

## **Objection to Sustainability Appraisal**

### **Executive Summary**

Paragraph 1.0.18 of the pre-submission Draft Local Plan states: *'The Sustainability Appraisal (SA) of the Stroud District Local Plan has been fully integrated into the plan preparation process, so that it has informed and influenced the plan as it has evolved. The SAs done at earlier stages of the process tested each possible alternative strategy against a number of sustainability objectives. We have used the results of these tests in deciding on our final strategy, as well as the policies and proposals that support it.'*

The Sustainability Appraisal ([https://www.stroud.gov.uk/media/1485646/sa-report-for-stroud-district-local-plan-review\\_-\\_pre-submission-may-2021.pdf](https://www.stroud.gov.uk/media/1485646/sa-report-for-stroud-district-local-plan-review_-_pre-submission-may-2021.pdf)) is inconsistent in its approach and outcomes, with the result that it fails to deliver an objective assessment.

Stroud District Council's reliance upon it therefore does not meet the test of soundness in relation to being 'justified'.

Further as the Sustainability Appraisal is a required part of the 'proposed submission documents' under Regulations 17, 19 and 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012, its inadequacy must bring into question the legal compliance of the local plan and its development.

In particular the Sustainability Appraisal:

- Conflates Phases 1 and 2 of the site allocation PS36, rather than considering the potential sustainability of PS36 (Phase 1) as presented in the pre-submission Draft Local Plan;
- Is inconsistent in scoring in relation to PS36 - considering the potential sustainability at the conclusion of Phases 1 and 2 interchangeably, presenting the 'optimal' result to support positive scoring;
- Does not consider site allocations on a 'like for like' basis – none of the other strategic sites are considered for their sustainability beyond the plan period;
- Is inconsistent in the appraisal method: with some appraisals considering policy implications and others being policy agnostic;
- Does not appraise impact on education facilities, which will be significant considering the strategy adopted by Stroud District Council to deliver volume housing via large sites, requiring infrastructure and community investment;
- Does not adequately consider mitigation, in particular in relation to recommendations within the Habitat Regulations Assessment; and

- Is reliant on assessment methods which are questionable in their accuracy and consistency.

We expand upon our concerns below:

## **Presentation of PS36**

### **(1) Conflation of Phases 1 and 2**

The Sustainability Appraisal May 2021 ([https://www.stroud.gov.uk/media/1485646/sa-report-for-stroud-district-local-plan-review\\_-\\_pre-submission-may-2021.pdf](https://www.stroud.gov.uk/media/1485646/sa-report-for-stroud-district-local-plan-review_-_pre-submission-may-2021.pdf)) states at paragraph 5.1 on page 104:

*'The 35 site allocations in the Pre-submission Draft Local Plan include the new settlement at Sharpness (PS36) presented across two phases. Given that these sites are allocated through one policy and together will form a new settlement in their own right, they have been presented as one site in the SA. Where differing effects are expected for the two phases these have been highlighted in the appraisal text.'*

We would argue that while there is an aspiration for Phase 2 to be developed post Plan period, in order to provide a consistent objective assessment the Sustainability Appraisal in respect of site PS36 ought to consider the implications in relation to the plan period only.

As the purpose of the Sustainability Appraisal is to consider the likely sustainability effects of policy and site allocation, we would ask the Inspector to consider whether a conclusion can be drawn as to the sustainability of PS36 during the plan period, in the absence of a separate assessment of each Phase.

It is apparent that Phases 1 and 2 have been conflated in the Sustainability Appraisal and the Plan policy, as presenting Phase 1 as a stand-alone would likely deliver a significantly weaker solution which would not offer itself as an appropriate solution.

Considering the effect of Phases 1 and 2 collectively also has the potential implication that the residents affected by PS36 development will be waiting a further decade for the positive delivery outcomes which are aligned with the 2050 aspirations (they are not articulated in policy), as opposed to their fellow residents within Stroud who can rely upon outcomes at 2040.

