



Stroud District Local Plan Review

Summary of Responses to Additional Technical Evidence Consultation

**APPENDIX F:
EB112 SALA Accessibility Scoring Note and EB112a-EB112c
SALA Transport Accessibility Assessments**

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Stakeholders	Summarised comments	Stroud District Council Response
Stagecoach West (20)	<ul style="list-style-type: none"> • The SALA Accessibility Scoring methodology is unfit for purpose. This is principally because it does not allow any meaningful distinctions to be drawn between sites with respect to public transport owing to the choice of parameters and thresholds used. • The exercise is based on a bus network that has changed sufficiently since 2020 to disadvantage key potential development locations. • The parameters exclude a meaningful consideration of public transport options for all sites as they are discounted to nil if the centroid is more than 400m from an existing stop, which is true in almost all cases. • The methodology takes minimal account of public transport service quality, nor of trip practicality for any sustainable mode. 	<p>There is no one correct way of assessing accessibility. The Council has taken a proportionate approach based on the advice of third parties and has consistently applied the approach through the process, updating where new data has become available. As part of the SALA process, all SALA sites were modelled for accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. As set out in EB112 SALA Scoring Note, modelling was carried out in 2018 and 2019 based on the public transport network and most up to date road network in place at the time. The modelling for all SALA site options was re-run in 2020 to provide updated accessibility scores and a standardised dataset based on the public transport network at January 2020 and most up to date road network. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as part of each data set, EB112a – EB112c, and is not a qualitative assessment of public transport provision or trip practicality of sustainable transport provision. See EB108 Sustainable Transport Strategy Addendum (July 2022) for further information on public transport and sustainable transport provision.</p>
Wisloe Action Group (32)	<ul style="list-style-type: none"> • The PS37 proposal was not assessed as a single site option but as three separate parcels: SLI002, SLI004 & SLI005. The larger collective site should have received a greater degree of assessment against the acceptance criteria. 	<p>Accessibility modelling was carried out as part of the SALA process with accessibility scores provided for individual SALA site polygons. The 2020 accessibility scoring dataset (EB112a) provides accessibility scores ranging from 67 to 81 for SALA site polygons within the wider PS37 Wisloe new settlement site (SLI002,004 – 007/ CAM027). The range provides a greater degree of detail on relative accessibility across the strategic site than for many other sites. Full SA of the larger collective site comprising PS37 New settlement at Wisloe is set out in SA Report Appendix 7 (CD3b) and identifies the likely effects across each of the 17 SA objectives at both the equivalent site option stage (policy-off) and</p>



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	<ul style="list-style-type: none"> Noise, air quality and amenity issues associated with the elevated M5, A4135 and railway line were all noted requiring mitigation but accepted in preference to other large sites (PGP1 & PGP2) which don't have similar issues. These other sites should score much better in the assessment as they are much nearer the true centres of employment. 	<p>the pre-submission Draft Plan stage (policy-on).</p> <p>All potential constraints affecting PS37 and PGP1 & PGP2 have been taken into consideration through the SALA, other site assessment work and through the SA process. The Council has selected sites using this range of assessment work. Accessibility modelling was carried out for the individual SALA site polygons comprising PGP1 Land at Grove End Farm (WHI007/ WHI014) and PGP2 Moreton Valence (HAR006-009/ HAR15 & 16). The 2020 accessibility scoring dataset (EB112a) provides accessibility scores ranging from 78 - 80 and between 76 – 89 for SALA site polygons within the wider PGP1 and PGP2 sites respectively. The full SA of the individual SALA sites comprising PGP1 and PGP2 are set out in SA Report Appendix 5, together with the SA of an additional growth point as Option C of the additional spatial options set out in SA Report Appendix 8 (CD3b).</p>
Slimbridge Parish Council (37)	<ul style="list-style-type: none"> The PS37 proposal was not assessed as a single site option but as three separate parcels: SLI002, SLI004 & SLI005. The larger collective site should have received a greater degree of assessment against the acceptance criteria. 	<p>Accessibility modelling was carried out as part of the SALA process with accessibility scores provided for individual SALA site polygons. The 2020 accessibility scoring dataset (EB112a) provides accessibility scores ranging from 67 to 81 for SALA site polygons within the wider PS37 Wisloe new settlement site (SLI002,004 – 007/ CAM027). The range provides a greater degree of detail on relative accessibility across the strategic site than for many other sites. Full SA of the larger collective site comprising PS37 New settlement at Wisloe is set out in SA Report Appendix 7 (CD3b) and identifies the likely effects across each of the 17 SA objectives at both the equivalent site option stage (policy-off) and the pre-submission Draft Plan stage (policy-on).</p>
	<ul style="list-style-type: none"> Noise, air quality and amenity issues associated with the elevated M5, A4135 and railway line were all noted requiring mitigation but accepted in preference to other large sites (PGP1 & PGP2) which don't have similar issues. These other sites should score much better in the assessment as they are much nearer the true centres of employment. 	<p>All potential constraints affecting PS37 and PGP1 & PGP2 have been taken into consideration through the SALA, other site assessment work and through the SA process. The Council has selected sites using this range of assessment work. Accessibility modelling was carried out for the individual SALA site polygons comprising PGP1 Land at Grove End Farm (WHI007/ WHI014) and PGP2 Moreton Valence (HAR006-009/ HAR15 & 16). The 2020 accessibility scoring dataset (EB112a) provides</p>



