

# **Fairford Neighbourhood Plan 2016-2031**

**Sustainability Appraisal Report  
(incorporating a  
Strategic Environmental Assessment)**

**Published by Fairford Town Council to accompany the Submission version of  
the Fairford Neighbourhood Plan under the Neighbourhood Planning  
(General) Regulations 2012 and in accordance with EU directive 2001/42 and  
the Environmental Assessment of Plans & Programmes Regulations 2004**

**February 2017**

## NON- TECHNICAL SUMMARY

1. The purpose of this Sustainability Appraisal Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission version of the Fairford Neighbourhood Plan. It has been published for consultation by Fairford Town Council under the Neighbourhood Planning Regulations 2012. The District Council has not issued a formal screening opinion requiring an SEA, but given the contents of the Neighbourhood Plan, the Town Council has determined that one will be required in order to meet the basic conditions of the 2012 Regulations.

2. A Scoping Report, (as part of Stage A of the process) was consulted on for the minimum 5-week period during July and August 2016, in line with the Regulations. The report also contains the baseline evidence. The Draft SA/SEA report was consulted on from November 2016 to January 2017, as per Stages C and D of the process. The comments made on both documents have been considered by the Town Council in finalising the Plan for the independent examination prior to the referendum.

3. The Neighbourhood Plan contains a number of policies for the use and development of the land in the Parish of Fairford in the plan period up to 2031. The policies, together with the policies of the Local Plan and the National Planning Policy Framework (NPPF) will be used by the District Council to help determine planning applications once the Neighbourhood Plan is approved in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the emerging Local Plan.

4. The Neighbourhood Plan has five key objectives as follows:

- Ensuring infrastructure and services are in place as a pre-requisite of development including: schools, transport links, health services, community facilities and communication - broadband, mobile phone signal.
- Ensuring that new housing and business developments are designed appropriately and have robust sewer and drainage systems and positioned close to local schools, shops/services and in areas of low flood risk.
- Ensuring that development seeks to improve and protect the existing natural environment and historical setting of Fairford.
- Ensuring that developments provide the right housing mix for the existing and projected future demographic in Fairford.
- Improving local employment opportunities and the attractiveness of the town centre, range of shops/services and sports/culture facilities.

5. The Town Council hopes that the District Council will be persuaded by the proposals of the Neighbourhood Plan and will agree to adopting a different approach to plan making for the town in its submitted Local Plan in due course. There is no need for the Local Plan to duplicate the Neighbourhood Plan in making non-strategic housing site allocations (and the NPPF and PGG discourage this). At the very least, the Town Council expects the housing allocations of Policy S5 are deleted and are replaced by the provisions of the Neighbourhood Plan.

6. In terms of other nearby policy initiatives, the nearby town of Lechlade has a Neighbourhood Plan covering its Parish for the same plan period, which was 'made' on 17 November 2016. The plan does not make site allocations but supports the emerging Local Plan proposals for 114 new homes in the town, requiring only 18 homes to be planned for. Two small sites have been proposed on the Fairford side of the town.

7. The dominant sustainability issue in the Town relates to the effects of the rapid and major growth of the town in the last five years. Although each planning application for the major schemes consented in that period seemed able to show that their individual effects on local infrastructure could be successfully managed, and were not sufficient in scale to outweigh the presumption in favour of sustainable development, the local community is now seeing, first hand, the emergence of the cumulative effects. They are most obvious in the increasing demand for school places, for sewage/waste water capacity, for local health services and in increasing levels of traffic through the town in the peak hours. Whilst none may yet be critical – with the exception of sewerage issues – they are likely to become more obvious as the last of the almost 500 new homes in the town are completed and occupied in the coming year or so.

8. The Parish of Fairford currently has a population of 4,000, but which will grow to nearly 5,000 when the major housing schemes of recent years have been completed and occupied. Future sustainable development in the town will therefore be based on finding locations that avoid harm to the most precious of landscapes, open spaces and historic areas of the town on the one hand, but enable investment in building the capacity of local infrastructure on the other.

9. The presence of many buildings from the town's history makes it one of the most beautiful towns of the Cotswolds. All the older town is a Conservation Area as a result and there are 120 listed buildings. There are also two Scheduled Monuments. There are two Sites of Specific Scientific Interest (SSSI) just outside of the Area at Cotswold Water Park SSSI and at Whelford Meadow SSSI. These designations make the whole of Fairford Neighbourhood Area fall within a SSSI Impact Risk Zone. There is a Special Landscape Area designated in the Local Plan that covers much of the land to the north of the town. But the landscape to the south of the town also plays an important role in defining its character – especially with the town now growing to its east and west – and the gap between the main town and Horcott is also becoming increasingly important.

10. The selection of objectives for the proposed framework reflects the general sustainability issues of the Parish and the policies in the Neighbourhood Plan. It has selected those objectives that are considered the most relevant information for this purpose. The decision not to choose any particular policy objective does not necessarily mean that the objective has no relevance to the Plan but that it is unlikely to enable the effects of policy options to be measured and is therefore unhelpful for this purpose.

11. Given the Neighbourhood Plan must contribute to the achievement of sustainable development to meet its basic conditions, and must win the support of the local community in due course, it is not surprising that there is a reasonably strong correlation between the two sets of objectives.

12. The objectives are especially driven by the goal to improve local social, utilities and commercial infrastructure to enable the town to improve its self-containment and to avoid becoming a satellite commuter town. There are therefore a number of positive effects in respect of the 'Population', 'Health' and 'Climate Change' SA/SEA objectives. There is also the goal of new development being located and designed in ways that avoid harming the landscape and heritage assets, hence a positive effect in that respect and in promoting health and well being.

13. There is, however, the potential for some negative effects in respect of promoting economic and commercial development in an area of high landscape and heritage value. It is expected, in practice, that a combination of the Neighbourhood Plan and Local Plan policies will avoid such effects when planning applications are being considered.

14. In overall terms, therefore, the sustainability effects of the Neighbourhood Plan are generally assessed as neutral but are occasionally positive. The proposed mitigation measures of most policies will effectively avoid any significant negative effects. Those residual effects that remain are assessed as modest and, in each case, are at least offset, or are outweighed, by other positive effects to justify their inclusion in the Plan.

15. At best, the assessment of the reasonable alternatives to the Neighbourhood Plan proposals indicates that they are also generally neutral in their effects, with a small number of clearer negative effects in some cases. Importantly, in no policy case does the alternative offer a clearly better sustainable outcome than the option preferred in the Plan.

# 1. Introduction

1.1 The purpose of this Sustainability Appraisal Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission version of the Fairford Neighbourhood Plan ("the Neighbourhood Plan") in accordance with the Neighbourhood Planning (General) Regulations and the EU Directive 2001/42 on Strategic Environmental Assessment (SEA). Plan A below shows the designated Neighbourhood Area, which coincides with the parish boundary.



*Plan A: Fairford Town Designated Neighbourhood Area Map*

1.2 The Neighbourhood Plan has been submitted by Fairford Town Council ("the Town Council") under the Neighbourhood Planning Regulations 2012 to the local planning authority, Cotswold District Council ("the District Council"), for its examination. The District Council has not issued a formal screening opinion requiring an SEA, but given the contents of the Neighbourhood Plan, the Town Council has determined that one will be required in order to meet the basic conditions of the 2012 Regulations.

1.3 Furthermore, the Town Council has chosen to meet this obligation by preparing a Sustainability Appraisal (SA) under the Environmental Assessment of Plans & Programmes Regulations 2004. A Sustainability Appraisal is a systematic process used to ensure the social and economic objectives of a plan are achieved in addition to environmental considerations. For completeness, the Neighbourhood Plan has been subject to a combined process whereby the SEA has been incorporated with a Sustainability Appraisal (SA/SEA) to consider the wider social and economic effects.

1.4 A Scoping Report, (as part of Stage A of the process – see Figure B below) was consulted on for the minimum 5-week period during July and August 2016, in line with the Regulations (see Appendix A). The report also contains the baseline evidence.

1.5 The comments received on the proposed scope of sustainability objectives were generally supportive. Natural England wished the Cotswold Water Park SSSI be given greater prominence in the assessment. Historic England recommended a Conservation Area Appraisal be undertaken to evaluate the effects of Plan proposals on the special heritage of the town. In this respect, it has not been possible within the time and resource constraints to prepare such an appraisal. However, the presence of individual heritage assets has been acknowledged and taken into account in the design of Plan policies and their cumulative character has been one of the driving factors the local community expects to shape the Plan.

1.6 The Town Council has also consulted on a Pre Submission version of the plan for the statutory six-week process, accompanied by a Draft SA/SEA report, as per Stages C and D of the process. The comments made on both documents have been considered by the Town Council and changes have been made to the Plan as a result. No new policies have been added but some have been amalgamated or refined to improve their meaning and implementation. The Plan is now proceeding to an independent examination prior to its referendum. The ongoing monitoring of the effects of implementing the plan (Stage E of the process) is covered in Section 11 of this report.

1.7 The report provides an assessment of the Neighbourhood Plan objectives and policies and seeks to do it in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts.

## 2. Background to Sustainability Appraisal

2.1 Through the SA/SEA the social, environmental and economic effects of the Neighbourhood Plan are tested to ensure that these promote Sustainable development and the Plan avoids causing any significant environmental effects.

2.2 The combined process involves a simple evaluation of the social, economic and environmental impacts of the plan as follows:

- An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- The social, economic and environmental characteristics of areas likely to be significantly affected
- Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
- The environmental protection objectives, established at international, community or national levels, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation
- The likely significant effects on the local economy, society and the environment
- The Measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the plan
- An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
- A description of measures envisaged concerning monitoring

2.3 The methodology for the assessment is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan in a relatively small rural area. A summary of the process, as derived from the 2004 guidance is contained in Table 1 below.

**Table 1: The Combined SA/SEA Process**

<p><b>Scoping</b></p>	<p><b>STAGE A:</b> This stage sets the context of the assessment by identifying the baseline data and establishing the scope of the assessment.</p> <ol style="list-style-type: none"> <li>1. <b>Identification of relevant plans, policies and programmes.</b> Any existing requirements that need to be taken into account or incorporated into the plan are identified.</li> <li>2. <b>Review of baseline information.</b> Data about environmental, social and economic issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation.</li> <li>3. <b>Identification of Sustainability Issues.</b> The review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan.</li> <li>4. <b>Development of the SA/SEA Framework.</b> The assessment criteria used to assess the impact of the plan or programme.</li> <li>5. <b>Identification of initial plan options.</b> Taking into account best practice initial identification of options and reasonable alternatives undertaken.</li> <li>6. <b>Consultation.</b> On the scope and alternatives for assessment it is necessary to consult statutory consultees, that is Natural England, Historic England and the Environment Agency.</li> </ol>
<p><b>Assessment</b></p>	<p><b>STAGE B:</b> This stage involves the assessment of any likely significant effects of the plan policies (and any reasonable alternatives) on the key sustainability issues identified.</p> <ol style="list-style-type: none"> <li>1. <b>Finalisation of the Plan options and alternatives for testing</b></li> <li>2. <b>Testing the Plan Objectives against the SA/SEA Framework.</b> The Plan Objectives are tested to ensure compliance sustainability principles</li> <li>3. <b>Evaluation of plan options and alternatives.</b> The SA/SEA Framework is used to assess various plan options by identifying the potential sustainability effects of the plan and assist in the refinement of the policies.</li> <li>4. <b>Predicting and evaluating the effects of the plan.</b> To predict the significant effects of the plan and assist in the refinement of the policies.</li> <li>5. <b>Consideration of ways to mitigate adverse effects and maximise beneficial effects.</b> To ensure that all potential mitigation measures and measures for maximising beneficial effects that are identified.</li> <li>6. <b>Proposing measures to monitor the significant effects of implementing the Plan:</b> To detail the means by which the sustainability performance of the plan can be assessed and monitored.</li> </ol> <p>This is assessment is used to feed into the development of a plan or programme to help ensure the most sustainable option is selected. The SA/SEA framework is also used to access the sustainability implications of the draft policies and the results used to inform policy development.</p>
<p><b>Reporting</b></p>	<p><b>STAGE C:</b> Preparation of the SA/SEA Report</p> <ul style="list-style-type: none"> <li>• The findings of the assessment together with how it has influenced the development of the plan are identified and set out in a draft environmental report together with the recommendations on how to prevent, reduce, or offset any significant negative impacts arising from the plan.</li> </ul> <p><b>STAGE D:</b> Consultation – seek representations from consultation bodies and the general public</p>



	<ul style="list-style-type: none"> <li>This is an ongoing process. Consultation of the draft SA/SEA Report is undertaken into account and used to influence further iterations of the sustainability appraisal process.</li> </ul>
<b>Adoption and Monitoring</b>	<p><b>STAGE E:</b> Monitoring</p> <p>Following adoption of the Plan, the significant effects of implementing the plan are measured and any adverse effects are responded to. The results are fed into the future plans and sustainability appraisals.</p>

*Table A: SA/SEA Process*

2.4 Since the Scoping Stage A was completed, the focus has been on spatial strategy choice and policy formation. As discussed in Sections 8 and 9, there have been three alternative spatial strategies to assess using the SA/SEA framework, amongst other factors, and the framework has been used to compare the other policies with a 'policy off' alternative.

