



**Representation to Fairford's
submission draft neighbourhood plan**

Please find below comments from **Cotswold District Council** (CDC) on the Fairford Neighbourhood Plan 2016-20131. CDC acknowledges the very substantial amount of research, debate and preparation that has been put in by the authors of this NDP and hopes that the following comments, observations and suggested amendments will assist the examiner in his task.

Review of the SA, incorporating SEA.

The Local Planning Authority needs to be satisfied that the Plan is accompanied by a satisfactory SEA, prior to proceeding to examination. Following **Stonegate Homes Ltd & Anor, R (On the Application Of) v Horsham District Council**, the Council took the decision to seek a review of the Fairford SEA to determine whether it could be relied upon. This review is appended to this representation. In this review, our consultants AECOM determine that:

'In three instances this review views there to be a clear compliance issue. This relates to the following:

- The options considered as reasonable alternatives, and the appraisal of these options lack sufficient detail.
- The SA Report does not explain clearly why the preferred spatial strategy for the Neighbourhood Plan has been chosen in light of the findings of the appraisal.
- There is no appraisal of the effects of the Neighbourhood Plan as a whole, and only of individual policies.

These three elements need to be rectified to minimise the risk of the Examiner deeming the Neighbourhood Plan to be not sufficient to meet the basic conditions.'

If the examiner agrees with this finding, our understanding is that the plan as a whole would fail to meet the Basic Conditions until it is accompanied by a compliant SEA. Should the examiner disagree, then the examination could proceed, and review the full content of the plan, hence our full comments that follow. However, it worth noting that the Council would need to review any report from the examiner in light of the opinion provided by AECOM.

p.14 3.5 Not only Horcott but the whole of the town area of Fairford is located within the Cotswold Water Park (CWP). It should be noted that the new CWP policy in the Reg 19 local plan consultation takes a slightly different approach – criteria based rather than locational.

p.15 3.7 Given its relevance to Fairford, and particularly FNP10,11 and 12, omission of the SLA Policy 8 regarding Special Landscape areas is an unfortunate oversight.

p.17 While the text does not specifically state that the list of policies is exhaustive, this may be inferred from such an extensive list. In that context, the omission of the new CWP (Upper Thames Vales) policy is notable.

p.19 Paragraph 3.11

We would suggest that the NDP itself is not the place to articulate this challenge to the district council's approach. This issue is specific to the current circumstances, and while clearly a significant factor in the Town council's approach, it will rapidly become a historical reference rather than something informing the ongoing use of this plan.

While it may be the Town Council's aspiration that CDC cease to allocate sites within Fairford through the Local Plan, the neighbourhood plan cannot make this happen. CDC's long standing strategy within the emerging Local Plan has been to deliver site allocations to meet our objectively assessed need. We are not in a position where we can readily drop any of the proposed site allocations – to do so would require a reconsideration of all our proposed allocations, and therefore further consultation. CDC was clear on this point in earlier discussions with the NDP Steering Group, and in our response to the pre-submission consultation.

As both plans are developing in a similar timeframe, there is a significant risk that Fairford will not end up with either the Local Plan allocations, or its own alternative allocations, but both sets of allocations, leading to additional development, above that required to meet the district's Objectively Assessed Need (OAN).

The emerging Local Plan is subject to a different testing regime. The site allocations that it proposes need to be proven sound – accordingly they have been subject to testing in terms of sustainability and deliverability. Importantly, the last factor includes a test of their viability.

The National Planning Policy guidance states 'If the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable. The National Planning Policy Framework requires that the sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.' We are concerned that no viability information has been submitted, to demonstrate that the policy burdens sought by the FNP do not threaten deliverability.

We do not intend to drop the proposed site allocations in favour of sites, even if the Fairford Neighbourhood Plan is made prior to the adoption of the Local Plan. The sites may be undeliverable, or, due to the conditions attached, may only develop with a reduced amount of affordable housing (which in turn affects the delivery of the Local Plan objectives).

p.24. Objectives, vision and policies.

The Vision makes reference to the upgrading of the Eastern Spine Road; however this is not included in GCC's transport plan to 2031 - <http://www.gloucestershire.gov.uk/ltp3>

We have some concern about the reference to enlarging the car park at the northern end of the High Street as this is in a very sensitive location. While this aspiration is not picked up within the plan's policies, it is mentioned in the RJ for FNP8.