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		<p>accessibility scores ranging from 78 - 80 and between 76 – 89 for SALA site polygons within the wider PGP1 and PGP2 sites respectively. The full SA of the individual SALA sites comprising PGP1 and PGP2 are set out in SA Report Appendix 5, together with the SA of an additional growth point as Option C of the additional spatial options set out in SA Report Appendix 8 (CD3b).</p>
<p>CarneySweeney on behalf of Redrow Homes (46)</p>	<ul style="list-style-type: none"> • The SALA transport accessibility assessment is solely based on existing facilities, it does not allow for local facilities such as schools, employment or local centres that are proposed to come forward either on-site or in close proximity. G1 South of Hardwicke includes a primary school and local centre within the allocation. If the on-site local centre had been included in the SALA transport accessibility assessment, the score for G1 South of Hardwicke would have been more positive. Also Quedgeley West Business Park is less than 1km from the centre of the site and therefore less than 15 minutes walk at 4.8km/hr and so should have scored a 1 rather than 2 in respect of walk time to a key employment site. • The assessment has only measured to existing bus stops and does not take account of possible highway and transport improvements as part of development proposals. 	<p>The accessibility assessment was carried out as part of the initial SALA assessment process to score the relative accessibility of sites to existing facilities. All SALA sites were modelled for accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as part of each data set, EB112a – EB112c. It is accepted that a policy-on approach with consideration given to new infrastructure would have given a different scoring but would not have been appropriate at the initial SALA stages. However, policy-on consideration of access to services has been assessed through the wider SA process. Full SA of all draft allocation sites is set out in SA Report Appendix 7 (CD3b) and identifies the likely effects across each of the 17 SA objectives at both the equivalent site option stage (policy-off) and the pre-submission Draft Plan stage (policy-on) which includes assessing likely impacts after the policy required infrastructure improvements are included. Regarding the accessibility of G1/ HAR001 to a key employment site: the 2020 (EB112a) and 2018 (EB112c) datasets record a walking distance of 1,645m from the site centroid to Quedgeley Trading Estate West and a score of 2 for a walking time of between 15 and 30 minutes, contributing to a total accessibility score of 70 (2020)/ 83 (2018).</p>
<p>Origin 3 on behalf of Newland Homes (47)</p>	<ul style="list-style-type: none"> • The distances cited to key facilities and services emphasise that Whitminster is a sustainable settlement for residential development at PS45, 	<p>Comment noted.</p>