### 3 Neighbourhood Plan Objectives & Other Programmes

3.1 The Neighbourhood Plan contains a number of policies for the use and development of the land in the Parish of Fairford in the plan period up to 2031. The policies, together with the policies of the Local Plan and the National Planning Policy Framework (NPPF) will be used by the District Council to help determine planning applications once the Neighbourhood Plan is approved in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the emerging Local Plan.

3.2 The Vision of the Town in 2031 is:

*Fairford has become an example as to how, with good forward planning and cooperation between planners, developers and the local community, the sustainable development of an historic market town can be achieved for the benefits of both existing and new residents.*

*New houses are being erected on a planned forward schedule which recognises local housing need and design and are positioned where they complement the town and are close to services. An upgraded sewage treatment works and pumping station has ensured that adequate infrastructural services are in place to support this housing growth. Revised speed/weight limits have been put in place on the A417 which, together with better signage to and upgrading of the Eastern Spine Road, have led to reduced traffic disruption and improved safety, especially by limiting the number of HGVs transiting through the town. The expanded primary school, and access road to the school site, have made the Leaffield Road development very popular with young families.*

*The Market Square and High Street have been modified to include an expanded 'pedestrian only' area in front of the Bull Hotel which is now used not only by the weekly market, but by community groups and a growing café culture. The re-designated parking areas on the northern section of the High Street and an enlarged free car park have also improved parking availability and it is now safer to cross the A417 at the southern end of the High Street/Market Place following the redesign of this area. These relatively low cost changes have made the Town Centre more attractive for local residents and visitors, resulting in more people shopping and spending time in Fairford, with the consequent introduction of more shops and services.*

*Following the active marketing by the Fairford Town Council of Fairford's opportunities for small business development, new business facilities have been introduced on the Whelford Road industrial site and at the more central business office centre. Coordination with local landowners and university has also resulted in the promotion of Fairford as a rural skills centre.*

*Fairford's large number of active societies and clubs catering for more mature residents have continued to grow, but the improved sports facilities, including the upgraded cricket, rugby and football clubs and the introduction of more youth facilities at the Palmer Hall and Community Centres, has widened its appeal to families. Through the protection given to Fairford's historical buildings, green spaces and landscape, and the upgrading of country walks/cycle paths into and around the Cotswold Water Park, including the new foot/cycle path to Lechlade along the old railway line, Fairford has greatly increased its attractiveness for both residents and visitors.*

3.3 The Neighbourhood Plan has translated this vision into five key objectives as follows:

- Ensuring infrastructure and services are in place as a pre-requisite of development including: schools, transport links, health services, community facilities and communication - broadband, mobile phone signal.
- Ensuring that new housing and business developments are designed appropriately and have robust sewer and drainage systems and positioned close to local schools, shops/services and in areas of low flood risk.
- Ensuring that development seeks to improve and protect the existing natural environment and historical setting of Fairford.
- Ensuring that developments provide the right housing mix for the existing and projected future demographic in Fairford.
- Improving local employment opportunities and the attractiveness of the town centre, range of shops/services and sports/culture facilities.

3.4 The National Planning Policy Framework (NPPF) published by the government in 2012 is an important guide in the preparation of local plans and neighbourhood plans. The Neighbourhood Plan must demonstrate that it is consistent with the provisions of the NPPF. The following paragraphs of the NPPF are considered especially relevant:

- Supporting a prosperous rural economy (paragraph 28)
- Good design (paragraph 58)
- Protecting healthy communities (paragraph 70)
- Protecting local green spaces (paragraph 76)
- Conserving and enhancing the natural environment (paragraph 109)
- Conserving and enhancing the historic environment (paragraph 126)
- Neighbourhood planning (paragraph 185)

3.5 The Neighbourhood Plan must also be able to show that its policies are in general conformity with the strategic policies of the development plan, which currently comprises saved policies of the Cotswold District Local Plan 2001 – 2011, of the Gloucestershire Minerals Local Plan 1997 – 2006 and of the Gloucestershire Waste Core Strategy 2012 - 2027. Although the first two documents are in the process of being replaced, it is not expected that either will have been adopted before the examination and referendum of the Plan. The Core Strategy remains up-to-date.

3.6 In which case, its policies have regard to the relevant saved policies of the adopted plans and are informed by the relevant strategies, policies and evidence base of the new plans, i.e. the Cotswold District Local Plan to 2031 and the Gloucestershire Minerals Local Plan to 2030. The new Local Plan is at its Regulation 19 consultation stage. The new Minerals Local Plan is currently being prepared for pre submission consultation. Both plans are therefore expected to be adopted within the next year.

3.7 The adopted Local Plan contains a number of saved policies (see below) that will be relevant to the Neighbourhood Plan, notably those on protecting the natural environment, on protecting heritage, on development inside and outside of defined development boundaries, and on promoting rural economic development and good design. The Policies Map (see Plan B) shows the development boundary and areas of protected open space, a special landscape area, the conservation area and the town centre boundary. A large part of the southern half of the Parish, including Horcott, are shown as lying within the Cotswold Water Park area (Policy UT2) and subject to constraints as settlements to be protected from the other leisure and tourism policies promoted for the Water Park.

3.8 Fairford is defined as a Principal Settlement in the district and has a development boundary (Policy 18), but the remainder of the plan proposals for the town are now well out of date. The strategy envisaged for the town in 2001 has been very much different, with very significant levels of housing growth in the last decade and especially since 2014.

#### The Cotswold District Local Plan (CDLP)

3.9 As the Neighbourhood Plan may be examined prior to the adoption of the emerging Local Plan, it needs to be in conformity with the strategic 'saved policies' of the adopted CDLP. Those that are considered to have a specific relevance to Fairford and these are listed below:

- Policy 15: Conservation Areas – including managing development affecting the Fairford Conservation Area, which covers a large part of the town
- Policies 18 and 19: Development Boundaries – defining Fairford as a Principal Settlement and defining a boundary to distinguish the built up area from the surrounding countryside for managing development proposals
- Policy 24: Employment Uses – protecting existing employment uses from unnecessary loss and managing proposals for new uses
- Policy 25: Vitality and Viability of Settlements – defining a commercial centre at Fairford town centre for managing a healthy mix of town centres uses
- Policy 26: Tourism – managing proposals for hotel and other types of accommodation and the development of visitor attractions
- Policy 32: Community Facilities – protecting existing facilities from unnecessary loss and encouraging their improvement
- Policy 42: Cotswold District Design Code – requiring proposals to have regard to the Code's design guidance

## The Emerging Cotswold Local Plan 2016

3.10 In June 2016, the District Council published its Submission Draft Local Plan 2011 – 2031. It proposes planning policies to support the Local Plan's development strategy and which will replace the saved policies of the current Local Plan. These policies provide part of the framework, within which the general conformity of the Neighbourhood Plan with the development plan will be assessed.

3.11 It has proposed (in December 2016) to make some 'focussed changes' to its proposals. It does not propose any changes to Fairford-specific policies, though some other changes provide some clarifications which are supportive of proposals in the Neighbourhood Plan. It is noted that in the Sustainability Appraisal of the new Local Plan, no comparison is offered of the emerging site allocation proposals of the Neighbourhood Plan, even though the District Council has been aware of them for some considerable time.

3.12 The following are therefore considered to be the most relevant for the Neighbourhood Plan to be mindful of in judging the reasoning and evidence of the new Local Plan:

- Policies DS1 & DS2: Development Boundaries – to update the current defined development boundaries with the same intent
- Policy SA1 & SA2: Infrastructure in Cotswolds principle settlements
- Policy H1 & H2: Housing Mix & Tenure – requiring schemes to provide a mix of types and tenures
- Policy EC1: Existing Employment Sites – allowing for the managed expansion of existing facilities and protecting against their unnecessary loss
- Policy EC2: Safeguarding employment sites
- Policy EC3: Employment Generating Uses – offering qualified support for new employment uses in Principal Settlements like Fairford
- Policies EC6 & EC7: Town Centres and Uses – defining Fairford as a 'Key Local Service Centre' to encourage the provision of new local shops and to manage the mix of retail and other uses.
- Policy D1: Design – requiring proposals to have regard to the new Cotswold Design Code
- Policy EN1: Landscape – including managing development in the Cotswold Area of Outstanding Natural Beauty
- Policy EN2, EN3 & EN4: Landscape in the Cotswold principle areas
- Policy EN8: Recognising Fairford designate Heritage Assets
- Policy EN10: Recognising Fairford Non-Designated Heritage Assets
- Policy INF2: Social and Community Infrastructure
- Policy INF7: Green Infrastructure
- Policy INF8: Managing Flood Risk

3.13 The most important policy is S5 specifically on Fairford (see below). It proposes two site allocations – at Milton Farm and Faulkners Close – for a total of 77 homes, as well as protecting the town's key employment sites and setting out a series of local infrastructure projects. It also requires that development schemes contribute to the delivery of infrastructure projects across the South Cotswolds Sub-Area set out in its Policy SA1. Those projects contain only one in the town – improvements to the junction of the A417 and Whelford Road.

3.14 The Town Council disagrees with elements of both policies S5 and SA1. It considers that the proposed housing allocations of Policy S5 do not provide any means to directly address the need for improvements in local infrastructure, compared to the available alternatives. And Policy SA1 contains only one proposed local infrastructure project in the town and fails to recognise the effects that the rapid and major growth of the town in the last few years are very likely to have on local infrastructure and the character of the town. The two alternative approaches are compared and contrasted in this assessment below.

3.15 That said, in the light of the representations made on the Pre Submission Neighbourhood Plan and of the additional evidence submitted, the Town Council remains hopeful that the District Council will be persuaded by the proposals of the submission Neighbourhood Plan and will agree to adopting a different approach to plan making for the town in its submitted Local Plan in due course. There is no need for the Local Plan to duplicate the Neighbourhood Plan in making non-strategic housing site allocations (and the NPPF and PGG discourage this). At the very least, the Town Council expects the housing allocations of Policy S5 are deleted and are replaced by the provisions of the Neighbourhood Plan.

3.16 In terms of other nearby policy initiatives, the nearby town of Lechlade has seen its Neighbourhood Plan, which covers its Parish for the same plan period, made on 7 November 2016 by the District Council following a successful referendum. The plan does not make site allocations but supports the emerging Local Plan proposals for 114 new homes in the town, requiring only 18 homes to be planned for. Two small sites have been proposed on the Fairford side of the town.

## 4 Local Social, Environmental & Economic Issues

4.1 The dominant sustainability issue in the Town relates to the effects of the rapid and major growth of the town in the last five years. Although each planning application for the major schemes consented in that period seemed able to show that their individual effects on local infrastructure could be successfully managed, and were not sufficient in scale to outweigh the presumption in favour of sustainable development, the local community is now seeing, first hand, the emergence of those cumulative effects.

4.2 They are most obvious in the increasing demand for school places, for sewage/waste water capacity, for local health services and in increasing levels of traffic through the town in the peak hours. Whilst none may yet be critical – with the exception of sewerage issues – they are likely to become more obvious as the last of the almost 500 new homes in the town are completed and occupied in the coming year or so.

4.3 Future decisions about the growth of the town must therefore be made in that context and the ways that the local community perceives the effects of new development. The Town Council has therefore approached the Neighbourhood Plan very much from the perspective of ensuring that all new (primarily housing) development is located in places that will directly enable improvements to local infrastructure capacity. Not only will this approach deliver a more sustainable outcome for the town, but also a solution that the local community will support when the Neighbourhood Plan goes to referendum.

4.4 The Town Council has also been very mindful of the wealth of heritage and landscape assets in and around the town. These assets are not so comprehensive that they rule out or significantly constrain any future growth, but their presence and value in defining the essential character of the town is such that that growth must be carefully planned.

