the town centre to meet the needs of the town and make the most efficient use of land and buildings.</p>
Enhancing the environment	<p>To protect and enhance important spaces including greenspaces.</p> <p>To enhance biodiversity.</p> <p>To respect the setting of the town centre by protecting important views.</p> <p>To reduce the level of greenhouse gas emissions and air pollution.</p> <p>To enhance the historic fabric and appearance of the town centre.</p> <p>To maximise opportunities to develop or</p>

	<p>redevelop land within the town centre to meet the needs of the town and make the most efficient use of land and buildings.</p>
Supporting the social and cultural fabric	<p>To enhance the historic fabric and appearance of the town centre.</p> <p>To provide more high quality dwellings to increase the number of people who live in the town centre.</p> <p>To make the town centre a welcoming place where people are encouraged to spend time.</p> <p>To maximise opportunities to develop or redevelop land within the town centre to meet the needs of the town and make the most efficient use of land and buildings.</p>
Creating a healthier place	<p>To make the town centre accessible by all modes of transport, to encourage active travel using safe, convenient and well designed routes.</p> <p>To protect and enhance important spaces including greenspaces.</p> <p>To reduce the level of greenhouse gas emissions and air pollution.</p> <p>To provide more high quality dwellings to increase the number of people who live in the town centre.</p>

** some objectives relate to more than one theme*

4.4 Within the plan area, seven zones have been identified as offering opportunities:

1. The Central Shopping Area
2. Merrywalks Zone
3. Beeches Green Zone
4. Railway Zone
5. Canal/Frome Zone
6. Lansdown/Nelson Street Zone

7. The Hill

5 SCREENING

- 5.1 The purpose of screening the NDP is to determine whether or not it will have a significant effect on the environment, in the terms set out in Annex II of SEA Directive 2001/32/EC and in Schedule I of the Environmental Assessment of Plans and Programmes Regulations (2004).
- 5.2 The emerging Stroud local plan, with which this NDP must generally conform, has already been subject to a Sustainability Appraisal that included an assessment of environmental effects, recommending mitigation measures where necessary.
- 5.3 The Office of the Deputy Prime Minister (ODPM, 2005) produced a practical guide to the assessment process, describing (section 2.18 page 13) a sequence of questions to consider in applying the Directive. **Table 2** sets out these questions and considers the need for a full assessment in the case of this NDP.
- 5.4 **Table 3** lists the criteria for determination as described in the Directive and in the Regulations, and provides our reasoned opinion against which to judge the need for a full SEA. Questions 2(f) and 2(g) and appendices 1 and 2 should be noted.
- 5.5 In order to confirm the necessity of screening for a full SEA, the **Environment Agency, English Heritage** and **Natural England** must be consulted, and it is they to whom this document is primarily addressed.

TABLE 2 - ODPM APPLICATION OF THE SEA DIRECTIVE

Question	Response
Is the plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government?	YES. The plan is subject to adoption by the planning authority if supported by referendum.
Is it required by legislative, regulatory or administrative provisions?	NO. There is no legal, regulatory or administrative requirement to produce the plan. However, if adopted, it will form part of the statutory development plan, and therefore requires an assessment of environmental effects.
Is it prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	YES IN PART. It is a plan for town and country planning that will include spatial policies. UNCERTAIN. Although it relates to urban development (Annex II 10(b)) and possibly to canalisation/flood relief (Annex II 10(e)), these are unlikely to be significant.
In view of its likely effect on sites, will it require an assessment under Article 6 or 7 of the Habitats Directive?	NO. Although a SAC exists approximately 1km from the town centre, the effects of this plan will not be significant. An HRA was carried out for the Stroud District LP. See appendix 1 & 2.
Does it determine the use of small areas at local level, OR is it a minor modification of a plan?	YES. The plan is likely to be a significant material consideration in determining the use of discrete local sites.
Does it set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)?	YES. The plan will be used as a basis for future development consent.
Is its sole purpose to serve national defence or civil emergency, OR is it a financial or budget plan, OR is it co-financed by structural funds or EARDF programmes?	NO. The plan does not relate to defence, civil emergency or financial planning. Nor is its purpose to secure European funds.
Is it likely to have a significant effect on the environment?	UNLIKELY. The plan's purpose will be to enhance the environment where possible, especially relating to air quality, human health, cultural heritage and biodiversity.

