

Annex E to Basic Conditions Statement

Stroud Town Centre Neighbourhood Development Plan 2015-35

EVIDENCE REPORT

Introduction

This report summarises the core evidence on which the NDP is based and links the evidence to the development policies in the Plan. The evidence includes:

- national Census 2011
- National Planning Policy Framework 2012
- Stroud Local Plan and its evidence base;
- the emerging Local Transport Plan and its evidence base, prepared by Gloucestershire County Council;
- our consultation processes, including issues identified in September 2014; the questionnaire results from our visions (November 2014) and options (March 2015) consultations; and the outcome of our Regulation 14 Consultation undertaken between 3rd October and 14th November 2015.
- our own surveys including a full survey of upper floors in the town centre to see how many provide, or have the potential to provide, residential accommodation (LOTS survey 2015¹);
- commissioned surveys comprising an Access Audit²; a Viability Study³ and a Sustainability Appraisal⁴ all of which have provided independent evidence to underpin the Plan.

Copies of all of the studies done can be found on our website.

This report does not repeat the key facts which are included in Appendix 2 of the Plan and which form part of the evidence base of the Plan. In most cases the Stroud Local Plan provides the starting point for the NDP and the evidence which underpins the Local Plan is relied upon unless otherwise stated.

The report is set out under the topics which provide the framework for the policies in the Plan. Links to specific evidence related to the relevant documents are provided via our website <http://shapingtheheartstroud.org/evidence/>. Links are also provided on the website to background information about the town centre which may be of interest <http://shapingtheheartstroud.org/links-and-resources/>.

¹ Survey work done by Camilla Hale and Anne Mackintosh

² Harris Ethical Ltd

³ AECOM Strategic Planning and Design. Report provided as technical support funded by Locality

⁴ Charlie Falzon Associates

POLICY ISSUES

Jobs and business

Core documents:

Stroud Local Plan

2011 Census

Cotswold Canal restoration programme (available from the Cotswold Canal Trust website)

Evidence: The Local Plan provides the key evidence for the NDP's approach to jobs and business. The town centre forms part of the Stroud Valleys strategic growth area in the Local Plan. Under the "guiding principles":

- The town centre will be a focus for employment, economic growth and regeneration.
- Redevelopment of brownfield land will be prioritised – including vacant and underused sites, with the aim of boosting job numbers and intensifying use.
- Focus on canal restoration and canal corridor conservation and regeneration.

About 2000 people currently have their place of work in the NDP area of whom 500 work for Ecotricity. Under Policy AP1 the plan aims to retain or increase the number of jobs in the plan area.

The canal is a key driver for the NDP which seeks to make it more of a feature by improving links between the canal and the town centre (Policies AP3, ZP2a, ZP2c and ZP3); improving access along the canal (Policies ZP2a, ZP2b, ZP2c); and by bringing back the former canal basin at Lower Wallbridge (Policy ZP2b). All of these proposals have the potential to enhance the economy of the town centre by bringing in more people and supporting tourism.

Retail and social

Core documents:

Stroud Local Plan

"Stepping out: towards an action plan for Stroud's evening economy" 2005

Stroud Chamber of Trade Survey 2010

Stroud Retailing Study 2010 and update 2013

Farmers' Market Town Centre Consultation 2014

NDP consultation – vision and options questionnaire results and Regulation 14 responses.

Evidence: The Local Plan describes Stroud as the "principle commercial centre" which "underperforms" and "faces fierce competition from Cheltenham, Cirencester, Gloucester and Swindon" (paragraph 3.5). The guiding principles (paragraph 3.8) "aim to enhance the retail offer and tourist appeal, exploiting 'unique selling points' including its 'green', 'foody' and artistic culture".

The Retailing Study concluded “Stroud does have a strong sector with regards to independent retailing and this should be further encouraged .. (including further promotion on the back of the quality and diversity of the weekly farmers’ market, the amount and profile of the visitors which the market attracts, the potential that this can have for a wider permanent retail offer in the town centre). The on-street surveys (2009) also identified a significant opportunity in further enhancing the evening economy which currently attracts a small proportion of those who regularly use the town centre during the day. Access to the town centre during the evening was identified as a key constraint in addition to the limited range of its offer with regards to its eating and drinking establishments and targeting different sectors of the population.” (Paragraphs 4.52 & 4.53).

Policy AP2 provides additional support to the policies in the LP by encouraging development which will enhance both the retail viability and the social vitality of the town centre, including the evening economy. Policies ZP1b supports additional retail floorspace in the town centre. Other policies such as AP3, AP9b, ZP1c, ZP4c, NP4, NP5 and NP6 seek to improve the accessibility and environment of the town centre for shoppers.