Fairford Neighbourhood Development Plan: Regulation 16 draft
Comments from Cotswold District Council

FNP1 The Fairford and Horcott Development Boundaries.

p.25 It should be noted that this policy is tied up with the site allocations proposed in this plan, and those in the emerging Local Plan, in that the sites the Local Plan is seeking to allocate are not included within the boundary. Consequently, this policy could become rapidly outdated.

The Reasoned Justification states that “The policy will have the effect of focussing future housing and economic development on the existing urban area”; however a site allocation is then proposed that falls well outside the town and outside this development boundary in the open countryside (FNP22).

FNP3 Building New Retirement Homes & A Car Park at East End

p.26 The policy seeks to allocate a site, which because of access and impact of its setting may be undevelopable. The draft policy seeks to impose significant conditions, which in the absence of an established quantum of development, cannot be proven viable. We are not aware that any viability testing has been undertaken.

This site was subject to the SHLAA process and found to be “not currently developable” as there would be unacceptable landscape impacts on the setting of Morgan Hall and the CA. The policy refers to the Conservation Area, but the policy should provide more information than that the site is within the CA – an allocation should not be made unless a proposal can be put forward that is acceptable in CA terms

We note the analysis that was undertaken by the NDP group at “Site Assessment Report”, but we’re unclear on whether this was an assessment undertaken by the community or by those who are experienced and qualified in the various matters covered, e.g. were the GCC Highways Officers involved in commenting on the highway implications of these sites?

Dwellings could only be restricted for occupation by older people if a planning condition was attached to them or they were adapted or serviced in some way. There is no indication that these properties would be anything other than open market dwellings, so it would be useful if the policy or RJ specified how this policy might be realised. The extent of the proposed site is not clear at the map scale provided, more detailed boundaries are required to fully evaluate the site.

As with the education concerns reflected elsewhere, we suggest this issue targeted by this policy could be addressed through a criteria based policy emphasising the community’s desire for additional parking for the GP’s surgery. It needs to cover the possibility that at some point in the future the GPs may move – and Fairford would still be left with the residential development.

Within that context, the Gloucestershire CCG Primary Care Infrastructure Plan recognises that Fairford Surgery is already some 24% below its ideal spatial size. Development within

the Fairford Surgery catchment area, together with the move to increase, as envisaged by the STP, services provided by the Surgery, will only exacerbate that spatial shortfall.

Biodiversity

The site assessment highlights the trees and hedge, but does not explore how would these be retained in an undisturbed condition on such a restricted site. E.g. changes to lighting could cause impacts.

There is no indication as to whether a data search for ecological records has been made to the Gloucestershire Centre for Environmental Records, for example there is a Key Wildlife Site a relatively short distance away.

Flood risk

We are concerned that a site is being proposed for development, which is subject to flooding.

Listed buildings/Scheduled Monuments/CAs

An assessment of the historic environment should assess the full range of both designated and non-designated heritage assets. In this instance that would include the Conservation Area and the setting of Morgan Hall and Moor farm (designated). No assessment has been made on these issues and development here is likely to impact on the assets –the degree of impact will very much depend on the number size and exact locations of the units”.

Views/Visual Impact

The most important views that are likely to be affected are those from the PROWs, which will be significantly altered and urbanised, again the level of impact will depend on the number of units proposed and whether they (and the car parking) can be kept away from the paths.

Rural Character

No landscape assessment of the site appears to have been made. There is no reference to the appropriate Landscape Character Assessments –

- National Character Area 108. Upper Thames Clay Vales
- Gloucestershire Landscape Character Assessments for The Severn Vale; Upper Thames Valley; Vale of Moreton; Vale of Evesham Fringe (LDA 2006)
- Cotswold Water Park - Integrated Landscape Character Assessment (LDA Design 2009) The boundary of the study area encompasses the wider setting of the Cotswold Water Park.

The site does, as an open green space have some rural character however this is limited.

Land resources

No detailed data is given on agricultural land quality.

Public Rights of Way

The assessment highlights the PROWs along the north and eastern boundary of the site,. These are evidently well-used paths. The experience of using these paths would change considerably if there were houses adjacent to them.

