

Sent via e-mail to:
Elizabeth Dixon
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COMMUNITIES

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Dear Elizabeth,

Response to the Stratford-upon-Avon Neighbourhood Plan 2015- 31 for Stratford upon Avon Town Council area

The County Council supports Neighbourhood Plans (NP) and local decision making. NPs enable local residents and business to directly shape proposed developments and growth that will occur in a sustainable and fair way.

The County Council is one of the major infrastructure providers for the county, providing and managing many important services that communities use and rely upon. We have responsibility for: highways and transportation; schools provision; public health; waste management; community safety, libraries, support for elderly and vulnerable people and as the statutory planning authority for Minerals and Waste.

Planning Obligations and Neighbourhood Plans

The National Planning Practise guidance (updated on 30th March 2015) now advises that policies seeking planning obligations be also set out in Neighbourhood Plans. As well as the comments below we advise that Neighbourhood Plans should contain appropriate and clear policies on planning obligations. We also advise that an indicative Infrastructure Project list for the expenditure of the Community Infrastructure Levy to support growth should be identified.

Planning obligations assist in mitigating the impact of development which benefits local communities and supports the provision of local infrastructure. Local communities should be involved in the setting of planning obligations policies in a Local Plan and neighbourhood plans.

*Working for
Warwickshire*

Therefore, policies for seeking planning obligations should be set out in a Neighbourhood Plan to enable fair and open testing of the policy at examination.

NPPF para 204 states that planning obligations should only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Any necessary infrastructure that local communities identify must be funded from developments. There should not be any expectation that these would be funded by the County Council.

Local Economy

The National Planning Policy Framework (NPPF) advises that neighbourhood plans should plan positively to support local development. One of the core planning principles is that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Significant weight should be given to the need to support economic growth through the planning system.

Stratford-upon-Avon is key asset in the Warwickshire tourism economy, and is a key town centre in its own right. We therefore support plans that promote regeneration and development of the town centre, particularly plans to protect and provide a range of employment sites and business accommodation that in turn support a diverse and wider range of business activity and employment. Supporting the tourism economy, whilst also enabling the development of more balanced and therefore sustainable business base in the town is critical. The County Council will work in partnership to help deliver on policies TC1, TC2 and TC3 to improve the town centre for visitors, residents and businesses.

Education facilities

The County Council is responsible for the planning of school places, reduction of surplus places, pupil projections and assessing school capacities. In this context we support policy INF7. Furthermore, we seek the support of the Neighbourhood Plan on Planning Obligations (Section 106) and provision for schools. Section 106 of the Town & Country Planning Act 1990 allows education authorities to obtain funds from developers of new housing developments where the number of houses being built will require extra school places. We recommend that these matters should be made explicit in the Plan.

Policy INF8 refers to supporting a new secondary school to the south of the river. The County Council wishes to work with the Town Council and District Council in identifying the need for additional school places and how and where they should be provided.

We will work with promoters and developers to support the housing allocation sites including the Canal Regeneration Zone, and employment land south of the Alcester Road (A46).

Tourism

Stratford upon Avon is an international visitor destination. This attraction and the associated economic opportunities are of benefit to the wider Warwickshire economy. We support policy TC1 – Town Centre Strategic Partnership and policy TC11 - Promoting a Cultural and Learning Quarter.

Public Health matters

Public Health Warwickshire has developed the Public Health Evidence for Planners and Developers, which accords with the Building for Life standards and affordable housing. This document is attached for your information.

Transport - General Observations

A significant amount of work has been put into developing the Pre-Submission Consultation Neighbourhood Development Plan (NDP) (May 2015) and hope that our previous advice has been helpful. We welcome the opportunity to provide comments as part of the current formal NDP consultation process, and have done so with reference to 'Section 1: Introduction', 'Section 7: Town Centre' and 'Section 10: Infrastructure' below.

