



Fairford Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

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

The [Neighbourhood Plan and supporting documents](#) are available to view on our website

If you require a hard copy, please contact the Council and a hard copy can be provided at cost: £5 for the Neighbourhood Development Plan, £15 for the Plan and all the published supporting evidence.

All comments must be received by 12 noon on 13 December 2022. There are a number of ways to make your comments:

Complete this form and email it to: neighbourhood.planning@cotswold.gov.uk

Print the 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 representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our [privacy notice](#). Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

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, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

Full name: Hywel James, Nexus Planning (on behalf of Gleeson Land)

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Organisation and position (if applicable): Nexus Planning, Associate (on behalf of Gleeson Land)

Date: 13/12/2022

Part B

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: Policy FNPI4

Do you support, oppose, or wish to comment on this paragraph? *(Please tick)*

Support Support with modifications Oppose Have comment Please give details of your reasons for support or opposition or make comments:

Please see enclosed representations.

What improvements or modifications would you suggest?

N/A

Please make sure any additional pages are clearly labelled

Fairford Neighbourhood Plan

Regulation 16 Representations on behalf of Gleeson Land

1. On behalf of Gleeson Land, please find enclosed representations to the Regulation 16 consultation on the Fairford Neighbourhood Plan (herein, "FNP").
2. These representations are made in the context of Gleeson Land's promotion of land to the west of Hatherop Road (herein, "the Site"), which is a draft allocation for a new low carbon community under Policy FNP14 of the FNP. Gleeson Land, a strategic land promoter with a track-record of delivering planning permissions that facilitate high quality developments, is promoting the Site on behalf of the Ernest Cook Trust, a national education charity based in Fairford, who are the landowners.
3. Gleeson Land has submitted a planning application for the development of the Site to deliver upon the requirements of Policy FNP14, and the application was validated by Cotswold District Council (herein, "CDC") on 24th October 2022 (application ref. 22/03770/OUT).
4. Given that the FNP is at the final stage of consultation prior to it being submitted for examination, particular regard is had to the Basic Conditions and the compliance of the FNP with the requirements set out within the relevant paragraphs of the National Planning Practice Guidance (herein, "the PPG") note titled 'Neighbourhood Planning' (ref. ID:41).

Comparison with the previously submitted version of the FNP

Failing of the previously submitted version of the FNP

5. Gleeson Land recognises that a previous version of the FNP was submitted for Examination in 2017 and was concluded by the examining inspector to fail the Basic Conditions.
6. The concluded primary issue with the previous version of the FNP was that the Sustainability Appraisal (herein, "SA") was not compatible with EU Obligations. This was elaborated upon at paragraphs 6.24 – 6.27 of the Examiner's Report, which raise the following issues:
 - The SA that supported the previous version of the FNP did not properly take into account the nature, location and significance of the various environmental designations in the FNP area;
 - Additional information submitted in relation to the previous draft allocation at Leafield Road was submitted too late;
 - There is a lack of clarity in relation to the sites chosen and those dismissed; and
 - There is a lack of clarity in relation to how the how and when the infrastructure sought from the previous draft allocations will be delivered.
7. A further issue identified in the conclusions related to the previous version of the FNP was its failure to contribute to sustainable development, primarily as a result of previous draft allocation FNP16 having to be removed due to the evidence base that supported the proposed housing allocations not being sufficiently robust.
8. The principal allocation within the previous version of the FNP was to the west of Leafield Road, which was subject to draft policy FNP16. This previous draft allocation is to the west of the Site, which is allocated in the current

version of the FNP. The previous version of the FNP also proposed the allocation of Horcott Lakes under previous draft Policy FNP22.

9. At paragraph 7.85 of the Examiner's Report, a series of highways recommendations from the evidence base that supported the previous version of the FNP are referenced. Within the same paragraph, the Examiner notes that no information was provided to evidence how the previous version of the FNP had addressed these matters. The conclusion in relation to highways matters at paragraphs 7.91 & 7.92 details the lack of assessments in relation to the recommendations, which demonstrates that the previous draft allocation was not justified by an evidence base.
10. Paragraph 7.86 of the Examiner's Report on the previous version of the FNP states that CDC's view on the landscape sensitivity of the previous draft allocation differed from that presented by Fairford Town Council, with CDC raising long-standing concerns regarding the landscape impact of built development on this site. Further, paragraph 7.87 then outlines that the CDC Strategic Housing Land Availability Assessment (herein, "SHELAA") Review subsequently concluded that the previous draft allocation was unsuitable for residential development on the basis of landscape and heritage impacts.
11. In drawing a conclusion in relation to landscape matters, paragraphs 7.94 and 7.95 of the Examiner's Report notes that the Plan has given less weight to locational and environmental considerations that affect the site, with CDC's evidence suggesting that the previous draft allocation was unsuitable for residential development.
12. Issues were also raised with respect to the lack of clarity from Gloucestershire County Council in relation to delivering a drop off / turning facility within the previous draft allocation.
13. The Examiner consequently instructed the deletion of previous draft Policy FNP16, and on this basis determined that the previous version of the FNP should not progress to referendum.