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	Land West of Upton's Gardens, Whitminster.	
Blue Fox Planning Ltd on behalf of Persimmon Homes (Severn Valley) Ltd (53)	<ul style="list-style-type: none"> Any assessment of development sites should not only consider existing accessibility but also how the proposals would serve to enhance existing links. For example enhancements as put forward in relation to the Cam North West proposals will include improvements to offsite active travel links and bus connections that will further improve accessibility via sustainable modes of transport. 	As part of the SALA process, all SALA sites were modelled for accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as part of each data set, EB112a – EB112c. It is accepted that a policy-on approach with consideration given to new infrastructure would have given a different scoring. Full SA of the Cam North West site is set out in SA Report Appendix 7 (CD3b) and identifies the likely effects across each of the 17 SA objectives at both the equivalent site option stage (policy-off) and the pre-submission Draft Plan stage (policy-on).
Gloucestershire County Council (55)	<ul style="list-style-type: none"> Generally happy with the assessment methodology, but GCC officers feel that the low accessibility score given to both the Sharpness and the Whaddon site allocation strengthens the significant concerns raised in GCC's reg 19 consultation response. Some of the School walking distances do not take account of those Schools which may preclude local pupils on some specific grounds, e.g. faith or other entry requirements. 	On the contrary, the 2020 accessibility scoring dataset (EB112a) provides an accessibility score of 67 for PS36 Sharpness new settlement, which is better than any other draft allocation except PS25 Cam North East Extension. It is accepted that the policy-off scoring for Whaddon is higher, at 98, although the full SA Report Appendix 7 (CD3b) does identify that when policy-on infrastructure is included, the scoring for SA 10: Air Quality improves from a significant negative effect to a mixed significant effect.
Berkeley and Sharpness Residents' Action Group (64)	<ul style="list-style-type: none"> We are disputing the validity of some of the improved SALA scores, and also of some of the 'destinations' used to assess validity. Suspicion that yet again 'evidence' adapted to support the Plan rather than it being driven by the evidence. 	The Plan has been driven by the evidence. The methodologies for the accessibility assessment and the wider SA process were established before assessment on specific sites began. As part of the SALA process, all SALA sites were modelled for accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. The range of destinations is representative of the typical strategic and local facilities and services, that people may be required to access on a regular basis. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as



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<p>Pegasus group on behalf of Robert Hitchins (73)</p>	<ul style="list-style-type: none"> The methodology and scoring of the SALA Transport Accessibility Assessment is simplistic and has a number of flaws as identified above; it therefore cannot be relied on in a meaningful way to provide a reasonable basis for assessing a site’s credentials with respect to its transport accessibility. 	<p>part of each data set, EB112a – EB112c.</p> <p>There is no one correct way of assessing accessibility. The Council has taken a proportionate approach based on the advice of third parties and has consistently applied the approach through the process, updating where new data has become available. As part of the SALA process, all SALA sites were modelled for accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as part of each data set, EB112a – EB112c.</p>
Individuals	Summarised comments	Stroud District Council Response
<p>Individual (30)</p>	<ul style="list-style-type: none"> The PS37 proposal was not assessed as a single site option but as three separate land parcels, the larger collective site should have received a greater degree of assessment against the acceptance criteria. Noise, air quality and amenity issues associated with the elevated M5, A4135 and railway line were all noted as requiring mitigation but accepted in preference to other large sites (PGP1 & PGP2) which do not have similar issues. These two sites should score much better in the assessment as they are much nearer the true centres of employment. 	<p>Accessibility modelling was carried out as part of the SALA process with accessibility scores provided for individual SALA site polygons. The 2020 accessibility scoring dataset (EB112a) provides accessibility scores ranging from 67 to 81 for SALA site polygons within the wider PS37 Wisloe new settlement site (SLI002,004 – 007/ CAM027). The range provides a greater degree of detail on relative accessibility across the strategic site than for many other sites. Full SA of the larger collective site comprising PS37 New settlement at Wisloe is set out in SA Report Appendix 7 (CD3b) and identifies the likely effects across each of the 17 SA objectives at both the equivalent site option stage (policy-off) and the pre-submission Draft Plan stage (policy-on).</p> <p>All potential constraints affecting PS37 and PGP1 & PGP2 have been taken into consideration through the SALA, other site assessment work and through the SA process. The Council has selected sites using this range of assessment work. Accessibility modelling was carried out for the individual SALA site polygons comprising PGP1 Land at Grove End Farm (WHI007/ WHI014) and PGP2 Moreton Valence (HAR006-009/ HAR15 & 16). The 2020 accessibility scoring dataset (EB112a) provides accessibility scores ranging from 78 - 80 and between 76 – 89 for SALA site polygons within the wider PGP1 and PGP2 sites respectively. The</p>



