

Fairford Neighbourhood Plan

Gleeson Strategic Land's Hearing Statement

in response to Examiner's Hearing Questions dated 29 August 2017 (7 August 2017)

MATTER 1: The SA/SEA Process (total word count: 503)

Q1. Does the revised SA (incorporating SEA) meet the requirements of the SEA Directive?

Yes we consider it does. See below

SEA Requirements	Requirement met?	Gleeson Comments
a) <i>An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes</i>	✓	The revised SA makes clear within the opening paragraphs its purpose that being to “ <i>provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals in the submitted Plan</i> ”. Although there is no contents page

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		<p>within the document, we consider the introduction sufficiently clear in this regard.</p> <p>Section 3 identifies the main objectives of the Plan and is clear from paragraph 3.5 onwards about the Plan's relationship with other relevant Plans or programmes.</p>
<p><i>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme</i></p>	✓	<p>Section 5 covers 'Environmental Characteristics' and outlines the relevant environmental context.</p> <p>Section 4 deals with 'Local Social, Environmental & Economic Issues' and rationally indicates the likely future baseline position for the area in the</p>

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		absence of the Plan.
c) <i>The environmental characteristics of areas likely to be significantly affected;</i>	✓	This is covered by Section 5.
d) <i>Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.</i>	✓	Section 4 covers in a concise manner relevant existing social, environmental and economic problems.
e) <i>The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;</i>	✓	Section 3 covers the National Planning Policy Framework and makes reference to sub-regional Plans forming part of the statutory Development Plan. Although the Report does not provide a review of any international Plans or Programmes that is

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		because none are of relevance.
<p>f) <i>The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</i></p>	✓	<p>Section 6 identifies the Neighbourhood Plan SA/SEA Objectives and Measures and paragraph 6.2 confirms that these have been established so that likely significant effects can be identified. The Objectives cover a host of environmental considerations.</p> <p>Section 7 provides an assessment of Plan's key objectives against each of the identified SA/SEA Objectives. This section also adopts a simple scoring system to determine whether effects are positive, negative or neutral.</p>

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		Section 8 then assesses each of the Plan's policies against the SA/SEA Objectives using the same scoring criteria for consistency.
g) <i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</i>	✓	This criterion is satisfied by Sections 7 and 8. Under each sub-heading where negative effects have been identified measures to prevent, reduce and/or offset the effect have been identified.
h) <i>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</i>	✓	Section 9 considers the 'Reasonable Policy Alternatives'. In respect of the development management policies contained within the Plan we agree that the alternative would be to have no policy

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		and rely on other national and/or local policies. In respect of site-specific policies the rationale for the selection of the alternatives considered is outlined at paragraphs 9.2 and 9.3. Paragraph 9.2 describes how the alternatives were selected.
<i>i) Description of measures envisaged concerning monitoring in accordance with Art. 10;</i>	✓	Covered by Section 11 and refers back to Neighbourhood Plan SA/SEA Objections and Measures set down in Section 6.
<i>j) A non-technical summary of the information provided under the above headings</i>	✓	Covered from pages 2 to 5 of the Report.

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Q2. Has it assessed reasonable alternatives in an appropriate fashion?

The Site Assessment Report published alongside the SA details at length the process undertaken to identify sites. Something not contained within this Report but undertaken earlier on in the plan-making process was the testing of the preferred and alternative sites popularity.

The approach adopted by the Neighbourhood Plan Steering Group (“**NPSG**”) is on the whole qualitative in its nature and seeks to rely on technical or otherwise evidence publically available. Whilst a qualitative assessment can have a tendency for bias, it is clear when undertaking a comparative assessment that the NPSG has remained objective throughout.

The qualitative exercise is then in turn supported by a ‘+/-’scoring systems found within the SA Report itself.

Gleeson considers the assessment has been carried out in an appropriate fashion.

Word count: 125

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MATTER 2: The proposed allocation of land for residential use at Leafield Road (FNP16) (total word count: 371)

Q1. Would the proposed housing site contribute towards the achievement of the social and the environmental dimensions of sustainable development?

Gleeson submits that the Site FNP16 contributes towards the social and environmental dimensions of sustainable development. The merits or otherwise of FNP16 are:

- New market and affordable housing stock – to provide a wide choice of high quality homes, widen opportunities for home¹, including an element of self-build all within an attractive environment.
- Land can be made available for the school – great weight should be given to the need to expand or alter schools².
- Parked school traffic can be removed from Leafield Road thereby reducing congestion along Leafield Road back into Fairford – encouragement to be given to solutions which support reductions in congestion³.
- The site is well situated to much of the town's services and facilities and may reasonably encourage the use of non-car journeys – planning policy

¹ NPPF paragraph 50

² NPPF paragraph 72

³ NPPF paragraph 30

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should ensure an integrated approach to considering the location of housing, economic uses and community facilities⁴.

- Delivery of on-site high quality open space to encourage active and continual use⁵.
- Delivery of substantial net gains in biodiversity through on-site provision of a landscape buffer, retention of field hedges and new seed and planting consistent with NPPF paragraph 109.

Through the technical evidence already provided no adverse impacts have been identified that would significantly and demonstrably outweigh the above benefits.

Word Count: 209

Q2. What is the significance of the sixth criterion of the policy (the potential for a link between Leaffield Road and Hatherop Road) and the associated paragraph 5.58 in the supporting text?

The safeguarding of an access for a future route through to Hatherop Road is twofold as Gleeson understand and see it. Firstly, it provides the town with an opportunity to establish a direction for future growth well beyond the life of the Plan, endeavouring to retain an element of control over speculative development in unwanted locations. Secondly a new road has the potential to

⁴ NPPF paragraph 70

⁵ NPPF paragraph 70

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remove a large amount of traffic associated with the School and sports centre from Leafield Road, High Street, Lower Croft and Park Street. NPPF paragraph 185 affords Neighbourhood Plans the opportunity to shape and direct sustainable development. As such, the criterion 6 response to local ambition and is seen by Gleeson as a positive approach in the longer term to fostering the delivery of sustainable development. In our respectful submission, the Plan should not be dissuaded from such an approach when sustainable development is about “positive growth – making economic, environmental and social progress for this and future generations”⁶.

Word Count: 162

⁶ NPPF Ministerial Forward