How the previously raised concerns have been addressed in the preparation of the current draft FNP

Sustainability Appraisal

14. The SA (which incorporates a Strategic Environmental Assessment (herein, "SEA")) prepared in December 2021 that supports the current draft of the FNP includes 'Key sustainability issues' at paragraphs 3.5 and 3.6 (pages 9-12). This includes the identification of the relevant constraints impacting the FNP area.
15. Subsequently, the SA Framework at paragraph 3.1 (page 12) identifies that 'Assessment questions' against each 'SA objective', and these include due regard to relevant designations. Indeed, in assessing site options the SA has explicit regard to designations such as the Special Landscape Area and the Fairford Conservation Area (as can be seen, in particular, at paragraph 4.30), and these inform its consideration of effects for each site at Table 4.3 (page 26).
16. The information supporting the promoted sites has been in the public domain since the publication of the FNP Site Assessment Report in February 2019. Whilst additional information in relation to the draft allocation of the Site is submitted as part of these representations, this is to reinforce the conclusions reached by the SA (informed by the evidence base) as opposed to providing justification that did not previously exist (as was the case with the previous draft of the FNP).
17. Through the Site Assessment Report and the SA (notably Table 4.3 (page 26)), it is clear how the Council has assessed each of the sites promoted through the FNP, and the rationale for the selection of the Site as the single draft housing allocation (with consideration given to reasonable alternative growth options at Table 4.4 of the SA) clearly set out through the evidence base process.

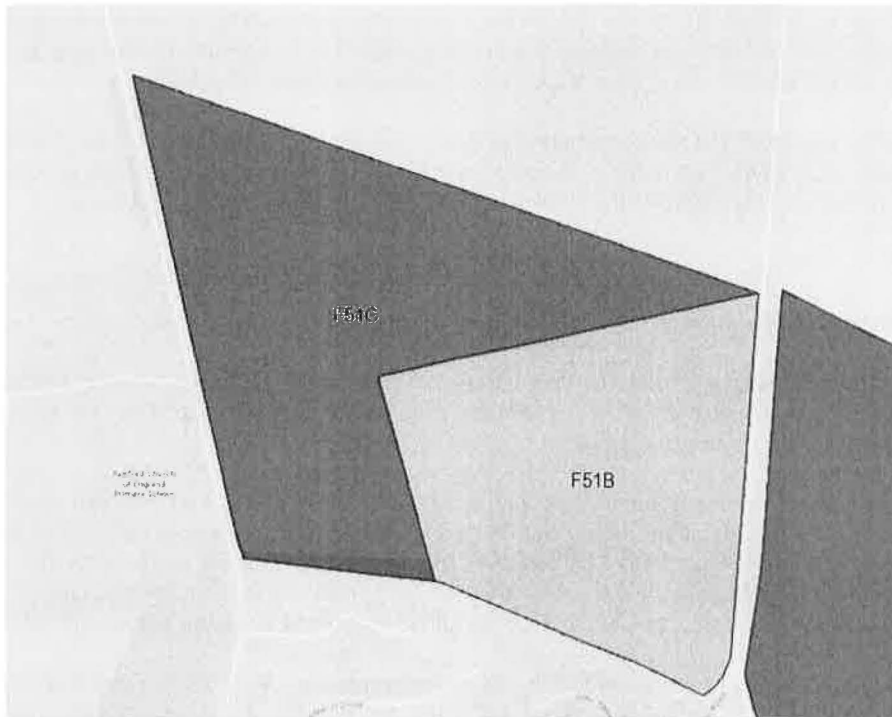
Fairford Neighbourhood Plan Representations continued

18. Unlike the previous version of the FNP, the current version does not require a vehicular connection into the draft housing allocation directly from Leaffield Road. Instead, it requires through draft Policy FNP14 (criterion g) for the future provision of a link road through from Leaffield Road into the western boundary of the Site.
19. Accordingly, this facilitates the potential solution to address concerns raised within the Fairford Town Transport Appraisal Report (January 2016)¹; however, it allows Fairford Town Council to liaise with Gloucestershire County Council to identify an appropriate way through which the recommended improvements can be achieved.

