



**COTSWOLD  
DISTRICT COUNCIL**

## **Fairford Neighbourhood Development Plan Pre-examination consultation (Regulation 16 Consultation)**

Fairford Town Council has prepared a Neighbourhood Development Plan. The Plan sets out a vision for the future of the town and parish and planning policies which will be used to determine planning applications locally.

Copies of the Neighbourhood Plan and supporting documents are available to view on the Cotswold District Council's **website**: [www.cotswold.gov.uk/neighbourhoodplanning/consultations](http://www.cotswold.gov.uk/neighbourhoodplanning/consultations)

Hard copies are also available for inspection between 9:00 and 17:00 Monday to Friday at the Council offices on Trinity Road, Cirencester, Gloucestershire, GL7 1PX.

Copies are also available for inspection at:

Fairford Community Centre  
*Monday – Friday* 10:00 – 13:00

Fairford Library  
*Monday* 9:30 – 17:00  
*Tuesday* Closed  
*Wednesday* 9:30 – 17:00  
*Thursday* 9:30 – 19:00  
*Friday* Closed  
*Saturday* 9:30 – 13:00

**All comments must be received by 17:00 on Tuesday 11<sup>th</sup> April 2017.**

**There are a number of ways to make your comments:**

- Complete this form and email it to: [neighbourhood.planning@cotswold.gov.uk](mailto:neighbourhood.planning@cotswold.gov.uk)
- Print this form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX
- We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

All comments will be publicly available, and identifiable by name and (where applicable) organisation. Please note that any other personal information provided will be processed by Cotswold District Council in line with the Data Protection Act 1998.

### **How to use this form**

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box. Please repeat this section for subsequent comments relating to other sections of the plan.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	Oliver Taylor
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<b>Organisation (if applicable)</b>	Gleeson Strategic Land
<b>Position (if applicable)</b>	Strategic Land Manager
<b>Date</b>	7 <sup>th</sup> April 2017

## **PART B**

**To which part of the document does your representation relate?**

Paragraph Number	5.1	Policy Reference:	
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

**Please give details of your reasons for support/opposition, or make other comments here:**

The identified objectives of the Neighbourhood Plan are well evidenced.

(Continue on separate sheet if necessary)

**What improvements or modifications would you suggest?**

None required.

(Continue on separate sheet if necessary)

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	FNP1
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

**Please give details of your reasons for support/opposition, or make other comments here:**

Gleeson considers it both fair and reasonable for the Fairford Neighbourhood Plan to contain a policy updating the development especially where the Neighbourhood is proceeding in advance of any Cotswold District Council Development Plan Document. Accordingly, Gleeson supports policy FNP1 and the Insert 2 ("Submission Policies Map February 2017").

(Continue on separate sheet if necessary)

**What improvements or modifications would you suggest?**

None required.

(Continue on separate sheet if necessary)

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	FNP7
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

**Please give details of your reasons for support/opposition, or make other comments here:**

Timely provision of utilities infrastructure is an important planning consideration and therefore the inclusion of such a policy in the absence of any up-to-date planning policy at the District level appears justified. However, Gleeson considers the wording of the draft policy slightly ambiguous. For example, proposals should not have to “*demonstrate that they include provision*”, merely proposal should make appropriate provision for off-site infrastructure where a need has been identified.

(Continue on separate sheet if necessary)

**What improvements or modifications would you suggest?**

Gleeson suggest the following modification to the drafting of the policy, namely: -

~~“Development proposals must demonstrate that they include provisions which ensure any additional capacity required of the local utilities infrastructure will be delivered in time to serve the development. Where a need for off-site utility infrastructure has been identified in order to support new development within the town, development proposals will be supported where the identified utility infrastructure can be delivered in line with an agreed phased timescale. Development Proposals will either make arrangements for direct implementation or financial contributions towards such provision.”~~

NB. Strikethrough indicates suggested text deletion and underlining is Gleeson’s proposed worded.

(Continue on separate sheet if necessary)

Please make sure any additional pages are clearly labelled/ addressed or attached.

