Appendix 1: Methodology Consultation Response Summary
There is no specific mention of a review of the existing public transport provision, in particular the mapping of existing commercial public transport and engagement with officers with responsibility for public and shared transport strategy at Gloucestershire CC. The emphasis should be on accessibility with due regard for all users.

Step 3 (Land Appraisals) - This step sets out the criteria that will be used to identify the areas of land that will be appraised. It limits the inclusion of standalone sites greater than 1km from existing settlement boundaries which are too small to accommodate more than c. 1500 dwellings. This approach will shift out areas which are separated from the urban area but too small to accommodate the scale of development necessary to support the inclusion of local services. This is essential if a shift to sustainable modes of transport is to be achieved.

Step 4 (Bus Network) - It is difficult to establish new high frequency commercially viable bus services on the back of developments of even the scale discussed. As noted before including an assessment of the current bus network and in particular the proximity to high frequency bus services will be needed to understand whether it is likely to be feasible to establish a high frequency high quality service that is likely to be attractive to a range of uses and for journeys including those to work.

Step 5 (Hybrid Development) - It is at this point that any requirement for rail related obligation should be included. The document includes a list of sources that data will be gathered from. I see Network Rail is not on this list. It may be beneficial if we were.

Step 2 (Travel to Work Patterns from 2011 Census) - Further segmentation analysis may help understanding of where investment in transport opportunities will be optimised.

Step 2 (Capacity of Strategic Infrastructure) - The transport plan will also consider current constraints in the capacity of strategic infrastructure. This is proposed to address road and rail or bus based transport corridors which may not be able to accommodate development as they are too small to accommodate the scale of development necessary to support the inclusion of local services. This is essential if a shift to sustainable modes of transport is to be achieved.

Step 2 (Majority of site could really do with being reconsidered. This is stated as being on the basis that these pieces of infrastructure will not be able to accommodate the scale of development necessary to support the inclusion of local services. This is not however the case for either bus based or rail transport corridors.

Step 2 (Access) - Straight line isochrones can be very inaccurate where there are significant severances (e.g. rail/river/motorway) and/or a street network with poor permeability, but for this initial stage of the assessment this has not been considered a major issue.

Step 2 (Accessibility Modelling Matrix) - It is also proposed to use Gloucestershire County Councils Accessibility Modelling Matrix, completed in 2016, to assess access to services and facilities but not employment. Public transport can change significantly over relatively short periods so it will be important to ensure that any major changes in public transport provision since 2016 are understood and reflected in the analysis.

Step 2 (Transport Policy) - It is also proposed to include the National Transport System Plan and Core Strategy. This is completed in 2016, to assess access to services and facilities but not employment. Public transport can change significantly over relatively short periods so it will be important to ensure that any major changes in public transport provision since 2016 are understood and reflected in the analysis.

Step 2 (Road Based Public Transport) - In terms of road based public transport achieving long term viability for a high frequency bus service will depend on whether the provision of the service is likely to be commercially viable. This will depend on the level of development of the site and the potential for a sustainable route.

2.20 - I’m not sure why smaller (fragmented) sites are being discounted. They could often be more appropriate in supporting the delivery of sustainable development and can often be more suitable in sensitive historic landscapes. The presumption of a minimum size of site could really do with being reconsidered.

Table 3.1 - It will be important that an understanding of the significance of affected heritage assets and the contribution of their setting informs the assessment.
The Assessment of Strategic Development Opportunities in Parts of Gloucestershire

GCC Planning Officers - Ecology and Historic Environment

Section 2.2 - There may be a need to do data searches for sites and notable species of any given growth area identified. Natural England and government websites do not include local sites (i.e. Local Wildlife Sites and Regionally Important Geological Sites), habitats and most species records. Although some partial information is available through the NBN Atlas (https://target.biodiversityjoint.info/), full biodiversity information can only be obtained through GCER (https://www.gicer.co.uk/). If GCER is not contacted (seems unlikely) there must be a strong caveat that each LPA needs to do more detailed environmental searches with GCER. The Historic Environment Record (https://www.gov.uk/guidance/historic-archaeological-data-from-gloucestershires-historic-environment-record.html) is used to inform all the LPAs in Gloucestershire regarding the historic environment and should also be consulted. These more local searches could easily affect the scoring system values as presented at Section 2.32 and Table 2.3. We are supportive of the Water Quality criteria. For the Flood risk line we encourage the inclusion of sewer flood risk assessment as detailed above in the Sewer Capacity Assessment, this is because flood risk can be a material consideration from this summer as all Gloucestershire LPAs will be part of an extended South Midlands scheme (https://naturespaceuk.com/participating-areas/). Only great Creasted Newt red zones (which will be made available on request) should be considered secondary constraints however.