Justification of the draft housing allocation

20. First and foremost, the current version of the FNP has selected the Site as its proposed housing allocation; therefore the previous conclusions in relation to the suitability of the previous draft allocations is of no relevance to the consideration of the current version of the FNP.
21. The FNP is supported by a Site Assessment Report prepared by AECOM, dated February 2019, which considers each of the sites promoted for development within the FNP area. The selection of twelve sites for detailed assessment is based on the conclusions of the CDC SHELAA. The detailed assessment of these twelve sites undertaken by AECOM concluded that seven of the twelve sites subject to detailed assessments were potentially suitable subject to overcoming the constraints identified within Table 5.1 of the Site Assessment Report.
22. Ultimately, this objective process has enabled Fairford Town Council to select its preferred housing allocation(s) on the basis of a list of potentially suitable site options, subject to the incorporation of appropriate mitigation.
23. For the purposes of the Site Assessment Report, the Site was considered as part of Site 5 (shown on the plan overleaf), which comprises an irregular parcel of land that is defined by a northern boundary that connects the corner of a field boundary along Hatherop Road to the east with the western field boundary at a point where this aligns with the northern boundary of the promoted Site 4. The Site Assessment Report is clear that only the southern half of Site 5 (i.e. the Site) is potentially suitable.
24. In its detailed consideration of Site 5, which has informed the above conclusion, the Site Assessment Report identifies the following key constraints:
 - Landscape – notably the absence of a defined northern boundary and the western boundary being adjacent to a Special Landscape Area;
 - Heritage – the Fairford Conservation Area is situated to the south-west;
 - Biodiversity – any constraints are concluded to be minor based on the arable use of the field, albeit recognising the trees and hedgerow habitats along field boundaries;
 - Flooding – within fluvial Flood Zone 1 but the low lying parts of Site are subject to groundwater flood risks;
 - Waste water – necessary upgrading of the waste water treatment works at Fairford.
25. With respect to landscape, the following extract from the latest CDC SHELAA Review interactive map illustrates CDC's conclusions with respect to Site 5, demonstrating that only the Site (F51B) should progress to the next stage of consideration:

¹ Paragraph 8.1.4



26. This parcel (i.e. the Site) is defined by an existing field boundary to the north and is situated away from the Special Landscape Area to the north-west.
27. From a heritage perspective, the Site (i.e. the area considered suitable for residential development) is set back from the Fairford Conservation Area that adjoins the south-western edge of the wider Site 5 area.
28. The evidence base does not suggest that biodiversity would represent a reason not to develop the Site.
29. The National Planning Policy Framework (herein, “the Framework”) directs development to the areas of lowest flood risk (i.e. Flood Zone 1)². Whilst groundwater flood risk affects part of the southernmost edge of Site 5, the Site Assessment Report recognises that the development would need to avoid locating built form in this part of the Site and consider options for mitigation. This does not, therefore, prevent the delivery of an appropriate development of the Site.
30. The Water Industry Act 1991 (as amended) sets out a statutory obligation for water companies to deliver necessary updates to foul drainage infrastructure to accommodate new development. Gleeson Land has held discussions with Thames Water, who has confirmed that the development of up to 100 dwellings at the Site can be accommodated within the foul drainage network.
31. Accordingly, the FNP’s selected housing allocation (i.e. the Site) is justified based on proportionate evidence, including the SA (Table 4.3 – page 26) as discussed under the next heading of these representations. The necessary mitigation required to ensure that the Site meets the tests of suitability is outlined within draft Policy FNP14, and this is consequently tested through the Basic Conditions.
32. Moreover, it is particularly notable that CDC endorses the current version of the FNP³.

² Paragraph 162

³ As per the report to Cabinet dated 1st December 2022

Evidence base

Cotswold Strategic Housing and Economic Land Availability Assessment (2021) (“SHLAA”):

- 33. The Site was assessed within CDC’s SHELAA (ref. F51B), forming part of a wider allocation with further land to the east and west of the Site. The assessment concluded that the Site itself would be for consideration for allocation within the District’s Local Plan, and to be supported, landscape issues would have to be mitigated, with Sites F51A and F51C considered unsuitable for development.

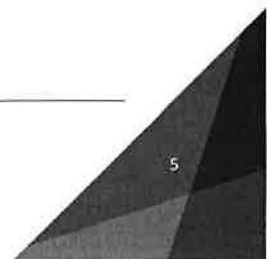
Fairford Neighbourhood Plan: Site Assessment Report

- 34. The Site was assessed as part of a range of suggested sites as part of the allocation and suitability for Policy FNP14. The Proposed Development site is reported within Site 5, with three key issues reported with regard to landscape, risk of groundwater flooding and location in terms of the distance to the existing settlement. At this stage the Site was considered not suitable for development for reasons of scale (i.e. the wider site 5 area) highlighted within the District Council’s SHELAA.
- 35. It was however suggested at Neighbourhood Plan level that the southern half of the Site was suitable for development. This included the desire for an outline scheme to make provision for significant public open space, tree planting and screening to the wider landscape. Development at this scale would need to be planned to ensure the existing town has the capacity for new development.

Fairford Neighbourhood Plan Sustainability Appraisal

- 36. This report assesses the Neighbourhood Plan against its sustainability objectives. In particular the table below provides a summary of the Sustainability Appraisal themes and its justified effects specifically highlighting Policy FNP14 of the emerging Neighbourhood Plan:

Theme	Policy FNP14 Impacts
Biodiversity	Minor positive effects
Climate Change	Minor positive effects
Landscape and Historic Environment	Residual neutral effects
Land, Soil and Water Resources	Minor negative effects
Population and Community	Significant positive effects
Health and Wellbeing	Significant positive effects
Economy and Employment	Minor positive effects
Transportation	Significant positive effects



37. Gleeson Land generally supports these conclusions. However, it should be noted that the significant positive effects in relation to Transportation Impacts may only be realised should a link road between Leafield Road and Hatherop Road be constructed, with the FNP only requiring the delivery of draft allocation FNP14 to facilitate the creation of this link road.