### **(2) Inconsistency in scoring**

As noted above it is acknowledged that Phases 1 and 2 of the proposed Sharpness development have the potential to deliver contrasting effects:

*'Where differing effects are expected for the two phases these have been highlighted in the appraisal text.'*

However the Appendices to the Sustainability Appraisal contradict this, stating in Appendix 7 at page 780:

*'The effect recorded for the Pre-submission Draft Local Plan relates to phase 1 given that it is set out in that document that phase 2 will be developed in the longer term. Therefore, any effects for phase 2 are expected beyond the plan period.'*

We would respectfully disagree in respect of the effect recorded. In our view the Sustainability Appraisal does not, in fact, simply highlight differing effects in the appraisal text but instead selects the more optimistic or positive result to support favourable scoring in respect of PS36's potential effects.

Paragraph 5.53 at page 130 includes the following:

*'Five of the strategic sites at Stonehouse North West (PS19a), Cam North West (PS24), Land at Whaddon (G2), Sharpness Docks (PS34) and Wisloe new settlement (PS37) contain areas that scored over 80 in the SALA transport assessment and therefore significant negative effects are expected for these sites in relation to SA objective 10. Phase 2 of the new settlement at Sharpness (PS36) contains an area which scored over 80 in the assessment, however, effects relating to this part of the development would occur beyond the plan period. Three of the strategic sites at Hunts Grove Extension (PS30), phase 1 of the new settlement at Sharpness (PS36) and South of Hardwicke (G1) scored between 70-80 in the SALA transport assessment and therefore minor negative effects are expected for these sites in relation to SA objective 10.'*

However, the paragraph goes on to state:

*'For strategic sites at Stonehouse North West (PS19a), Land at Whaddon (G2), Hunts Grove Extension (PS30), Sharpness new settlement (PS36) and Wisloe new settlement (PS37) the positive effects are likely to be significant as development will include prioritisation of walking and cycling and delivery of new walking and cycling routes, EV vehicle charging points, improved bus connections and, in the case of sites PS19a, PS30 and PS36, contributions to enhanced rail services.'*

If PS36 is indeed considered as one site then the methodology should be applied to consider the effect collectively. It is incongruous that the same paragraph and same policy consideration (air quality) elects to attribute the *least negative* SALA transport score excluding Phase 2, alongside the *positive* scoring from modal shift and sustainable transport which can only be achieved by including Phase 2.

This bias is further demonstrated as the Sustainability Appraisal later goes on to acknowledge that access and travel to PS36 is compromised during Phase 1 (i.e. prior to being fully built out) at paragraph 6.55 on page 154:

*'Residents at the new settlements of Sharpness (PS36) and Wisloe (PS37) would benefit from a good level of access to services and facilities once these strategic sites are fully built out although it is noted that there could be increased need to travel from the Sharpness site, in particular, in the early stages of development, given its more isolated location.'*

### **(3) Inconsistency in approach**

The Sustainability Appraisal states as paragraph 5.9 on page 105:

*'The appraisal of the 10 housing and mixed use strategic development sites includes the appraisal of phase 1 and phase 2 of the Sharpness new settlement together as one site.'*

The pre-submission Draft Local Plan should be presented to provide appropriate allocations for the District for the next plan period (to 2040); it cannot accurately anticipate the policies, frameworks, legislation or needs which could arise for the post-plan period.

If Stroud District Council is confident they are able to anticipate those needs, then proposals for sites should have been sought which were capable of delivering beyond the plan period. It would appear that only PS36 at Sharpness has been considered as such, as paragraph 8.9 at page 176 states:

*'The new Sharpness settlement will provide a long-term focus for housing growth in the plan area. The allocation of this site will allow for the delivery of 2,400 dwellings and associated uses by 2040 and a total of 5,000 dwellings by 2050 subject to Local Plan Review.'*

We would argue that Stroud District Council's approach to appraisal has not been considered on a like-for-like basis in respect of PS36 against the other strategic development sites.

The Sustainability Appraisal should therefore consider either Phase 1 as representing the delivery outcomes for the plan period, or consider the post-plan capabilities of other sites.