The NDP has a number of strengths and reflects some of the work already being progressed by the County Council; we have previously highlighted our concerns regarding some of your proposals, several of which still appear to be included in the current NDP. Our previous advice highlighted the potential difficulties in delivering Policy INF1, part 2, for an access road between Shipston Road and the Recreation Ground Car Park, and Policy INF1, part 5, which seeks to promote a traffic calming scheme on Birmingham Road covering the section between the A46 at Bishopton and the Arden Street/Clopton Road junction. Our current position on these proposals is consistent with our previous advice and is reproduced below under the relevant policy headings.

Section 1: Introduction

This section notes that *"as the plan will have gone through consultation and a referendum, it will be a record of where residents' priorities lie and how they would like to see the town develop. It will therefore provide public authorities with a clear local mandate for action"*. As highlighted in our previous correspondence, our understanding is that if an NDP is validly established, it joins the other development plan documents

mentioned in Section 38 of the Planning and Compulsory Purchase Act 2004. As such it will form part of the planning background against which proposed developments are measured. Paragraph 14 of the National Planning Policy Framework presumes that proposed developments in accordance with the development plan will be allowed to proceed.

The County Council will have regard to the NDP in the same way as the rest of the development plan when formulating its policies in areas such as traffic management. The development plan as a whole must be taken to be the most coherent way of securing the social and economic welfare of the area through sustainable development. That being said, our understanding of the legislation is that it does not impose a specific obligation on local authorities to deliver the aspirations or targets embodied in a NDP, as the cost and feasibility of doing so would need to be established before the County Council could consider supporting them. We would therefore recommend that the NDP includes a statement that any NDP policies or aspirations which would fall under the remit of the County Council would require its support before they could be considered for implementation.

Section 7: Town Centre

Policy TC10 - Birmingham Road, Arden Street and Windsor Street Environmental Improvement Area

We have held initial discussions on aspirations for improving the economic vitality and environmental amenity of this area with colleagues at the District Council, and this has helped to inform the development of outline options for reducing congestion on Birmingham Road.

Policy TC13 - Improving the Balance between Vehicles, Pedestrians and Cyclists

You have set out your proposals for Bridge Street and High Street in detail which is consistent with our previous advice and is welcomed. The rationale for your proposals is also clearly set out under 'Objective C: Improving Access and Movement within the Town Centre'. We also advised you that the NDP should include an honest comment on the 'in principle' implications of such proposals, such as the possibility of increased congestion on peripheral town centre streets. However, there appears to be no reference to this in the supporting text.

Policy TC14 - Parking in the Town Centre

The County Council's parking strategy should be referred to as it is a material matter. The Parking Strategy is contained in the Local Transport Plan on pages 274-287. Stratford on Avon District is specifically referenced on page 278 (link <http://apps.warwickshire.gov.uk/api/documents/WCCC-630-116>)

The County Council would be happy to work with a Parking Advisory Board to advise in regard to on street parking. Involvement in this however would be resource dependent. It is essential that both on and off street parking provisions and their inter dependencies are considered simultaneously. The County Council will remain the

relevant authority for deciding and approving the provision, enforcement and charges for on street parking.

There is a significant amount of pressure on residential parking across Stratford and any changes would need to give careful consideration to this.

Policy TC15 - Coaches in the Town Centre

We would support the proposal and principle for designated coach set down areas, subject to agreeing these locations.

Policy TC16 - Cycling in the Town Centre

The County Council is working with Sustrans to review the cycle network in the town and to identify possible future improvements

Policy TC17 - Town Centre to Maybird Centre Environmental Improvement Area

We are considering opportunities for improving the public realm and local amenity in this area as part of our scheme development work for Birmingham Road.

Section 10: Infrastructure

Policy INF1 - Initiatives to Reduce Peak Time Travel

1) A comprehensive report, commissioned by the Highway Authority, on the ways in which through traffic, i.e. traffic not destined for the town centre, can be taken out of town centre routes.