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	FNP14
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**Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)**

Support  Support with modifications  Oppose  Have Comments

**Please give details of your reasons for support/opposition, or make other comments here:**

Gleeson previously raised concern at the pre-submission consultation stage that the policy as drafted was overly prescriptive in its requirements. Paragraph 173 of the Framework advises that pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. For example, Policy FNP16 places a requirement on new development to be constructed of natural and/or heritage materials. Gleeson considers this requirement to be overly prescriptive as it fails to adequately reflect the need for a balance between the policy criterion and the ability of the development to provide a competitive return to a willing landowner and willing developer to enable the development to be delivered. The use of high quality materials which reflect the local vernacular is important, however, reconstituted/ reproduced materials are considered perfectly acceptable and would achieve the same end effect.

(Continue on separate sheet if necessary)

**What improvements or modifications would you suggest?**

Gleeson considers that the policy should allow for the use of high quality reconstituted/ reproduced materials.

(Continue on separate sheet if necessary)

Please make sure any additional pages are clearly labelled/ addressed or attached.

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	FNP16
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

**Please give details of your reasons for support/opposition, or make other comments here:**

Gleeson supports the allocation for up to 80 new homes on land off Leaffield Road ("**the site**"), as identified by FNP16 and Insert 2 of the Submission Policies Map February 2017 on page 53 of the Submitted Neighbourhood Plan. This land is being promoted by Gleeson and is owned by the Ernest Cook Trust. The Ernest Cook Trust was founded by the philanthropist Ernest Cook in 1952. Each year the Trust distributes more than £1.8 million in educational grants to benefit children and young people. As a consequence, the Trust is one of the UK's leading educational charities.

Gleeson is aware of comments made by Cotswold District Council ("**CDC**") during the last round of public consultation. In summary CDC objected to the site for the following reasons: -

- Little evidence to justify the educational use on-site;
- CDC intends to continue with the Local Plan allocations already identified for Fairford;
- No site capacity testing has been undertaken;
- Proposed access road expensive and may either make the site unviable or affect viability to drive down on-site affordable housing; and
- Concern over landscape impact.

Policy FNP16 requires the site to make provision for educational use and this is evidenced by local community concerns referenced at supporting paragraph 5.53 "*the local community is very concerned that the schools and nurseries will not be able to absorb the significant additional demand for new pupils of the 450 homes built/consented in the home since 2012.*" Accordingly, it is submitted that evidence does exist to justify criterion 2 of the policy. In this context, Gleeson considers that the Neighbourhood Plan Steering Group has approached plan-making in a positive way so as to foster the delivery of sustainable development.

Gleeson has appointed a team of technical specialists to assist in bring forward the site for development. This team includes the appointment of a masterplanner who has carefully considered the capacity of the site. An illustrative site layout plan is enclosed with these representations which show how 80 dwellings together with land for educational use can be accommodated within the site boundaries.

A Transport Statement, prepared by PFA Consulting is enclosed with these representations and confirms that there are no highway constraints to the allocation for up to 80 dwellings.

Criterion 6 of the policy identifies that the layout of the site should safeguard the potential for a vehicular pedestrian and cycle access to connect Leaffield Road with Hatherop Road. This would not be a "strategic" road link, but in the longer term would provide a "local" road facilitating better access from the eastern parts of the town to the two schools on Leaffield Road, and thus would reduce vehicle traffic on Leaffield Road, Mt Pleasant and Lower Croft. It should be acknowledged that the requirement to provide such a road link does not arise as a direct result of the proposed

allocation, but is an acknowledgement by the Neighbourhood Plan Steering Group that there may be the potential to continue to grow Fairford further in this direction, and should this occur, it is appropriate that a land should be safeguarded through the design of a scheme on the allocated site so as not to prejudice future growth. It is submitted that both Gleeson and the Ernest Cook Trust are content to safeguard such a potential route as the land immediately to the east is controlled and owned respectively. The fact that the policy requires a road link to be safeguarded to the wider land controlled by Gleeson does not infer that affordable housing delivery will be driven down on the allocated site. Rather the road would be funded and delivered by future development between the site and Hatherop Lane as an when this land comes forward.