The deliverability of the Site

38. To reinforce the appropriateness of the FNP's selection of the Site as a draft allocation, this section of the representations outlines how it meets the three criteria of 'deliverable', as outlined by the Framework.
39. Specific regard is had the range of technical work that has been prepared by Gleeson Land in support of its live planning application for the Site (CDC Planning Application ref. 22/03770/OUT), with the submitted technical reports available to view on the CDC planning application online register.
40. It is important to note that the level and technical rigour of information that supports a planning application far exceeds that which can be reasonably required to support a site promotion (or indeed a Local Plan or Neighbourhood Plan evidence base). As such, the information submitted in support of the planning application provides a scrupulous appraisal of the merits of the Site and assists the consideration of the acceptability of the FNP.

Available

41. The Site is within the control of Gleeson Land, a strategic land promotor who, in partnership with Ernest Cook Trust, controls the Site. An outline planning application has been submitted (ref. 22/03770/OUT) to CDC that is in accordance with the requirements of the FNP (notably draft Policy FNP14), further evidencing that the Site is available for development.

Suitable

Delivering a sufficient supply of homes:

42. The development of the Site would deliver around 80 dwellings (87 dwellings, as proposed through the planning application), which would help CDC meet its minimum housing requirement as well as the Government's objective to boost the supply of housing⁴.
43. Moreover, the development of the Site would be able to provide an appropriate mix of dwellings having regard to the Policy H1 of the adopted CDC Local Plan and draft Policy FNP15 of the FNP.

Building a strong, competitive economy:

44. The development of the Site would deliver economic benefits that would boost the local economy and contribute towards enhancing the vitality and viability of Fairford Town Centre.

⁴ Paragraph 60 of the Framework

Fairford Neighbourhood Plan Representations continued

Promoting healthy and safe communities:

45. In accordance with the requirements of draft Policy FNP14, a significant amount of multi-functional green infrastructure is required as part of the development of the Site. Indeed, the proposal subject to the current planning application would deliver 4.1ha (approximately 53% of the Site) of green infrastructure. The proposed green infrastructure offer would include a series of public open space as well as a children's play area. The proposals subject to the planning application also include a community garden / allotments.
46. The proposals subject to the planning application demonstrate that the public open spaces will benefit from high levels of natural surveillance through the proposed outward-facing layout.

Promoting sustainable transport:

47. The Site is in a sustainable location to accommodate residential development. As identified within CDC's adopted Local Plan, Fairford is one of the District's Principal Settlements where Policy DS1 of the CDC Local Plan seeks to focus employment and housing development. The Site is located within walking distance of a range of services and facilities within Fairford, and the development of the Site would include pedestrian / cycle connections to further encourage future residents to utilise sustainable transport modes (as demonstrated by the proposals subject to the current planning application).
48. Moreover, the planning application documentation (namely the Transport Assessment) demonstrates that safe vehicular access into the Site can be achieved from Hatherop Road and that the traffic generated from a development of up to 87 dwellings can be accommodated within the existing highway network.

Achieving well-designed places:

49. Draft Policy FNP14 requires a landscape-led approach to the development of the Site, namely through criterion e) which requires the Building with Nature – Design level to be achieved. As demonstrated through the planning application, the proposal submitted for approval has achieved this requirement.
50. The principles outlined within the Design and Access Statement that forms part of the planning application will ensure a high-quality development of the Site, in accordance with the Cotswold Design Guide, consistent with the requirements of the Framework⁵. This is demonstrated by the planning application⁶.

Meeting the challenges of climate change, flooding and coastal change:

51. In terms of Flood Risk, the Site is located entirely within Flood Zone 1. However, it is recognised from the FNP's evidence base that there are some surface / groundwater constraints at the southern edge of the Site.
52. The drainage strategy submitted as part of the planning application includes infiltration across much of the Site but with an attenuation basin at the southern edge to ensure that the development itself is not at risk of flooding and that greenfield run-off rates are achieved⁷. Indeed, criterion k) of draft Policy FNP14 specifically requires the development of the Site to include measures to attenuate surface water, and the proposal demonstrates that the Site can be delivered in a way that appropriately responds to the minor drainage constraint. This is acknowledge

⁵ In particular, paragraph 130

⁶ Paragraphs 6.43-6.54 of the Planning Statement outline the consistency of the proposal with the relevant requirements

⁷ As evidenced by the Flood Risk Assessment that forms part of the planning application

by the Lead Local Flood Authority's comments on the planning application, with the additional clarity requested addressed through the submitted Drainage Technical Note submitted in December 2022.

53. The key requirement of draft Policy FNP14 is the creation of a 'new low carbon community', with this expressed in the policy title. Criterion c) of draft Policy FNP14 subsequently requires the development of the Site to conform to specified sustainable housing requirements⁸. The Energy and Sustainability Statement submitted as part of the planning application demonstrates that the development of the Site is capable of meeting the specified requirements as well as the standards outlined within Building Regulations (noting that these are becoming more stringent).