“Stepping out’ – the evening economy report by URBED – recommended greater pedestrian priority in the town centre and the improvement of the gateways into the town, particularly Gloucester Road. This supports the general thrust of the NDP, in particular policies AP3 and AP7.

A survey was undertaken by the Chamber of Trade in 2010 in which 390 members of the public took part. Of the 7 options available the following were identified as the 3rd, 4th and 5th most important after “more independent shops” and “less litter”:

- Brighten up buildings shops and squares – which is addressed in Policies AP9a, AP9b, ZP1a, ZP1c, ZP4c and Policy NP4;
- Stronger links between shopping, canal and other attractions – which is address in Policies AP3; ZP2a; ZP2c; ZP3 and ZP5
- Promote all that Stroud has to offer – which is addressed in Policy NP2

The Farmers’ Market consultation in 2014 involved 285 face to face interviews and 501 telephone interviews. The results, alongside the outcome of our own NDP consultation, confirms the importance of the markets to the town’s economy. Policy ZP1b protects the markets currently held in Cornmarket.

Access and Movement

Core documents:

Stroud Local Plan

Local Transport Plan

GCC transport desire line map

Access Audit

Cheapside Neighbourhood Opportunities Report 2013

Station car parks and rail customer surveys 2015

NDP consultation – issues identification, vision and options questionnaire results and Regulation 14 responses.

Evidence: Stroud Local Plan guiding principles seek to “improve the physical accessibility between the canal and the town centre” (paragraph 3.8). The Local Plan seeks “to deliver new and improved transport infrastructure” and expects “development in the Stroud Valleys (to) contribute funds to the restoration of canals and towpaths as well as potentially designing in new links across communities” (paragraph 5.7).

The GCC transport desire line map shows the very strong dominance of Gloucester and Cheltenham for all forms of movement, but the Stroud Valleys is an important secondary centre. Stroud Parish is the main centre of movement within the Stroud Valleys, though not dominant. Stroud represents the biggest attractor for many surrounding zones: Rodborough/Lightpill, Ebley/Cashes Green, Nailsworth, Stonehouse, Brimscombe/Minchinhampton, Chalford/Bussage, Painswick area. The Stroud Valleys area is very car-dependent. Bus travel to Stroud represents only a small proportion of trips. Walking is most significant from the Stroud zone itself, but not registered on the map. Walking is also significant from Rodborough and Ebley zones to Stroud, but even from those zones car use is far more important, reflecting not only distance but the poor quality and perceived danger of the routes into the centre

The traffic counts undertaken for the Local Transport Plan (24hr 5 day average flows 2013 and 2014) show the relatively high levels of traffic both within the town centre (4,650 in and 6,994 out of Rowcroft) and around the southern and western edge with more than 11,500 vehicles each way on Merrywalks, 10,500 each way on Beeches Green and between 9,000 and 10,000 vehicles each way on Dr Newton’s Way. These roads are major traffic routes running north/south (A46) and east/west (A419) through the Plan area.

Evidence from the police concerning collisions involving pedestrians in the town centre between 2012 and 2014 shows 1 fatal on London Road; 7 serious injuries – 4 in the centre, 1 on Merrywalks, 1 on Beeches Green and 1 on London Road; and 20 slight injuries – these scattered throughout the plan area. Traffic congestion and pedestrian accessibility was one of the key issues raised in the initial consultation on the NDP.

The Cheapside Neighbourhood Opportunities Report analysed the problems of pedestrian accessibility and connectivity in the south part of the NDP area, and suggested new links that were needed. The Proposals map incorporates most of those links, which relate to Policy AP3.

The Access Audit of the NDP area pointed to a general lack of care and attention to the pedestrian environment, which is of critical importance for all people in the town centre. This includes inadequate pavement width in many places, sometimes compromising use by wheelchairs and double-buggies; awkward and sometimes dangerous crossings; excess signs (mainly for

traffic) and bollards etc along the pavement, though conversely key information/signs for pedestrians missing; generally poor levels of maintenance, in places causes pedestrian hazard; and a lack of enforcement of parking restrictions, with pavements occasionally blocked or narrowed as a result.

Policies AP3, ZP1c, ZP2a, ZP2c, ZP3, ZP4b, ZP5, NP3 and NP6 all seek to create a more pedestrian and cycle friendly environment and improved links within and into the town centre, seeking to use development opportunities to deliver such improvements, where possible.