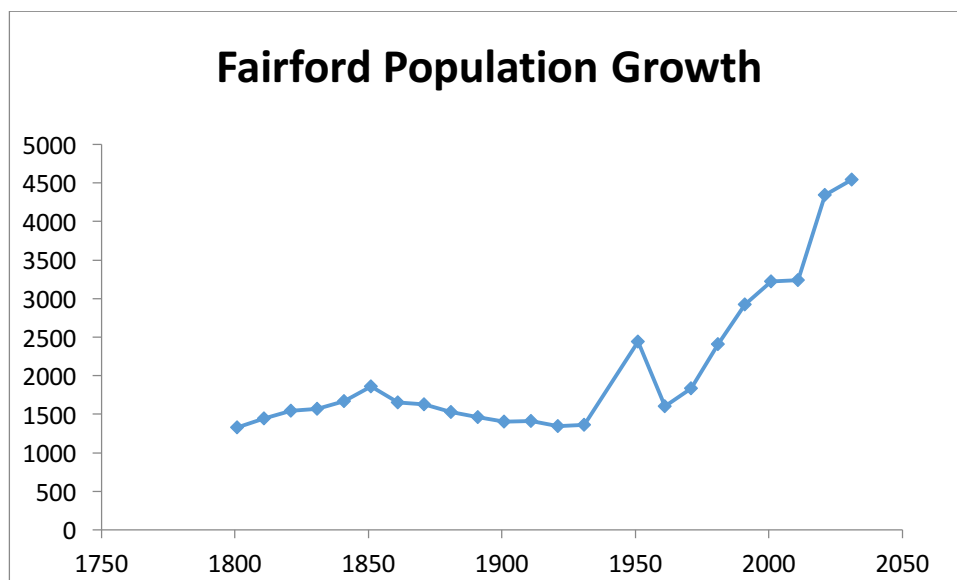
4.5 As with other traditional market towns, Fairford faces many challenges in maintaining a critical mass and variety of employment, retail and commercial premises, though it has sustained a reasonably healthy mix of these uses in recent years. Its historic town centre provides a number of convenience-type retail units that meet some of the needs of the local community. Its ability to adapt to changing commercial formats or to increase its total floor space, will be limited by the special heritage status of much of the centre. But its business parks remain popular, with units rarely vacant for any length of time, benefiting from the A417 to access local markets.

4.6 Future sustainable development in the town will therefore be based on finding locations that avoid harm to the most precious of landscapes, open spaces and historic areas of the town on the one hand, but enable investment in building the capacity of local infrastructure on the other.

## 5 Environmental Characteristics

5.1 The presence of many buildings from the town's history makes it one of the most beautiful towns of the Cotswolds. As the White Report says, 'At the northern end of the High Street is Fairford Park. This proximity of High Street and parkland is one of the town's most distinctive qualities. The permeability of the settlement edges is one of the most significant features of the town and provides 'good continuity between the town and its landscape context.' All the older town is a Conservation Area as a result and there are 120 listed buildings. There are also two Scheduled Monuments in the Parish at Thornhill Farm (an extensive late Iron Age ranching/pastoral complex), Tanners Field (an Anglo-Saxon cemetery) and land South of Burdocks (a Bronze Age hengiform barrow mound and ring ditch).

5.2 The Parish of Fairford currently has a population of 4,000, but which will grow to nearly 5,000 when the major housing schemes of recent years have been completed and occupied. The parish of Fairford consists of the town of Fairford and Horcott. For the purposes of this document, 'Fairford' should be taken to refer to the whole parish.

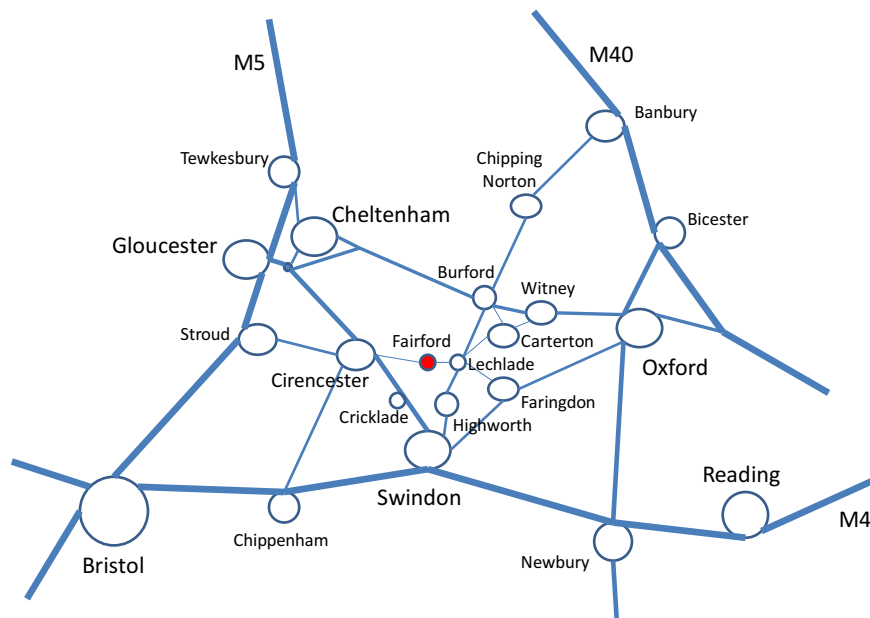


5.3 The town serves as a Local Service Centre for a wider rural area with the towns of Swindon, Cirencester and Lechlade some distance away. Although relatively small for a town, it benefits from a good range of local services, including a small but successful town centre, schools, health services, churches, sports facilities and many clubs and societies. Fairford is, therefore, a modern, thriving community which has been formed by long history. Its people, spirit and buildings still reflect that history, making it a very desirable place to live and work.

5.4 On the opposite side of the River Coln lies the much smaller but distinct settlement of Horcott on the edge of the Cotswold Water Park and RAF Fairford to the south east. Horcott comprises a small number of homes, an industrial estate and some recreational facilities. The other main employment areas lie on the A417 to the east of the town at the old station site and at Whelford Business Park.

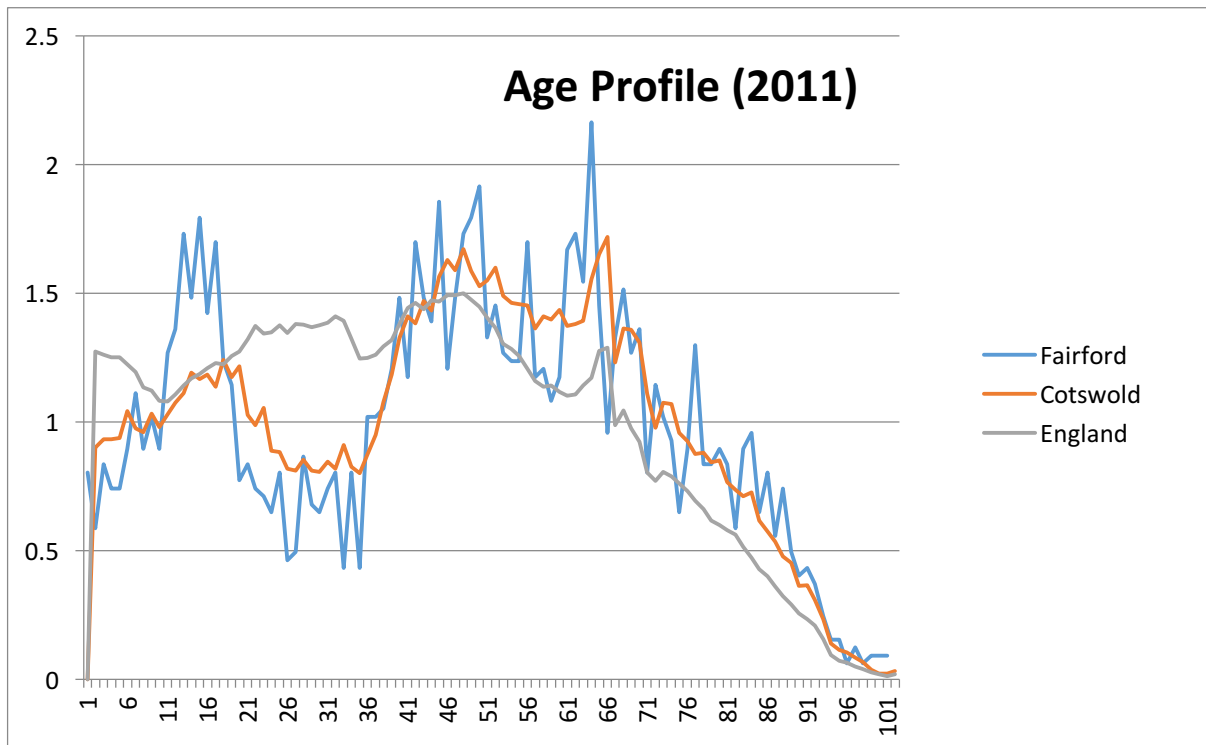


5.5 The town serves as a Local Service Centre for a wider rural area including the villages of Kempford, Whelford, Meysey Hampton, Quenington, Coln St Aldwyns, Southrop and Eastleach. The slightly smaller town of Lechlade is about 5 miles to the East, with the towns of Cirencester, Burford, Carterton, Faringdon, Highworth, Cricklade and Swindon also within 17 miles.



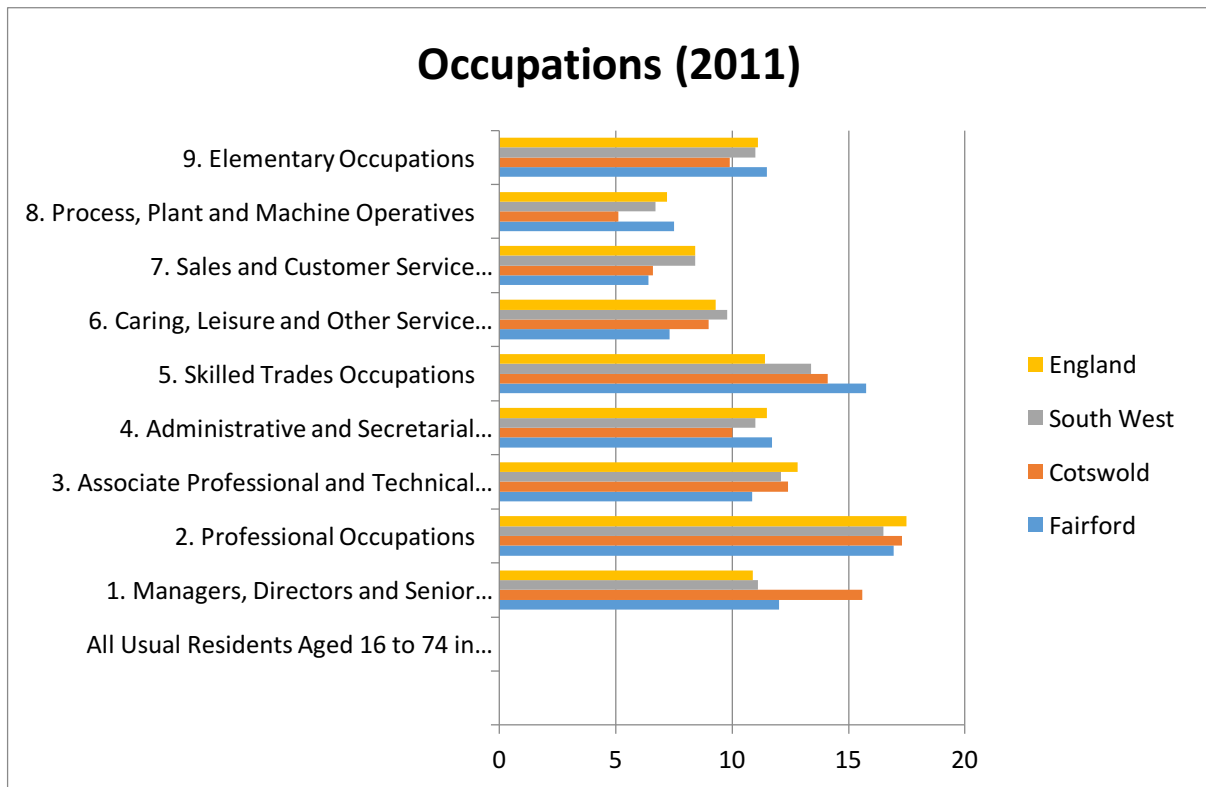
5.6 Although relatively small for a town, it benefits from a good range of local services, including a small but reasonably successful town centre (albeit there has been a loss of shops to residential conversions over the years and Lloyd's Bank has recently announced the closure of the only local bank branch in November 2016). Current shops/facilities include two convenience stores, a Post Office, a chemist, a butcher, an hotel, cafes, a restaurant, hairdressers, beauticians and several take-aways. There are also a Community Centre, a library/Children's Centre, Primary and Secondary schools, health services, churches, sports facilities and many clubs and societies.