Conserving and enhancing the natural environment:

54. The Site is not subject to any landscape designations and is visually enclosed at a low level by existing field boundaries. Whilst Gleeson Land recognises that introducing built form into an undeveloped site will inevitably change the landscape character, the impact is mitigated by the landscape-led requirement for the development of the Site, including the enhancement of existing hedgerow boundaries⁹. The Landscape and Visual Impact Assessment that accompanies the planning application demonstrates that the proposed development would appropriately address the relevant adopted and emerging planning policy requirements in this regard.
55. In terms of ecology, the planning application demonstrates that a biodiversity net gain of approximately 19% can be achieved through the development of the Site. This coincides with the achievement of the Building with Nature – Design standard through the proposed development of the Site. Moreover, the FNP Habitats Regulation Assessment Appropriate Assessment (herein, "HRA") outlines that air quality impacts on the Special Area of Conservation (herein, "SAC") at North Meadow near Cricklade can be screened out and that recreational pressure would be mitigated through the public open space provided through the development of the Site in accordance with draft Policy FNP14.
56. As demonstrated by the planning application, the proposals for the Site have achieved the Building with Nature – Design accreditation, demonstrating that they incorporate the landscape and ecology led approach that is sought by draft Policy FNP14.

Conserving and enhancing the historic environment:

57. The Site does not contain any heritage assets and is separated from the northern edge of the Fairford Conservation Area. Moreover, as demonstrated by the planning application proposals, the development of the Site would set proposed built form back from the south-western corner of the Site to further preserve the setting of the Conservation Area.
58. As a consequence of the appropriate design solution, the Archaeology and Heritage Statement submitted as part of the planning application concludes that the proposal submitted for approval will not adversely impact the significance of any heritage asset.
59. In terms of archaeology, as part of pre-application discussions associated with the now submitted planning application Gloucestershire County Council's Archaeologist has agreed that the proposed development can be approved with a programme of trial trenching to be conditioned.

⁸ Which are set out at draft Policy FNP16

⁹ As required by adopted CDC Local Plan Policy EN1 and draft Policy FNP14 (criterion d)

Summary of Suitability:

60. Accordingly, the Site is located adjacent to a sustainable settlement with a range of services and facilities within walking distance of the Site. As demonstrated under the previous headings (with reference to the relevant planning application documentation), the development of the Site in accordance with draft Policy FNP14 is consistent with the relevant policies of the adopted CDC Local Plan and the Framework in relation to technical matters such as highways, drainage / flood risk, landscape, ecology and heritage.
61. Therefore, the Site is a suitable location for residential development.

Achievable

62. The Site is considered suitable to deliver a mix of housing, in particular affordable housing for which there is a known need in Cotswold District and Fairford¹⁰, and does not require significant or abnormal new infrastructure to facilitate the delivery of housing. Gleeson Land considers it achievable to deliver a residential development with 40% affordable housing (as evidenced by the planning application).
63. This is demonstrated by the current planning application for the development of the Site, submitted by Gleeson Land. The planning application also demonstrates that the requisite requirements of the FNP (notably draft Policy FNP14) are addressed through the development proposals submitted for approval.
64. Moreover, the planning application also demonstrates through the Section 106 Draft Heads of Terms (contained within the Planning Statement) that the development of the Site is able to generate the requisite on and off-site community infrastructure provisions / contributions.

Summary of Deliverability

65. In light of the above, the FNP's selection of the Site as a residential allocation is wholly justified having regard to the requirements of the Framework.
66. Gleeson Land has a strong track-record of delivering development in a timely manner following the securing of a planning permission, averaging 21 months from outline approval to starting on-site. This emphasises the deliverability of a residential development of the Site.

Meeting the Basic Conditions – General Conformity

67. The draft FNP is supported by a Basic Conditions Statement. This demonstrates that the FNP meets the relevant Basic Conditions as prescribed by the Neighbourhood Planning (General) Regulations 2012.
68. Gleeson Land supports and endorses the conclusions of the Basic Conditions Statement. Further detail is provided under the next heading of these representations to demonstrate how each individual requirement of draft Policy FNP14, the only site proposed to be allocated by the draft FNP, is consistent with national policy (Basic Condition a), the adopted development plan (i.e. the CDC Local Plan 2011 to 2031) (Basic Condition e) and Environmental legislation (Basic Condition g).