As currently presented the Sustainability Appraisal does not offer a consistent and objective assessment on which Stroud District Council can rely.

## **Assumptions and methodology**

### **(1) Appraisal method**

We are concerned as to the application of consistency in the appraisal method within the Sustainability Appraisal.

Paragraph 5.3 at page 104 states:

*'It should be noted that the appraisal of all the reasonable site options in Appendix 5 was undertaken on a consistent basis using the SA assumptions set out in Appendix 4, and without taking any policy requirements into account (i.e. 'policy-off').'*

We would submit this is simply untrue in relation to PS36, particularly in relation to SA10 (Air Quality), the result of which is entirely linked to the proposed public transport solution, which is articulated as a policy requirement, including at Draft Plan stage in 2019 and Additional Housing Consultation stage in 2020.

## **(2) Exclusion of education**

At page 19 the following exclusion is noted:

*'Due to the sensitivity of data relating to schools' capacities it was not possible to appraisal (sic) the draft site allocations individually in relation to impacts on access to education facilities. However, the findings of Gloucestershire County Council's School Places Strategy have been used to provide an overview of where problem issues relating to capacity might emerge as new growth provided over the plan period.'*

Considering the significant volume of housing to be delivered at few sites as a result of the strategic site allocation option selected by Stroud District Council it is easy to see where pressures in relation to education and school place provision will arise.

We would argue it is not sufficient for the Sustainability Appraisal to simply consider an overview of issues, as this does not provide a robust assessment basis upon which mitigation actions can be built.

## **Mitigation**

The Sustainability Appraisal to be presented alongside the pre-submission Draft Local Plan should include appropriate mitigation actions.

This position is consistent with policy and advanced by sector experts: as noted by Savills in their response to the Additional Housing consultation of December 2020 ([https://www.stroud.gov.uk/media/1485253/00308-savills\\_lq-estates.pdf](https://www.stroud.gov.uk/media/1485253/00308-savills_lq-estates.pdf)):

*'In moving to the Regulation 19 stage, we assume as per the Planning Practice Guidance and Schedule 2(7) of the SEA Regulations, the next stage of the SA will consider mitigation and enhancement opportunities associated with the policies within the Local Plan, and as such, provide a comprehensive review of the various spatial and site options.'*

While the Sustainability Appraisal does include some mitigation actions, these are not consistently or sufficiently developed to ensure the pre-submission Draft Local Plan is robust.

## **(1) Biodiversity mitigation**

As noted elsewhere in our response the development of PS36 will have an impact on the Severn Estuary SAC/SPA/Ramsar site. In order to fully understand this impact, whether it will prevent development or is capable of being appropriately mitigated a detailed HRA is required and site specific measures required.

However the Sustainability Appraisal makes clear that granular and bespoke mitigation measures in relation to the Sharpness site have not yet been developed (paragraph 5.49, page 129):

*'Site design and construction requirements set out through the site allocation policies are of particular importance to prevent impacts on the integrity of the Severn Estuary SAC/SPA/Ramsar site...Mitigation*

measures embedded within the plan were identified to address the scale of risk at each location. These measures are to be resolved through site design and project level HRA.'

Paragraph 6.28 at page 150 goes on to state:

'Strategic approaches are currently in place to address recreation impacts on the Rodborough Common SAC71 and on the Severn Estuary SAC/SPA/Ramsar72 and there is a draft strategy for the Cotswolds Beechwoods SAC. The HRA states that the adopted strategies will need to be updated to ensure they will deliver sufficient mitigation to address the scale of growth in the plan. Therefore, some uncertainty remains in relation to the adverse effects on the integrity of Rodborough Common SAC and on the Severn Estuary SAC/SPA/Ramsar, until this review of the relevant mitigation strategies is undertaken.'

As the Draft Local Plan is soon to be submitted for examination should there not be detailed mitigation measures available to ensure this environmentally important site is not compromised by development?