TABLE 3 - LIKELY SIGNIFICANCE OF EFFECTS ON THE ENVIRONMENT

Criteria for determining the likely significance of effects on the environment (Schedule 1 of the regulations)	Relationship to Stroud Neighbourhood Plan
1(a) the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The plan will be used to inform consent of development proposals. Location, nature and size will form part of its policies.
1(b) the degree to which the plan influences other Programmes Plans or Strategies (PPSs) including those in a hierarchy	As the 'lowest tier' plan, the NDP needs to conform to higher level plans, and to provide a local spatial expression to their policies.
1(c) the relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development	The plan provides an opportunity to integrate environmental considerations. Its purpose is to promote development that is sustainable.
1(d) environmental problems relevant to the plan	These include congestion (noise, air pollution, overuse of carbon fuels), limited biodiversity and amenity corridors, concerns about the condition of some listed buildings, and the need to conserve energy.
1(e) the relevance of the plan for the implementation of Community legislation on the environment (for example, plans linked to waste management or water protection)	Localised and not significant in itself.
2 (a) the probability, duration, frequency and reversibility of the effects	Any negative effects are likely to be minimal, and outweighed by positive effects of the plan.
2 (b) the cumulative nature of the effects	No adverse cumulative effects are anticipated.
2 (c) transboundary nature of the effects (i.e. environmental effects on other EU Member States)	Any effects are likely to be contained within the plan area. Improved air quality, drainage (SUDS) and ecological corridors will be beneficial if not significant at this level.
2 (d) the risks to human health or the environment (for example, due to accidents)	Low risks - need to ensure that development uses best environmental standards where possible, and mitigates e.g. in the case of bird/bat roosts, as well as aquatic habitats and associated protected species e.g. voles and newts.
2 (e) the magnitude and spatial extent of	Effects are likely to be localised. The plan

the effects (geographical area and size of the population likely to be affected)	relates to part of Stroud Town only. The plan expressly intends to improve modes of travel within the defined area and from surrounding settlements. Improved amenity, commercial and retail may attract larger numbers of visitors.
2 (f) the value and vulnerability of the area likely to be affected due to- (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use.	None of these apply in terms of significant negative effects. There are a number of listed buildings in the plan area, whose condition is not known. Rodborough Common is a high value site. The condition of its key features have been assessed as being 89% unfavourable ¹ . It is unlikely to be affected directly or indirectly by the plan's policies (see appendices 1 & 2).
2 (g) the effects on areas or landscapes which have a recognised national, Community or international protection status	The Cotswolds AONB surrounds the town. It is highly unlikely to be negatively affected by the plan's policies, and may be enhanced by them.

6 CONCLUSION

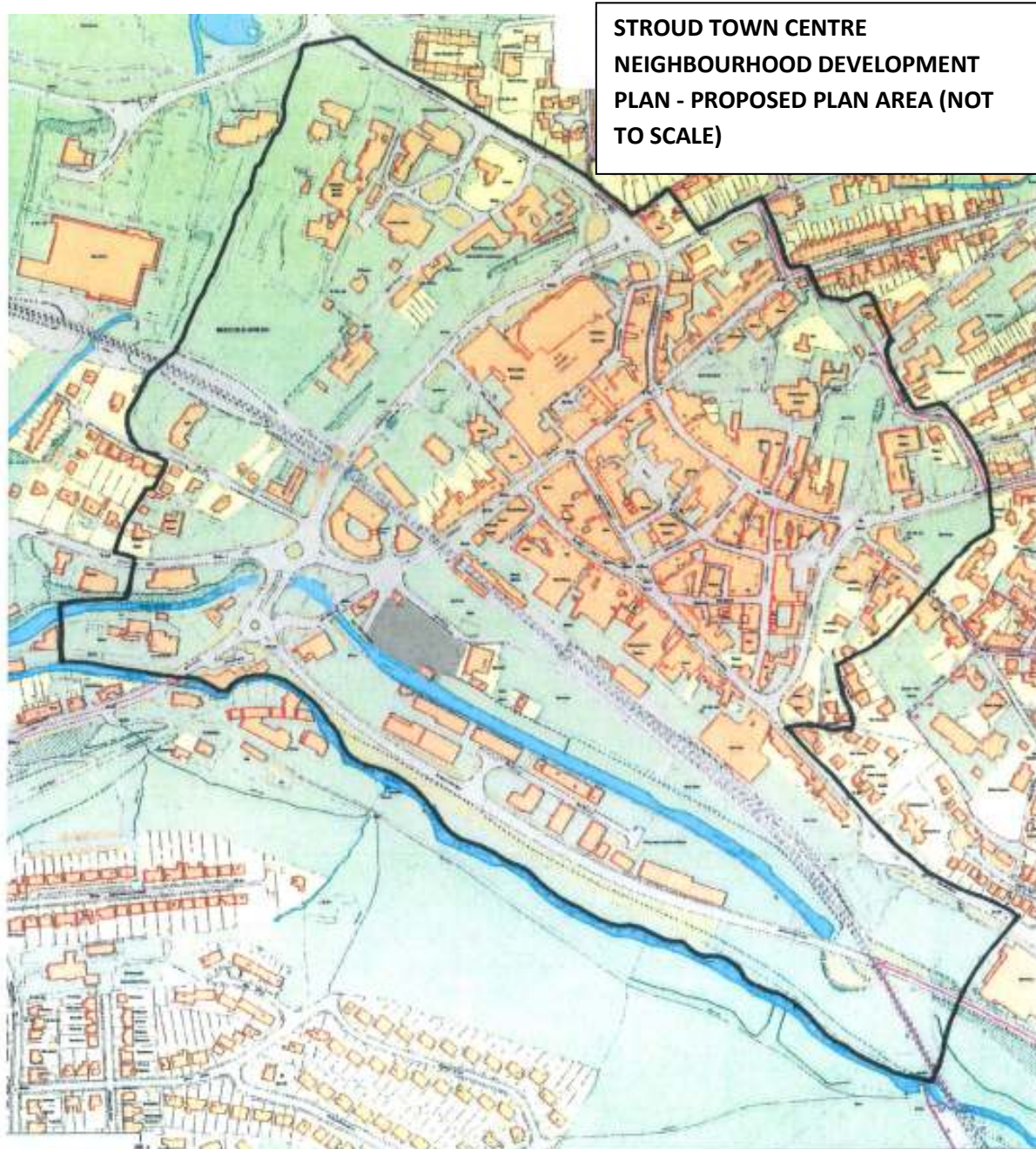
- 6.1 The Stroud Town Centre Neighbourhood Development Plan will conform to the Stroud District Local Development Plan, which has been subject to both SEA and HRA.
- 6.2 No significant negative environmental effects are anticipated within the space or timeframe of the plan, although Natural England and council ecologists will want to be satisfied that appropriate mitigation occurs in the case of birds and bats should that be necessary. Note should also be taken of other protected species and their habitats including water voles and newts. These issues will be referred to in the Sustainability Appraisal. Furthermore, although the HRA of the local plan concluded that negative significant effects on Rodborough Common SAC are unlikely, efforts to improve the site's resilience alongside monitoring measures will be necessary. The draft local plan includes a policy commitment (policy ES6) to avoid development that results in significant adverse effects on sites of international interest (page 144).
- 6.3 Positive effects could include reduction in congestion, and an improved air quality; improvements in energy conservation measures; enhanced public