¹⁰ As specified by the Fairford Housing Report (September 2015) prepared by Gloucestershire Rural Community Council

Meeting the Basic Conditions – Policy FNP14

69. In relation specifically to draft Policy FNP14, its requirements are consistent with the Framework as follows:

Policy Section	Requirement / Consideration	Relevant paragraph of the Framework	Commentary
FNP14.1	Allocation of around 80 homes	8b) and 60	Paragraph 8b) of the Framework details the social objective that underpins the Framework, and this outlines that a sufficient number and range of new homes should be provided to meet the needs of present and future generations. Further to this, paragraph 60 of the Framework outlines the Government’s objective to significantly boost the supply of homes and to a sufficient amount of land can come forward where it is needed. Policy FNP14’s allocation of the Site will contribute towards boosting the supply of housing, and also helps meet local need within Fairford, as identified by emerging Fairford Neighbourhood Plan (notably the foreword).
FNP14.1	Site location	105	Paragraph 105 of the Framework sets out that the planning system should actively manage patterns of growth to reduce the need to travel. As illustrated within the submitted Transport Assessment and Design and Access Statement, the Application Site is within walking and cycling distance of a range of services and facilities so that future residents will not be reliant on the private car to meet daily needs.
FNP14.1	Principle of low or zero carbon development	8c) and 152	Paragraph 8c) of the Framework specifies an objective to move to a low carbon economy. This is supplemented by paragraph 152 which sets out that the planning system should support the transition to a low carbon future. This requirement of Policy FNP14 is consistent with this.
FNP14.2 a)	Upgrading local utilities infrastructure	124	Paragraph 124 of the Framework emphasises the need for the capacity of existing and proposed infrastructure to be further improved, if necessary, to accommodate new development. This requirement of Policy FNP14 is in-line with this.

Fairford Neighbourhood Plan Representations continued

Policy Section	Requirement / Consideration	Relevant paragraph of the Framework	Commentary
FNP14.2 b)	Deliver appropriate housing type and mix	62	Paragraph 62 of the Framework sets out that planning policies should require the size, type and tenure of housing to reflect local needs. This is facilitated by this requirement.
FNP14.2 c)	Deliver sustainable design	8c) and 152	Paragraphs 8c) and 152 of the Framework outline a requirement for the planning system to support a transition to a low carbon future. This requirement will help facilitate this.
FNP14.2 d)	Mitigate the visual impacts of the development on the countryside	174b)	Paragraph 174b) of the Framework seeks for planning decisions to recognise the character and beauty of the countryside. This requirement of Policy FNP14 will assist in ensuring that the development of the FNP14 allocation will assimilate into its setting, thus complying with the relevant requirements of the Framework
FNP14.2 e)	Achieving Building with Nature standards	92c), 154a), 174d), 175 and 184	Paragraphs 92c), 154a), 175 and 184 of the Framework all emphasise the benefits that GI can bring, and paragraph 174d) requires development to minimise impacts and provide net gains for biodiversity. The purpose of the Building with Nature mission is to make GI integral to placemaking in the UK and to put nature at the heart of development. As such, the requirement of Policy FNP14 to reach the 'Design' standard of the Building with Nature accreditation will help meet the relevant requirements of the Framework.
FNP14.2 f)	Have regard for the setting of the Fairford Conservation Area	199	Paragraph 199 of the Framework stipulates that great weight should be afforded to the conservation of heritage assets when considering the impacts of development. This requirement of Policy FNP14 accords with this.
FNP14.2 g)	Make provision for the future provision of a link road	106	Paragraph 106 of the Framework outlines that potential new transport routes should be identified and protected. This requirement of Policy FNP14 would protect the ability to provide a new road connection through from Leafield Road to Hatherop Road, via the Application Site, and is therefore consistent with the Framework.

Fairford Neighbourhood Plan Representations continued

Policy Section	Requirement / Consideration	Relevant paragraph of the Framework	Commentary
FNP14.2 h)	Provide a dropping-off point to serve the school	104a)	Whilst there is no specific requirement in the Framework in relation to school parking spaces, the provision of a school drop-off point within the FNP14 allocation could address existing impacts on the highway network in accordance with paragraph 104a) of the Framework.
FNP14.2 i)	Provide one or more areas of publicly accessible open space	93	Paragraph 93 of the Framework outlines the need for planning decisions to ensure that open space is provided for as part of developments. This is reflected in this requirement of Policy FNP14.
FNP14.2 j)	Provide for the delivery of self of custom build plots	62	Paragraph 62 of the Framework encourages the assessment of the size, type and tenure of housing needed for different groups in the community to consider (inter alia) people wishing to commission or build their own homes. Policy FNP14's requirement for the delivery of some of the dwellings on this allocation as self or custom build plots is consistent with this.
FNP14.2 k)	Keep housing away from areas at risk of flooding	159	Paragraph 159 of the Framework states that development should direct built form away from areas at high risk of flooding. The requirement of Policy FNP14 in this regard is consistent with the Framework.
FNP14.2 l)	Provide affordable housing	62 and 63	Paragraph 62 of the Framework outlines that the needs for affordable housing should be reflected in planning policies, and paragraph 63 sets out that these should be expected to be provided on site. Policy FNP14 is consistent with this
FNP14.3	Mitigate the impact of development on the SAC at North Meadow near Cricklade	182	Paragraph 182 of the Framework states that the presumption in favour of sustainable development is disengaged where a plan or project results in significant harm to a habitats site, unless an appropriate assessment has concluded that the plan or project has concluded that the plan or project will not adversely affect the integrity of the habitats site. Policy FNP14 is consistent with this.