The County Council is proposing to commission consultants to undertake an initial feasibility study to review options for a relief road/bypass/third river crossing. The study will consider outer and inner route options and will be informed by public feedback from the Stratford Traffic Summits. It will also seek to assess whether there are opportunities for reducing traffic dominance in the town centre (e.g. on Bridge Street, High Street and Clopton Bridge) which may arise as a result of providing additional highway capacity through various route options.

With regard to your desire to see a transportation strategy to accommodate additional traffic entering the town arising from the allocation of new housing development outside the NDP area, we are pleased to inform you that the County and District Councils are in the early stages of developing a joint transport strategy which will consider existing and future transport needs for Stratford town and the wider District. We are also progressing further Strategic Transport Assessment work to look at housing and employment allocation options on behalf of Stratford on Avon District Council following publication of the Inspector's Interim letter in March 2015.

2) To take measures to reduce peak time traffic and to re-distribute existing traffic from congested roads

We would support the principle of using a dynamic signing strategy to encourage traffic to use alternative routes in response to congested conditions. We would further suggest that a similar scheme to direct unfamiliar drivers to the nearest car parks could possibly help to reduce unnecessary traffic circulation, thus promoting more efficient use of the local road network within and around the town centre.

As highlighted in our previous correspondence, the possibility of an access road between Shipston Road and the Recreation Ground Car Park has been considered in the past but is not included in the current Warwickshire Local Transport Plan (LTP) 2011-2026. The County Council has no current proposals to promote such a scheme. For such a scheme to be considered, the promoter would need to provide quantitative evidence which demonstrates that it has a positive business case, particularly in terms of supporting growth and helping to create new jobs. It would also need to have a good cost/benefit ratio and provide local traffic benefits (e.g. reduced queuing, improved journey time reliability). Without such evidence, there is little prospect that a scheme could be considered for public funding. Stratford Voice has previously raised strong objections to a scheme in this location so we believe that there is also a risk that it would be difficult to deliver from a public acceptability perspective.

3) Car parking to be provided to support measures for the re-distribution of traffic

Stratford on Avon District Council are the relevant authority for provision of public off-street car parking, so any proposals to provide additional spaces would need to be considered by them. The County Council will remain the relevant authority for deciding and approving the provision, enforcement and charges for on-street parking. The County Council will work and consult the proposed Car Parking Advisory Board on these matters.

As noted in our response to 'Policy TC14 - Parking in the Town Centre' above, it is essential that both on and off street parking provisions and their inter dependencies are considered simultaneously.

4) Use of pricing mechanisms to encourage car park users to arrive or depart from outside peak times should be encouraged as should pricing mechanisms which encourage the use of park and ride for long stay parking

A policy to vary parking charges to encourage car park users to enter and leave the town outside peak times is unlikely to be effective unless it is specifically targeted at encouraging commuters to switch to non-car modes such as walk, cycle, bus, rail and park and ride. Is this its intended purpose?

We would support the principle of encouraging park and ride usage through appropriate pricing of long stay parking.

5) Birmingham Road: Immediately prepare a scheme based on consultants' advice for traffic calming in Birmingham Road from the entrance to the town at the A46 roundabout to the Arden Street/Clopton Road junction in which:

- Reduces speed limits to 20mph;
- Narrows road widths in certain sections;
- Removes signals in certain locations e.g. St Peters Way and Western Avenue;
- Removes priority at certain junction and approaches narrowed e.g. St Joseph's Way, the Maybird roundabout and Justins Avenue;
- A re-design of the Arden Street junction; and
- Repositions the Clopton Road junction.

As noted in our previous correspondence, the above measures were previously considered by JMP Consultants Ltd as part of the A3400 Birmingham Road Traffic Management Study. However, JMP did not include them in their final study recommendations as the Steering Group comprising elected members from Warwickshire County Council, Stratford-on-Avon District Council and Stratford-upon-Avon Town Council did not consider them to be appropriate for Birmingham Road. As such, the County Council has no current proposals to progress them.

Notwithstanding this, in recognition of the differing and often conflicting stakeholder views on the issue, we commissioned consultants to undertake a further independent review of possible approaches for managing traffic on Birmingham Road. The outcome of this review is currently being considered by the County Council alongside public feedback from the third Stratford Traffic Summit held in March 2015.