Homes

Core documents:

Stroud Local Plan

Census 2011

Living over the shop (LOTS) survey 2015

Report of housing seminar held in February 2015

Evidence: Stroud Valleys is a focus for strategic growth with 450 dwellings proposed in the Local Plan. One site is allocated in the NDP area – Cheapside for 30 dwellings. This site is owned by Newlands Homes who propose a mixed use development including 35 dwellings. Their proposals have been discussed with the NDP team and incorporate the criteria set out in Policy ZP2a.

The Census zones do not precisely coincide with the NDP area. The nearest approximation to the centre shows that relatively few people (427) live in the NDP area. About two thirds (63%) are male and a third (33%) are aged between 16 and 30. Few families live in the plan area (11%). The actual population is likely to be somewhat higher, both because of zonal discrepancies, and the transitory character of some of the residents.

A very high proportion of dwellings are flats (78%) and just over half of dwellings are one bed (52%). 56% of dwellings are privately rented. The LOTS survey revealed 221 (mainly one bed) flats available and occupied with potential for 41 more. The principles set out in Policy AP4a aim to encourage the development of a wider range of housing which would attract a more diverse population mix than currently exists.

The plan area offers a potentially attractive living environment for people of all ages and more people living in the town centre would add to the vitality and help boost its economy. The Plan does not allocate sites for residential development over that allocated in the Local Plan but identifies opportunities which can be explored by landowners and developers as part of making the best use of land in the town centre eg Policies ZP1b, ZP2c, ZP3, ZP4a, ZP4c, ZP5 and ZP6.

As part of the NDP consultation process a number of topic specific seminars were held with a cross section of interests. The housing seminar held in

February 2014 was well attended and concluded that the NDP should focus on “aspiration to deliver a greater proportion of high quality, affordable, professionally managed housing run over the long term by ethical/social landlords” and that Community Land Trusts ought to be one of the mechanisms used to deliver this aspiration. This led to the inclusion of Policy AP4b.

Green Spaces

Core documents:

Stroud Local Plan

Wallbridge public consultation 2014

Stroud’s potential green spaces February 2014 (report prepared by a volunteer as part of the NDP consultation process)

NDP consultation – vision and options questionnaire results and Regulation 14 responses.

Evidence: The Local Plan encourages local communities to designate Local Green Spaces through Neighbourhood Plans (Policy ES13). Policy AP5a identifies 5 spaces which are proposed to be designated Local Green Spaces. Paragraph 77 of the NPPF sets out the criteria to be used to assess whether Local Green Space designation is appropriate. These are that the designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to the community and holds a particular local significance for example because of its beauty, historic significance, recreational value .. tranquility or richness of its wildlife;
- where the green area concerned is local in character and is not an extensive tract of land

The following assesses the 5 areas referred to in Policy AP5a against the NPPF criteria:

Frome Banks – an area of woodland which lies along the river bank at the southern edge of the designated plan area within easy walking distance of those living, working or visiting the town centre. It is a Gloucestershire Wildlife Trust Nature Reserve with a diverse bird and plant life. It provides a relatively small tranquil area in which to relax and enjoy nature.

Capel’s Mill area – a recently restored former rubbish tip lying opposite Waitrose. The area has been planted by volunteers led by Stroud Valleys Project a local charity which works with communities and disadvantaged people. The area has a range of different species of trees set in a wildflower meadow with a pond and seats for people to enjoy the tranquillity. It has been made into an attractive place to visit with easy access to those living, working or visiting the town centre. It is fast becoming a popular place for recreation and leisure as well as an increasingly diverse habitat for a range of species, including bats.

Bank Gardens – a popular small park in the heart of the town centre which is

very well used by people living, working and visiting the town centre. It is one of two formal gardens in the town centre Stroud's Bank Gardens provides a green space for visitors and residents. It was given to the town by Ernest, George and Hugh Winterbotham in 1930. The gift was in memory of their parents, who had previously owned the gardens. A mixture of seating, lawns and formal borders with numerous mature specimen trees it offers a popular resting spot in the summer. The gardens are the base for the town's annual Fringe Festival in September and adjoin the Lansdown Hall and Gallery – Stroud's community venue (subject to Policy AP10).

St Laurence Churchyard – adjacent to Bank Gardens this land provides a setting for the church and a quiet and tranquil green space in the heart of the town centre.

Wallbridge open spaces on either side of the canal at an important gateway into the town centre. As part of the consultation on the NDP a separate consultation was carried out on the future of the undeveloped land on either side of the canal at Walbridge. This concluded very strongly that this land should be protected as green space. It is part of the historic canalside and is a popular area for people to relax, despite its proximity to the busy A46/A419 junctions at Wallbridge.