FNP5 Maintaining Viable Community Facilities

p.28 The policy identifies a number of community facilities. While in our view there are facilities missing (for example the schools) we presume as drafted that this list is intended to be exhaustive. We suggest it might be better to put this in as a list of “includes”.

This policy does not appear to go as far as the emerging Local Plan policy, so could be rapidly superseded.

FNP8 Managing Traffic in the Town

p.32 We believe the second paragraph is unclear, and therefore are struggling to understand how we would be able to implement it.

The policy refers to the “development plan car parking standards” –we believe it would be clearer to provide an explicit reference to where those can be found, but also to allow for a successor document, to try to avoid becoming outdated.

The subsequent clause appears to be missing a word ‘...considered appropriate to [address/tackle] the poor level of public transport provision...’ It is unclear how these requirements will be identified and considered appropriate.

All development [...] mitigate any harmful effects of additional road traffic on the town Centre and on heritage assets.’ There will be a burden of proof to demonstrate that impact is due to new development, making it difficult for us to use this provision effectively within Development Management decisions.

Para 5.33 refers to the up-grading of the Eastern Spine Road – however this is not included in GCC’s transport plan to 2031 - <http://www.gloucestershire.gov.uk/ltp3>.

5.34 refers to expansion of the car park at the north end of the High St – this is a very sensitive location, which will present some challenge to an expansion. As this is neither policy nor expressed clearly as a community aspiration, it adds no weight to this project, but risks building expectations.

Local Green Space, Local Gap and Special Landscape Value

We acknowledge and welcome that the local community wishes to protect these areas (LGS, Local gaps and SLV) and to ensure that only appropriate development comes forward, but we need to ensure that the policies are worded in a way that is compliant with the NPPF and that are easy to implement in the DM process.

FNP10 Protecting Local Green Spaces

p.34 We believe the policy wording proposed is consistent with the NPPF. Our emerging Local Plan policy, EN12, proposes:

‘Development will only be permitted within a Local Green Space where there are very special circumstances, which outweigh the harm to the Local Green Space. Particular attention will be paid to the evidence presented by the local community when assessing development proposals that are likely to affect a designated Local Green Space.’

All of the LGS designations have been accompanied by strong evidence of their archaeological or historical significance. However, that may be the case for many other sites around the town – the key point that has to be proved is why the site is “demonstrably special.

FNP11 Protecting the Fairford – Horcott Local Gap

p.34 The policy wording refers to “function” –we believe this needs to be clearer in explaining what that means so that planning decisions can be made appropriately without harming that “function”. On the other hand, “open character” is clear and unambiguous.

FNP 12 Protecting the Area of Special Landscape Value

p.35 This policy appears stronger than the SLA policy (and potentially than AONB policy). As such a strong constraint, we are concerned that this may not be compliant with the NPPF, which highlights a criteria-based approach with due consideration of landscape character analysis (para 113).

The justification for these designations (and the LGS) are to be found in the “Landscape and LGS Study”. The purposes of the study are very much focused on the settlements of Fairford and Horcott and do not refer to protecting and enhancing the “intrinsic character and beauty of the countryside” (to quote from the NPPF).

We expected more reference to the SLA and possibly to the AONB, which is close to the parish (adjacent to the northern parish boundary in parts). And also more reference to existing landscape character assessments which would provide additional evidence to support these designations (a minor mention is made of the CWP LCA) –

- National Character Area 108. Upper Thames Clay Vales
- Gloucestershire Landscape Character Assessments for The Severn Vale; Upper Thames Valley; Vale of Moreton; Vale of Evesham Fringe (LDA 2006)
- Cotswold Water Park - Integrated Landscape Character Assessment (LDA Design 2009) The boundary of the study area encompasses the wider setting of the Cotswold Water Park.

Much of the evidence for these policies focuses on issues that are covered under other local and national policies/legislation/guidance, for example conservation areas, flooding etc and the policy may be challenged on that basis. The Reasoned Justification and supporting evidence (as well as the policies) need to be very clear on what additional matters these policies will bring into play. If the allocations form part of the “made” plan they should provide more certainty on where development is not acceptable on a locational rather than a criteria/issue basis.