5.7 Mineral extraction (mainly sand and gravel) has been an important activity in the area for a long time, but this has increased significantly since World War 2. This has led to the creation of a great number of lakes in the Cotswold Water Park, many of which are now managed for recreational and wildlife purposes, as part of restoration programmes. These now play a significant part in the area's recreation and tourism.



5.8 The age profile (2011) is generally similar to that for Cotswold District as a whole, with a higher percentage of older people than the national average. However, there are relatively more young people of Secondary school age (reflecting the presence of Farmor's School) and less in their 20s and 30s.

5.9 Comparison of employment occupations with figures for Cotswold District as a whole, shows a higher number in elementary, manual and administrative/secretarial occupations and skilled trades, and significantly fewer in higher level managerial and official roles, probably reflecting a small business focus and proximity to industrial employers in Swindon as well as the local area.



### Geology, Topography and Hydrology

5.10 Fairford is situated at a crossing point in the valley of the River Coln where the limestone of the Cotswold escarpment meets the gravel beds of the Upper Thames valley. The Coln headwaters rise from the inferior oolites and then flow over great oolite, forest marble, cornbrash and oxford clay. The upper part of the catchment is predominantly permeable, absorbing much rain water which then slowly discharges into the river. Fairford is located just upstream of the boundary between the great oolites and the forest marble and cornbrash, where the great oolites become confined. Springs issue from the oolites at this point and contribute to groundwater and flow/levels at Fairford.

5.11 The floodplain around Fairford has large gravel beds and soils containing clay. Due to the impermeable character of clay the river responds quickly to high rainfall run-off. The Coln valley is relatively steep and narrow which means that rain reaches the river very quickly. In addition, once the flood waters from the rainfall move downstream of Fairford, they are very likely to be followed by additional waters from the permeable section of the catchment upstream.

5.12 The town is located in the lower part of the catchment and in addition to local run-off it has to cope with headwaters from the upper catchment. The narrow floodplain in the upper catchment widens at Fairford, posing significant risk of flooding, and, as Fairford is surrounded by hills, the run-off rate is very high. Also catchment shape influences the speed at which the run-off reaches a river.

5.13 The River Coln catchment is very long and narrow and therefore slow to drain and water levels stay high for a long time. This is very typical for the Fairford area. Size helps to determine the amount of water reaching the river, as the larger the catchment the greater the potential for flooding. The Coln catchment is 130km<sup>2</sup> and has no major tributaries.

5.14 Land use contributes to the volume of water reaching the river. The flood plain at Fairford is significantly urbanized and rainfall on roofs, pavements and roads is collected by the Coln with almost no absorption into the ground. Extended periods of wet weather result in lower than average soil moisture deficit (SMD) - a measure of the saturation of the soil. This means that less rainfall is needed for the soils to become fully saturated, increasing the potential for flooding. A wetter than average winter leads to higher than average groundwater recharge rates – that is ground water contributes additional water to the lakes and rivers. Areas with gravel beds over a clay base will drain quickly in dry seasons when the SMD is high, but will fill up from the base in wet seasons, causing the groundwater level to rise rapidly. This gives rise to the winterbourne streams which are characteristic of the area. Groundwater levels can respond at very different time scales to rainfall, depending on the geology. Rain falling on the oolites in the Coln catchment takes very little time to percolate through to the aquifer, meaning levels respond quickly to any substantial rainfall.

5.15 All the above factors contribute to flood risk, and when there is high intensity and volume of rainfall, rapid run off inundates ditches, rivers, sewers, highway drains and highways and is likely to cause flooding. There is evidence of swales and drainage ditches from very ancient times; water management has always been and remains a very important issue for Fairford. In 2013-14 the Environment Agency installed various flood alleviation measures to avoid a repeat of the 2007 flooding. However, these only addressed riparian flooding from River Coln. Flooding from highways was not addressed and has continued to be an issue every year.

#### Heritage, Biodiversity & Landscape

5.16 There is also one conservation area in Fairford, designated in 20 January 1971. There are listed buildings that can be found throughout the Neighbourhood area but the largest concentration can be found in the Town Centre. Most of the listed buildings are Grade II Listed. There are also two Scheduled Monuments within the Neighbourhood Area

5.17 There are two Sites of Specific Scientific Interest (SSSI) just outside of the Area, at Cotswold Water Park SSSI and at Whelford Meadow SSSI. These designations make the whole of Fairford Neighbourhood Area fall within a SSSI Impact Risk Zone.

5.18 There is a Special Landscape Area designated in the Local Plan that covers much of the land to the north of the town. But the landscape to the south of the town also plays an important role in defining its character – especially with the town now growing to its east and west – and the gap between the main town and Horcott is also becoming increasingly important.

## 6 Sustainability Objectives

6.1 To assess the sustainability performance of the Neighbourhood Plan, the following assessment framework has been adopted. The proposed framework was consulted upon with the statutory consultees as part of the SA/SEA Scoping Report.

6.2 In the light of the context and available data, the Town Council proposes to establish the following framework of sustainability objectives and measures in order to identify any likely significant environmental effects.

6.3 The selection of objectives for the proposed framework reflects the general sustainability issues of the Parish and the policies in the Neighbourhood Plan. It has selected those objectives that are considered the most relevant information for this purpose. The decision not to choose any particular policy objective does not necessarily mean that the objective has no relevance to the Plan but that it is unlikely to enable the effects of policy options to be measured and is therefore unhelpful for this purpose.

6.4 The process of any housing site selections has been informed by an analysis of their suitability for development when assessed against the spatial policy of the Plan. That spatial policy, and the reasonable alternative spatial options, has been informed and tested by the SA/SEA framework.

<b>Neighbourhood Plan SA/SEA Objectives</b>	<b>Neighbourhood Plan SA/SEA Measures</b>
1. Environmental Quality	<ul style="list-style-type: none"> <li>• Will the FNP maintain or improve local air quality?</li> <li>• Will the FNP promote the clean-up of contaminated land?</li> <li>• Will the FNP protect or improve local water quality?</li> </ul>
2. Biodiversity	<p>To improve biodiversity and to protect habitats.</p> <ul style="list-style-type: none"> <li>• Will the FNP protect and enhance semi-natural and priority habitats?</li> <li>• Will the FNP achieve a net biodiversity gain?</li> <li>• Will the FNP create a well-connected, multi-functional green infrastructure?</li> </ul>
3. Climate Change	<p>To cut down on energy consumption and to reduce flood risk.</p> <ul style="list-style-type: none"> <li>• Will the FNP promote the use of sustainable modes of transport and reduce the need to travel?</li> <li>• Will the FNP ensure that no development takes place in areas at higher risk of flooding?</li> </ul>

	<ul style="list-style-type: none"> <li>• Will the FNP ensure that flood risk is not increased by new development?</li> <li>• Will the FNP sustainably manage surface water run-off and ensure that the risk of surface water flooding is not increased?</li> <li>• Will the FNP improve green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> </ul>
4. Historic Environment and Landscape	<p>To protect, maintain and enhance the cultural heritage resource of the Parish and the character and quality of its landscapes and townscapes.</p> <ul style="list-style-type: none"> <li>• Will the FNP preserve and enhance building structures of architectural or historic interest?</li> <li>• Will the FNP protect the historic settlement pattern and distinctive character of the town?</li> <li>• Will the FNP preserve and enhance the setting of cultural heritage assets?</li> <li>• Will the FNP contribute towards local and national landscape character objectives?</li> </ul>
5. Land Resources	<p>To use natural resources prudently.</p> <ul style="list-style-type: none"> <li>• Will the FNP promote/increase the use of sustainable building design?</li> <li>• Will the FNP promote the use of previously developed land?</li> <li>• Will the FNP avoid development of the best and most versatile agricultural land?</li> </ul>
6. Population & Communities	<p>To create a balanced community and economic opportunity and to improve access to a wide range of homes and local services.</p> <ul style="list-style-type: none"> <li>• Will the FNP provide sites for mixed housing schemes and community facilities?</li> <li>• Will the FNP help retain basic rural services?</li> <li>• Will the FNP increase the self-sufficiency of the town?</li> <li>• Will the FNP increase access to various services including for those without cars and those in surrounding villages?</li> <li>• Will the FNP help to enable local residents/ young people to remain within their communities? (e.g. through encouraging local employment and an incremental approach to development including affordable housing?)</li> </ul>

7. Health & Well-being	<p>To make the most of the area's relatively high standard of living and health.</p> <ul style="list-style-type: none"> <li>• Will the FNP promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Will the FNP improve access to the countryside for recreation for all age groups?</li> </ul>
8. Economy & Enterprise	<p>To create opportunities for residents to find employment locally and for local businesses to flourish and to ensure the vitality and viability of the town centre.</p> <ul style="list-style-type: none"> <li>• Will the FNP promote the development of tourism in a sustainable manner?</li> <li>• Will the FNP support employment provision?</li> <li>• Will the FNP enhance the vitality of the town centre?</li> <li>• Will the FNP provide workspace for locally appropriate businesses?</li> </ul>

*Table B: Fairford Neighbourhood Plan SA/SEA Framework of Objectives*

6.5 In most cases, it is acknowledged that data is not collected or reported at a parish scale to enable a sensible assessment. This makes the identification of cause-and-effect relationships between inputs and outputs very uncertain. However, the assessment does seek to identify the relative attributes of the policies of the Neighbourhood Plan to inform the reader.

## 7. Assessment of Neighbourhood Plan Strategic Objectives

7.1 A summary of the assessment of the five Neighbourhood Plan objectives against the eight SA/SEA objectives is provided in Table B below. A simple 'scoring' system is used to show positive (+), neutral (0) or negative (-) effects. Where the effect is dependent on an assumption, then a mix of those scores is used and an explanation is provided in the text below.

SA/SEA Objectives	Environmental Quality	Biodiversity	Climate Change	Historic Environment & Landscape	Land Resources	Population & Communities	Health & Well-being	Economy & Enterprise
<b>Neighbourhood Plan Objectives</b>								
Social infrastructure	+/0	0	+	0	0	+	+	+
Design & Location	0	0	+	0	0	+	+	0
Environment	0	0	0	+	0	0	0	0
Housing Mix	0	0	0	0	0	+	0	0
Employment	0	0/-	+	0/-	0	+	0	+

Table B: Assessment of Neighbourhood Plan Strategic Objectives

7.2 Given the Neighbourhood Plan must contribute to the achievement of sustainable development to meet its basic conditions, and must win the support of the local community in due course, it is not surprising that there is a reasonably strong correlation between the two sets of objectives.

7.3 The Neighbourhood Plan objectives are especially driven by the goal to improve local social, utilities and commercial infrastructure to enable the town to improve its self-containment and to avoid becoming a satellite commuter town. There are therefore a number of positive effects in respect of the 'Population', 'Health' and 'Climate Change' SA/SEA objectives.

7.4 There is also the goal of new development being located and designed in ways that avoid harming the landscape and heritage assets, hence a positive effect in that respect and in promoting health and well being.

7.5 There is, however, the potential for some negative effects in respect of promoting economic and commercial development in an area of high landscape and heritage value. It is expected, in practice, that a combination of the Neighbourhood Plan and Local Plan policies will avoid such effects when planning applications are being considered.



## **8. Assessment of Neighbourhood Plan Policies**

8.1 The Neighbourhood Plan contains 22 policies, which have a series of social, environmental and/or economic impacts. Using the sustainability framework of Section 6, the assessment of each policy is summarised below in Table C. The assessment is of the proposed policies with their mitigation measures. The Site Assessments and Green Spaces reports are available as separate documents in the evidence base of the Neighbourhood Plan and should also be referred to.

### **Policy FNP 1**

8.2 This policy makes minor amendments to the established development boundary of the town and Horcott to accommodate the new development within the main built up areas of the Parish unless it is especially suited or necessary to a countryside location (or provision has been made elsewhere in the Plan). In doing so, it will have a positive effect in protecting the essential setting to the Conservation Area and the wider landscape character, as reinforced in other policies.

8.3 The policy will also have a positive housing supply effect as it provides for further housing growth in the plan period of a scale that exceeds the target proposed in the emerging Local Plan. Various spatial options for this growth have been tested and, as acknowledged in the Local Plan Sustainability Appraisal, growing to the north east of the town is considered the most sustainable. Not only will growth here deliver an opportunity to plan for the long term capacity and efficient operations of the schools, but the land is the least constrained around the town. The assessment of the alternative options is contained in §9.6 – 9.8 of this report.

### **Policy FNP 2**

8.4 The policy will have a number of positive effects, in restating the value and need for community facilities on the land to increase access for an increasing local population. This will reduce the town's reliance on the facilities of other towns and the site is within reasonable walking distance of a large part of the town.

