

Cotswold District Local Plan 2018 – 2031 Update

Town and Country Planning (Local Planning) Regulations 2012

Regulation 18 “Issues and Options” consultation/participation

Evidence Paper: Accessibility of New Housing Development

1. Main Issues

- 1.1 Cotswold District Council is undertaking a partial update of its adopted Local Plan to fulfil a corporate commitment to make the Local Plan “Green to the Core” and ensure our future planning meets the increasingly pressing need to mitigate and adapt to climate change.
- 1.2 Part of this review includes an aim to reduce levels of greenhouse gas emissions from transport by ensuring essential facilities, services and jobs can be reached quickly and conveniently on foot, bicycle or public transport from new homes.
- 1.3 Cotswold’s existing Local Plan already contains an objective to “Locat(e) most developments in sustainable locations where there is better access to jobs, services and facilities and public transport.” Our aim is to develop a set of accessibility metrics that define this directive more clearly, with reference to objective measures, that can be used to guide the location of new development – and potentially highlight the need for new services or better access to existing ones – to minimise dependency on private vehicles.
- 1.4 As well as reducing carbon and other harmful environmental emissions, this policy will also contribute to better physical and mental health (through increased activity and reduced exposure to traffic fumes), improve inclusion and opportunity for all (by ensuring people do not need to have a car to get to the places they need to go), reduce isolation and increase street safety (by increasing activity in the street and reducing traffic volumes).

2. Objectives

- 2.1 The adopted Local Plan has several objectives relating to locating housing in accessible locations.
 - Objective 5a aims to ensure good access to jobs, services and facilities, without the need to drive, by locating most developments in sustainable locations. However, there is ambiguity in the Local Plan over how accessibility should be measured, which has led to some development being permitted in locations that do not support easy access to facilities vital for health, wellbeing and prosperity. Objective 5a could be improved to place more emphasis on permitting developments in accessible locations¹ as follows:

¹ An accessible location is a location with good and measurable access to local services.

a) Locating most developments in locations where there is better access to jobs, services and facilities and public transport and **only permitting developments with limited access to services in exceptional circumstances.**

2.2 This would be coupled with a clear accessibility scoring system, as described in Section 6 below.

- Objective 5b aims to reduce car use by supporting improvements in public transport and walking/ cycling networks. It is implicit that this also supports and enables regular physical activity vital for maintaining good health, although for added clarity and certainty, this objective could be updated as follows:

b) Supporting improvements in public transport and walking/ cycling networks **to deliver more active and sustainable forms of travel.**

3. NPPF, PPG and other material considerations

3.1 The National Planning Policy Framework (2021) (the NPPF) consistently supports accessibility planning in new developments and recognises its role in achieving sustainable development². The social aspect of sustainable development includes supporting strong, vibrant and healthy communities, which includes ensuring that new housing developments create well-designed places, with accessible services and open spaces that reflect current and future needs and to support communities' health, social and cultural well-being.

3.2 Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes³. In assessing sites that may be allocated for development in Local Plans, appropriate opportunities to promote sustainable transport modes should be taken up⁴.

3.3 Planning policies must enable the retention and development of accessible local services and community facilities⁵. Linked to this, they should also support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation, and recognising that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites⁶.

3.4 Planning policies are also required to create healthy, inclusive and safe places which are accessible and support healthy lifestyles⁷. In so doing, developments should create accessible and inclusive places to promote health and well-being⁸. National policy recognises that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities⁹