The boundaries of these new designations appear to go across rear gardens. Much clearer mapping is required to enable this designation to be considered in the development management process.

If development takes place to the south of Morgan Hall (policy FNP4) this could have a detrimental impact on the experience of the footpaths out of Fairford towards this area.

FNP13 Valuing our Trees and Hedgerows

p.36 Although the intent of this policy is laudable, it is not practical in implementation terms. It may be best to illustrate that by means of an example. If a development site contained a large Leylandii, which was already too close to neighbouring properties and this tree had to be removed to enable development, it would not be reasonable to expect the planting of two equivalent sized trees on a small site. In addition, we would not normally encourage the planting of semi-mature or even extra heavy standard trees given the high level of care that they require to flourish. In the long term smaller trees tend to survive better.

The policy states that “proposals for new planting should link...”. This will not always be appropriate so the eventual policy should include the wording ‘where appropriate’. We note that reference is made to GCC’s comments (consultation report) which state:

‘Policy FNP15 is supported but could be strengthened by a small change in wording perhaps. It is normal practice to replace each lost tree with at least two replacements particularly as these will generally be younger and at risk from not reaching full maturity. In terms of hedgerows replacement providing another of equal length is the minimum required and this should be of similar or greater diversity of usually native species. A hedgerow of similar height and form will take time to grow so again the requirement should be same length of a new hedgerow plus some additional hedgerow or other shrub or tree planting elsewhere. We therefore recommend the policy is tweaked with some commentary in paragraph 5.5X about valid replacement ratios.’

Note they refer to “normal practice” – this is very different to planning policy. They also refer to planting “younger” trees, which are unlikely to be the same size as a mature tree that is removed.

Reference is made to planting native trees; although this is certainly an important consideration there are locations where this is not suitable – designed landscapes, areas where room for tree growth is limited; contaminated sites, orchards etc.

Hedgerows may not be an appropriate landscape approach – in certain areas of the town a wall might be more in character. It is also very difficult to assess whether the biodiversity value delivered is exactly equivalent – what metric should be used? What happens if the hedge to be removed is a leylandii hedge? If there are concerns about landscape design and trees/hedges – perhaps this should be left to the design policy, where it is already highlighted?

Para 5.48. The last sentence does not make sense. In addition we would not recommend the use of “instant hedging” as it is expensive and does not always establish very well.

FNP14 Achieving High Standards of Design

p.37 We welcome a design policy which helps to amplify the policy and guidance provided in the old and new Cotswold Design Codes and provides a very useful local context.

2. A map to show important views in Fairford would be very useful
4. This is not very clearly worded and is an issue that is well-covered in the new Cotswold Design Code
5. We would not support the use of instant hedging as it does not thrive as well as traditionally planted (small whips) hedge in the long-term. It would also be unreasonable to stipulate that applicants had to use instant hedging rather than planting more traditional hedging.

9. It is not reasonable to expect all artificial stone houses to be re-clad in natural stone or render. “Bradstone” is a trade name and it is probably not appropriate to use in a policy document. It would also impact on viability of developments.

12. a requirement to provide full off-road parking capacity would affect the land take of new development, and thereby affect viability, potentially to the extent that it would undermine the deliverability of the number and tenure of houses expected by the emerging Local Plan. Street parking can play a role in traffic calming if appropriately designed.

14. We’d suggest removing the reference to flooding, this is Reasoned Justification and not policy.

15 and 16. Do not seem to be consistent with each other. It might be better to say “If ground levels are to be raised or sites re-contoured, full consideration should be given to the impacts of this on landscape/townscape, water management and the amenity of neighbouring properties.”

17. this could affect the viability of schemes

‘Fairford Neighbourhood Plan – Character and Design Assessment for Fairford and Horcott’ was sent to CDC for comment earlier this year, however it does not appear to form part of the submission package. We made some comments on the assessment and were under the impression that it would form a very useful part of the NDP; but if it has not been subject to public consultation as part of the NDP process it will have little weight. No reference is made to this document in the text, which seems unfortunate given that it provides a greater level of analysis.

FNP15 Conserving Non-Designated Heritage Assets.

p.38. Considerable work has gone into the development of a list of NDHAs for Fairford and we consider it to be an example of good practice (and we will share this work with other NDP groups).