Fairford Neighbourhood Plan Representations continued

70. In light of the above, each of the requirements of draft Policy FNP14 is consistent with the relevant requirements of the Framework.

71. In relation to the compliance with the relevant policies of the adopted CDC Local Plan:

Policy Section	Requirement / Consideration	Relevant Local Plan Policy	Commentary
FNP14.1	Allocation of around 80 homes	Policy DS1	Policy DS1 of the CDC Local Plan requires the delivery of at least 8,400 dwellings within Cotswold District over the period 2011-2031. This requirement of draft Policy FNP14 will help meet this need.
FNP14.1	Site location	Policy DS1	Policy DS1 of the CDC Local Plan identifies Fairford as one of Cotswold District's principal settlements where the required housing growth is expected to be accommodated. Accordingly, the proposed allocation of the Site for residential development is consistent with this.
FNP14.1	Principle of low or zero carbon development	Paragraphs D.59-D.62 of the Cotswold Design Guide	The Cotswold Design Guide, appended to the CDC Local Plan, seeks for new developments to address climate change through sustainable design (paragraphs D.59-D.62). This requirement of draft Policy FNP14 is consistent with this.
FNP14.2 a)	Upgrading local utilities infrastructure	Policy INF1	Policy INF1 requires new infrastructure that is identified to be needed to serve new development to be provided in a timely manner. This requirement of draft Policy FNP14 is consistent with this.
FNP14.2 b)	Deliver appropriate housing type and mix	Policy H1	Policy H1 expects housing developments to provide a suitable mix to reflect local housing need. This requirement of draft Policy FNP14 outlines the local need in Fairford and requires the development of the Site to address this. Accordingly, it is consistent with Policy H1.
FNP14.2 c)	Deliver sustainable design	Paragraphs D.59-D.62 of the Cotswold Design Guide	The Cotswold Design Guide, appended to the CDC Local Plan, seeks for new developments to address climate change through sustainable design (paragraphs D.59-D.62). This requirement of draft Policy FNP14 is consistent with this.

Fairford Neighbourhood Plan Representations continued

Policy Section	Requirement / Consideration	Relevant Local Plan Policy	Commentary
FNP14.2 d)	Mitigate the visual impacts of the development on the countryside	Policy EN4	Policy EN4 requires development proposals to take account of landscape character and expects them to (inter alia) enhance the natural environment and key views. This is what is specified by this requirement of draft Policy FNP14, so it is consistent with Policy EN4.
FNP14.2 e)	Achieving Building with Nature standards	Policy EN1	<p>Policy EN1 requires new developments to promote the protection, conservation and enhancement of the natural environment by (inter alia):</p> <ul style="list-style-type: none"> • Ensuring the protection and enhancement of existing natural environmental assets; and • Contribution to the provision and enhancement of multi-functional green infrastructure. <p>The Building with Nature accreditation requires the achievement of this, so this requirement of draft Policy FNP14 is consistent with Policy EN1.</p>
FNP14.2 f)	Have regard for the setting of the Fairford Conservation Area	Policy EN4, Policy EN10, Policy EN11	<p>Policy EN4 requires development proposals to take account of historic landscape character and expects them to (inter alia) enhance the setting of heritage assets.</p> <p>Policy EN10 requires development proposals to avoid causing harm to the setting of heritage assets.</p> <p>Policy EN11 relates specifically to the preservation of the significance of Conservation Areas.</p> <p>This is what is specified by this requirement of draft Policy FNP14, so it is consistent with Policy EN4.</p>
FNP14.2 g)	Make provision for the future provision of a link road	Policy INF3	Whilst not directly relevant, Policy INF3 seeks for developments to assist with the delivery of local transport objectives. The creation of a link road from Leafield Road to Hatherop Road through the site is a local transport

Fairford Neighbourhood Plan Representations continued

Policy Section	Requirement / Consideration	Relevant Local Plan Policy	Commentary
			objective that is facilitated through this requirement of draft Policy FNP14.
FNP14.2 h)	Provide a dropping-off point to serve the school	Policy INF3	Whilst not directly relevant, Policy INF3 seeks for developments to assist with the delivery of local transport objectives. The provision of a school drop-off / parking area within the site is a local transport objective that is facilitated through this requirement of draft Policy FNP14.
FNP14.2 i)	Provide one or more areas of publicly accessible open space	Policy INF1	Policy INF1 requires the provision of suitable infrastructure as part of developments. The requirement to provide areas of public accessible open space through draft Policy FNP14 is consistent with this.
FNP14.2 j)	Provide for the delivery of self of custom build plots	Policy H1	Criterion 3 of Policy H1 requires developments of more than 20 dwellings to provide 5% of these as custom / self build plots. Policy FNP14's requirement for custom / self build plots is consistent with this.
FNP14.2 k)	Keep housing away from areas at risk of flooding	Policy EN14	Policy EN14 requires development proposals to avoid areas at risk of flooding. This requirement of Policy FNP14 is consistent with this.
FNP14.2 l)	Provide affordable housing	Policy H2	Policy H2 outlines a requirement for residential developments of 11 or more dwellings to contribute towards affordable housing provision. This requirement of draft Policy FNP14 is consistent with this.
FNP14.3	Mitigate the impact of development on the SAC at North Meadow near Cricklade	Policy EN9	Policy EN9 outlines that internationally designated wildlife sites will be safeguarded from development that could cause a significant effect that would adversely impact their integrity. This requirement of Policy FNP14 requires the prevention of significant impacts on the SAC and is therefore consistent with Policy EN9.