Environment Agency

Para 2.16 - We are supportive of the inclusion of water and waste water in the Utilities infrastructure assessment. The common approach that we employ on consultations of this nature is to complete what we call a Sewer Capacity Assessment. We are supportive of the Odour constraints line and inclusion of a Sewer Capacity Assessment within this in order to consider all available capacity. We would advise that the Sewer Capacity Assessment should be included as a material consideration from this summer as all Gloucestershire LPAs will be part of an extended South Midlands scheme (https://naturespaceuk.com/participating-areas/). Only great Creasted Newt red zones (which will be made available on request) should be considered secondary constraints however.

Para 2.18 - 2.47 – Development specific infrastructure requirements – here it would be useful to note land contamination and also where there are culverted watercourses as we would like to see greater commitment to opening up culverts as part of the JCS Review (there is currently support for this in Policy IN2 (section 4 states “enhance natural forms of drainage”), and supporting text para 5.3.11 (“restoring culverted watercourses back to open channels”), however we would be concerned about the potential of flooding and pollution risks to customers and to minimise the potential delays to development that infrastructure improvements may cause.

Para 2.19 - Section 2.32 - See comments about local record centre searches under Section 2.3 above. The criteria/information needed for scoring biodiversity (Table 2.3) cannot be done without contacting GCER (and HER similarly for the historic environment). Note that housing development over 2km from the Cotswold Beechwoods SAC could easily have adverse effects due to an increase in recreational disturbance (minor to significant negative impacts).

Para 1.9 – Severn Trent is supportive of the Duty to Cooperate comments and are keen to be included as a key stakeholder in subsequent site assessments and JCS Review consultations. We would ask that the email address growthdevdevelopment@severntrent.co.uk is included as the main contact address for future consultations.

Para 1.10 – We are supportive of you working closely with Stroud District Council throughout the production of the JCS and advise that the JCS take into consideration the sites that have been proposed for allocation as part of the recent Stroud District Local Plan Review – Emerging Strategy Consultation from November 2018.

Para 2.3 - We are supportive of flood risk being included in the potential constraint assessments however we advise that you edit this section to say “hydrology including flood risk from multiple sources”. This is because there are a number of causes for flood risk including fluvial, pluvial, groundwater and sewer flooding and we advise that any flood risk assessments should include assessment of sewer flooding in addition to surface water flooding.

Para 1.2 – We are supportive of the inclusion of Water Quality Drinking Water Quality Safeguarding and Source Protection Zones as a secondary constraint as it is important to protect drinking water resources to avoid pollution as a result of new development.

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Para 2.11 – We are supportive of the inclusion of Water Quality Drinking Water Quality Safeguarding and Source Protection Zones as a secondary constraint as it is important to protect drinking water resources to avoid pollution as a result of new development.

Para 2.12 – We are supportive of the incorporation of water and waste water in the Utilities infrastructure assessment. The common approach that we employ on consultations of this nature is to complete what we call a Sewer Capacity Assessment whereby we complete a desktop assessment of each of the potential development allocations providing a low to high risk rating against the following areas: surface water; groundwater; stormwater and sewer flooding. We advise that any flood risk assessments should include assessment of sewer flooding in addition to surface water flooding. We are supportive of the inclusion of water and waste water in the Utilities infrastructure assessment. The common approach that we employ on consultations of this nature is to complete what we call a Sewer Capacity Assessment whereby we complete a desktop assessment of each of the potential development allocations providing a low to high risk rating against the following areas: surface water; groundwater; stormwater and sewer flooding. We advise that any flood risk assessments should include assessment of sewer flooding in addition to surface water flooding.