The open spaces the subject of Policy AP5b form an important part of the green framework of the town centre and help to offset the carbon emissions associated with the heavily trafficked roads which dominate the western and southern sections of the designated area. The canal embankment is also important as part of the setting of the historic and partially restored canal.

Setting

Core documents:

Stroud Local Plan

NDP consultation – vision and options questionnaire results and Regulation 14 responses.

Evidence: Stroud Local Plan guiding principles “conserve and enhance high quality natural landscape ... , including the valuable ‘green horizons’ that are visible from within the urban area” (paragraph 3.8). The key views which need to be protected to maintain that ‘green horizon’ were identified through the NDP consultation process and are defined in Policy AP6.

Gateways

Core document: Stroud Local Plan.

Public Realm Strategy 2009 (PRS)

NDP consultation – vision and options questionnaire results and Regulation 14 responses.

Visual appraisal 2014 undertaken by a volunteer with expertise in landscape architecture

Evidence: One of the guiding principles of the Local Plan is to “improve the approach and sense of arrival at the town centre” (paragraph 3.8). The PRS and the consultation on the NDP identified a number of gateways to the town

centre which are the subject of Policy AP7. The zonal policies require the enhancement of the relevant gateways as part of any development/redevelopment scheme (Policies ZP1b, ZP4c and ZP6).

Heritage

Core documents:

Stroud Local Plan.

Public Realm Strategy 2009

Historic England Advice Note on local heritage listing

Reports by Stroud Preservation Trust on buildings of local interest in the plan area

Evidence: The guiding principles of the Local Plan look to “conserve and enhance the valley’s heritage assets, including the features of the area’s unique industrial heritage” (paragraph 3.8). The District Council’s Conservation Area Statements for the three Conservation Areas within the plan area are given prominence through Policy AP8a. Policy AP8b reflects the recognition that within the plan area there are a number of unlisted buildings of historic and/or architectural interest which are important to retaining the unique character of Stroud town centre. Following the guidelines published by Historic England this policy offers local protection for such buildings.

Design

Core documents:

National Planning Policy Framework paragraph 56

Stroud Local Plan submission draft December 2013

Public Realm Strategy 2009

Shop fronts guide 2010

Visual appraisal 2014 undertaken by a volunteer with expertise in landscape architecture

SDC Conservation Area character and management statements.

Evidence:

Guiding principle 10 for the Stroud Valleys cluster in the Local Plan seeks to “secure high quality distinctive design, in keeping with local character” (paragraph 3.8). The Local Plan includes a design policy framework under Policies CP14 and ES12. Policy AP9a builds on that in relation to the plan area by providing some guiding principles based on what are considered to be good practice for achieving high quality, sustainable development. Further detail will be developed as part of design guides for specific locations (as referred to in Table 1 Projects).

The PRS provides a set of detailed design principles for enhancing the public realm which have been adopted by both the town and district councils. These are given greater weight via Policy AP9b and Appendix 6 of the NDP. Similarly the shop fronts guide which has been adopted by the Town Council and was consulted upon as part of the NDP process is given greater weight via Policy ZP1.

Buildings of cultural importance

Core documents:

Stroud Local Plan

NDP consultation – vision and options questionnaire results and Regulation 14 responses.

Evidence: Within the guiding principles for the Stroud Valleys the Local Plan notes “artistic culture” as one of the town centre’s ‘unique selling points’. A handful of buildings with the plan area were identified through the NDP consultation process as having particular value in supporting and facilitating this strong cultural tradition which helps boost the town centre’s tourist appeal. These buildings are mainly in a form of public ownership eg SDC own the Subscription Rooms and the Old Town Hall; STC own Lansdown Hall and Gallery; and the Brunel Goods Shed is owned by Network Rail but leased to Stroud Preservation Society. Policy AP10 seeks to protect their ongoing community use for public enjoyment and community use purposes, which can embrace a range of cultural, sporting and recreational uses.

Public transport

Core documents:

Stroud Local Plan

NDP consultation – issues identification and Regulation 14 responses.

Evidence: In accordance with the NPPF the Local Plan promotes healthier alternatives to the car. As noted under Access and Movement above the level of travel by bus does not register on the GCC travel desire map, Stroud being a very car dependent town. The process of identifying issues for the NDP threw up concerns about the quality of the facilities for bus users and the need to make this form of transport more attractive. Policies AP12a and b address these issues, which were reinforced at the Regulation 14 consultation stage.