The policy itself is not NPPF compliant. The policy only refers to “buildings and structures”, which would exclude Fairford Park and any archaeological sites, the policy should be changed to “buildings, structures, sites and landscapes”.

FNP16 Delivering new Homes at Leaffield Road

p.40 While recognising the ability of a neighbourhood plan to allocate sites, we would refer to our comment on pp1-2 above, regarding our position on the Local Plan housing allocations. If in the event that this allocation is made, and the Local Plan Inspector is minded to accept Fairford’s position, we are not aware of any site testing undertaken to see if 80 units can be accommodated on the site with all the other requirements. Should the number fall short, then the site allocations would risk not meeting the target being set in the emerging Local Plan.

In terms of the site itself, we have reviewed the “individual site assessment”, but have not undertaken a detailed site survey.

The policy is quite weak in that it says that there can be up to 80 units but it must have “regard to the following key principles”. In order to deliver on its expectations, the policy should make clear that housing at this site can only come forward if the following items are delivered and the timeframes for their delivery. For example that the housing cannot come forward until the educational aspects are under construction etc.

Need for educational space

The policy allocates land for “educational uses”, but it is not clear what is meant by that. There is little evidence presented to justify the educational provision, other than community concern. The policy is not clear as to what quantum of educational development would be sufficient to deliver the benefits that would then make the housing allocation acceptable. No viability assessment has been presented.

If the principle of development off Leafield Road is established, the relatively weak justification for this allocation of land for educational purposes could easily see this educational contribution being overruled. No evidence is presented to demonstrate that this site would actually be fit for purpose. There is no mention of any requirement by GCC or Farmors School Academy for the schools to expand at present and whether they consider that more land on the opposite side of the road would be needed. We would suggest that a criteria-based policy, enabling school expansion where necessary and appropriate, would provide confidence to the community that the schools’ growth will not be unduly constrained, whilst providing more flexibility than an allocation that may not prove appropriate for unknown future needs.

The main implication of the educational provision would appear to be to allow for more car parking, which may well increase car journeys rather than decrease them. No highways assessment has been presented, to assess this impact.

As with the educational land component, the proposal to safeguard land to enable an alternative future access (6) will affect the viability. Where conditions make the site unviable, the presumption in favour of sustainable development may mean that the development still goes ahead, but without the infrastructure investment that was part of FNP’s reason for allocating the site. We have real concerns about the landscape impacts of a new link road to the Hatherop Rd (plus the cost and highways impacts elsewhere).

The site

This site has not been subject to the SHLAA process. It has not been evaluated in terms of landscape value (all sites to be allocated in the emerging Local Plan have been subject to a thorough landscape analysis by White Consultants.) We note the analysis that was undertaken by the NDP group at “Site Assessment Report”, but we’re unclear on whether this was an assessment undertaken solely by the local residents or by those who are experienced and qualified in the various matters covered, e.g. were the GCC Highways Officers involved in commenting on the highway implications of these sites?

Para 5.58 States that “it is considered a more sustainable ...and away from the most sensitive historic buildings and landscapes to the west and south of the town”. In terms of landscape this is not correct – the SLA is adjacent to this site and the AONB a short distance to the north, i.e. in terms of existing landscape designations it could be considered to be a more sensitive site.

Biodiversity

The site assessment highlights the woodland and hedge and suggests that it would need to be “maintained as far as possible”. The road access points would mean that the hedges to the east and west would be broken, which could have biodiversity impacts on bat flightlines etc. The mature trees are also likely to be of biodiversity value. Changes to lighting could cause impacts.

There is no indication as to whether a data search for ecological records has been made to the Gloucestershire Centre for Environmental Records, for example there is a Key Wildlife Site a relatively short distance away.

Listed buildings/Scheduled Monuments/CAs

An assessment of the historic environment should assess the full range of both designated and non-designated heritage assets. In this instance that would include the Conservation Area (designated) and Fairford Park (non-designated heritage asset). No assessment has been made on these issues yet development here is likely to impact on the setting of the CA and Fairford Park.

Views/Visual Impact

The site assessment states that the views would be screened by existing and proposed vegetation. However new roads, lighting and seasonal changes in vegetation would mean that the screening could not be fully effective, particularly given the very open nature of the landscape. If the screening were to work in views from Hatherop Road (notwithstanding the proposed new road connection) it would need to be wide and dense thus reducing the capacity of the site for housing.

