FAIRFORD NEIGHBOURHOOD PLAN 2020-2031

CONSULTATION STATEMENT

VERSION 2.1 / 20-SEPTEMBER-2022

FAIRFORD

A GOOD PLACE TO BE

Contents

1 INTRODUCTION

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Fairford Neighbourhood Plan 2016-2031.

The legal basis of this statement is provided by Section 15 (2) of part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:-

I. Contain details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan,

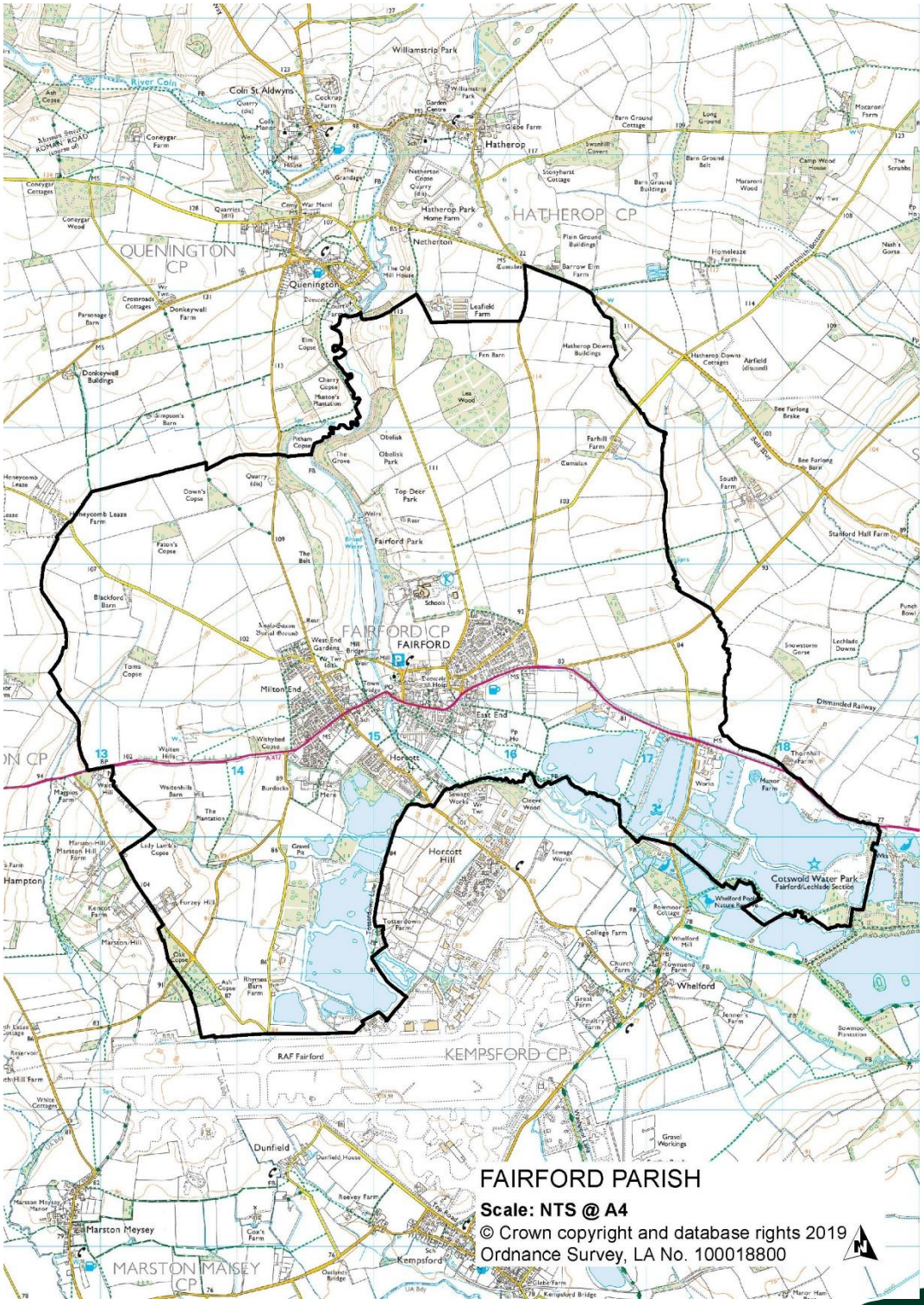
II. Explain how they were consulted,

III. Summarise the main issues and concerns raised by the persons consulted, and

IV. Describe how those issues and concerns have been considered and, where relevant addressed in the proposed Neighbourhood Development Plan.

2 AREA COVERED BY THIS PLAN

The Neighbourhood Area was designated by Cotswold District Council on 20th November 2013 following the statutory publicity and covers the whole of the parish but does not intrude into any of the adjoining parishes.



3 TIMETABLE AND HISTORY

ORIGINAL PLAN

The Town Council had striven for constructive engagement with residents over the development of the Town over many years. Three previous consultations had resulted in the comprehensive Fairford Health Check (2005), Fairford Horizon 2011-16 (2011) and Fairford Community Plan (2014). Following production of these, the Town Council resolved that the vision and aims from the Community Plan should be incorporated into a Fairford Neighbourhood Plan after full consultation with residents. Work began on the Plan in 2015, and it went for examination in October 2017. Parts of this Plan, including policies on flood risk and utilities, were rejected by the Examiner.

The original FNP was based upon the results of wide consultation with the local community. This process included leaflets, meetings, workshops, questionnaires, discussions and public consultation drop-in days, and there were invitations throughout to participate and to make comments. The results from this process, including the Household questionnaire and the Business questionnaire, and the issues identified and comments received, were carried over into the new FNP.

The Consultation Statement produced for this original Plan and an Addendum to it are in **Appendix 2**.

The key dates for the original Plan were:

Date	Event	Outcome/ comments
Nov 2011	Town Council carries out housing needs survey	
Aug 2013	Public meeting in Fairford -	sub-committee of councillors and residents formed;
Aug 2013	Neighbourhood Area Designation Request submitted to CDC	
Nov 2013	Neighbourhood Area designated by CDC	

Date	Event	Outcome/ comments
Feb 2014	Community Questionnaire sent out	Community Views clearly established
July 2014	Completion and adoption of Community Plan	Community plan published
June 2015	Town Council agreed to setting up of Neighbourhood Plan Steering Group	
January 2016	Questionnaire sent to every household in Fairford,	Good response analysed by GRCC. Issues determined
Sept 2016	Consultation open days	
Nov 2016	Start of Reg 14 consultation period	
Oct 2017	Reg 16 Examination	Plan rejected by Examiner Policies on Leafield Road site, Flood Risk and Utilities not accepted.