² NPPF (2021) paragraph 8

³ NPPF (2021) paragraph 105

⁴ NPPF (2021) paragraph 110

⁵ NPPF (2021) paragraph 84

⁶ NPPF (2021) paragraph 86

⁷ NPPF (2021) paragraph 92

⁸ NPPF (2021) paragraph 130

⁹ NPPF (2021) paragraph 98

- 3.5 Accessibility planning is also recommended by various National Planning Practice Guidance (PPG) documents.
- 3.6 The PPG on ‘Housing and economic land availability assessment’ recommends site assessments to take account of the proximity of development sites to services and other infrastructure.¹⁰
- 3.7 The PPG on ‘Plan-making’ explains that strategic policy-making authorities can work with public health leads and health organisations to understand and take account of the current and projected health status and needs of the local population, including the quality and quantity of, and accessibility to, healthcare and the effect any planned growth may have on this. Authorities will also need to assess the quality and quantity of, and accessibility to, green infrastructure, education, sports, recreation and places of worship including expected future changes, and any information about relevant barriers to improving health and well-being outcomes.¹¹
- 3.8 The PPG on ‘Transport evidence bases in plan making and decision taking’ requires policies to identify the opportunities for encourage a shift to more sustainable transport usage. This includes a robust evidence base to enable an assessment of the transport impacts of both existing and proposed development, to inform sustainable approaches to transport at a plan-making level. The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.¹²
- 3.9 The recent government strategy ‘*Gear Change: A bold vision for walking and cycling (2020)*’ is a material consideration. The strategy is based around ensuring that “all new housing and business developments are built around making sustainable travel, including cycling and walking, the first choice for journeys... [and] working with the MHCLG and the LGA to place cycling and walking provision at the heart of local plan making and decision taking for new developments.”¹³

4. Background evidence and Sustainability Appraisal

National approaches to accessibility analysis

- 4.1 Accessibility Planning was a compulsory element of the second round of Local Transport Plans (2006-2011) (LTP2) and the government published a set of national indicators and guidance to assess access to key services by walking, cycling and/or public transport. This information ceased to be collected after 2012. Nevertheless, it provides a good starting point for consideration of suitable accessibility metrics for Cotswold District.
- 4.2 The DfT’s core accessibility indicators measure access to eight key services:
- Employment centres;

¹⁰ [Planning Practice Guidance: Housing and economic land availability assessment \(MHCLG, July 2019\)](#) Para. 015 Ref. ID: 3-015-20190722, Revision date: 22.07.2019)

¹¹ [Planning Practice Guidance: Plan-making \(MHCLG, March 2019\)](#) Para. 046 Ref ID: 61-046-20190315, Revision date: 15.03.2019)

¹² [Planning Practice Guidance: Transport evidence bases in plan making and decision taking \(MHCLG, March 2015\)](#)

¹³ [Gear Change: A bold vision for walking and cycling \(DfT, July 2020\)](#) Page 26

- Primary schools;
- Secondary schools;
- Further education institutions;
- GPs;
- Hospitals;
- Food stores; and
- Town centres.

4.3 The LTP2 metrics have been cross-referenced with more recent approaches to accessibility assessments, both in local approaches (e.g. the Tewksbury, Cheltenham and Gloucester Joint Core Strategy) and wider concepts such as 20 minute neighbourhoods and 15 minute cities. More recently, the National Audit Office has produced a national journey time tool examining accessibility to local services by walking and public transport. The services assessed are:

- Schools (primary and secondary);
- Further education establishments;
- Acute hospital trusts;
- GP surgeries;
- Large employment centres and town centres; and
- Health and education services rated as good or outstanding.

4.4 Most of these assessments start with a similar set of core indicators with varying additional metrics. It's not always clear what these are based on – whether there is clear research on what people require for daily life, or whether it is based on local circumstances, availability of data, etc. – but they provide a further useful cross-reference for developing accessibility metrics for Cotswold District.

4.5 The additional services that commonly arise from these sources include:

- Green / blue open space, such as a park, playground, recreation area, beach, river;
- Regular public transport services (bus or train);
- Good quality walking and cycle route;
- Leisure / entertainment opportunity;
- Community space (e.g. village hall, community centre, library, sports centre / club);
- Financial service (e.g. bank or post office);
- Pharmacy;
- Early years childcare (e.g. nursery);
- Café, restaurant or pub;
- Space for children (e.g. play area, club or playgroup); and
- Space for older people (e.g. tranquil space, public bench).

Local accessibility data

4.6 Inform Gloucestershire provided an analysis of journey time by bus/walk and by car from potential development sites in the Local Plan to the following facilities and services:

- Area of 1,000+ employees;
- Primary school;
- Secondary school;

- GP;
- A&E and MIUs;
- Supermarkets;
- Convenience shops;
- Town centres (as identified in the adopted Local Plan);
- Sports fields;
- Play areas;
- Post offices;
- Banks;
- Pharmacies;
- Nurseries;
- Libraries;
- Community halls;
- Places of Worship;
- Dentists; and
- Allotments

4.7 Aligning the metrics provided by Inform Gloucestershire broadly correlates with the metrics provided within LTP2, The National Audit Office tool and other recent approaches to accessibility assessments forms the basis of our proposed methodology for an accessibility scoring system for new development sites in Cotswold, outlined in section 6 below.