¹ Stroud Local Development Framework (2009): Sustainability Appraisal Scoping Report. paragraph 15.4.7

spaces, including green spaces; re-use of redundant historic buildings; opportunities to provide for walking and cycling; and better quality housing that promotes healthier conditions.

- 6.4 Taking into account the above considerations, our conclusion is that a full Strategic Environmental Assessment is **not required**. The environmental dimension will form part of the Sustainability Assessment, whose scope and detail will be discussed as part of the assessment process.

FIGURE 1 - STROUD TOWN CENTRE NDP AREA



APPENDIX 1

HABITAT REGULATIONS ASSESSMENT - RODBOROUGH COMMON SAC (EXTRACT)

" Rodborough Common SAC lies in the most densely populated part of Stroud district. The settlements/parishes of Stroud, Minchinhampton, Chalford, Brinscombe and Nailsworth all lie wholly or partly within 3km of the SAC and all contribute visitors to the SAC, with the greatest proportion arising from Stroud town. The combined population of these settlements/parishes is approximately 49,000 people i.e. approximately 43% of the entire Stroud district population.

A visitor survey of Rodborough Common SAC was undertaken during summer 2013 in order to inform this Habitat Regulations Assessment...

...In summary, the survey confirmed the very local nature of the core catchment of Rodborough Common. Of the 159 people or groups interviewed 59% lived in Stroud town itself, 7% lived in Nailsworth and 5% lived in Gloucester. Three percent of visitors lived in Chalford or Stonehouse. Only 2% of visitors came from Rodborough and 1% from Brimscombe, despite the close proximity of those settlements to the European site, probably reflecting their small size. Approximately 73% of visitors to the SAC live within 3km of the site, with over 60% living within 2km of the site (mainly in Stroud town). Beyond 3km, visitor origin becomes dispersed...

The site is subject to a lot of regular visitors, 63% of survey respondents visited at least once a week. Moreover, the visitors like to wander, 40% of survey respondents go off-path. Visits tend to be short; almost all visitors spend less than 2 hours on site, with half spending less than 1 hour.

The site is a National Trust property and specifically seeks to attract visitors. There are well-maintained paths across the site. Anecdotal observation by the author of this HRA report indicates that there are several tarmac paths and minor roads that bisect the common. The common slopes steeply on virtually all sides, so in most areas off-path activity is very limited.