CURRENT PLAN

After discussion, a new Steering Group was formed to produce a revised plan with more robust evidence, and a professional investigation was commissioned to carry out groundwater monitoring and review flood risk in Fairford, based on the underlying geology (WRA November 2018). Subsequently, an independent company, AECOM, was commissioned by Locality to carry out site assessments and produce a Sustainability Appraisal. Evidence from these reports was used in preparing the new plan.

Current Steering Group Members are:

- Jon Hill and Margaret Bishop – Joint Chairs
- Cllr Richard Harrison
- Cllr Jennie Sanford
- Sarah Basley
- Cllr Andrew Doherty.

With much secretarial help from Fairford Town Council Deputy Clerk, Roz Morton.

Lizzie Garthwaite contributed to the Group in its early stages.

Various events during the preparation period impacted on the Plan. The Water Cycle Study carried out for the Cotswold District (JBA, 2015) predicted that the Sewage Treatment Works (STW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent water quality deterioration. The study further concluded that Fairford STW has limited spare capacity without the need for an upgrade.

CDC adopted its Local Plan in August 2018, and this plan allocated 2 sites for 61 (previously 77) additional houses in Fairford. Thames Water has investigated the problems of sewage and surface water flooding and published a Drainage Strategy for Fairford in 3 stages between 2018 and 2020.

Water Resource Associates (WRA) was commissioned to produce a report on flood risk and groundwater levels. This was published in November 2018, with the conclusions that "*There is no scope for SuDS drainage using infiltration in low-lying areas associated with the Coln alluvial corridor due to frequent high groundwater levels*". They pointed out that effective SuDS infiltration schemes require that groundwater levels are at least 1 m below the bottom of soakaways, and *"Ideally development would be directed away from the Coln and Court Brook corridor"*. This confirmed local feeling that areas south of the main road A 417 are unsuitable for building development and should be kept as green space for floodwater storage.

Preliminary recommendations of the Plan were presented to residents in March 2019. The feedback from this consultation supported the preferred site off Leafield Road. See **Appendix A** for details of presentation and residents' feedback.

In July 2019, CDC declared a Climate Emergency, and published their strategy for response in September 2020. Whilst national policy does not demand it, they note that increasing numbers of homes are being built to net zero carbon standards, and are developing an electric vehicle strategy that encompasses electric vehicle charging.

Since March 2020, there were unavoidable delays due to the Covid 19 restrictions.

In September 2020 the "Reg 14" (Pre-Consultation) version of the Plan was issued. Responses from consultees were collated and changes made to the Plan (see Section 4 below). Since then the Steering Group refined the policies but progress was slow due to Covid.

During 2021, Natural England changed the designation of the Sites of Special Scientific Interest (SSSI) within the Cotswold Water Park, and all the lakes within the vicinity of Fairford now have SSSI status.

After discussions with the landowners and developers, the site between Leafield Road and Hatherop Road was revised to include only the southern part of site F51B. AECOM updated their Site Assessment report and produced a final SA/SEA report.

Below is a summary of events leading up to the production of this Consultation Statement.

Date	**Event**	**Outcome/ comments**
Oct 2017	Fairford Neighbourhood Plan Steering Group formed to create a	

Date	Event	Outcome/ comments
	revised Plan with more robust evidence	
Oct 2017 – date	Regular meetings of the Steering Group, either by Zoom or in person.	
2018	CDC adopted its Local Plan	Fairford has to deliver 61 new dwellings
2018-20	Thames Water Drainage Strategy developed	
Nov 2018	Hydrogeological Survey of Fairford report produced (WRA 2018)	
Mar 2019	Open day for community consultation on seven potential sites.	See feedback in Appendix A
Apr 2019	AECOM produce Sustainability Appraisal (SA) of potential sites.	
Sep 2020	Fairford Neighbourhood Plan "Reg 14" (Pre-Consultation) version issued.	
Nov 2020	Period for comments from residents and statutory consultees ends.	Responses from residents and statutory consultees collated.
Jan 2021	CDC Habitat Regulations Assessment (HRA) Screening Report on Special Area of Conservation (SAC) near Cricklade issued.	
Mar 2021	Natural England (NE) change designation of Site of Special Scientific Interest (SSSI) North Meadow, Cricklade.	AECOM commissioned to update Site Assessments
May 2021	AECOM issue Addendum to Site Assessment (SA) Report.	Including an assessment of Yells Yard
Dec 2021	AECOM issue SA/SEA report	Final changes to Plan

Date	Event	Outcome/ comments
Feb 2022	Consultant Neil Homer produces the Basic Condition Statement (BCS).	
Feb 2022	AECOM produce HRA for CDC	CDC to review
Feb 2022	AECOM produce HRA for CDC to review and present to Natural England	CDC send HRA to NE who are not satisfied that assessment is robust enough to justify conclusion that proposals will not result in adverse effects
May 2022	Natural England concur with CDC's Appropriate Assessment (AA) of the AECOM HRA that "will not result in adverse effects on the integrity of any of the sites" near Cricklade.	Finalise FNP text and supporting documents (Basic Condition Statement and this Consultation Statement) accordingly
May 2022	Consultant Neil Homer updates the Basic Condition Statement (BCS).	
September 2022	"Reg 16" (Submitted) version of Plan issued to CDC Including this Consultation Statement and other supporting documents	CDC to review

Subsequent to the issuing of the "Reg 16" version of the Plan the following steps will take place:

- CDC appoint an Examiner.
- The Examiner examines the Plan.
- The Examiner issues his report.
- Either the Plan is accepted (with or without amendments) or it is rejected.
- If accepted:
    - CDC make any amendments required to the Plan.
    - A Public Referendum is held.
    - If more than half of the people who vote, vote in favour of the Plan:
    - CDC take the decision to make the Plan.

4 PRE-SUBMISSION CONSULTATION

A) COMMUNITY CONSULTATION.

After consultants AECOM had considered the 2017 SHELAA sites (from the CDC Local Plan) and carried out detailed assessments of all potential sites, they proposed seven sites as suitable for further consideration and assessment by the Steering Group, provided constraints could be overcome. There were no sites without constraints.