If the Local Plan has been developed based on robust assessment leading to detailed professional appraisal to develop a comprehensive evidence base, PS36's potential to deliver biodiversity effects should become clearer through this process; yet this is not the case.

At Draft Local Plan stage in 2019 (when the SA did not consider mitigation) SA7 scored +/-? as indicated below.

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
Site PS36	++	++/--?	0	0	+	+	+/--?	--?	-	++/--	0	--	--?	+?	0	++	++?

By the time the scores for strategic sites were presented in March 2021 as a comparison document (<https://www.stroud.gov.uk/media/1485068/updated-sa-findings-summary-table-of-strategic-site-options.pdf>), PS36 was performing more poorly against SA7, scoring --?

PS36 Sharpness	++	++/--?	0	0	+	+	--?	--?	-	++/--	0	--	--?	0	0	++	++?
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In the intervening period to publication of the pre-submission Draft Local Plan in May 2021 the HRA was published, and Stroud District Council have acknowledged there is work to do in relation to PS36 mitigation measures. However, perversely, within the Sustainability Appraisal for the pre-submission draft at Appendix 7 (<https://www.stroud.gov.uk/media/1485648/appendices-3-9-sa-report-appendices-for-stroud-district-local-plan-review-pre-submission-draft-plan-may-2021.pdf>) the score for SA7 has again improved to ++/--?.

The reason given is:

'Strategic Site Allocation Policy PS36 in the Presubmission Draft Plan also includes the incorporation of green infrastructure, including SANG, as well as the requirement to deliver a net gain to local biodiversity. Impacts upon the Severn Estuary SAC/SPA/Ramsar site are to be mitigated on and off site. Furthermore, a

*new managed new nature reserve is to be provided.'*

The SANG has been a feature of PS36 for some time (featuring in the proposer's materials prior to Draft Plan in 2019) so cannot be considered a mitigation, and ought to be included in previous assessments. Similarly the lack of detail of mitigation and need to address them outwith the plan cannot offer confidence in mitigation.

We would argue, therefore, that the scoring in relation to biodiversity and geodiversity (SA7) cannot be relied upon as accurate and reflective of a fully developed and considered scheme.

## **(2) Mitigation actions at PS36**

Where negative effects of development are anticipated mitigation actions are needed and we welcome the Council's work in this regard. Indeed, it is noted that SA objective 9 in relation to the historic environment and SA11 (water quality), have been strengthened in the pre-submission draft plan.

However, we would challenge the objectiveness and robustness of the mitigation assessment as a whole. There seems to be an acceptance that simply amending policy wording to request something be delivered will have a positive effect.

The following SA objectives have received more favourable scoring in the pre-submission draft, as against previous versions of the Sustainability Appraisal, for PS36 (<https://www.stroud.gov.uk/media/1485648/appendices-3-9-sa-report-appendices-for-stroud-district-local-plan-review-pre-submission-draft-plan-may-2021.pdf>) (Appendix 7), with little detail or evidence as to how this will be achieved:

- SA5: Vibrant communities
- SA6: Services and facilities
- SA7: Biodiversity / Geodiversity
- SA8: Landscapes / Townscapes
- SA10: Air quality
- SA12: Flooding
- SA14: Climate change

The mitigation (and therefore justification for improved scoring) in relation to SA5 relates only to defining a previously identified community use:

*'This site included community uses in line with the Site Allocation policy text included in the Draft Plan. Strategic Site Allocation Policy PS36 in the Presubmission Draft Plan also includes community uses. These are to be provided as part of a new local centre which would also include local retail and a surgery.'*

We would argue this is not mitigation of a negative but instead a positive effect which ought to have been included in the previous scoring rounds.

The mitigation in relation to SA6 appears to also take account of the community facilities which are claimed

as mitigation for SA5:

*'The Site Allocation policy text included in the Draft Plan required the delivery of development at the site in line with the Garden City Principles which is likely to help promote access to these new facilities as part of the creation of vibrant, sociable neighbourhoods. Strategic Site Allocation Policy PS36 in the Pre-submission Draft Plan also requires the incorporation of a new local centre to include the provision of local retail, surgery and other community uses. The development is also to incorporate ultrafast broadband which will also improve access to services and facilities.'*

The reference to ultrafast broadband as a mitigation measure and benefit resulting from development is also incongruous as the Berkeley and Sharpness area (and surrounding villages) is currently in the process of receiving rural full fibre broadband via roll out from Gigaclear. This is not linked to the Local Plan development.