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		full SA of the individual SALA sites comprising PGP1 and PGP2 are set out in SA Report Appendix 5, together with the SA of an additional growth point as Option C of the additional spatial options set out in SA Report Appendix 8 (CD3b).
	<ul style="list-style-type: none"> These scores are overall supportive of a rejection of any development on the scale proposed as even with some mitigations proposed in other reports it is clear that the residents of the Sharpness and Wanswell developments will have no option but to drive substantial distances to access basic facilities. 	On the contrary, the 2020 accessibility scoring dataset (EB112a) provides an accessibility score of 67 for PS36 Sharpness new settlement, which is better than any other draft allocation except PS25 Cam North East Extension.
Individual (48)	<ul style="list-style-type: none"> The SALA scores for the site(s) are flawed and based on incorrect unrealistic destination locations and unrealistic accessibility criteria. The vast majority of any journeys outside Minchinhampton is likely to involve the use of a car. Even many journeys within Minchinhampton will involve using a car. 	The planning system encourages local authorities to locate development where possible where there is a choice of travel options available, and this is therefore the basis for the initial SALA assessment. As part of the SALA process, all SALA sites were modelled for accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as part of each data set, EB112a – EB112c.
Individual (60)	<ul style="list-style-type: none"> The PS37 assessment was not made as a whole but three discrete sites. 	Accessibility modelling was carried out as part of the SALA process with accessibility scores provided for individual SALA site polygons. The 2020 accessibility scoring dataset (EB112a) provides accessibility scores ranging from 67 to 81 for SALA site polygons within the wider PS37 Wisloe new settlement site (SLI002,004 – 007/ CAM027). The range provides a greater degree of detail on relative accessibility across the strategic site than for many other sites. Full SA of the larger collective site comprising PS37 New settlement at Wisloe is set out in SA Report Appendix 7 (CD3b) and identifies the likely effects across each of the 17 SA objectives at both the equivalent site option stage (policy-off) and the pre-submission Draft Plan stage (policy-on).
Individual (62)	<ul style="list-style-type: none"> The PS37 proposal was not assessed as a single site 	Accessibility modelling was carried out as part of the SALA process with accessibility scores provided for individual SALA site polygons. The



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	<p>option but as three separate land parcels, the larger collective site should have received a greater degree of assessment against the acceptance criteria</p>	<p>2020 accessibility scoring dataset (EB112a) provides accessibility scores ranging from 67 to 81 for SALA site polygons within the wider PS37 Wisloe new settlement site (SLI002,004 – 007/ CAM027). The range provides a greater degree of detail on relative accessibility across the strategic site than for many other sites. Full SA of the larger collective site comprising PS37 New settlement at Wisloe is set out in SA Report Appendix 7 (CD3b) and identifies the likely effects across each of the 17 SA objectives at both the equivalent site option stage (policy-off) and the pre-submission Draft Plan stage (policy-on).</p>
	<ul style="list-style-type: none"> Noise, air quality and amenity issues associated with the elevated M5, A4135 and railway line were all noted as requiring mitigation but accepted in preference to other large sites (PGP1 & PGP2) which do not have similar issues. These two sites should score much better in the assessment as they are much nearer the true centres of employment. 	<p>All potential constraints affecting PS37 and PGP1 & PGP2 have been taken into consideration through the SALA, other site assessment work and through the SA process. The Council has selected sites using this range of assessment work. Accessibility modelling was carried out for the individual SALA site polygons comprising PGP1 Land at Grove End Farm (WHI007/ WHI014) and PGP2 Moreton Valence (HAR006-009/ HAR15 & 16). The 2020 accessibility scoring dataset (EB112a) provides accessibility scores ranging from 78 - 80 and between 76 – 89 for SALA site polygons within the wider PGP1 and PGP2 sites respectively. The full SA of the individual SALA sites comprising PGP1 and PGP2 are set out in SA Report Appendix 5, together with the SA of an additional growth point as Option C of the additional spatial options set out in SA Report Appendix 8 (CD3b).</p>
<p>Individual (72) PS25</p>	<ul style="list-style-type: none"> Cam Hopton School listed as closest school yet it's 100+ oversubscribed each year (as is Everlands as next closest). Cam Mills listed as closest large employer - they employ c60 and rarely advertise for staff - how does that correlate to 180 minimum new homes in PS25? Majority of jobs in Cam and Dursley are minimum wage and low skill based. Employers are not attracted to invest in an area unless it has decent infrastructure ie doctors, dentists, schools so people will want to live and work here. SDC are 	<p>There is no one correct way of assessing accessibility. The Council has taken a proportionate approach based on the advice of third parties and has consistently applied the approach through the process, updating where new data has become available. As part of the SALA process, all SALA sites were modelled for geographic accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. The range of destinations is representative of the typical strategic and local facilities and services, that people may be required to access on a regular basis, including protected employment</p>