Rural Character

No landscape assessment of the site appears to have been made. There is no reference to the appropriate Landscape Character Assessments –

- National Character Area 108. Upper Thames Clay Vales
- Gloucestershire Landscape Character Assessments for The Severn Vale; Upper Thames Valley; Vale of Moreton; Vale of Evesham Fringe (LDA 2006)
- Cotswold Water Park - Integrated Landscape Character Assessment (LDA Design 2009) The boundary of the study area encompasses the wider setting of the Cotswold Water Park.

These LCAs highlight the open nature of the landscape in this area and this makes it vulnerable to change from development.

There are also potential impacts on the Special Landscape Area and Fairford Park.

There are several important trees on site and an adjacent TPO. The measures to retain these trees (and an adequate protection area) would further reduce the capacity of the site.

The assessment has reviewed the recent White Consultants report; however it is unclear how the layout and design of the development can be consistent with the description of “large scale arable fields and pasture”.

Land resources

No detailed data is given on agricultural land quality.

Public Rights of Way

The footpath to the north is included in the assessment but not the one to the south, running alongside Crabtree Park, which appears to be a very well used path. The experience of using this path would change considerably if there were houses on both sides.

In summary, the footpath to the north of Crabtree Walk with its associated trees marks an obvious end to the town (the schools appear more green and “edge of town”). The landscape is very open and development at this site would intrude markedly into the countryside, albeit an area that is not SLA or AONB.

At (4) – we cannot see a justification for dividing the site into 3 parcels. It may be possible to secure more effective POS if it is all “lumped together”.

FNP18 Creating New Jobs for the Town

p.43 In our comments regarding Coln House School at pre-submission, we noted that we were unclear why a residential use of this site or a mixed use would not be acceptable in bringing a listed building back into a positive use (provided this can be done without harm to its historic character etc.) It could even provide those useful housing numbers that the town is seeking.

FNP19 and FNP20.

p.44 There are various (and somewhat complicated) permitted development rules regarding changes between office and residential. While we have no objection to the intention to protect employment use, there is a risk these policies will not be effective, and therefore will not realise residents’ aspirations.

Policy FNP20 Sustaining a Successful Town Centre.

The description of the marketing exercise would fit better in the RJ than the policy.

FNP21 Creating New Visitor Accommodation.

p.45 By inference this policy suggests new campsites would not be acceptable, which appears overly restrictive, and not in keeping with the positive aspirations around tourism in the RJ.

FNP22 Horcott Lakes

Pp.47-48 A small part of the site covered by the Policy is currently proposed as a housing site allocation in the emerging Local Plan. Moreover, as discussed elsewhere in this response, the CDC Local Plan site allocations have been, and have to be, proven viable. We would not expect an examiner to support such an unproven site allocation where it served to stymie a deliverable housing site.

Evidence in support of policy FNP22 should show the viability of the lake ownership and visitor centre issues. We are unclear on the scale of the visitor centre or its future use – for example are there highways issues related to the access?

Bullet vi:

We are unconvinced that a site allocation is appropriate in this case. It is not clear what work has been carried out to justify this proposal, and to consider its impact e.g. has the MOD been consulted on the impact on RAF Fairford from glare etc. Depending on the detail of the development planning permission may not be required for the panels, although it would be required for the fencing and associated infrastructure.

No site assessment has been provided for the site – e.g. would it have an impact on ecology? We don't believe that a Landscape and Visual Impact Assessment or other landscape assessment has been undertaken.

Without more detail it is very difficult to comment on the potential acceptability of the proposals, and therefore the policy itself.

Bullet vii:

Development of this scale, away from the built up area of the parish, does not in our view fit with the NPPF. While the policy itself is silent on the tenure of the properties, the RJ states that no affordable housing will be sought. This is not in general conformity with the adopted Cotswold Local Plan, which seeks up to 50%. A case is put that this allocation should be allowed as an exception to the proposed FNP1, yet exception sites are expected to deliver affordable housing.

We would suggest that this housing allocation is inconsistent with the second objective of the plan, in terms of proximity to local schools, shops and services.