### **Policy FNP 3**

8.5 This policy will have a number of positive effects in addressing an acknowledged car parking problem on the streets in East End that surround the busy health centre, which will become increasingly popular with the larger local population and will continue to serve a wider rural area. As the town expands on its edges beyond a reasonable walking distance to the health centre, car trips are therefore likely to increase. The new homes element of the scheme will enable the delivery of that social benefit and will also have a positive effect in meeting a specific local housing need for homes suited to older households.

		SA/SEA Objectives							
		Environmental Quality	Biodiversity	Climate Change	Historic Environment & Landscape	Land Resources	Population & Communities	Health & Well-being	Economy & Enterprise
<b>Neighbourhood Plan Policies</b>									
FNP 1	Development Boundaries	0	0	0	+	0	+	0	0
FNP 2	London Road	0	0	+/0	0/-	0	+	+	0
FNP 3	Retirement homes & car park	0	0	0	0/-	0	+	+	0
FNP 4	Burial Ground	0	0	+/0	0	0	+	+?	0
FNP5	Viable Facilities	0	0	+/0	0	0	+	+	0
FNP 6	Flood risk	0	0	+	0	0	0	0	0
FNP 7	Utilities Infrastructure	+	0	+	0	0	0/-	+/0	0
FNP 8	Traffic in the town	+/0	0	+	+/0	0	0	+/0	+/0
FNP 9	Access to Attractions	+	0	+	0	0	0	+	+/0
FNP10	Local Green Spaces	0	0	+/0	+	0	0	+/0	0
FNP11	Fairford – Horcott local gap	0	0	+/0	+	0	0	0	0
FNP12	Area of special landscape value	0	0	+/0	+	0	0	+/0	0
FNP13	Trees & Hedgerows	0	+	+	+/0	0	0	0	0
FNP14	Design	0	0	0	+	+	0	0	0
FNP15	Heritage assets	0	0	0	+	0	0	0	+/0
FNP16	Homes off Leaffield Road	0	0	0/-	0/-	0	+	+	0
FNP17	Housing Types	0	0	0	0	0	+	0	0
FNP18	New jobs	+/0	0	+	0	0	+	0	+
FNP19	Lower Croft	+/0	0	+	0	+	+	0	+
FNP20	Town centre	+/0	0	+	0	0	+	0	+

FNP21	Visitor accommodation	0	0	0	0	0	0	0	+
FNP22	Horcott Lakes	0	0/-	+	0/-	0	+/0	0	+

8.6 The policy mostly avoids a negative heritage or landscape effect as the site does not make a significant contribution to the character of the Conservation Area as an open space. It is enclosed for the most part, with no means by which the public can enjoy the Conservation Area in views from the east or any significant views of nearby listed buildings or appreciate the land as being part of the distinct Area of Special Landscape Value proposed for the land to its east. In any event, the policy limits the scale of the new buildings, which are regarded as enabling development to secure the public benefit of a car park (for surgery use) on this private land, and it requires the design to have regard to the Conservation Area.

8.7 The overall conclusion is that the policy provides a scarce opportunity to address an increasing problem for health centre visitors and the residents of East End alike. Any residual negative heritage or landscape effects of developing this open land are therefore outweighed by the positive social effects of securing a long term car parking solution and homes for older households.

#### **Policy FNP 4**

8.8 This policy will be generally neutral in its effects but will provide a new facility that will provide a local choice and may avoid some car trips to facilities beyond the Parish.

#### **Policy FNP 5**

8.9 This policy will have positive community health and wellbeing effects in seeking to protect existing facilities from unnecessary loss and thereby reduce the need for local people to travel outside the Parish to meet these needs. The town enjoys a range of community facilities though they need to be maintained and improved to meet the needs of a growing local population. It avoids any negative environmental effects by ensuring that any impacts on local amenity are properly addressed in detailed proposals that are brought forward.

#### **Policy FNP 6**

8.10 This policy directly addresses important flood risk issues and therefore has positive flood effects. Fairford is prone to flooding of various kinds because of its geology, hydrology and topology. The ground water levels are likely to remain high in wet seasons because of groundwater recharge from the aquifers to the west, and borehole evidence suggests that the requirements for SuDS to have 1m water storage space above the water table cannot be met in some areas because of high groundwater levels. In the light of these issues, a detailed hydrology report for the town has been commissioned and is expected to be completed early in the New Year, once Thames Water has completed its local review of highways run off into gullies. In the meantime, it seems a sensible precaution for the policy to require that land with known high groundwater levels is better used for water storage purposes.

8.11 In any event, much of the land likely to be subject to this policy also has landscape and open space value and is subject to constraint on housing development. But, the policy avoids a negative housing supply effect, as other policies of the Plan make positive provision for new homes in more sustainable locations.

#### **Policy FNP 7**

8.12 This policy will have positive environmental quality and flood risk effects as it seeks to ensure that new development is matched with corresponding investments in the local utilities infrastructure, especially in respect of waste water management and the effects of flooding. Thames Water has acknowledged the current capacity problems and their likely harmful effects on local water quality. The policy does not have harmful housing supply effects as other policies of the Plan are phasing new developments into the later part of the plan period, or are confining housing development to small infill schemes.

#### **Policy FNP 8**

8.13 This policy will have some positive environmental quality, climate change, heritage and economic benefits as it encourages better management of traffic and non-car trips within the town. If successful, it ought to lead to improvements in air quality and less harm from traffic vibrations and pollution on listed buildings.

#### **Policy FNP 9**

8.14 This policy has the potential for a number of positive effects, notably in terms of encouraging non-car trips between the town and surrounding attractions and encouraging local people to enjoy the surrounding countryside. In all other respects the policy has neutral effects.

#### **Policy FNP 10**

8.15 This policy will have a positive effect in protecting land from harmful development to form part of the green infrastructure network of the Parish. It avoids having a negative housing supply effect, as other policies of the Plan allocate sufficient land to exceed the proposed housing target over the plan period.

#### **Policy FNP 11**

8.16 This policy will have a positive landscape and heritage effect in preserving the visual integrity of the separate Fairford and Horcott settlements, which has the effect of protecting the essential enjoyment of the setting to the Conservation Area in views from Horcott. It avoids having a negative housing supply effect, as other policies of the Plan allocate sufficient land to meet those needs over the plan period.

### **Policy FNP 12**

8.17 This policy will have a positive landscape and heritage effect in preserving the visual integrity of the land to the south and east of the Fairford and Horcott settlements, which has the effect of protecting the essential enjoyment of the setting to the Conservation Area in views from River Coln. It avoids having a negative housing supply effect, as other policies of the Plan allocate sufficient land to meet those needs over the plan period. Much of the land also lies in the flood plain and so would not be appropriate for housing development in any event, as there will continue to be other opportunities to grow the town in the longer term.

### **Policy FNP 13**

8.18 This policy will have positive biodiversity, landscape and climate change (green infrastructure) effects by requiring the retention or replacement of trees and hedgerows as part of development schemes.

### **Policy FNP 14**

8.19 The policy will have positive design, heritage and landscape effects by establishing design guidance specific to the town to enhance its historic character and landscape setting.

### **Policy FNP 15**

8.20 The policy will have a positive heritage effect by ensuring the local heritage value of buildings will be taken into account in development proposals. It avoids any negative effects as it does not necessarily prevent the reuse of such buildings.

### **Policy FNP 16**

8.21 This policy will have positive effects in providing for an increase in the facilities of the local school and improving its efficiency in order to meet the needs of a larger local population so families have to rely less on transporting students to schools in other towns or villages. The proposals will also improve the accessibility of the facilities with additional off-street car parking. The landowner has committed to releasing the land for these purposes before the housing element is capable of being delivered (as a result of Policy FNP7), should that be necessary.

8.22 The land is identified in the Sustainability Appraisal of the emerging Local Plan as part of a wider land parcel (FAIR4) that it ranks as the most sustainable for development in the town. Although the present school facilities on the north east edge of the town are not ideally located for access from developments on the western side, it is not practical or economic to relocate the established facilities or build a second school there, and there is no suitable land nearer the town for this purpose in any event. The land is only in reasonable walking distance of the eastern half of the town, which ought to have been taken into account in the planning of new homes on its western edge in recent years.

8.23 This policy will have a positive housing supply effect in delivering new homes once the investment in utilities infrastructure improvements has been made. Although this may mean the scheme comes forward later, the scale of existing commitments is such that there is no need for the town to contribute any further homes to the five year land supply.

8.24 Given the agricultural land adjoins the current town edge, and adjoins the Special Landscape Area to its west, there will be a modest negative landscape effect. However, the land has no formal designation and it is not essential to the appreciation of the Special Landscape Area, the significance of which is mostly derived from the valley area and its wildlife. Leaffield Road forms a distinct change in landscape character, from a landscape of special historic importance and forming an essential vista and setting to the Conservation Area from the north, to farmed land with few features. In any event, the policy requires the scheme layout and design to mitigate the effects of the development on the adjoining countryside. It is noted that the Local Plan Sustainability Appraisal identifies no landscape constraint of the FAIR4 land area.

8.25 An ecology survey of the site has revealed no special biodiversity interest. It can therefore be left to a planning application to determine how biodiversity should be addressed within the scheme.

#### **Policy FNP 17**

8.26 The policy will generally have neutral effects but may have a modest positive effect in ensuring that housing types (of 2 and 3 bedrooms) in new schemes favour younger families and help to address the aging population profile of the town.

#### **Policy FNP 18**

8.27 The policy will have a number of positive economic effects, focusing on maintaining and improving the self-containment of the town in economic terms. The overall strategy is to seek to balance the significant growth in new homes in recent years with a corresponding growth in local employment opportunities. The policy is neutral in terms of other effects as it requires any landscape effects to be mitigated.

#### **Policy FNP 19**

8.28 This policy also protects scarce employment land in the town from a change of use to residential. It therefore has a number of economic benefits in encouraging the self-containment of the town by creating local employment opportunities. It avoids any negative housing supply effects as the Plan makes provision for such development through other policies, so redevelopment here is not necessary.

## **Policy FNP 20**

8.29 The policy will have a number of economic benefits in sustaining and creating jobs and in providing convenient local services to reduce the reliance of the local community on other, larger towns requiring car trips. It will also encourage tourism for economic benefits, alongside other policies of the Plan. The individual and collective special heritage value of the commercial and other buildings in the town centre will be managed by other development plan policies and so is not repeated in this policy, and hence this will avoid any negative heritage effects. It may even be possible to secure heritage benefits in maintaining historic buildings in productive commercial use.

## **Policy FNP 21**

8.30 This policy is generally neutral in its effects but has potentially positive economic effects in encouraging investment in the tourism sector in and around the town. The use of other development plan policies should avoid or satisfactorily mitigate any negative heritage or landscape effects.

## **Policy FNP 22**

8.31 This policy will have positive economic and social effects in encouraging tourism investment in the local economy as part of a series of initiatives aimed at securing greater public use and benefit from the Lakes (notably the tourism and community benefits of Policy FNP21). They also include delivering a renewable energy scheme, which will have a marginal positive climate change effect.

8.32 The housing element of the comprehensive scheme is an enabling development, to secure the investment in delivering the rest of the masterplan. Although these new homes are not being justified on housing supply grounds – as Policy FNP16 alone delivers on this requirement – they will make another contribution to supply of local housing and the policy therefore has a positive housing effect.

8.33 The northern boundary of the land adjoins the Development Boundary of Horcott and the proposed visitor facility will be located on that edge. That element of the policy will therefore have very little landscape effects. The housing element is best located further south and it will have modest landscape and climate change related negative effects. However, the policy requires mitigation to minimise its landscape impact and will be neutral in biodiversity terms in requiring new tree and hedge planting. There is also the potential for some negative landscape and biodiversity effects, both in terms of the construction of a solar array and its operation.

8.34 The policy requires that proposals must have regard to those matters that may lead to negative effects. The technical work undertaken by the landowner on the masterplan indicates that it will be possible to deliver each element of the scheme with a package of landscape and biodiversity mitigation measures to ensure that the positive effects of the proposals outweigh the negative effects.

## 9. Assessment of Reasonable Policy Alternatives

9.1 The assessment is obliged to consider any reasonable alternatives to the proposed policies. In practice, the only alternative to all but two of the policies is that of having no policy and relying upon other development plan policies or national policy. The assessment therefore considers how such alternatives would make any difference to the sustainability outcomes.