Factors considered in the Steering Group's appraisal included flood risk and groundwater levels, proximity to SSSI Lakes, Heritage considerations including settings of listed buildings and Conservation Area, etc.

An Open Day for community consultation was held on 14th March 2019, when information was presented to the public in a series of display boards. The public were asked to comment on seven key themes. These were:

- Natural and Historic Environment
- Climate Change, Spatial Strategy and Water Management Infrastructure
- Housing Provision and Mix
- Community and Business Infrastructure (including Highways)
- Local Economy and Town Centre
- Local Green Spaces
- Local Green Gap proposals

There was also a display of the seven sites which AECOM had selected as potentially suitable for development, with pros and cons, showing number of houses suggested for each site and giving the assessments from CDC SHELAA of 2017, from AECOM and from the FNP Steering group. The public were asked to "vote" (with stickers) on whether they would support housing on each site (Yes, No, Maybe). The revised Leafield Rd/Hatherop Rd site (southern part of F51b) performed much the best.

Further details and full results are given in Appendix A

B) STATUTORY CONSULTATION

The six-week Statutory Consultation for Draft Pre-Submission of the Neighbourhood Plan took place during the autumn of 2020 after the "Reg 14" version of the Plan was issued. During this period, the consultation was advertised in the Town Council Newsletter which is delivered to every household in Fairford, the Town Council Website, Neighbourhood Plan

website and the Town Council and local Facebook pages. Hard copies were available from? As Neighbourhood Plan Guidance requires, the following were consulted:

- Residents
- Community organisations
- Elected representatives
- Businesses
- Landowners
- Developers
- Active players in voluntary sector
- Government Organisations (Environment Agency, Natural England, English Heritage etc)
- Non-government statutory bodies (National Grid, Thames Water etc)

C) RESPONSES FROM STATUTORY CONSULTEES AND LAND INTERESTS

The responses from Statutory Consultees are collated in this document:

Document Name: Collated-Stat-consultees-responses.pdf

Link: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/Collated-Stat-consultees-responses.pdf

A summary of changes due to responses from Statutory Consultees and Land Interests is given below:

NATIONAL GRID

No record of assets in the Neighbourhood Plan Area: No changes required.

GCC HIGHWAYS (DANIEL TIFFNEY)

Found it to be a thorough plan and encouraged by the number and ambition of the objectives: No changes required.

GLOUCESTERSHIRE COUNTY COUNCIL (ECOLOGY)

support for conservation and enhancement of local biodiversity: Additional wording added in policies FNP10 and FNP11.

GLOUCESTERSHIRE COUNTY COUNCIL (LIBRARY)

Community facilities: New text added to FNP3.

MOD – DEFENCE INFRASTRUCTURE ORGANISATION

Supports principle of the plan and para 3.10: No changes required.

GLEESON

(Various): 5.2 and 5.6 re-worded (also for CDC). "Future" road added. p14.11 – kept

THE ERNEST COOK TRUST

(Various):

a) *Tourism etc*: This item *out of scope*, no changes required.

b) *Climate change*: Additional content noted and added.

c) *Community facilities*: No changes required.

d) *Access for visitors*: No changes required.

e) *Design standards*: No changes required.

f) *Non-designated heritage assets*: Noted, no further changes required.

g) *New visitor accommodation*: Addressed by FNP18. No further changes required.

KNIGHT FRANK (REPRESENTING MR R BLOCK)

a) *land west of Horcott Road*: FNP8 updated

b) *Bat house (No 30)*: To be kept as NDHA, no further action.

HANSON

(F_44) "not suitable": New hydrology evidence does not support site, consideration of new SSSI designation adjacent to and adjoining site. Proposed changes to development boundary on this site removed and current local plan site boundary kept. The reduction in the housing quota in the adopted Local Plan recognises that only part of the site may be developable.

COTSWOLDS WATER PARK

Noted Vision and Implementation Plan (2008) and Biodiversity Action Plan.

EARLSWOOD (BEAUMOOR PLACE)

Parking for Hilary Cottage Surgery: At the examination of the previous draft NDP in 2017 it was questioned whether car parking for surgery staff was a public rather than a private benefit. Also, despite significant efforts it could not be established that this facility would be used by the surgery staff and would therefore provide a public benefit to justify a 'less than significant' impact on the setting of Morgan Hall and the significance of this and the Conservation Area. In this plan the proposal is not considered viable, no changes required.

Meeting housing needs of ageing population: Specialist accommodation for older people or 'affordable' housing could still be provided in areas adjacent to the development boundary under policies H3 or H4 of the Local Plan, subject to other policy requirements. No changes required.

Support inclusion of F_38 within development boundary and suggest reference to windfall developments in FNP1: The inclusion of the site within the development boundary shown in the draft plan was an unintentional carry-over from the previous draft Plan. The acceptability of the scale of development proposed in the previous plan and the subsequent planning application (17/05185/FUL) was called into question by CDC's Conservation Officer, and this led to the latter planning application being withdrawn. This calls into question the deliverability of the site's housing contribution.

Suggest additional clause for policy FNP3: This is already covered by CDLP policy INF2 and chapter 8 of the NPPF (July 2021), which would be a material consideration in determining applications which might otherwise fail. It is a constant aspiration of Fairford Town Council to support improved community and other facilities in the town.

Object to P4.3 blanket requirement: P4.3 refers specifically to "Land … that is subject to high groundwater levels such that adequate and effective SuDS drainage systems cannot be

Object to FNP6 threshold for requiring Transport Assessments: Requirement reviewed and considered reasonable. No further change made.

Question viability of FNP14 requirements: Site F_51B is subject to less constraints than other potential smaller sites in and around Fairford, which generally either have drainage issues or are in close proximity to heritage assets. Additional coverage in the latest SA/SEA.

Dependence of FNP14 on upgrade to STW?: STW capacity is the same issue whether the housing capacity is achieved by one large site or multiple small sites. However, the requirement for upgrading is considered easier to determine for one large site. No further change made.

Additional allocation of smaller sites would provide choice: Given the various constraints on these smaller sites, this would provide less certainty for the delivery of the housing requirement. (See also NPPF para 73.) This choice may also be provided by additional windfall sites allowed for under CDLP policies, although see Para. 2.73 of FNP re. Infill. No further change made.