The fact that such a remote site is seen as developable undermines the site allocations evidence base. Sites which have not been selected, including the current appeal site, are much closer into town.

The extent of the proposed site is not clear at the map scale provided, more detailed boundaries are required to fully evaluate the site. In order to deliver what level of community benefit (e.g. the necessary financial contribution is not specified); we are not privy to any viability testing. The infrastructure requirements of this site (stand-alone sewerage, upgrade of single track road) are extensive.

The policy refers to houses of “high environmental standard” – to be effective policy that would need to be defined. However, there are significant challenges to enacting policies that require a higher standard than that delivered through Building Regulations without very strong evidence (advice we’ve received in preparing the Local Plan policies, Written Ministerial Statement, 18 December 2014).

This site was not part of the SHLAA process.

We note the analysis that was undertaken by the NDP group at “Site Assessment Report”, but we are unclear on whether this was an assessment undertaken by the community or by those who are experienced and qualified in the various matters covered, e.g. were the GCC Highways Officers involved in commenting on the highway implications of these sites? Or GCC minerals officers in commenting on how the proposals would affect the approved restoration proposals? In terms of the site itself, we have reviewed the “individual site assessment”, but not undertaken a detailed site survey.

Biodiversity

The site assessment states “a considerable variety of wildlife could be expected”, but there is no consideration of any species or habitats or any site survey, nor does it consider the potential impacts of the development on biodiversity. It is possible that this site has a high ecological value and as such a full ecological survey should be undertaken before the site is allocated for development.

There is no indication as to whether a data search for ecological records has been made to the Gloucestershire Centre for Environmental Records, for example there is a Key Wildlife Site a relatively short distance away.

Flood risk

Not very clear

Views/Visual Impact

The assessment underplays the visibility of the site from Rhymes Lane (a very rural lane) and potentially also from Totterdown Lane – there would also be lighting impacts; the

highway access would have a major impact. Built development here would form an alien urban intrusion into the open countryside.

Rural Character

The assessment states that “Since the site is in a remote location, reached by narrow lanes it is rural in itself, but development would therefore not affect the rural character of the town”. However this site would have a major impact on the rural character of the countryside around the town (although still within the parish / NDP area) and on Rhymes Lane (it would require major widening and improvement to service a residential development). It would also potentially open up the whole area between this site and the A417 for development. No landscape assessment of the site appears to have been made. There is no reference to the appropriate Landscape Character Assessments and how that character would be affected by residential development –

- National Character Area 108. Upper Thames Clay Vales
- Gloucestershire Landscape Character Assessments for The Severn Vale; Upper Thames Valley; Vale of Moreton; Vale of Evesham Fringe (LDA 2006)
- Cotswold Water Park - Integrated Landscape Character Assessment (LDA Design 2009) The boundary of the study area encompasses the wider setting of the Cotswold Water Park.

Public Rights of Way

The assessment states that there are no PROWs on the site so no impact; however this ignores the close proximity of the footpath along Totterdown Lane, from which the development would be clearly visible, thus the character of the PROW would change. The site is also close to Rhymes Lane which is currently very quiet and is likely to be used by walkers. This lane would have to be substantially altered to enable it to be used for a development of this type.

We have substantial concerns about the allocation of this site

- It is remote from the town – increasing car journeys etc
- Significant road improvement schemes would be required, which would impact on the viability of the scheme (and thus the potential for the site to deliver the desired public benefits). The road improvements would completely alter the rural character of Rhymes Lane and the junction from the A417
- Once the road improvements were in place there would probably be demands to develop the rest of the land to the A417
- Development here would completely alter the rural character of the countryside. Although this is a restored mineral extraction site and thus the rural character is different to that before extraction it is still rural in character.
- Proximity to RAF Fairford. Consideration would have to be given to aircraft noise, lighting etc.
- Potential biodiversity impacts (not yet assessed)

Policies map.

p.52 We found this quite difficult to interpret, given the relatively small palette of colours used, and the number of policies covered. Use of patterns in place/as well as colours could make this clearer. Given the scale of the map – clearer, more detailed site boundaries will be required for development management purposes.

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Appendix 1: Review of the SA Report prepared to accompany the Fairford Neighbourhood Plan 2016-2031

Appendix 2: Comments made by CDC Ward Councillors to inform the CDC representation.