The main off-path activity is on the central plateau. However, under-grazing is the main threat to the favourable conservation status of the common. The National Trust, Defra, English Nature and the Commons Committees have been working in partnership to help deliver sustainable management. The under-grazing is partly connected to recreational activity in that areas subject to recreation (particularly with dogs) are for this reason the most difficult areas to graze due to concerns over cattle-worrying. Other parts of the site (such as the lower slopes) are under-grazed due to concerns with cattle wandering off-site and being struck by cars. Scrub encroachment due to under-grazing is also of concern.

Since the site is already under threat indirectly due at least in part to recreational activity, potential damage could be caused to the site by a further increase in visitors through footpath erosion or (in particular) through disruption of grazing, particularly by dogs...

...visitors to the SAC would be expected to increase by approximately 2.3% over the period to 2031 due to the housing planned for delivery within the core catchment. Note that this is a worst-case scenario since it assumes that all new housing will be occupied by people who do not currently reside in the core catchment of the SAC, and that average household size

will continue to be as high in the future as is currently the case. Neither of these situations is likely to arise in reality...

...Discussion with Natural England and The National Trust has identified that measures which would increase the amount of grazing possible on the site would offset the small increase in visitors that would be associated with the delivery of the Local Plan.

An example of site-specific infrastructure that could be delivered on the SAC is installation of cattle grids on minor roads associated with the lower slopes, which would stop cattle escaping and mean that those slopes could be properly grazed. There are other possibilities for measures that could be introduced to improve the common generally (e.g. scrub management) and reduce cattle worrying (e.g. inform local dog walkers of the risks to cattle and how they can minimise the risk through leaflets and signage). There are also things that could be done to manage minimise erosion, such as by ensuring that the areas used for parking are adequately surfaced thus reducing the likelihood of people parking on the grassland itself.

Discussions are on-going between the District Council and the National Trust to progress the delivery of the current National Trust Management Plan for the Commons. It is therefore recommended that the Local Plan should include a specific commitment by the Council to working with Natural England and The National Trust to deliver improvements to the SAC through assistance with the delivery of measures including installation of new cattle grids, scrub control on the common and maintenance of parking areas in order to avoid an adverse effect on the integrity of the SAC...

(pages 47-50)

STROUD LOCAL PLAN SUSTAINABILITY APPRAISAL (DRAFT) JULY 2013

*'In-light of the findings of Habitats Regulations Assessment (HRA) it is possible to conclude that **significant negative effects** on biodiversity are **unlikely**'.*

(paragraph 14.3.13)

APPENDIX 2 - DRAFT STROUD DISTRICT COUNCIL LOCAL PLAN POLICY ES6**Protecting our built and natural heritage****Delivery Policy ES6****Providing for biodiversity and geodiversity****European Sites**

Development will safeguard and protect all sites of European and Global importance, designated as Special Area of Conservation (SAC), Special Protection Area (SPA) and RAMSAR sites. Development must not result in significant adverse effects on these internationally important nature conservation sites, either alone or in combination with other projects and plans.

National Sites

Nationally important sites, including Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR), will be safeguarded from development, unless the benefits of the development outweigh the nature conservation interest or scientific interest of the site.

Local Sites

Local sites, including Local Nature Reserves (LNR), Key Wildlife Sites (KWS) and Regionally Important Geological and Geomorphological Sites (RIGS) will be safeguarded from development, unless the benefits of the development outweigh the nature conservation or scientific interest of the site. Where development is considered necessary, adequate mitigation measures or, exceptionally, compensatory measures, will be required, with the aim of providing an overall improvement in local biodiversity and/or geodiversity. Opportunities will be sought to access and enhance the value of such sites for educational purposes, particularly in relation to promoting public awareness as well as appreciation of their historic and aesthetic value.

New Development and the Natural Environment

All new development will be required to conserve and enhance the natural environment, including all sites of biodiversity or geodiversity value (whether or not they have statutory protection) and all legally protected or priority habitats and species. The Council will support development that enhances existing sites and features of nature conservation value (including wildlife corridors and geological exposures) that contribute to the priorities established through the Local Nature Partnership. Consideration of the ecological networks in the District that may be affected by development should take account of the Gloucestershire Nature Map, river systems and any locally agreed Nature Improvement Areas, which represent priority places for the conservation and enhancement of the natural environment. In this respect, all developments should also enable and not reduce species' ability to move through the environment in response to predicted climate change, and to prevent isolation of significant populations of species.

Protected Species

Development proposals that would adversely affect European Protected Species (EPS) or Nationally Protected Species will not be supported, unless appropriate safeguarding measures can be provided (which may include brownfield sites).

The Council may, in exceptional circumstances, allow for biodiversity offsets, to prevent net loss of biodiversity at the District scale.