Housing allocations should be "at least" not "approximately": Housing capacity is determined by land area and type of housing to be provided (with appropriate factors) and we have been advised it should be stated as approximate. No further change made.

FNP14 does not include requirement for housing for older people: Both FNP14 and FNP15 refer to 'Lifetime Homes'. It should be noted that the FNP14 site is not particularly suitable for elderly people because of its location. More specialist accommodation (of which there is already a significant amount in Fairford) may be provided elsewhere under CDLP policy H4. No further change made.

Illustrative Master Plan proposal: Noted, but it does not seem to address all the issues raised by CDC on the previous withdrawn planning application. No further change made.

Issues on SAR assessment: We have reviewed and are satisfied that AECOM's assessment in the SAR is generally reasonable. No further change made.

Disagree with SHELAA assessment re heritage impact: Refer to the Conservation Officer's assessment on application 17/05185/FUL. Differences from 2017 SHELAA to be addressed in SA/SEA.

FRA and Drainage Strategy: It is well established that groundwater levels in Fairford vary significantly over longer periods. There does not yet seem to be sufficient evidence to give confidence in the deliverability of a scheme like that shown in the 'Illustrative Masterplan', although this might be achieved in the future. No further change made.

Failure to consider the site in the SA/SEA: Now included in 'reasonable alternative' options assessment.

PEGASUS

(This is part of the Earlswood Homes responses)

TURLEY (ON BEHALF RAINIER DEVELOPMENTS)

(F_39C, F_52) "not most suitable": Site discounted due to access, no further action.

Rainier have provided an updated illustrative scheme: Illustrative scheme is noted, but comes too late for inclusion in the NDP and does not address all the issues and suggestions raised by the Town Council. This is essentially an 'omission site' proposal.

FNP1: Land is not included within Development Boundary: The land is not included withing the development boundary because it was being proposed by FTC for employment rather than housing. It is still possible to include some housing related to employment outside the DB, under policy EC3.

FNP16: No explanation of how access could be delivered: This was suggested by FTC to Rainier but has apparently not been pursued with the owner of the Industrial Estate. In the absence of demonstrated deliverability, the proposed employment allocation has been dropped.

Illustrative Masterplan shows direct access onto A417: This is at a location where a smaller development has already been refused permission on highway safety grounds. The alternative of access to the employment development via the existing housing estate is not suitable.

Concern about how F_52 has been assessed relative to 51_B and 51_C: Considered in updated SA/SEA.

ABBEY MILL LAND

This response too late for plan but considered by AECOM SA/SEA separately. Considered as another 'omission site' proposal.

Evidence base not up to date or robust. No new call for sites since 2017 SHLAA: With no visibility as yet of sites submitted to the latest SHLAA round, we have relied on proactive approaches from landowners and a new assessment (by independent consultant AECOM) of those that were already under consideration. Subsequent to the

Regulation 14 consultation, an assessment of the Yells Yard site has now been included in and Addendum to the Site Assessment Report, on the same basis as the others.

Failure to make provision for small and medium house builders: F_51B is not a 'large site' in national policy terms. NPPF para 69 is relevant to local planning authorities. Para 70 now makes it clear that Neighbourhood Plan bodies can also allocate medium sized sites. FNDP has considered smaller sites, but these are already covered as 'windfall' sites by CDLP policy DS2. Site F_51B is subject to less constraints than other potential smaller sites in and around Fairford, and therefore gives greater certainty of deliverability.

No proper assessment of previously developed land: This is covered by National and Local Plan policies, as above. Land needed for all uses includes existing light industrial. Caravan storage use was refused consent when this was sought.

"up to 20 new high quality homes": This number is not reasonably achievable without extending into greenfield land (and the proposed Local Gap) outside the existing development boundary as was proposed by the recent planning application that was refused consent. There are also landscape and heritage setting issues with a subsequent smaller proposal that has not yet been determined.

"reduce the need for such an extensive area of productive best and most versatile (BMV) agricultural land to be permanently lost to residential development": No evidence has been provided that land at Leafield Road/Hatherop Road is 'best and most versatile'.

"local green space" : Part of the site lies within the Local Green Gap Policy, but is not designated as local green space.

Buildings in the site are curtilage listed / "Non-designated heritage assets are those not statutorily recognised i.e. not listed or within a Conservation Area"): The curtilage of the NDHA in question was re-drawn and no longer includes buildings within the site in question. Non-designated heritage assets can be identified separately within a conservation area.

GCC PROPERTY MANAGEMENT

(Coln House School): More suitable residential elsewhere technically too late for residential FNP.

COTSWOLD DISTRICT COUNCIL

(Various items)

a) *NDP and Local Plan*: Add "alongside the Local Plan" to 1.3.

b) *Dev boundary*: Minor rewording.

c) *F44*: Text changed to be explicit as to why discounted.

d) *FNP1 and dev boundary*: CDC consulted, and boundary finalised.

e) *FNP2 (Burial Ground)*: Added off street parking where feasible.

f) *FNP3 (Community facilities)*: Added map

g) *FNP4 (footnote)*: Noted.

h) *FNP5*

   i. *modify 5.1 to be clear as to what's in infrastructure*: No further action

   ii. *conflict 5.2 and 5.6:* Both items reworded

   iii. *5.8 – more definitive*: No further action.

i) **FNP6 (Traffic)** *GCC matter – threshold of 10 may be counterproductive*: kept 10 but re-worded.

j) **FNP9 (The Gap)** – *are we overriding the exception in the LP?* No, no action.

k) **FNP10 (River Coln valued landscape)**: Updated.

l) **FNP11 (Hedges and trees)**: Updated.

m) **FNP12 (Design)**: Updated.

n) **FNP13 (list and map reference clarity)**: Updates and refinements made.

o) **FNP14 ("bullets")**: Alphabetised list, noted will engage GCC Highways.

p) **FNP15** – *conflict with FNP12 and Electric vehicle charging "ready"*: re-drafted.

q) **FNP16** – *change of classes?* New classes used.

r) **FNP17** – *not just car parking*: Added walking/cycling.

s) **FNP18** – *visitor accommodation*: Reworded, town boundary redrawn.