5. Current Local Plan Policy

5.1 Local Plan Policy DSI identifies 17 Principal Settlements where the majority of the District's housing and employment needs will be delivered up to 2031. These were assessed to be the most sustainable locations for development with the best access to services and facilities, as well as having sufficient land availability. Policy DS2 provides in-principle support for applications inside the development boundaries of the 17 Principal Settlements.

5.2 Policy DS3 is permissive of small-scale residential development in Non-Principal Settlements. A list of Non-Principal Settlements is not provided. The Local Plan instead provides guidance to help decision makers determine what constitutes a Non-Principal Settlement. The guidance states:

5.3 'Some rural settlements have greater sustainability credentials than others and may, for example, have 'everyday' facilities, such as a shop/ post office, a (non fee paying) school, and/or good public transport access to neighbouring service / employment centres. Availability of everyday facilities is important in reducing unnecessary traffic movements and engendering a sense of community, which helps to prevent 'social isolation'. Accordingly, this policy applies to those rural settlements in the District that have reasonable access to everyday services, facilities and/or employment opportunities, either within the settlement itself, at a Principal Settlement, or at a neighbouring rural settlement. Some rural settlements are located near to the District boundary and have better public transport access to equivalent service centres in adjacent local authority areas (e.g. Cricklade, Burford and Winchcombe). Distance, quality of route, topography and pedestrian safety are important issues when considering the accessibility of services and facilities.'¹⁴

¹⁴ Cotswold District Local Plan 2011-2031 - paragraph 6.3.4

6. Potential Policy Responses

- 6.1 We propose to introduce an Accessibility scoring system to help to guide the decision on which sites are allocated in the Local Plan and ensure we meet local and national objectives to focus development in the most sustainable locations. The system would also provide clarity about how accessibility to services should be measured for Policy DS3, which will add certainty for both applicants and decision makers.
- 6.2 Housing is sometimes needed in less accessible locations to sustain existing services and to enable people, particularly younger people, to live in an area where they have strong connections. So there is a potential conflict in policy objectives that must be considered as part of the planning balance. However, the accessibility test will shift planning weight in favour of more sustainable developments. The need for a Rural Exception Site, as set out by Policy H3, would be an example of an exception to the accessibility test.
- 6.3 The option may have an impact on the number of windfalls¹⁵ that are granted planning permission. It may therefore have an impact on the housing land supply. If the windfall allowance were to decrease, it may require additional compensatory housing sites to be allocated in the Local Plan. However, we note other policy changes may also affect the windfall allowance, such as the extended permitted development rights or alterations to other Local Plan policies. Further work would be needed to understand the impact on the windfall supply.
- 6.4 We proposed the following method for assessing car-free access to important services and facilities, which draws on the research outlined in Section 4.

7. Services and Facilities

Core Services

- 7.1 Each of the existing accessibility assessment approaches we reviewed identified a broadly consistent core set of services and facilities which were implicitly understood to form fundamental requirements of modern daily life. In general terms, these were education, employment, healthcare and food. These are defined as Core Services in Table 1:

Table 1: Core Services

Core Service	Local indicator for Cotswold
Employment centre	Area of 1,000+ employees
Primary school	Primary school
Secondary school	Secondary school
GP	GP
Hospital	A&E and MIUs

¹⁵ Windfalls are dwellings delivered on sites that are not allocated in the Local Plan

Food store	Supermarkets Convenience shops Town Centres
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7.2 In allocating sites for residential development, we propose that all such sites (unless subject to exceptional circumstances) should seek to achieve a minimum standard of access to all of these Core Services for residents, without relying on those residents having access to a private vehicle.

Primary Services

7.3 We have also used national policies, strategies, metrics and locally available information to identify a set of services and facilities we have defined as Primary Services in Table 2. These are not as fundamental to sustaining modern life as the Core Services, but are nonetheless services that most people need to access regularly to maintain good health, wellbeing, community and personal life.