The station rail customer survey found that the majority (79%) accessed the station by car, some driving alone, some sharing, some dropping travellers off. Most of the rest walked to the station. There is limited cycle parking available, very heavily used (policies AP13 and NP6 reflect this issue). Taxis are normally available. The car users survey found that 54% said there is ‘no chance’ of changing their travel mode to the station. 24% however stated there is the possibility of change. Most wanted improvements to the station, and considered that could influence a change of behaviour in the future. Rail trips are primarily for commuting and leisure purposes. The most frequent destination is London. 74% go there regularly. Cheltenham, Gloucester and Swindon are the other main destinations. School children heavily use certain trains. The relationship of the bus station and the railway station is a matter which will be considered in the context of Policy AP12b.

Car parking

Core documents

SDC car parking capacity data 2015
NDP consultation – issues identification, vision and options questionnaire
results and Regulation 14 responses.

Evidence: Formal data on car park usage is not available but informal surveys of the use of the car parks by members of the Steering Group supported by NDP consultation responses suggest that, whilst there is sufficient space available, information about usage and location is lacking. This leads to disappointment when newcomers or those unfamiliar with the various car parks located around the town centre cannot find parking and go elsewhere. Furthermore, both shoppers and retailers have expressed concerns about the pricing policy which requires people to pay in advance – thus, potentially, deterring long stays. Policy AP11 recognises the fact that some land used for parking has development potential but safeguards the amount of parking whilst Policy NP1 reflects the intention of the Town Council to work with and influence the way in which SDC operate their parking policy within the Plan area.

The station car park survey found that use of the car parks (both sides of the tracks) was split pretty evenly between long-stay (6+ hours), medium stay (3-5 hours) and short stay (1-2 hours), with car parks on the town side favouring short stay, those on Cheapside favouring longer stay. Since even a quick visit to neighbouring cities for shopping or leisure purposes would take at least 3 hours (and normally longer) these car parks are not exclusively used by rail passengers, but probably at least as much by people visiting the town.

Energy

Core documents:

National Planning Policy Framework paragraph 35
Stroud Local Plan submission draft December 2013

Evidence: The Local Plan provides a comprehensive policy framework for development to achieve sustainable construction and energy efficiency (ES1) and to promote renewable and low carbon energy schemes (ES2). Policy AP13 of the NDP builds on these by focusing on specific issues relating to the town centre – notably the provision of charging facilities for electric vehicles and cycles as recommended in the NPPF. The Town Council also wish to emphasise the importance they attach to energy efficiency and small scale renewable energy generation through the application of this policy.

VIABILITY

A viability study was commissioned to assess the site related zonal policies. As these policies do not allocate the sites or areas for specific land uses the study inevitably adopted a wide range of assumptions. The study showed that for most of the sites the preferred mixed use options were unviable in the current market. However the report acknowledges that *“in our experience most commercial development in UK towns would be shown as unviable using high level residual valuation such as that deployed for this study”* (paragraph 8.2.9). The report goes on to conclude that *“Some level of*

intervention is likely to be required to ensure that sites come forward over the Plan period” and “whilst some sites may be showing as unviable at this particular point in time, small amendments to the proposals could help viability” (paragraph 8.2.10). The Plan seeks to aid the development process by setting out at Appendix 7 the likely infrastructure requirements and possible costs associated with the proposals in the NDP (where these have been able to be assessed) and the Projects set out in Part D of the NDP include actions STC will take in partnership with others to help stimulate interest in the development options identified in the zonal policies.

It is noted that the viability study found that *“the proposals in the emerging NDP would not subject development to such a scale of obligations and policy burdens that its ability to be developed is threatened”* (paragraph 8.2.11).

SUSTAINABILITY APPRAISAL

A comprehensive sustainability appraisal was commissioned from an independent expert. The report was consulted upon alongside the draft NDP at Regulation 14 stage. The sustainability appraisal is an iterative process which has informed the plan as it has been prepared. The submission draft Plan has been assessed against 26 sustainability objectives and in recognition that the purpose of the NDP is to add to, not repeat what is in the Local Plan. It concludes that *“The draft NDP appears to address all but three of the sustainability objectives... Of the three none is likely to be negatively affected”* (paragraph 7.4).

Strategic Environmental Assessment (SEA): In accordance with required procedure SDC have consulted the statutory agencies, Natural England, Historic England and the Environment Agency, who have confirmed that a formal SEA is not required for the NDP.

Habitats Directive: Natural England have confirmed that an Appropriate Assessment under the Habitats Directive will not be required if the Local Plan is adopted before the NDP. The Local Plan was adopted in 19th November 2015.

December 2015