HISTORIC ENGLAND

Conservation area appraisal: CDC have not prepared a Conservation Area Appraisal as such for Fairford, but we have produced a Character and Design Assessment and the Landscape and Local Green Spaces Study, which CDC have endorsed as meeting the immediate purpose. We are also now referring in the policy to taking account of any Conservation Area Appraisal or Management Plan in anticipation. There are also the original Fairford Conservation Area policy statement (1971) and the landscape assessments of the Special Landscape Area to the north of Fairford (White Consultants for Cotswold District Council).

The other points raised have been reviewed and addressed by the group and/or AECOM as appropriate.

There appears to have been some confusion over the location of sites 5 and 10, since some HE comments appear to refer to 10 which is not proposed in the plan.

NATURAL ENGLAND

NPPF para 112 note: Site 5 not considered to be "best and most versatile land" no changes made.

NB: In March 2021 the North Meadow site near Cricklade was designated a Site of Special Scientific Interest (SSSI) for which Natural England required a Habitat Regulations Assessment to be made. In 2022 this Assessment was made by AECOM for CDC and has been approved by Natural England.

THAMES WATER

(5.18) P5.18 updated.

FNP5: Statement requested by TW added to FNP5.

D) RESPONSES FROM RESIDENTS

The following (redacted) responses to the "Reg 14" submission were received from residents:

Document Name: Collated-residents-responses.pdf

Link: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/Collated-residents-responses.pdf

The following table summarises these responses and the replies thereto.

Response	Page	Response and reply
1	1	Support and thanks
2	2	Support but need access road
3	3	Surgery parking *We were unable to substantiate the proposed public benefit – letter from surgery, NDP Steering Group choose to have a policy that puts all the required housing in one place rather than several smaller scattered developments.*
4	4-5	Jones' Field in curtilage of Morgan Hall *This is not proposed in the NDP.*
5	6	Beaumoor never flooded *Acknowledged, but site known to be waterlogged at times.*
6	7-8	Beaumoor in scope *Site has been discounted.*
7	9-10	Lechlade – welcomes the report – impact on Lechlade – cycle path *Further response in more detail.*

Response	Page	Response and reply
8	11	Cannot cope with houses *The NDP is not able to prevent further development, it can only try to ensure the most suitable developments happen in the most suitable sites.*
9	12	Leafield road *Noted.* Green area *Noted.* No of houses *Noted correct figures.*
10	13	Several issues - 1. No houses *The NDP is not able to prevent further development, it can only try to ensure the most suitable developments happen in the most suitable sites. Note need for infrastructure to keep pace but the plan is for residential or business development.* 2. affordable? *NDP recognises the importance of affordable housing.* 3. School places *NDP must fit to the Local Plan which dictates a minimum of 61 houses in the plan period.* 4. Traffic *The link road has been introduced for this reason.* 5. Vote *Yes, the plan is subject to a referendum.* 6. Crime *Government directed and must fit into the Local Plan and dictates a minimum of 61 houses in the plan period.*
11	14	New development adjacent Keble Fields *Existing planning application, not in scope of the NDP.*
12	15	New development adjacent Keble Fields *Existing planning application, not in scope of the NDP.*
13	16	New development adjacent Keble Fields *Existing planning application, not in scope of the NDP.*
14	17	Paragraph 2.16 *The text in question has been subsequently updated.* FNP6 – Managing traffic in the town

Response	Page	Response and reply
		The NDP is unable to set traffic policy as part of development policy, notes and references to the issues observed have been added where appropriate. FNP13 – Conserving non-designated heritage assets *The NDP does now include policy text similar to that recommended.*

RESPONSE TO RESIDENTS

This template letter was used to respond to residents on 8 December 2020:

RE: Response to Fairford Neighbourhood Plan Regulation 14 Consultation.

Thank you for taking the time to respond to our Reg 14 Consultation. The Steering group has considered your comments and discussed them at length.

There seem to have been some misunderstandings about the relationship of some of the supporting documents with the draft Fairford Neighbourhood Plan itself and the constraints on the Neighbourhood Planning process. To clarify:

- If we are to have a Neighbourhood Plan with the planning protections and benefits including the additional share of Community Infrastructure Levy funding it brings, this needs to provide for at least 61 homes (net) in Fairford/Horcott, which is the number set by the allocations in the Cotswold District Local Plan. It may be prudent to provide for a few more, depending on the capacity of the site(s) chosen, particularly as the housing requirement is likely to increase if/when the new standard Housing Need formula is implemented for the District. Importantly, the neighbourhood planning process allows us to have a say over the location of these new homes.
- The selection of sites for allocation in a Neighbourhood Plan is required to be supported by a Site Assessment Report and an Environmental Assessment and/or Sustainability Appraisal of the options available. These reports were produced by independent consultant AECOM, appointed by Locality and funded under a Government neighbourhood planning grant. They reviewed all the sites in and around Fairford identified by Cotswold District Council as having the potential for housing or employment, identifying the pros and cons and assessing those passing an initial screening test against the agreed Sustainability criteria. The Neighbourhood Plan Steering Group then had to select which site or sites would on balance best meet the need for sustainable housing and the sustainability criteria, as identified in the reports.
- Just because a site was assessed in the reports, it does not mean it is currently developable. It will certainly not be so if it conflicts with the policies and boundaries set in the Local Plan and/or Neighbourhood Plan.
- Equally, some sites within the Development Boundary could be developed in accordance with Local Plan policies without the need for an allocation in the Neighbourhood Plan, subject to the other policies.
- Proposed changes to the Planning system, including the new standard formula for calculating housing need, are likely to mean that both the Local Plan and the Neighbourhood Plan will need to be reviewed much sooner than we would have liked, possibly within the next 2-3 years.

However, getting a Neighbourhood Plan in place now still has significant benefits for Fairford in terms of additional Planning protection and an increased share of Community Infrastructure Levy (to be used as the local community sees fit). The likely need for review also means that there may be an opportunity to reconsider proposals for some other sites that could offer additional community benefits including incremental provision of housing for people with local connections.

- As regards community support for this Neighbourhood Plan, we have previously consulted extensively on the options as well as commissioning the Sustainability Appraisal report. Assuming that the final version of the draft Plan passes independent examination, it will be put to a local referendum to decide whether it should be implemented. Circumstances permitting, we expect this to be in May next year.

In addition, each resident's specific questions were answered individually.

More details of comments and responses can be found at **Appendix 1**.

All these responses were analysed by the Steering Group and taken into consideration when reviewing the Plan policies.