ACD Environmental was commissioned to provide an Archaeology and Heritage Assessment (“**AHA**”) for the site which is enclosed for reference. The AHA confirms that the site does not contain any extant heritage assets.

A Preliminary Ecological Appraisal (“**PEA**”) of the site has been carried out by ACD Environmental and is enclosed for reference. The PEA finds that: -

- the arable land is of negligible ecological value;
- the field ditches running along the site boundaries are of negligible ecological value;
- the field margins which are semi-improved grassland are assessed as being of value within the zone of influence;
- the hedgerow and trees are assessed as being of value within the zone of influence;
- the site is of negligible interest to great crested newts;
- the site is within the zone of influence for badgers, commuting/ foraging bats, dormouse, and reptiles.

A Landscape and Visual Impact Assessment (“**LVIA**”), prepared by ACD Environmental, is enclosed for reference. The LVIA provides an assessment of the illustrative scheme (also submitted) for up to 80 dwellings and a new car park and drop off for the school. The LVIA concludes that the proposed scheme with a substantial landscape framework will not be uncharacteristic when set within the existing attributes of the local receiving landscape. Development of the site is considered to result in a ‘medium’ magnitude of change to the landscape character. Based upon the ‘medium’ landscape sensitivity of both the local and wider landscape, ACD Environmental consider the significance of effect on the landscape character resulting from the proposed development falls within the ‘moderate’ category of assessment. In respect of visual impact, ACD Environmental concludes that the introduction of new residential development on-site would not be out of character when considered as part of the wider setting (which includes the road network, existing development and infrastructure).

In the pre-submission draft Neighbourhood Plan the site specific policy (FNP18) sought to prevent the site from coming forward until 2026. Gleeson is pleased to see that Policy FNP16 no longer frustrates the timing/ delivery of the site. Criterion 1 of the policy does however state, *inter alia*, that a scheme is not to be commenced until the necessary upgrade and improvements to the local utilities infrastructure are complete.

Gleeson is aware of a foul capacity problem at Fairford. Our investigations reveal the problem as being attributed to an inundation of the foul system when the river levels are high and from surface water run-off. The rising main from the Fairford Moor Sewerage Pumping Station (“**Fairford Moor SPS**”) leading to the Waste Water Treatment Works (“**WWTW**”) on the south side of the river has sufficient capacity (capable of passing a maximum of 129 s/l at 2.5 m/s). Presently the rising main pumps at a lower rate (circa 70 l/s). Accordingly, a scheme of 80 dwellings requires the pumping

station to provide a further 4 l/s and associated emergency storage. As such, the foul sewerage problem at Fairford is the capacity of the sewers leading to the pumping station and investigations are still on going to determine the most appropriate technical solution. One such solution however would be to implement a scheme for uprating pumps, impellers, motors and increase the size of storage at the Fairford Moor SPS. This, Gleeson is advised would have the benefit of increasing the capacity of the foul network leading to the Fairford Moor SPS.

Gleeson is aware that a flow and pressure test was carried out for the Bovis Homes development site in October 2014. The results of investigation established the following, namely, the network has sufficient spare capacity in the distribution mains network to supply domestic peak demand profile. As such, there are not local constraints in respect of potable water.

To conclude, Gleeson submits that there are no technical reasons why the site should and will not come forward for development. Gleeson submits the site is 'available' being in the hands of a development company, is 'suitable' and is 'achievable' with a very realistic prospect that housing will be delivered within five years.

Enclosures:

1. Site Plan
2. Sketch Layout Plan
3. Sketch View
4. Transport Statement
5. Archaeology and Heritage Assessment
6. Preliminary Ecological Appraisal
7. Landscape and Visual Impact Assessment

(Continue on separate sheet if necessary)

**What improvements or modifications would you suggest?**

None required.

(Continue on separate sheet if necessary)