

Date: 12 December 2022
Our ref: 411082
Your ref: Fairford Neighbourhood Plan



Joseph Walker
Community Partnerships Officer
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Publica, on behalf of Cotswold District Council

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BY EMAIL ONLY

Dear Mr Walker

Re: Fairford Neighbourhood Plan: Regulation 16 Consultation

Thank you for your consultation on the above dated and received by Natural England on 01 November 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Neighbourhood Plan

Having looked at the policies in the plan, Natural England provides the following advice:

FNP9 Protecting the Fairford-Horcott Local Gap
FNP10 River Coln Valued Landscape

The plan area is within an area identified in the [Cotswold Water Park Nature Recovery Plan](#) as part of the Nature Recovery Network. This plan aims to expand and connect wildlife habitats to support species recovery and deliver wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation in line with the Lawton principles set out in [Making Space for Nature](#) and paragraph 179a of the [National Planning Policy Framework](#).

The areas identified within these policies are an important location in the Nature Recovery Network, acting as a landscape connection to the Cotswold Water Park Site of Special Scientific Interest (SSSI). The retention, creation and management of the habitats on this site are important to the conservation of the SSSI and its function within the Nature Recovery Network and we would advise that you refer to and link in to the Cotswold Water Park Nature Recovery Network within these policies.

FNP14 A new Low Carbon Community in Fairford

We advise that paragraph FNP14.3. "The development of this site will be required to mitigate its impact on the Special Area of Conservation (SAC) at North Meadow near Cricklade." should be amended. We refer you to the Fairford Neighbourhood Development Plan Habitat Regulation Assessment dated September 2022 (section 6.14, page 29) which recommends "for the avoidance of doubt a reference to the emerging Interim Mitigation Strategy and the need for developers to comply with it should be added to Policy FNP14." We would advise that you amend the policy to state that "The development of this site will be required to mitigate for any impact on the Special Area of Conservation (SAC) at North Meadow near Cricklade. Recreational impacts will need to be mitigated through either the emerging Interim Mitigation Strategy or sufficient alternative mitigation measures that the developer will need to develop."

We also advise in line with the recommendations in the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) for the Fairford Neighbourhood Plan dated December 2021 (page 48) that this policy should include a reference to potential impacts on Cotswold Water Park SSSI. We advise that this should be in the policy itself rather than in the supporting text.

Recommendation from the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) for the Fairford Neighbourhood Plan dated December 2021:

“Part of ‘land between Leafield Road and Hatherop Road’ site allocation falls within a SSSI IRZ for Cotswold Water Park SSSI. It is considered that there is the potential to strengthen Policy FNP14 by including a reference to the Cotswold Water Park SSSI IRZ and requiring early consultation with NE as part of any proposal.”

FNP17 Growing Our Local Economy

In its current form this policy could potentially allow development that could impact Cotswold Water Park SSSI to go ahead. Whelford Lane Industrial Estate is surrounded on three sides by Cotswold Water Park SSSI. We advise that this policy should acknowledge the proximity of the SSSI and require development proposals to ensure there are no impacts. The policy should note that in line with paragraph 180a.) of the [National Planning Policy Framework](#):

180. When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

Maps

None of the maps within the Neighbourhood Plan show Cotswold Water Park SSSI or Whelford Meadow SSSI which are both within the plan area and together cover a significant portion of the plan area. We would advise that a map showing these protected sites should be included within the plan and any references within the policies and supporting text to the SSSI should refer to the maps as appropriate.

Map B: Fairford Policies Map and Map B1, Fairford Policies Map (Central area) show an area highlighted in blue to the south west of the plan area. The key indicates that the colour relates to FNP16. Policy FNP16 relates to Zero Carbon Buildings and we presume this is an error and that as the site is Whelford Lane Industrial Estate, the key should state FNP17 (Growing Our Local Economy), as this policy relates to the Industrial Estate.

We note that colour of areas for FNP8 and FNP10 are very similar and can be quite hard to tell apart on the maps. We would advise changing the colour of one of these to make it more easier to identify the different areas.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

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