5 SUMMARY OF CHANGES MADE

A Summary of Changes Made to the Plan due to Pre-submission Consultation.

DOCUMENT CHANGELOG (1.1.0 TO 1.2.0)

September 2022

Summary of Changes: The main changes are listed below; typographical and grammatical changes are not included here.

Page	Section	Para.	Change	Status
0	0	0	Version and date updated	Change
iii – vi	Intro	Various	Introductory text re-ordered and re-written – "Executive Summary" and "Foreword"	Change
vii	References	Various	Minor corrections to names and titles	Change
8	2	2.9	Removed reference to "eastern end"	Change
8	2	2.10	Removed reference to "retail/commercial"	Change
13	2	2.37	Amended connection speeds wording	Change
24	3	3.6	Removed "since 2012"	Change
31	5	Vision	Added contextual sentence	Change
35	6	6.4	Paragraph content deleted but numbering retained to keep following consistent.	Deletion
37	FNP1	FNP1.x	New numbering added for ease of reference	Change
39	FNP2	FNP2.1	New numbering added for ease of reference	Change
41	FNP3	FNP3.x	New numbering added for ease of reference	Change
45	FNP4	FNP4.x	New numbering added for ease of reference	Change
49	FNP5	FNP5.x	New numbering added for ease of reference	Change
53	FNP6	FNP6.x	New numbering added for ease of reference	Change
55	FNP7	FNP7.x	New numbering added for ease of reference	Change
57	FNP8	FNP8.x	New numbering added for ease of reference	Change
59	FNP9	FNP9.x	New numbering added for ease of reference	Change

Page	Section	Para.	Change	Status
59	FNP9	6.49	Updated references to supporting documentation.	Change
61	FNP10	FNP10.x	New numbering added for ease of reference	Change
63	FNP11	FNP11.x	New numbering added for ease of reference	Change
64	FNP11	6.57	Minor amendments to text	Change
65	FNP12	FNP12.x	New numbering added for ease of reference	Change
65	FNP12	FNP12.1 (a)	Text updated for clarity and accuracy	Change
67	FNP12	FNP12.2	New text to incorporate design code and/or conservation area appraisal into policy	Change
67	FNP12	6.62	Design code block moved into policy	Change
69	FNP13	FNP13.x	New numbering added for ease of reference	Change
71	FNP14	FNP14.x	New numbering added for ease of reference	Change
74	FNP14	6.75	Corrected and removed references to directions for sites (compass references)	Changes
74	FNP14	6.76	Corrected and removed references to directions for sites (compass references)	Changes
75	FNP15	FNP15.x	New numbering added for ease of reference	Change
79	FNP16	FNP16.x	New numbering added for ease of reference	Change
81	FNP17	FNP17.x	New numbering added for ease of reference	Change
81	FNP17	FNP17.1	Added “via Whelford Road”	Change
83	FNP18	FNP18.x	New numbering added for ease of reference	Change
85	FNP19	FNP19.x	New numbering added for ease of reference	Change
96	MAPS	MAP E	Key views map removed and replaced with historical environment and landscape designations map	Change
101	A3	1st section	Text and points removed as they are duplicates of that already included in policy	Change
101	A3	Key Views	Various updates to text and corrections to naming	Change

DOCUMENT CHANGELOG (1.0.9 TO 1.1.0)

February 2022

Document Name: 20220213-Changelog-(1.1.0).pdf

Link: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/Changelog-1.1.0.pdf

Summary of Changes: The main changes are listed below; typographical and grammatical changes are not included here but can be found in the referenced document.

Page	Section	Para.	Change	Status
0	0	0	Version and date updated	Change
iii	Our Vision	1	Added "and sustainable" after "sensitive"	Change
4	1	1.13	Updated current stage details	Change
5	1	1.15 – 1.19	Updated paragraphs asto reflect the stage completed to date and the current stage of the document.	Change
8	2	2.5 (4)	Replaced "serious" with "continuing harmful"	Change
8	2	2.9	Amended text to reference additional roads	Change
13	2	2.37	Replaced "Internet facilities are inadequate" with "Broadband speeds are poor."	Change
24	3	3.9	Amended reference to F44 to indicate it is considered unlikely to be developable, noted SSSI boundary change, moved F35B note to earlier in paragraph. Simplified ending to refer to the F51B.	Change
24	3	3.9	Changed F51B/C reference to "southern part of F51B"	Change
25	4	4.3	Corrected last sentence to refer correctly to website continuation	Change
27	4	4.11	F51B/C Reference	Change
30	5	5.4	Changed "By 2024 …" text to "Many more …"	Change
31	5	5.7 [4]	Added new sentence (b) referencing the sports/community building	Addition
35	FNP1	All	Update policy text and paragraphs as suggested by NH	Change
35	FNP1	6.5	Amended text to remove reference to Faulkner Close since we are not removing that location in our development boundary changes.	Change

Page	Section	Para.	Change	Status
41	FNP3	6.20	Added "now very" before "limited"	Change
47	FNP5	Policy 1 & 3	These blocks are not policy and have been moved to supporting text – 6.25, 6.26	Change
48	FNP5	Sub-heading	"Supporting Evidence" sub-heading removed	Change
51	FNP6	Policy 1	Moved last sentence "Transport assessments must …" into its own paragraph	Change
55	FNP8	Policy 2	Updated with new text	Change
55	FNP8	6.48	Updated with new text, amalgamating previous three separate supporting text paragraphs	Change
63	FNP12	Policy Text	Updated with new text	Change
64	FNP12	6.62	Updated with new text, amalgamating previous three separate supporting text paragraphs	Change
65	FNP13	P13.2	Moved the list of NDHA to Appendix 2 (replacing previous Appendix 2 content). Original appendix 2 content was determined as not being required	Change
65	FNP13	All	Updated with new text	Change
67	FNP14	Policy 1	Changed "proposes" to "allocates"	Change
67	FNP14	(b)	Added new list item to reference "FNP15: Housing Type and Mix"	Change
67	FNP14	(c)	Old (b) now references "FNP16: Zero carbon homes" for sustainable development	Change
68	FNP14	(b)	Split out reference to drop-off point and safe route to school into its own list item	Change
68	FNP14	Policy 3	Moved SAC mitigation paragraph from supporting text into the policy body itself	Change
69	FNP14	6.73 (Old P14.10)	Removed as better dealt with in §3.9	Change
71	FNP15	All	Split into FNP15 and "new" FNP16 – separating out housing type/mix and zero carbon related elements of policy	Change