As with SA5, the wording in the pre-submission draft in relation to SA8 seeks to clarify previously articulated requirements (in relation to landscaping):

*'The Site Allocation policy text included in the Draft Plan required the incorporation of strategic landscaping. Strategic Site Allocation Policy PS36 requires the incorporation of landscaping buffers to incorporate new native hedgerows and trees.'*

Furthermore the scoring in relation to SA8 is acknowledged to include unknowns and should therefore be treated with caution:

*'The development is to respond to the landscape context within the Berkeley Vale. These more stringent requirements may potentially limit impacts in terms of the local landscape setting; however, impacts will be dependent on the specific design of development, which is unknown at this stage.'*

SA10 in relation to air quality, is assessed on the basis of prioritising sustainable transport options, providing a modal shift and making the car the choice of final resort. We are supportive of the Council in this objective. However to suggest this is achievable and therefore to score positively in relation to PS36 is not supported by evidence. As noted elsewhere in our response, neither the evidence base nor the pre-submission Draft Local Plan offer any detail as to the deliverability or viability of the rail or bus services proposed, in fact they have been repeatedly challenged by sector experts, public transport providers and the assessment work of the transport authority. The potential to effect positive change in relation to air quality is therefore being assumed on aspiration alone, aspiration which has already failed to achieve funding for a business case via the Restoring Your Railways Ideas Fund. If rail experts and the Department for Transport believe there is little value in even investigating the option of reopening the Sharpness branch line, how can Stroud District Council rely on it so steadfastly?

The proposed mitigation in relation to SA12 (flooding) offers little detail and does not appear to have been developed as a result of a dedicated and detailed Flood Risk Assessment for site PS36. Reference to SuDS and attenuation are generic in nature and not a considered mitigation action for this strategic site, so close to an estuarine location and with fluvial and tidal flood risk.



The mitigation in relation to SA14 Climate Change again appears to have been undeveloped since draft stage, instead rewording existing intentions:

*'The Site Allocation policy text in the Draft Plan required delivery of development at the site in line with the Garden City Principles which is likely to help promote the use of zero-carbon and energy-positive technology to ensure climate resilience. The Local Sites Allocation Policy PS36 in the Presubmission Draft Plan will also address zero carbon energy generation and carbon capture onsite.'*

We would argue this is not sufficient to improve scoring from previous assessments.

## **Assessment methods and data**

The Sustainability Appraisal considers the capability of each of the site allocations to deliver sustainability effects (positive or negative), enhancements and mitigations. As such it must consider and rely upon an evidence base and data derived from other assessments and sources.

We would argue that there are significant deficiencies in the assessment data on which the Sustainability Appraisal is founded.

### **(1) Process of selection**

The process of selection of strategic locations should be evidence base > strategy > location selection. The absence of a complete evidence base for PS36 (even at Local Plan submission stage) show this not to be the case. The timing of reports, for example the HRA, does not support the appraisal and selection process but follows it.

### **(2) Appraisal of existing communities in Berkeley and Sharpness**

Appraisals in relation to access for Berkeley/Sharpness delivered different results during the Draft Local Development Plan process from 2017 at Issues and Options stage (very poor) to Emerging Strategy stage in 2018 (good), despite no change in circumstance.

