



## **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>	David Neame
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<b>Organisation (if applicable)</b>	Neame Sutton Limited o/b Cygnet Investments
<b>Position (if applicable)</b>	Director
<b>Date</b>	10 April 2017

## PART B

To which part of the document does your representation relate?

Paragraph Number	SUSTAINABILITY APPRAISAL	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:**

Cygnets Investments original objections raised at the Pre-Submission consultation stage to the draft SA remain unresolved in the context of the updated SA (February 2017) for the following key reasons:

1. The failure of the Town Council to acknowledge that saved Policy UT.1 is a strategic policy (failure of Basic Condition e))

As set out elsewhere in these representations the FNP does not acknowledge that saved Policy UT.1 is a strategic policy and consequently the document and its supporting evidence including the SA systematically fail to have regard to one of the key Local Plan policies that washes over the majority of the designated neighbourhood plan area.

2. The Consequent failure to give proper consideration to the Waterpark within the SA and the FNP (failure of Basic Conditions a), d), e) and f))

As a consequence of the approach taken by the Town Council the scoring matrix on page 26 of the updated SA cannot be regarded as reliable because it has no regard for the Waterpark and the strategic policy objectives set out in the Local Plan. The detailed commentary in Paragraph 8.17 is also silent on the matter of the Waterpark and its objectives.

As a prime example of the failure of the SA Policy FNP12 is given a neutral impact score under the heading of Economy and Enterprise. This cannot be right given the aspiration of the draft Policy to introduce a level of constraint reflective of Paragraph 109 of the Framework (but unsupported by any credible evidence).

The matrix therefore needs to be completely revisited and all draft policies reassessed by reference to the presence of the Waterpark and the relevant strategic saved Local Plan policy.

When considering alternatives the commentary on Page 35 states in the first bullet on that page that Policy FNP12 simply refines national and district policy in terms of landscape protection. This is incorrect.

The bullet goes on to state that *'their specificity in the Plan ought to be a greater deterrent to inappropriate development than relying on the development plan, in which case, their absence may lead to negative landscape, heritage and environmental quality effects'*. This statement confirms the objective of the draft policy, which in the case of Lake 104 clearly goes well beyond simple refinement and looks to introduce a level of constraint in terms of valued landscape that is not supported by any credible evidence. Furthermore this Statement confirms the Town Council has ignored the presence of the Waterpark and the strategic policies in the adopted Local Plan

that relate to it. No consideration has been given to an alternative that relies on those specific policies without the additional and unfounded constraint proposed in draft Policy FNP12. Consequently the SA has failed to properly consider the alternatives as is required by the relevant Regulations.

(Continue on separate sheet if necessary)

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

The SA needs to be reworked to include consideration of saved Policy UT.1 as a strategic policy of relevance to the FNP and all subsequent assessment and consideration of the FNP needs to be undertaken afresh in the light of the inclusion of the Waterpark as a key consideration.

The assessment of alternatives also needs to be revisited to ensure that alternatives such as reliance upon the current saved Policy UT.1, which has operated for many years, are properly assessed and considered.

(Continue on separate sheet if necessary)

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