72. Accordingly, draft Policy FNP14 is consistent with each of the relevant policies within the CDC Local Plan.

73. In addition, the requirement of FNP14.3 ensures that the FNP is conforms to the Conservation of Habitats and Species Regulations 2017 through requiring residential development to mitigate impacts on the SAC at North

Fairford Neighbourhood Plan Representations continued

Meadow near Cricklade. This impact is considered through the submitted Strategic Environmental Assessment (herein, "SEA").

74. Therefore, draft Policy FNP14 is in accordance with the Basic Conditions.

Consistency of the Proposed Development with the requirements of the FNP

75. The Fairford Neighbourhood Plan identifies the Site as a suitable location to provide additional housing within Fairford. The Proposed Development is able to demonstrate consistency with the requirements of Policy FNP14 of the emerging Fairford Neighbourhood Plan. In summary the development will:

- The proposed development will secure necessary upgrades to local infrastructure, prior to the commencement of development (and it is expected that this would be secured via a condition).
- Whilst the housing mix submitted as part of the current outline planning application are only indicative, the Illustrative Masterplan demonstrates that a mix of 1, 2, 3 and 4 bedroom properties can be delivered on-site, with a particular focus on the identified need for 2 and 3 bedroom properties in line with draft Policy FNP15.
- The proposed development seeks to deliver low carbon dwellings. An Energy and Sustainability Statement has been submitted with the outline planning application, and this outlines how this can be conditioned for delivery as part of future reserved matters approval to secure the delivery of sustainable housing.
- The proposed development is able to establish the principle of significant tree planting. The Site's boundaries will be enhanced through additional native hedgerow planting to further assimilate the development into its context minimising its visual impact
- The Building with Nature – Design accreditation that has been achieved demonstrates the proposed development meets the 'Design' standard required by FNP14.
- The Land Use Parameter Plan submitted for approval as part of the outline planning application demonstrates that built form would be set back from the Fairford Conservation Area, with a landscape buffer proposed along the southern edge of the Site and enhanced planting proposed along the southern boundary.
- The submitted Land Use Parameter Plan demonstrates a spine road running through the proposed development, linking from Hatherop Road to the western side of the Site. This will facilitate the future delivery of a link road between Hatherop Road and Leaffield Road. In addition to this, the proposals include a dropping-off area to serve the existing Fairford CofE School to the west, using the adjacent site as a potential pedestrian / cycle link onto Leaffield Road.
- A range of open space areas and green infrastructure provision will be provided on-site, this includes a Local Equipped Area of Play ("LEAP"), and community garden. Green Infrastructure has been provided across the Site,
- The proposed development is proposed to deliver 5% of dwellings as self / custom build plots, and 40% affordable housing in line with Policy FNP14.
- The submitted Land Use Parameter Plan demonstrates that all built form proposed will be located outside of any areas that are subject to flood risk. The drainage strategy submitted in support of the planning application includes an attenuation basin in the south-eastern corner of the Site as part of a comprehensive approach to limit surface water run-off from the Site to greenfield rates.

Fairford Neighbourhood Plan Representations continued

- In relation to air quality effects, the FNP HRA determines that *“Likely Significant Effects of the Fairford NP on the North Meadows & Clattinger Farm SAC ‘in-combination’ can be excluded in the opinion of the report authors. The site is screened out from Appropriate Assessment in relation to this impact pathway.”* (paragraph 5.24). With respect to recreational impact, the Site will deliver significant pockets of public open space that will offer an attractive alternative to travelling circa 8km to the SAC (as indicated by paragraph 7.3 of the HRA). Moreover, a letter from Natural England dated 11th October 2022¹¹ indicates that the SAC Zone of Influence is likely to be reduced to 5km in any event, so would not impact the FNP area. Nevertheless, this is appropriately addressed through the planning application.

Summary

76. Gleeson Land considers that the FNP has been prepared in accordance with the relevant extracts of the PPG, notably by virtue of it being supported by a wide-range of evidence base documents; accordingly, the approach adopted by the FNP is robustly justified. It has addressed the issues identified through the examination of the previous version and is based upon, and justified by, proportionate evidence.
77. Gleeson Land considers that the FNP meets the Basic Conditions and will deliver sustainable development. This is notably achieved through the allocation of the Site under draft Policy FNP14.
78. Accordingly, Gleeson Land endorses the FNP.

¹¹ In relation to a planning appeal at Foxbridge Village North, Swindon – ref. APP/U3935/W/22/3298100