Similarly the Core Strategy 2011 scoring delivered significantly poorer, and more realistic, scores than those of the assessments during this plan development period. The document 'Towards a Preferred Strategy: Pros and Cons of Potential locations for Strategic Growth 2011' (<https://www.stroud.gov.uk/media/2535/cdf15-towards-a-preferred-strategy-pros-and-cons-of-potential-locations-for-strategic-growth.pdf>) states at page 20 when considering a development of similar scale to Phase 1:

*'Whilst Sharpness has the theoretical capacity to achieve this scale of development (and more), it is relatively remote from main employment centres and primary facilities and services in the District, would require significant new infrastructure and has flood risk and landscape impact issues. Cam, Eastington or West of Stonehouse are all preferred as the more sustainable and viable options, should this scale of development be considered desirable.'*

If the Sustainability Appraisal utilises the baseline data from the June 2009 Local Development Framework SA Scoping Report (as stated at paragraph 3.106) we would ask that the Inspector look at the accuracy of assessment methods which have delivered such differing results.

### **(3) Sustainability appraisal in relation to PS36**

As noted above PS36 considers sustainability in relation to the built-out future solution, assuming certainty of its infrastructure and delivery – this is inconsistent with other sites.

The 'new' settlements are assessed on a mixed mode travel/access basis, which includes the proposer plan for access but ignores the local settlements to which they will have connection. How can this be compared with the assessment of existing settlements within the District which are proposed for expansion? The Sharpness proposal builds its accessibility exclusively on new sustainable transport provision rather than the accessibility of Sharpness as it stands.

### **(4) Testing of alternatives**

Between the 'Issues and Options' stage in 2017 and the 2018 'Emerging Strategy' stage of Plan development only PS36 was added as a growth point. We would ask the Inspector to consider where were the alternative sites tested to provide evidence that PS36 offered the most appropriate, sustainable solution as a growth point?

It has never been clear against what criteria the strategic sites proposed within the draft plan have been considered - is it simply capacity to accommodate rather than suitability? We would ask the Inspector to consider whether there has been consideration given to an alternative comparable location in Stroud District to accommodate a 2400 house (or even 5000 house) development?

During the Additional Housing Options Stage (consulted upon during October – December 2020) (<https://www.stroud.gov.uk/media/1287256/additional-housing-options-consultation-paper-16-10-20-for-web.pdf>) the two growth points considered at Whitminster (PGP1) and Moreton-Valance/Hardwicke (PGP2) scored in line with PS36 in their Sustainability Appraisal <https://www.stroud.gov.uk/media/1287281/sa-report-for-additional-housing-options-final.pdf>

**Table 4: Summary of sustainability effects for the new growth point options**

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social Inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
Site WHI014 (PGP1)*	++	-/++	0	0	+	++	-?	--?	-	--?	--?	-	--	0	0	++	++?
HAR006-HAR009 and HAR015-HAR016 (PGP2)*	++	-/++	0	0	+	++	-?	?	--	--?	0	-	--	0	0	++	++?

They were not, however, considered as an alternative to PS36, but considered only to address additional need.

By the time the pre-submission plan was presented for consideration by the Environment Committee and Full Council in April 2021, PGP1 and PGP2 were included as illustrative comparisons of performance of strategic sites.

<https://www.stroud.gov.uk/media/1485068/updated-sa-findings-summary-table-of-strategic-site-options.pdf>

(March 2021)

Newtown and Sharpness																	
PS34 Sharpness Docks	+	++/- -?	0	0	+	+	--?	-?	+/-?	--	0	--	+	0	+	+	+
PS36 Sharpness	++	++/- -?	0	0	+	+	--?	--?	-	++/- -	0	--	--?	0	0	++	++?
Wisloe																	
PS37 Wisloe	++	++/-	0	0	+	+	-?	-?	0	--	--?	-	--	0	0	++	++
Whitminster/Moreton Valance																	
PGP1 Grove End Farm	++	++/-	0	0	+	++	-?	--?	-	--?	--?	-	--	0	0	++	++?
PGP2 Moreton Valance	++	++/-	0	0	+	++	-?	--?	--	--?	0	-	--	0	0	++	++?

The result in relation to PGP2 Moreton Valance was more negative than presented previously, yet no detail offered as to why.

### (5) Testing of alternatives – Strategic Allocation

The SALA (Strategic Assessment of Land Availability) has been undertaken across various periods from 2017 to 2020, as is consistent with policy.