Table 2: Primary Services

Primary Service	Local indicator
Green space	Sports fields Play areas
Local services	Post offices Banks Pharmacies Nurseries
Community facilities	Libraries Community halls Places of Worship
Transport links	<i>*This is an area of further work that we would like to pursue</i>

Secondary Services

7.4 Secondary Services are those which many people will wish to access to maintain good quality of life. They are services people will tend to visit less frequently than the Primary Services: some people rarely or never visit some of these services. When people do visit them, they will tend to stay for longer periods than at the Primary Services.

Table 3: Secondary Services

Secondary Service	Local indicator
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Dentist	Dentists
Allotments	Allotments
Entertainment/Leisure	Leisure centres Pubs
Further Education*	FE college

Journey times to services and facilities

- 7.5 Having defined the services and facilities we understand to be key to maintaining a healthy and successful life and community, we must define how long it is reasonable to expect residents of Cotswold to travel to access these individual services. This enables the assessment of proposed development sites to measure whether they are sufficiently well connected to these services for development to proceed, or if improvements need to be made.

Journey Time Thresholds – Core Services

- 7.6 The Department for Transport’s (DfT) original accessibility indicators set lower and upper thresholds for journey times to each type of core service. The lower threshold is the national median journey time for that trip purpose, taken from the National Travel Survey at the time. The upper threshold is roughly the 90th percentile for journey times for that purpose. As such, the two thresholds reflect averaged national travel practise, rather than an objective indicator of acceptable distance.
- 7.7 The National Audit Office tool also scores access to key services as relative to national average journey times. In this case, areas are scored from 0 to 7 based on their comparison to the national average journey time for the relevant purpose (areas whose travel time accords with the average will receive the median score of 3, for example).
- 7.8 Accessibility scorings based on national average journey times have to be evaluated carefully in a rural area, as people in rural areas typically travel further distances to access services – this being part of the definition of a rural area. Nevertheless, national average journey times are informative when forming a view on suitable accessibility metrics as they provide a guide to the distances most people are willing to travel to access a given service, albeit that it is likely to be an under-estimation for rural areas such as Cotswold. They also align well with the expectations underpinning concepts such as 20-minute neighbourhoods and 15-minute cities.
- 7.9 The DfT thresholds are outlined in Table 2. These have been aligned with the local journey time datasets provided by Inform Gloucestershire.

Table 4: Local Journey Time Banding

Service	DfT journey time thresholds (mins)	Local Journey time bands (mins by walk/bus)
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	Lower	Upper	<15 mins	15-30 mins	>30mins
Employment	20	40			
Primary school¹⁶	15	30			
Secondary school	20	40			
GP	15	30			
Hospital	30	60			
Food store	15	30			

7.10 For the Core Services, potential development sites that score red for any service are deemed to require improvement (in terms of access, service provision or other mitigating measures) before a site would be considered suitable for allocation for residential development in the Local Plan in terms of its accessibility or whether the accessibility test would be passed for applications for housing development in Non-Principal Settlements.

Journey Time Thresholds – Primary and Secondary Services

7.11 Scores for access to Primary and Secondary services give a broader view of the expected transport sustainability of development sites. Sites that are well-connected to a range of local services by foot and public transport are less likely to generate high levels of vehicle traffic as people will be more able to access their regular services without needing a car. The scores for both Primary and Secondary Services give an indication of where access or service improvements should be sought through development. A site that scores low on access to the majority of the indicator services should seek to provide improvement or mitigation. A site that scores well against a broad range of Primary and Secondary Service indicators may be able to offset less favourable performance in other areas.

7.12 This approach will apply to both strategic housing sites identified in the Local Plan and to planning applications for housing development in Non-Principal Settlements. In the latter case, applicants will be required to provide information on access to Core, Primary and Secondary Services as part of their planning application

7.13 We propose to score Primary Services as follows:

- Score 2 for each service within 15 mins walk/bus time; and
- Score 1 for each service within 15-30 mins walk/bus time.

Secondary services score 1 for each service within 30 mins walk/bus time.

¹⁶ The indicator for Primary Schools turn back to amber for longer journeys, as free home to school transport is offered for children under 8 who live more than 2 miles from their nearest school (3 miles for over 8s)

Pub								
FE College								

Policy Approach	Discussion of impacts, effectiveness etc - justification
(A) Preferred Option:	Option 1 - introduce an accessibility scoring system
(B) Rejected Option:	Do nothing