		SA/SEA Objectives							
		Environmental Quality	Biodiversity	Climate Change	Historic Environment & Landscape	Land Resources	Population & Communities	Health & Well-being	Economy & Enterprise
<b>Policy FNP1 Alternatives</b>									
A	CDC LP Options	0/-	0/-	0/-	0	0	0/-	0	0
B	Land west of Fairford	0	0	0/-	-	0	0	0	0
C	Land east of Fairford	0	0	0/-	0/-	0	0	0	0
<b>Policy FNP18 Alternative</b>									
A	Housing Use	0	0	0	0	0	+0	0	-
B	Mixed Use	0	0	+0	0	0	+0	0	0

### Policy FNP1

9.2 Firstly, however, it assesses the alternatives to the preferred spatial strategy that defines Policy FNP1. The definition of the development boundaries at Fairford and Horcott in that policy is the outcome of the spatial strategy determined by the overall vision and objectives of the Plan. In redrawing the boundary after this exercise was completed, it therefore accommodates the three site allocations (in policies FNP3, FNP16 and FNP22) that are consistent with that strategy.

9.3 In theory, there are three alternative spatial strategies, assuming that the main town is the only sustainable means of accommodate housing growth to contribute to meeting local housing needs, as opposed to a new settlement for example. The first (Option A) is set out in the draft Local Plan and comprises two sites of a total of approximately 80 new homes (ref F35B and F44). The other two alternatives would look to continue to grow the village to the west (Option B – including F35B again and F36B) and east (Option C – including F15, F20A, F39, F41 and F45) to deliver a similar overall quantum of development, and each is described and assessed below.



9.4 In practice, the community engagement work undertaken so far (and in some cases the planning history of sites in those locations) has given a clear indication that none of the alternatives would be supported by a clear majority of voters at the referendum in due course. The Judicial Review ruling in relation to the Tattenhall Neighbourhood Plan in May 2014 (EWHC 1470) stated:

*“The consultation undertaken set the framework for deciding the reasonable alternative options for the policies in the Neighbourhood Development Plan and informed the decisions taken on what the draft policies would contain. Those options that had not commanded community support were not considered to be reasonable to take forward in the draft plan. Therefore, reasonable options were determined through the community consultation exercise (§67)”.*

*“In my view the level of consideration of alternatives in the sustainability assessment was sufficient to meet the requirements of the SEA Directive and the Regulations (§75)”.*

9.5 This ruling has since been affirmed by the ruling on the St. Ives Neighbourhood Plan (EWHC 2817) of November 2016. However, although not defined as ‘reasonable’, the Town Council has requested that the assessment looks at the technical attributes of the options to enable a comparison, should the examiner not consider that this ruling applies here.

9.6 Option A is assessed as having generally neutral effects. Its potential to have a positive effect on local housing supply is offset by neither site being capable of directly addressing local infrastructure capacity problems. Both sites lie on the edge of the town and are not located in places that will enable other positive effects to be secured. They both have modest negative climate change effects in discouraging non-car trips. In addition, the Horcott Lakes site (F44) has the potential for negative biodiversity effects that will not be outweighed by the value of securing a public benefit. It is noted that the Local Plan Sustainability Appraisal ranks the respective land parcels, within which these sites lie (FAIR7 and FAIR8), as the fourth and third most sustainable of the eight parcels in and around the town. It is also noted that the respective landowners have given a clear indication that the two sites will not be made available for housing; in the case of site F44, the landowner supports the preferred alternative set out in Policy FNP16.

9.7 Option B has a very similar assessment as Option A, although here there are clearer negative effects on the setting to the Conservation Area and on the visual integrity of the open gap between Fairford and Horcott in respect of the land comprising F36B. That site is marginally closer to the town centre than other land in the preferred option or the other options and so has a neutral effect. However, this side of the town is furthest from the schools provision and can make no realistic contribution to addressing capacity issues. New homes will likely increase the capacity problems and again, this is assessed as offsetting the positive effect of new homes contributing to local housing supply. It is noted that the Local Plan Sustainability Appraisal ranks the land parcel within which these sites lie (FAIR7), as the fourth most sustainable of the eight parcels in and around the town.

9.8 Option C has a very similar assessment, being generally neutral in its effects but negative in respect of landscape and discouragement of non-car trips. The former is more stark in places (F20) where the land is more exposed in the landscape. The latter is true of most of the land, which although closer to the school site still lies beyond a reasonable walking distance from the town. Again, although there would be a positive effect of delivering new homes, the inability of this part of the town to directly address infrastructure capacity issues (other than the community facility provision at F39, which has already been approved), means this effect is offset to become net neutral. It is noted that the Local Plan Sustainability Appraisal ranks the respective land parcels within which these sites lie (FAIR5 and FAIR6), as the seventh and fifth most sustainable of the eight parcels in and around the town.

### **Policy FNP18**

9.9 The alternatives to this policy are to allocate the land either for housing or a mixed use scheme of housing and employment uses. With the completion of the housing scheme to its immediate west, the development of the land for these alternatives will have no different effect on most measures to the preferred option. The housing use will deliver more new homes, though the Plan has made more than sufficient provision for growth elsewhere.

9.10 The loss of the opportunity to deliver additional employment land for the town in a most suitable location adjoining a well-established employment use will have a significant negative economic effect. It will also undermine the goal of building a sustainable town where local employment opportunities grow with the new housing, rather than generating more commuting trips. The alternative of a mixed use scheme will have some positive housing effect and some positive employment effect, and may be seen as an acceptable compromise in due course, should the landowner seek to bring forward a scheme.

### **Other Policies**

9.11 The reasonable alternative to all the other policies is the 'Policy Off' option, whereby the remainder of the development plan and national policy are relied upon to guide development management decisions.

9.12 In almost all cases, the effect is neutral, on the assumption that the district and national policy framework will provide the basis for effective decision making. It is possible that in some cases, the lack of a local focus or refinement of policy may make this more difficult to achieve, but this is marginal. The exceptions to this assessment are identified below:

- Policy FNP3 – similarly, the policy supporting a development scheme on land in the Conservation Area and currently beyond the Development Boundary is considered sufficient to persuade the land interest to deliver the proposed community benefit and housing scheme to meet local demand – the failure of this proposal will leave the health centre parking issue unresolved as demand for the facility increases and will result in negative effects on access to community facilities and meeting housing supply. The NHS has stated that

the present facility can be expanded to cope with increased doctors/patients.

- Policy FNP10, FNP11 and FNP12 – these policies refine national and district policy in terms of landscape protection to apply to this Parish – 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
- Policy FNP 16 – it is possible that the absence of policy supporting housing and education development in this location may dissuade the land interest in bringing forward proposals in due course, with the considerable negative effect on community cohesion and housing supply that would arise – it is noted that of the major housing schemes consented in the town in the last five years, only one has enabled a specific community benefit to be secured (the subject of Policy FNP2)
- Policy FNP22 – this policy contains a package of initiatives to deliver on a number of key objectives – a failure to deliver one is likely to lead to the failure of the others as the housing scheme is justified as an enabling scheme to deliver the new visitor centre and new green infrastructure – the absence of this policy package is unlikely to encourage proposals to come forward, resulting in negative economic, tourism, climate change and housing supply effects but in neutral biodiversity and landscape effects (rather than modest negative effects of the preferred option)

## 10. Summary of the Assessment

10.1 In overall terms, therefore, the sustainability effects of the Neighbourhood Plan are generally assessed as neutral but are occasionally positive. The proposed mitigation measures of most policies will effectively avoid any significant negative effects. Those residual effects that remain are assessed as modest and, in each case, are at least offset, or are outweighed, by other positive effects to justify their inclusion in the Plan.

10.2 At best, the assessment of the reasonable alternatives to the Neighbourhood Plan policies indicates that they are also generally neutral in their effects, with a small number of clearer negative effects in some cases. Importantly, in no policy case does the alternative offer a clearly better sustainable outcome than the option preferred in the Plan.

## 11. Monitoring

11.1 The Town Council will monitor the progress in the implementation of the Neighbourhood Plan using the measures identified in Table A. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Town Council will endeavour to collect data to report on the progress of the plan. It is likely the Council will choose to review the Neighbourhood Plan on a five yearly cycle and it will be informed by this monitoring activity in considering if and how to update the policies.

## APPENDIX A

# Fairford Neighbourhood Plan

## Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA)

### SCOPING LETTER TO STATUTORY BODIES

Dear XXXXX,

#### **Fairford Neighbourhood Plan: Sustainability Appraisal Scoping Letter**

I set out below for your attention the proposed scope of the Sustainability Appraisal (incorporating Strategic Environmental Assessment (SA/SEA)) to accompany the forthcoming Fairford Neighbourhood Plan (FNP).

This letter and its appendices should be regarded as the Scoping Report of the FNP in accordance with Stage A of the provisions of the Environmental Assessment of Plans & Programmes Regulations 2004 (which implement EU Directive 2001/42).

As a statutory consultee in the Regulations you are invited to comment on this report and I would be grateful for your comments by XXXXXXX.

#### **Background**

The FNP is being prepared by Fairford Town Council as a qualifying body under the 2012 Neighbourhood Planning (General) Regulations. The local planning authority, Cotswold District Council, has not issued its formal screening opinion on the requirement for an SEA, but it has indicated that an assessment is likely to be required. The Town Council has heeded this advice and has chosen to undertake an SA rather than an SEA alone, covering social and economic objectives, as well as environmental objectives, to enable relevant assessment of the FNP policies, including various types of land designation.

The guidance for undertaking SA/SEA is contained in the National Planning Practice Guidance (ID 11-030), which emphasises that it must “only focus on what is needed to assess the likely significant effects of the neighbourhood plan” and on the “environmental impacts that are likely to be significant”. It then states that this “does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan”.

The FNP is likely to contain only a relatively small number of policies that will seek to identify sites for housing and other types of development and to put in place a clear spatial framework of other land designations to direct and manage future development successfully. It will therefore work alongside other development plan policies for the district to guide the consideration of planning applications.

The first stage of the process, the scoping of the SA/SEA, is summarised in the text below:

Stage A: This stage sets the context of the assessment by identifying the baseline data and establishing the scope of the assessment.

- 1. Identification of relevant plans, policies and programmes.** Any existing requirements that need to be taken into account or incorporated into the plan are identified.
- 2. Review of baseline information.** Data about environmental, social and economic issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation.
- 3. Identification of Sustainability Issues.** The review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan
- 4. Development of the SA framework.** The assessment criteria used to assess the impact of the plan or programme.
- 5. Identification of initial plan options.** Taking into account best practice, initial identification of options and reasonable alternatives is undertaken
- 6. Consultation** on the scope and alternatives for assessment – it is necessary to consult Statutory Consultees; Natural England, Historic England and the Environment Agency at this stage.

The SA/SEA framework will be used to assess two or three spatial options for distributing development in and around the town, rather than to assess individual sites in isolation of each other. Its conclusions will inform the choice of the most appropriate spatial plan, which in turn will inform the selection of sites alongside the Town Council's view on the relative acceptability to the local community of the spatial options, bearing in mind the need for the FNP to win a majority vote at a referendum.

It is not anticipated that there will be any element of the plan which would trigger an EIA under the criteria listed in Schedule 2 of EIA Regulations to which you refer.

Such aspirations as the plan is likely to espouse are consistent with the emerging local plan (see below) and the statement as to the proposed strategy for Fairford to the effect that by 2031 the town will have strengthened its position as a local service and employment centre.

The FNP may therefore contain policies relating to its local shops, employment sites, community facilities and sustainable infrastructure, as well as to meeting local housing needs, all of which will be in general conformity with the relevant saved development plan policies, and will accord with the provisions of the National Planning Policy Framework. The consideration of these potential policies has begun

but will await the conclusions of the consultation on this scoping exercise before progressing any further.