However, it is unclear with each new assessment/proposal whether previously rejected sites were reconsidered and whether the comparative merit of sites offered at differing years was considered.

It would appear from the evidence base presented by Stroud District Council that the SALA reports are considered annually in isolation rather than on an alternative basis. There does not appear to be the consideration of alternative sites on a comparative basis.

## **(6) Transport assessment method – accuracy**

Accessibility, access and sustainable transport will play a key role in the future of Stroud District and, rightly, impacts on the Sustainability Appraisal. The Sustainability Appraisal draws access information from the Settlement Role and Function Study Update 2018 (May 2019) (<https://www.stroud.gov.uk/media/1032745/settlement-role-and-function-update-2018.pdf>)

In order to rely on the information presented in the ‘Settlement Role and Function Study Update’ (SRFSU) there should be confidence in its accuracy and the methodology adopted to deliver a useful and usable result.

We would draw the Inspector’s attention to the fact that ‘access’ in relation to transport in the SRFSU considers only the travel time and not the availability/frequency of a public transport service. A daily service which reaches a destination in 15 minutes may be perversely described as ‘good’ – is this an accurate assessment method?

The methodology considers ‘access’ against parish and not settlement, which is inconsistent with public transport delivery and has the effect of over-inflating results.

There is such a serious query in relation to the access methodology in the SRFSU that Stagecoach, the largest public transport operator in the area, stated in their response to the Draft Local Plan consultation: *‘so concerned are we with the methodology, that we have no confidence whatever in the SRFSU, with regards to sustainable accessibility’*

<https://www.stroud.gov.uk/media/1165833/00405a-stagecoach.pdf>

<https://www.stroud.gov.uk/media/1165825/00405e-stagecoach-ps36.pdf>

## **(7) SALA – Transport and Access**

As an alternative to the SRFSU the Sustainability Appraisal can also call upon the SALA accessibility assessment undertaken by Gloucestershire County Council, however this too is not suitable to deliver an accurate result, with it being noted at page 18 of the Sustainability Appraisal ([https://www.stroud.gov.uk/media/1485646/sa-report-for-stroud-district-local-plan-review\\_-\\_pre-submission-may-2021.pdf](https://www.stroud.gov.uk/media/1485646/sa-report-for-stroud-district-local-plan-review_-_pre-submission-may-2021.pdf)):

*‘The SALA accessibility assessment undertaken by Gloucestershire County Council was only appropriate for using in the appraisal of residential and mixed use sites, but not employment site options. The assumptions that were used for the appraisal of employment site options (see Appendix 4) therefore draws on GIS data showing the location of bus stops (but not frequency of services from each bus stop). This dataset showed the location of all bus stops, including some that may not be well-served by existing bus services.’*

Similarly when considering journeys for existing provision this was based on travel time only:

*‘The assessment did not consider the practicality of the journeys from each site’*

We consider the SALA inadequate in its consideration of existing public transport and access options and we have further concerns about its approach to future provision.

As detailed in our objections to PS36 the deliverability of the proposed transport solution for Sharpness has not been tested.

The SALA (Strategic Assessment of Land Availability) reports from 2017 – 2020, when undertaking site assessments do not, in fact, appraise the actual deliverability of the public transport measures within the transport assessment. However the Sustainability Appraisal relies upon the transport assessment to provide 'positive' ratings in relation to air quality as a direct result of the transport solutions which are not demonstrably viable.

## **Conclusions**

Stroud District Council has asserted they have relied upon the Sustainability Appraisal to decide their final strategies, policies and procedures within the proposed Local Plan.

We believe the Sustainability Appraisal to be fundamentally flawed. Stroud District Council's reliance upon it has created a Plan which is inherently unsound and should be reconsidered.

We recommend Stroud District Council revisit the scoping, methodology and assumptions in relation to the sustainability appraisal; consider the accuracy of the evidence base and data on which it relies; and undertake a new sustainability appraisal to recommend appropriate strategic site(s).