Page	Section	Para.	Change	Status
73	FNP15	6.101	Removed 1st "therefore" (2nd sentence)	Correction
77	FNP17 (Old 16)	Para 3 & 6.95	This text moved from FNP17 to this location to go with zero carbon content. Removed redundant wording at beginning of 6.95 (referencing climate emergency declarations)	Change
77	FNP17 (Old 16)	P17.1 (Old P16.1)	Policy and supporting paragraphs on "BREEAM" moved to new FNP16 Zero Carbon	Change
77	FNP17 (Old 16)	Policy 1	Updated with new text	Change
79	FNP 18 (Old 17)	Policy 2	Updated with new text (2nd sentence)	Change
83	7	Para 4	Amended end sentence to add community reference	Change
83	7	Community Infrastructure Projects	Added new section heading, paragraphs and list to support agreed projects list	Addition
	Appendix 2	ALL	Old Appendix 2 replaced with new content (the migrated NHDA list)	Change
99	Appendix 3	"Key Views"	Added reference to the new "Fairford Views" map	Addition
	Appendix 4	Last para	Added "Further localised flooding was experienced in 2020 and 2021." at end	Addition
	Appendix 4	ALL	Appendix 4: FNP4 Supporting Evidence moved to separate document	Change

DOCUMENT CHANGELOG (1.0.7 TO 1.0.9)

November 2021

Document Name: 20211128-Changelog-(1.0.9).pdf

Link: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/Changelog-1.0.9.pdf

Summary of Changes: The main changes are listed below; typographical and grammatical changes are not included here but can be found in the referenced document.

Page	Section	Para.	Change	Status
0	0	0	Version and date updated	Change
ii	Flood Risk	3	Changed to "the Southern part of F51B"	Change
iii	Foreword	2	Removed reference to new squadron at RAF Fairford	Change
2	1	1.3	Added additional text suggested by CDC (from "Response Table")	Change
3	1	1.13	Changed to "Plan Process"	Change
7	2	2.3	Removed "trunk" from "A417 trunk road"	Change
7	2	2.5	Last bullet point changed "serious" to "harmful"	Change
8	2	2.8	Added "... bottleneck..." wording	Change
8	2	2.11	Added "... rural economy ..." wording	Change
9	2	2.15	Added text "... to schools and town-centre businesses,"	Change
9	2	2.16	Updated paragraph with latest text	Change
17	2	2.59-60	Updates to reflect changed plans at RAF Fairford	Change
18	2	2.62	Changed "defines" to "identifies"	Change
18	2	2.64	Changed "commerce-sourced" to "commerce-funded"	Change
19	2	2.67	Added "local" before "Character and Design"	Change
19	2	2.67	Added "has been prepared and" after previous change	Change
19	2	2.70	Changed "extremely limited." to "... private vehicles"	Change
21	3	3.2	Added 2021 to list of NPPF revision years	Change
21	3	3.2	Last sentence changed to note NPPG and NDC	Change

Page	Section	Para.	Change	Status
22	3	3.7	Added new explanatory text at end of bullet 1 (from "Response Table")	Change
24	3	3.9	Added note on withdrawal of F35B at end of paragraph	Change
35	FNP1	P1.4	Replaced "are not" with "should not"	Change
37	FNP2	P2.1	Bullet 2 – Added new text at end of paragraph	Change
40	FNP3	P3.5	Updated wording as per library service suggestions	Change
49	FNP5	P5.18	Updated with new Thames Water wording (from "Response Table")	Change
50	FNP5	P5.20	New paragraph with words Thames Water (from "Response Table")	Added
55	FNP8	P8.2	Edited to add "Local Green Spaces" and remove para 10.3.1 reference	Change
55	FNP8	P8.3	Updated NPPF references	Change
55	FNP8	P8.5	Added "Very special circumstances …" paragraph	Added
57	FNP8	P8.2	Changed to "the policies" (from "Response Table")	Change
58	FNP9	P9.4	Removed "distinctive" from "as a distinctive Local Green Space	Change
62	FNP11	P11.2 (b)	Added "within the site" at end of paragraph	Change
64	FNP12	P12.1	Changed to explicit reference to Policy EN2	Change
64	FNP12	P12.2 (c)	Added "relevant", change to "Design Code"	Change
66	FNP13	P13.2	NDHA list moved to main policy block – style and colour updated	Change
68	FNP13	P13.3	New policy paragraph (P13.3) – Incorporating beginning of old P13.6 "Non-householder development …"	Change
69	FNP14	FNP14.2	Changed bullet list to letter list for ease of reference	Change
69	FNP14	FNP14.2	Added "… in the layout for the future provision of a …"	Change

Page	Section	Para.	Change	Status
71	FNP14	FNP14.10	Added new bullet points (x3) with additional text from the reasonable justifications document in relation to this site	Added
71	FNP14	FNP14.11	Updated last sentence to reflect timing of developments and plan	Change
72	FNP14	P14.15	Added this new paragraph “SSSI IRZ / NE”	Added
72	FNP14	P14.16	Added this new paragraph “charging points”	Added
72	FNP14	P14.17	Added the new paragraph “… (SAC) …”	Added
77	FNP16	P16.3 (16.2)	Policy paragraph deleted (referred to Coln House school)	Deleted
77	FNP16	P16.4 (16.5)	Removed reference to Coln House School	Deleted
77	FNP16	P16.7	Policy paragraph deleted (referred to Coln House school)	Deleted
80	FNP17	P17.2	Updated references to use classes	Change
90	MAP C	MAP C	Latest Heritage Assets map applied	Change
97	A3	3	New paragraph – building with nature	Added

A1. MATERIAL FROM MARCH 2019 PUBLIC CONSULTATION

The work of the Fairford Neighbourhood Plan Steering Committee to date was presented to the public in a series of display boards. The public were asked to comment on seven key proposals. Seven potential sites for housing development were presented showing number of houses and the assessments from SHELAA, AECOM and NDP; the public were asked to "vote" (with stickers) on whether they would support housing on each site (Yes, No, Maybe).

A.1. PUBLIC VIEWS ON SEVEN KEY PROPOSALS

As transcribed from manuscripts.