Our key current objective is to develop an outline business case for a possible scheme for Birmingham Road by Summer 2015, in order to support an internal bid for scheme development funding. If secured, this funding will enable us to develop a scheme in more detail. We do not envisage being in a position to consult on our emerging proposals with members of the public and other stakeholders, including the local business community, until the position on funding required to progress a scheme towards delivery has become clearer. Our consultation on a scheme for Birmingham Road will therefore not take place until well after the current consultation period on the Pre-Submission NDP.

Policy INF2 - Promoting and Enhancing Park and Ride Opportunities

The County Council is currently progressing a scheme with the Highways Agency to improve signing on the A46 to Stratford Parkway and Stratford Park and Ride.

A study of the feasibility of a southern Park & Ride which included a review of the operation and performance of the northern Park & Ride site was undertaken by JMP Consultants Ltd in 2011 on behalf of a partnership involving Warwickshire County Councillors, Stratford-on-Avon District Councillors, Stratford-upon-Avon Town Councillors and other local stakeholders. The study investigated options under which a Park and Ride scheme located in the south of Stratford-upon-Avon could be delivered. The partnership accepted the following key findings as an outcome of the study:-

- The successful delivery and operation of a southern Park and Ride scheme is dependent on a complementary town centre parking regime - something not currently in place;

- The issue of the over-supply of on street/off street parking in the town centre is a key factor, and therefore, the quantum of parking is a critical issue, i.e. removal of parking increases the performance of a Park and Ride scheme;
- The preferred location for a Southern Park and Ride is the Bird Group Ltd/Waitrose Site - where the existing Southern Park and Ride arrangement is in place;
- The projected capital cost of delivering a Southern Park and Ride after the Bird Group sponsored scheme has expired in Summer 2015, was projected to be £1.4 million, e.g. land costs and construction of customer services building etc;
- The study deemed it highly likely that Bird Group Ltd will make a substantial loss from the operation of its sponsored Southern Park and Ride;
- A high level of subsidy would be required to continue the operation of the current standalone Southern Park and Ride when the funding from the Bird Group Ltd expires; and
- There is no economic business case to support the further capital development and operation of a Southern Park and Ride in the town when the Bird Group funding expires in terms of access to Government or Warwickshire County Council capital funding.

The annual net subsidy costs to the County Council of continuing the current Southern Park & Ride bus service could be approximately £75,000 or more and this is likely to continue at this level into the future. In a time of reducing budgets, the County Council would not seek to take on an additional financial liability for which it is not currently responsible. This would apply equally to the subsidy of existing local bus services.

In view of the financial risks and long term liabilities associated with the outturn costs of any subsidy arrangements, it is not the intention of the County Council to become involved with the park & ride scheme. This stance does not preclude the District Council from taking responsibility for the continuance of the scheme.

On a more positive note, bus services to the town will continue to run approximately every half hour into town on Mondays to Saturdays from outside Waitrose on Shipston Road. We understand that there may be some discussions taking place between Johnsons and Tony Bird as to whether these services can operate into the park and ride site. If this proves not to be feasible the bus stops on the main road would continue to be used and whilst this would require intending passengers to cross the road to catch the bus on the inbound journey, the service frequency is similar to the existing Park & Ride bus service.

Policy INF3 - Dedicated Pedestrian and Cycle Routes

Please see previous comment under Policy TC16 - Cycling in the Town Centre.

Policy INF4 - Replacement Bridge at Lucy's Mill

As noted in our previous correspondence, the County Council's adopted policy position regarding Lucy's Mill Footbridge which is included in the current Warwickshire LTP is as follows:-

"Lucy's Mill Footbridge lies 600m downstream from the Tramway Bridge which is located on the north eastern edge of the town centre. The steps at each end of Lucy Mill Footbridge do not allow access for cyclists, wheelchair users or pushchairs.