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	<p>wilfully creating a dormitory suburban sprawl in Cam and destroying the rural character of the village.</p>	<p>sites, and is not a qualitative assessment of provision or the level of availability of facilities and services. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as part of each data set, EB112a – EB112c.</p>
Individual (86)	<ul style="list-style-type: none"> The employment section for Cam, lists Cam Mills as a large employer when it rarely has new jobs and only employs 40-60 workers. 	<p>As part of the SALA process, all SALA sites were modelled for geographic accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. The range of destinations is representative of the typical strategic and local facilities and services, that people may be required to access on a regular basis, including protected employment sites, and is not a qualitative assessment of provision or the level of availability of facilities and services. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as part of each data set, EB112a – EB112c.</p>
Individual (80,87)	<ul style="list-style-type: none"> I do not believe that there has been realistic reporting on local job opportunities in Cam. Although there are local employers such as Cam Mills (as stated in report) it employees 40-60 workers. There tends not to be much movement in workforce, so rarely positions are advertised. Most work available are minimum wages and without much prospect of moving up the ladder to better wages. 	<p>As part of the SALA process, all SALA sites were modelled for geographic accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. The range of destinations is representative of the typical strategic and local facilities and services, that people may be required to access on a regular basis, including protected employment sites, and is not a qualitative assessment of provision or the level of availability of facilities and services. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as part of each data set, EB112a – EB112c.</p>
	<ul style="list-style-type: none"> In PS25 proposal it states Cam Hopton School listed as closest school for new housing estate but already it is over subscribed by 100+ applications. The catchment for the school is so small even people living in the nearby new estate of Littlecombe do 	<p>As part of the SALA process, all SALA sites were modelled for geographic accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. The range of destinations is representative of the typical strategic and local facilities and services,</p>



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	<p>not automatically get a place.</p>	<p>that people may be required to access on a regular basis, including protected employment sites, and is not a qualitative assessment of provision or the level of availability of facilities and services. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as part of each data set, EB112a – EB112c.</p>
<p>Individual (88)</p>	<ul style="list-style-type: none"> The accessibility assessment is seriously flawed, as without concrete evidence based data to support any additional development, and no understanding of the oversubscribed schools and lack of suitable well paid employment within the area how can this assessment be credible 	<p>There is no one correct way of assessing accessibility. The Council has taken a proportionate approach based on the advice of third parties and has consistently applied the approach through the process, updating where new data has become available. As part of the SALA process, all SALA sites were modelled for geographic accessibility to a range of identified strategic and local facilities by MAIDeN Gloucestershire County Council (GCC), the County Council Data and Analysis Team. The range of destinations is representative of the typical strategic and local facilities and services, that people may be required to access on a regular basis, including protected employment sites, and is not a qualitative assessment of provision or the level of availability of facilities and services. Accessibility modelling was carried out on a policy-off basis against a consistent set of parameters and assumptions which are included as part of each data set, EB112a – EB112c.</p>