*Plan A: Fairford Neighbourhood Plan Area*

### **Other Plans & Programmes (Stage A1)**

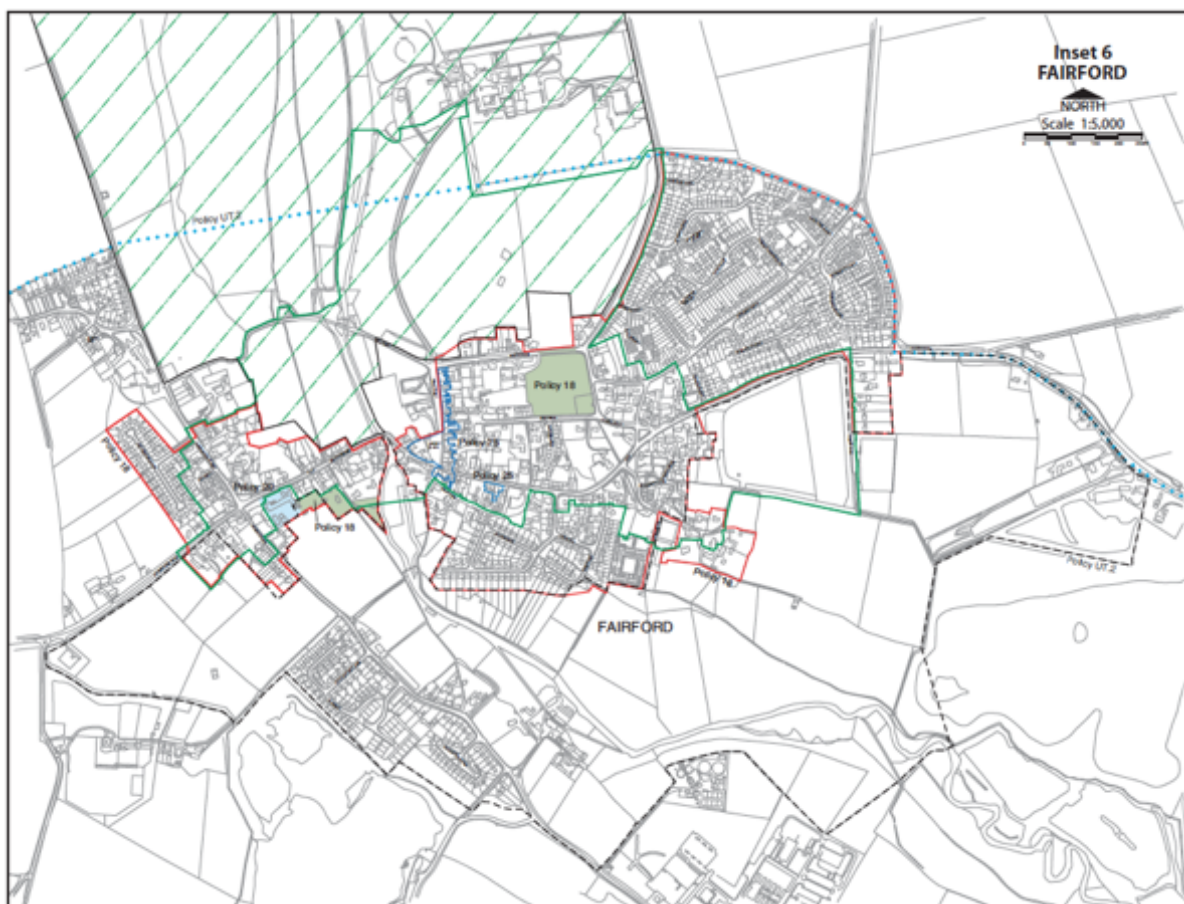
The FNP must be able to show that its policies are in general conformity with the strategic policies of the development plan, which currently comprises saved policies of the Cotswold District Local Plan 2001 – 2011, of the Gloucestershire Minerals Local Plan 1997 – 2006 and of the Gloucestershire Waste Core Strategy 2012 - 2027. Although the first two documents are in the process of being replaced, it is not expected that either will have been adopted before the examination and referendum of the FNP. The Core Strategy remains up-to-date.

In which case, the FNP policies will have regard to the relevant saved policies of the adopted plans and will be informed by the relevant strategies, policies and evidence base of the new plans, i.e. the Cotswold District Local Plan to 2031 and the Gloucestershire Minerals Local Plan to 2030. The new Local Plan is currently at its

Regulation 19 consultation stage. The new Minerals Local Plan is currently being prepared for pre submission consultation. Both plans are therefore expected to be adopted within the next year.

The adopted Local Plan contains a number of saved policies that will be relevant to the FNP, notably those on protecting the natural environment, on protecting heritage, on development inside and outside of defined development boundaries, and on promoting rural economic development and good design. The Policies Map (see Plan B) shows the development boundary and areas of protected open space, a special landscape area, the conservation area and the town centre boundary. A large part of the southern half of the Parish, including Horcott, are shown as lying within the Cotswold Water Park area (Policy UT2) and subject to constraints as settlements to be protected from the other leisure and tourism policies promoted for the Water Park.

Fairford is defined as a Principal Settlement in the district and has a development boundary (Policy 18), but the remainder of the plan proposals for the town are now well out of date. The strategy envisaged for the town in 2001 has been very much different, with very significant levels of housing growth in the last decade and especially since 2014.



Plan B – 2001 Local Plan (Fairford Inset)

The Minerals Local Plan allocated a large area of land on the south western edge of the Parish below Horcott for aggregate working (Policy A7). There are no proposals

in the Waste Core Strategy that specifically affect Fairford.

The new District Local Plan contains a strategy for Fairford and makes a number of specific policy proposals, including two housing site allocations (see Policy S5 below).

**Policy S5**

**FAIRFORD**

**Housing**

**Allocated housing development sites:**

- F\_35B Land behind Milton Farm and Bettertons Close (49 dwellings); and
- F\_44 Land to rear of Faulkner Close, Horcott (28 dwellings)

**Employment**

**Protected existing employment sites:**

- Horcott Industrial Estate (EES26);
- London Road (EES27);
- Whelford Lane Industrial Estate (EES28); and
- New Chapel Electronics (EES29).

**Infrastructure**

The route for the multi-use path from Fairford to Lechlade along the line of the former railway will be safeguarded and, as part of any development proposal, contributions will be sought for the improvement of this link.

**Once contributions to delivery of infrastructure required in the South Cotswolds Sub Area (Policy SA1) have been made, development proposals will, subject to viability, be expected to help deliver or make appropriate contributions towards:**

- a. Improvements to the provision of footpath and cycle links between Fairford and the riverside, the Cotswold Water Park and canal route;
- b. The provision of suitable land for allotments; and
- c. The provision of suitable land for a burial ground.

The housing element proposals are not supported by the Town Council. Its intention is to propose in the FNP an alternative spatial strategy and policy framework that will deliver at least the equivalent scale of new homes but will also enable the delivery of essential social infrastructure.

The SA of the new Local Plan (see extract below) identifies some potential for



negative effects of the proposals but indicates that there may be mitigation measures that may overcome such effects.

#### Fairford

Four sites were appraised at Fairford:

- F\_32, Highgate, West End Gardens;
- F\_35B, land behind Milton Farm and Bettertons Close;
- F\_44, land to rear of Faulkner Close, Horcott; and
- F\_46, land between Horcott and Fairford.

The following table presents a summary of the appraisal findings.

SA Theme	Appraisal findings	Sites where significant constraints have been highlighted	Possible mitigation measures to limit potential significant effects
Environmental Quality	All four sites intersect a sensitive groundwater location (i.e. located within Source Protection Zone 1 (SPZ 1) and a principle aquifer).	All	Development at these sites should take place in conjunction with Environment Agency advice.

SA Theme	Appraisal findings	Sites where significant constraints have been highlighted	Possible mitigation measures to limit potential significant effects
Biodiversity	One proposed site, F_44 is located on an area of Biodiversity Action Plan Priority Habitat. The site also is located within 10m of a Key Wildlife Site.  The three other sites are located within 400m of a Priority Habitat.	F_44  F_32, F_35B, F_46	Retaining of existing habitats (i.e. features of biodiversity value) in-situ. Enhancement of ecological connections to and from site and creation of buffer zones (in conjunction with improved green infrastructure provision).
Climate Change	None of the sites are located within a Flood Zone 2 or 3 or intersect a surface water flood zone.	None	N/A
Historic Environment and Landscape	No sites intersect or are located in close proximity to a Scheduled Monument, Registered Park or Garden, conservation area or listed building. None of the sites are located within the Cotswolds Area of Outstanding Natural Beauty.	None	N/A
Land, soil and water resources	All sites, with the exception of site F_44 are located on Grade 3 agricultural land. It is uncertain whether this comprises the Best and Most Versatile Agricultural Land (i.e. Grade 3a rather than Grade 3b land).  All sites are located wholly on greenfield land. The sites are located over 11km from a Household Recycling Centre (this is not considered a significant constraint).	Potentially all except F-44 (depending on agricultural land classification).	Mitigation measures not possible if areas of the best and most versatile agricultural land are sterilised by development.
Population and Communities	No sites are deemed to be relatively deprived (i.e. in the 0-40% most deprived in Cotswold District). In terms of accessibility, all four sites are located at significant distance (over 10km) by public transport from a train station (this is not considered a significant constraint).	None	N/A
Health and Wellbeing	All of the sites are located over 400m from an area of public open space. All sites are located within close proximity to an amenity footpath; however F_35B may affect a Public Right of Way.	All	Whilst development is not likely to lead to significant effects in relation to this theme, new and/or enhanced open space/green infrastructure provision should be considered to meet any deficits.
Economy and Enterprise	All sites are located within 1km of a key employment site and the town centre.	None	N/A

In which case, it is proposed that the SA/SEA of the FNP will adopt the same set of sustainability objectives (without some measures that are not relevant to Fairford) and use the same baseline evidence to enable a valid comparison between the two plans.

### **Baseline Information (A2)**

The baseline evidence of the SA/SEA is summarised in Appendix A but is contained in more detail in the SA/SEA of the new Local Plan.

The Town Council is mindful that it is very difficult in most cases to measure impacts at this local scale as either the data is not reported at this scale and/or the impact is so relatively negligible that it cannot be measured. In which case, the SA/SEA framework will be used to inform judgements on the impact of the proposed policies in relation to any reasonable alternatives there may be.

### **Sustainability Issues (A3)**

Although the town shares its sustainability issues that are common to small, historic market towns in rural England, the recent unprecedented scale of housing development is in danger of making a range of those issues much worse if left unaddressed by the local development planning system.

Much of that recent development has been contrary to the last adopted land use strategy for Fairford, as a result of the lack of the five year housing land supply in the district. Each consented scheme was able to demonstrate that, on its own, it would not lead to a less sustainable town, but there has been little attempt to plan for the cumulative effects of major population growth on community services and facilities and on local transport and utilities infrastructure.

Whilst the new Local Plan originally intended not to make any further housing site allocations in the town, it now contains proposals for another 77 homes, with the possibility of almost 200 more on other sites with imminent planning applications. None of these proposals seek to address these wider sustainability issues and are therefore likely to make matters only worse in terms of access to services, especially local school places and health services.

The small town centre has a good basic mix of shops and services though these are under strong competitive pressures affecting all local 'high streets'. These also provide essential services to the wider rural hinterland population. But the town centre is significantly constrained by its wealth of heritage assets.

### **Appraisal Framework (A4)**

As noted in Section A1 of this letter, the Town Council proposes to establish the same framework of environmental, social and economic objectives as the SA/SEA of the new Local Plan. Most, but not all, of the same measures have also been selected in order to identify any likely significant environmental, social and economic effects.

## Objective 1 – Environmental Quality

To improve soil and water quality

- Will the FNP promote the clean up of contaminated land?
- Will the FNP protect or improve local water quality?

## Objective 2 – Biodiversity

To improve biodiversity and to protect habitats

- Will the FNP protect and enhance semi-natural and priority habitats?
- Will the FNP achieve a net biodiversity gain?
- Will the FNP create a well connected, multi-functional green infrastructure?

## Objective 3 – Climate Change

To cut down on energy consumption and to reduce flood risk

- Will the FNP promote the use of sustainable modes of transport and reduce the need to travel?
- Will the FNP ensure that no development takes place in areas at higher risk of flooding?
- Will the FNP ensure that flood risk is not increased by new development?
- Will the FNP sustainably manage surface water run off and ensure that the risk of surface water flooding is not increased?

## Objective 4 – Historic Environment & Landscape

To protect, maintain and enhance the cultural heritage resource of the Parish and the character and quality of its landscapes and townscape

- Will the FNP preserve and enhance buildings and structures of architectural or historic interest?
- Will the FNP protect the historic settlement pattern and distinctive character of the town?
- Will the FNP preserve and enhance the setting of cultural heritage assets?
- Will the FNP contribute towards local and national landscape character objectives?

## Objective 5 – Land Resources

To use natural resources prudently

- Will the FNP promote the use of previously developed land?
- Will the FNP avoid development of the best and most versatile agricultural land?

## Objective 6 – Population & Communities

To create a balanced community and economic opportunity and to improve access to a wide range of homes and to local services

- Will the FNP provide sites for mixed housing schemes and community facilities?
- Will the FNP help retain basic rural services?

- Will the FNP increase the self-sufficiency of the town?
- Will the FNP increase access to various services?

#### Objective 7 – Health & Well-being

To make the most of the area's relatively high standard of living and health

- Will the FNP improve access to the countryside for recreation for all age groups?

#### Objective 8 – Economy & Enterprise

To create opportunities for residents to find employment locally and for local businesses to flourish and to ensure the vitality and viability of the town centre

- Will the FNP promote tourism?
- Will the FNP support employment provision?
- Will the FNP enhance the vitality of the town centre?

#### **Statutory Consultation (A5)**

The conclusions of this consultation will be considered by the Town Council in finalising the SA/SEA assessment framework. That framework will then inform the formulation of the Pre Submission FNP and will be set out and employed in the accompanying Draft SA/SEA report. It is expected that draft FNP policies will be formulated and assessed against one or more reasonable alternatives to ensure any significant environmental effects have been identified and any necessary mitigation measures are included in the policies.