The lack of a cycle-friendly crossing over the river is a significant barrier for cycling in Stratford-upon-Avon, particularly for those living to the east of the river. Survey evidence provided by Stratford Voice indicates that the bridge is currently used by a significant number of cyclists and pedestrians.

On the basis of this evidence, there would appear to be merit in upgrading the bridge to make it more accessible. There are however several constraints which would need to be overcome before an improvement scheme could be delivered, which are as follows:

- The level of capital funding available for all transport projects will be severely restricted for the foreseeable future;*
- The likely costs and benefits of the scheme would need to be evaluated against those for other competing transport schemes;*
- There is potential for local objections preventing the public footpaths on either side of the bridge being upgraded to cycle track status;*
- A ramped access which meets the requirements of the Disability Discrimination Act (DDA) 1995 cannot be provided on the western river bank without encroaching onto private land; and*
- Compulsory Purchase Orders could be made to acquire the necessary land for the west ramp but there would need to be a compelling case in the public interest and local residents have already indicated that they would oppose any improvements that affected their properties."*

The above position was informed by two feasibility studies undertaken by the County Council in 2006 and 2008. Both of these showed that the upgrading of Lucy's Mill Footbridge in its existing location was not feasible. Notes from a subsequent site visit undertaken in November 2011 which were issued by the County Council to Mr Lloyd Beesley (Stratford Voice) and representatives from Sustrans concluded the following:-

- (1) Generally discussed the possibilities of replacing the existing footbridge.
- (2) Concluded that a DDA compliant footbridge and associated footways cannot be constructed at this location without additional land being acquired from adjacent private property owners.
- (3) We also considered a new footbridge on the other side of the road bridge and concluded that a new DDA compliant footbridge can be built on this side of the road bridge.

(4) If Stratford Voice wish to consider the option in (3) above then initial designs should be prepared to present to Sustrans and other organisations to raise funding for the proposal.

(5) Due to funding constraints, the County Council would find it difficult to make any significant contribution to fund the scheme.

The County Council's position on this issue remains unchanged.

We note your previous response to the above position in that you fully endorse the above points but have retained this policy in the expectation that a solution will be found during the lifetime of the NDP.

Policy INF5 - Preserving and Enhancing Rail Links and Services

As noted in previous correspondence, the County Council's adopted policy position regarding reopening of the Stratford – Honeybourne line which is included in the Warwickshire LTP is as follows:-

"Reopening of the Stratford-upon-Avon to Long Marston route as a six mile single line link between the Cotswolds and West Midlands rail network is an aspiration of local support groups. The advocates of reopening suggest that the scheme would enable a new direct Oxford-Moreton-Stratford service as well as local trains for Long Marston and Honeybourne.

The rail link is advocated by its proponents to boost tourist flows and to provide new rail journey opportunities to and from Long Marston and Stratford.

A business case to demonstrate the viability of reopening the line will need to be produced by a scheme promoter if it is to be pursued.

The County Council will consider supporting a proposal for reopening the line if it is promoted by DfT, the rail industry or a third party provided the local benefits outweigh any local environmental disbenefits."

The County Council's position on this issue remains unchanged.


We would point out that Stratford-on-Avon District Council and other stakeholder interests commissioned the Ove Arup business case study, not the County Council.

Policy INF6 - Promoting Enhanced Bus and Coach Facilities

As noted in earlier correspondence, we would wish to encourage bus operators to use town centre streets as pick up and setting down points for service buses and to use the Leisure Centre Coach Park or bus/rail interchange at the former Cattle Market site for lay-overs.

If there are any matters contained in this letter or the Neighbourhood Plan you may wish to discuss further please contact me?

Yours sincerely



Mark Ryder
Head of Economic Growth

cc: Monica Fogarty, Strategic Director for Communities

cc: Isobel Seccombe, Leader

cc: Phil Evans, Head of Localities & Community Safety

cc: Dan Green, Localities & Partnerships Manager

cc: Graeme Fitton, Head of Transport & Highways

cc: Nigel Minns, Head of Education & Learning