If you have any queries then please contact our planning consultant, Neil Homer, of RCOH Ltd at [neil.homer@rcoh.co.uk](mailto:neil.homer@rcoh.co.uk) or call him on 07833 462991.

We look forward to hearing from you.

Yours sincerely,

## Appendix A

### Baseline Data

Title	Source	Data	Trends and consequences
<b>Settlement Hierarchy</b>	District Local Plan, June 2016	<p>Fairford is defined in the Local Plan as a Principal Settlement. It has all of the following attributes:</p> <ul style="list-style-type: none"> <li>• A town centre</li> <li>• A good range of shops, both convenience and comparison</li> <li>• Local Employment</li> <li>• Pre-School and a Primary School</li> <li>• GP's surgery</li> <li>• Sports provision</li> <li>• Frequent public transport services</li> </ul> <p>"Fairford town centre has a day-to-day retail and service nature serving the nearby RAF airbase in addition to local residents. The Town centre also attracts tourists. Fairford has all the necessary community facilities, as well as schools and leisure provision".</p>	<p>The town benefits from a range of services and facilities, but they are vulnerable in rural areas.</p> <p>On the other hand, the schools and surgery are very popular and may need to expand to meet local demand in future years.</p> <p>The town has seen unprecedented levels of housing development over the last decade, which the Local Plan and FNP will seek to scale down to enable the provision of infrastructure to catch up in the coming years. To that end, the FNP will allocate sites for development within or adjoining the town but only of a small scale relative to the recent schemes.</p>
<b>Listed Buildings / Scheduled Ancient Monuments</b>	<p>British Listed Buildings</p> <p>Magic Map</p>	<p>There are 121 listed buildings, which is a significant amount given the size of the Neighbourhood Area.</p> <p>Most noticeably is Church of St Mary, which is Grade I listed. There are also 3 Grade II* listed buildings. The rest of the listed buildings in the Fairford Neighbourhood Area Are Grade II Listed.</p> <p>A map showing where the concentration of listed buildings can be found is in Appendix B of this letter (Plan C).</p> <p>There are two Ancient Scheduled Monuments in FNP area, Fairford Saxon Cemetery</p>	<p>The many heritage assets of the town appear well maintained and there has been no loss in recent years.</p> <p>The FNP must therefore be able to demonstrate that its policies acknowledge this wealth of special heritage interest by avoiding harm to that interest and by seeking to protect and allow for the appropriate improvement of heritage assets.</p>

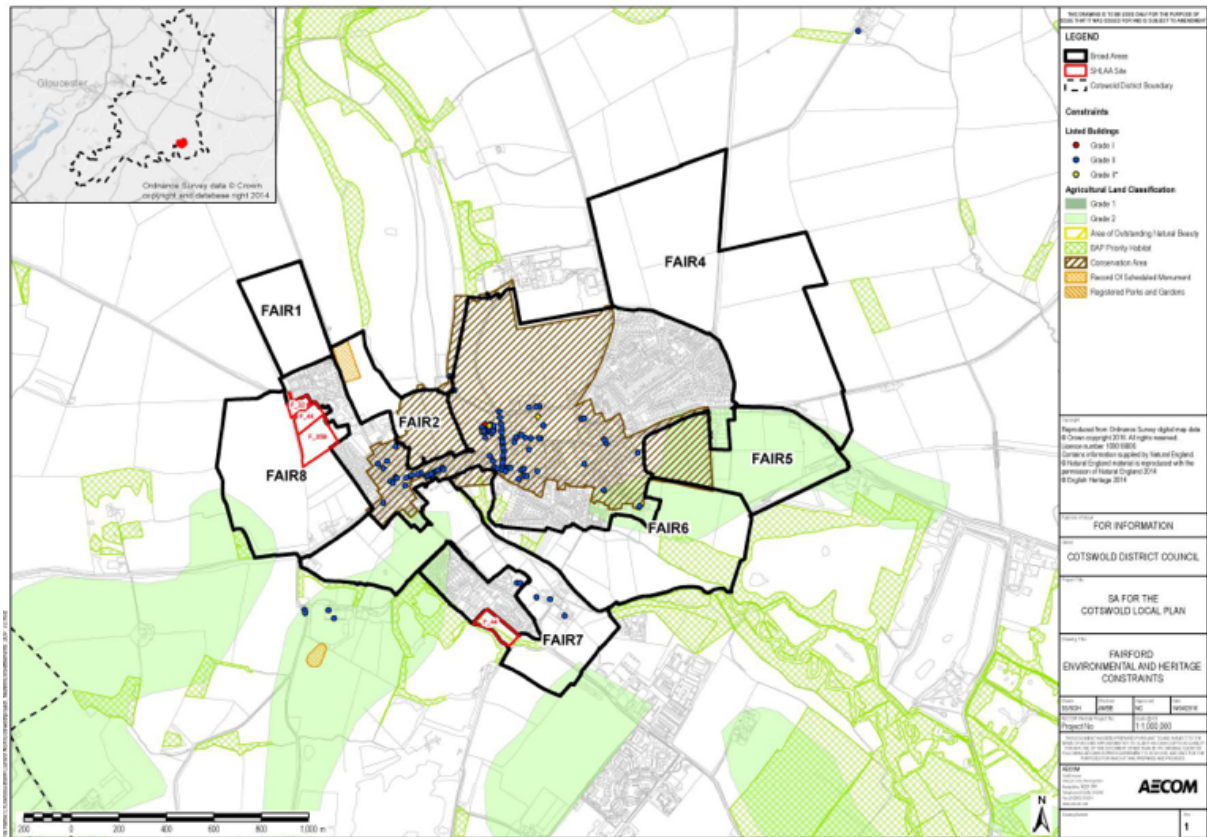
		and Hengiform barrow and associated ring ditch south of Burdocks	
<b>Conservation Area</b>	Local Plan	There is one conservation area in Fairford covering a large part of the town. A map showing the conservation area can be found in Appendix B Plan B of this Scoping Letter.	The character of the Conservation Area itself has been maintained but its setting has been altered by the large scale developments in recent years. It will therefore be essential that new proposals respect not just the integrity of the Area but also its setting.
<b>Landscape</b>	Study of land surrounding Key Settlements in Cotswold District: Update: November 2015	Fairford has been designated as being medium/high for Landscape Sensitivity.  The North of the town, but still within the Neighbourhood Area is designated as a Special Landscape Area.	The landscape setting to the town has changed considerably on its western and eastern edges over the last few years. The landscape character in these locations and elsewhere on the town's edges will require careful consideration by the FNP in establishing proposals and selecting any potential development sites.  The FNP policies will especially have to show they have responded to the designated special landscape area to the north of the town.
<b>Biodiversity</b>	Cotswold Local Plan Reg. 19 SA Report appendices  GCC Environmental Constraints Map (online)	There are the Whelford Meadow and Cotswold Water Park Sites of Special Scientific Interest (SSSI) in the south-eastern corner of the FNP area. Because of this, it means that the rest of the Neighbourhood Area falls within SSSI Impact Risk Zone.  The GCC environmental map identifies a series of Key Wildlife Sites (which are Biodiversity Opportunity Areas) to the SW of Horcott and east of the main town area.	The new Local Plan SA/SEA notes no degradation in these SSSIs and Key Wildlife Sites but there is a risk that further development in very close proximity may tip a balance in these ecosystems. The FNP should therefore look to grow the town and deliver new infrastructure in areas that are well beyond these natural assets and find ways of achieving a biodiversity gain.  SSSI Impact Risk Zones were developed by Natural England to make assessments of the potential risks posed by development. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and

			indicates the type of development proposals which could potentially have adverse impacts. This should be taken into account when permitting new developments in the Parish.
<b>Surface Water Flood Risk</b>	Environment Agency	There are areas of the town and its edges that are vulnerable to surface water flood risk (see Plan C).	The local community is concerned that the fast and extensive recent growth of the town is aggravating existing surface water flooding problems. It is therefore essential that the FNP spatial strategy seeks to avoid areas of known flood risk vulnerability and also requires new developments elsewhere can demonstrate there will be no harmful effects.
<b>River Water Flood Risk</b>	Environment Agency	From information provided by the Environment Agency, it has shown there to be high levels of river water flooding in the Neighbourhood Area, particularly though the Town Centre.  A large amount of the Town Centre and area to the east of the main town is Zone 3 flood risk (high/severe) with other adjoining areas in Flood Zone 2.  See Plan C	This type of flood risk is significant for the town and the FNP spatial strategy must avoid allocating any uses vulnerable to such risks in the identified flood zones.
<b>Social Factors</b>	Community Facilities  Sport/ Recreational Facilities	It is considered that Fairford fulfils the role of a Principal Settlement. In terms of retail there are 28 units in the town centre.  In terms of community facilities and services, including the secondary school, a leisure centre, and a small hospital. Fairford is placed joint third in terms of having the largest provision of community facilities in the district, and as such, its facilities play a 'major' role in	In terms of retail, and community facilities, Fairford plays a vital role in supporting its community, and other nearby settlements. As Cotswold District as a whole has no City Centres, making market towns such as Fairford vital, and ensuring the provisions are safeguarded or expanded even more important.

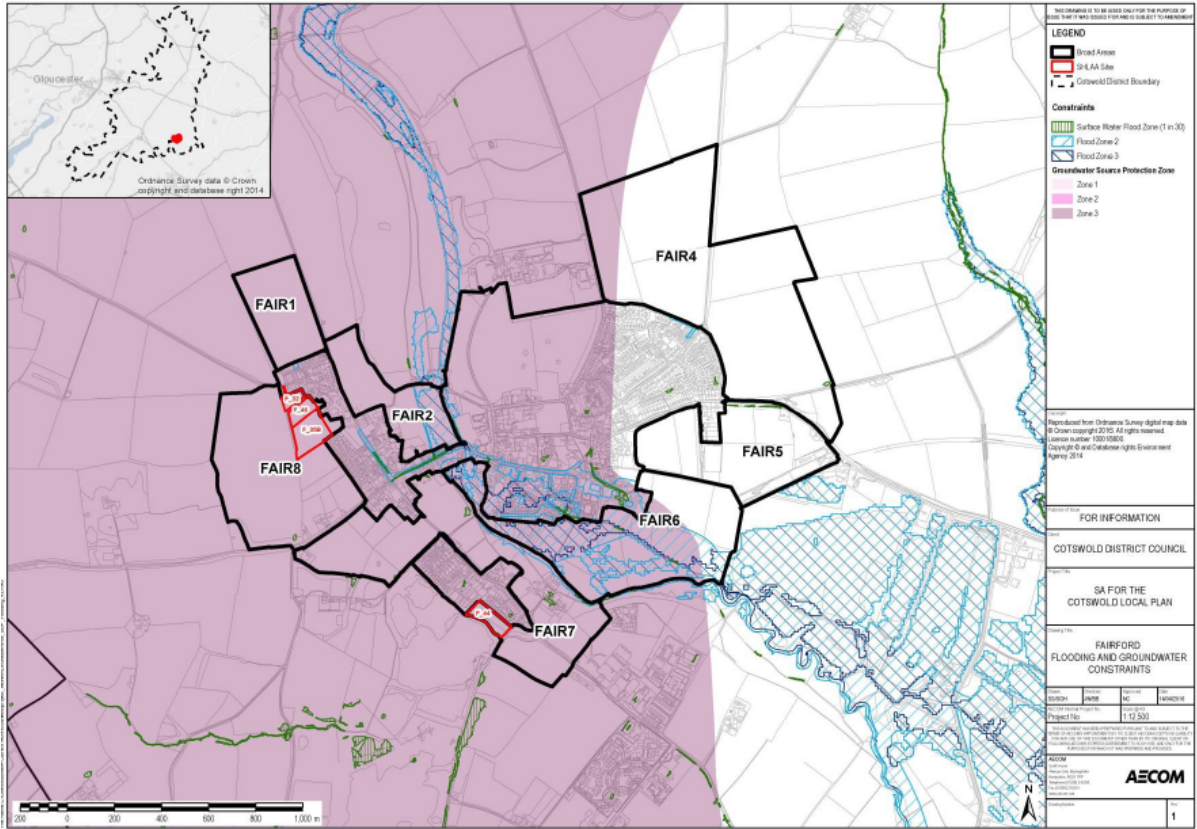
		the district, for surrounding areas not just for Fairford alone.	
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# Appendix B - Environmental Constraints Plans



Plan C - Cotswold Local Plan Reg. 19 SA Report appendices – Fairford



Plan D - Cotswold Local Plan Reg. 19 SA Report appendices – Fairford