NATURAL AND HISTORIC ENVIRONMENT

t) Good

u) Yes agree-really important and "gaps" need to be fought for

v) Green spaces need to be protected and it seems that they are being

w) Fencing which is a barrier to all wildlife should be banned, support your objective

x) Important to bear these in mind

y) Approve

z) We need to retain the natural environment

aa) We need to retain the green belt, once it is concreted over there is no going back

CLIMATE CHANGE, SPATIAL STRATEGY AND WATER MANAGEMENT INFRASTRUCTURE

a) Approve

b) Seems very sensible

c) Sewage is a problem as is flooding

d) Support your objective. Fairford needs to become carbon neutral. We should have local renewable energy, e.g wind and solar. Fairford should declare a climate emergency. FTC should set an example by becoming carbon neutral

e) Concerned about flooding and pressures on water supply

f) Housing, built to higher sustainable standards-Allotments

g) Ok

HOUSING PROVISION AND MIX

a) I think Fairford has had plenty of expansion and should be allowed to settle-No more building

b) Need more affordable housing

c) Support your objective, all new housing should have solar panels, there should be no more building on the flood plain

d) I agree affordable housing is needed for the younger generation

e) No more housing, or at least until better infrastructure-roads etc

f) Fairford has increased by 40% within the last 5 years. The town needs to be able to settle and get used to the additional population

g) Large scale development on the edge of the town will not help support the town centre. More likely to go elsewhere by car for shops

COMMUNITY AND BUSINESS INFRASTRUCTURE (INCLUDING HIGHWAYS)

a) And services- Risk of creating a divided community.

b) Housing has increased by 40%. There is no industry or commerce in Fairford so the option is to commute with the result local roads get very congested

c) Consideration needs to be given to London street. It is much more busy. Traffic across the bridge is dangerous at times

d) Leafield road is already a problem from 8.20-9.00am, so this would need looking at access improved

e) Definitely need more local employment. There should be no more housing without increased employment opportunities as increased commuting out of Fairford is not sustainable-support your objective

f) Concerns about parking in the town, no spaces

g) Use Coln house school as flats rather than build more houses, affordable 1 or 2 beds for younger people

LOCAL ECONOMY AND TOWN CENTRE

a) Encourage expansion of local businesses reduced rates etc-keep parking free

b) Agree-use of Coln House school site-mixture residential, small business, studio space. Local employment area priority

c) Local businesses need our support

d) Support your objective

e) New primary school is needed at Cirencester end

f) The town centre needs more shops

g) More shops and services

h) Small scale in-fill developments are more likely to support the town centre but they don't seem popular as far as comment stickers show. More affordable housing for local young people. Don't develop posh suburbs for out commuters

LOCAL GREEN SPACES

LOCAL GREEN SPACES: WALNUT TREE FIELD

a) Love it

b) Excellent facility

c) Very good facility-wonderful for the children

d) An excellent community space

e) Must be kept-wonderful space for youngsters of all ages

f) Central, important to keep this empty community resource

g) All green local spaces are important to the character of Fairford and the well being of its inhabitants

h) It's a brilliant space, Would love to see a better skate park

i) Essential green space

j) Keep

LOCAL GREEN SPACES: UPPER GREEN

a) Keep

b) Beautiful space

c) This is essential for the character of Fairford

d) Historic space and an asset to the town

LOCAL GREEN SPACES: COLN HOUSE SCHOOL PLAYING FIELD

a) Would be fabulous to protect this green space

b) Public open space

c) Keep

d) This would be good to keep it as it is

e) Potential for opportunity to be an asset facility for the town

f) Should be maintained for the use of the community

g) Keep for the community

h) The Horcott gap is important

LOCAL GREEN GAP PROPOSALS

a) Endorse local green gap proposals

b) Good

c) No preference

d) Support

e) Do not allow any development

f) Important to maintain space between Horcott and Fairford

g) Area of Special Landscape Value

h) Homeground and Morgans Ground needs to be protected as green space-its such an area of local beauty used by my children as a perfect place to enjoy and play

i) Problem of balance-gaps needed and preservation of countryside - not spilling into surroundings

j) Good

k) Need to protect

l) Parking is a problem at the schools. Farmors school should allow parking on their playing field

m) Asset to the town

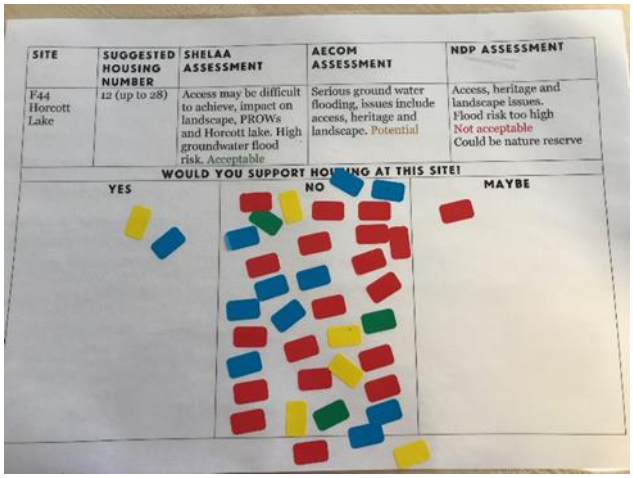
A.2. PUBLIC VOTING ON SEVEN POTENTIAL SITES:

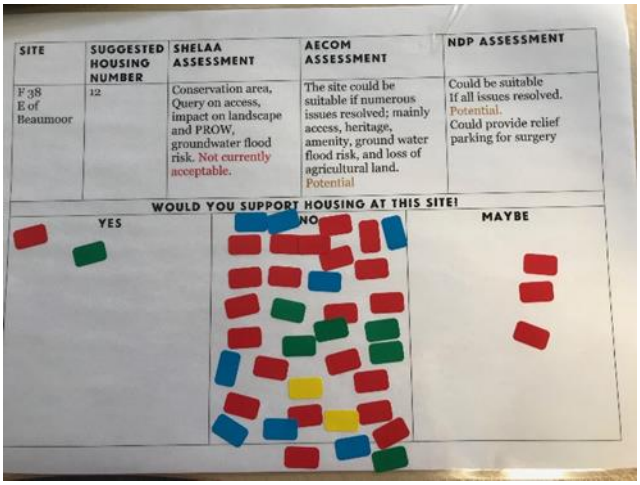
DO YOU SUPPORT HOUSING ON THIS SITE?

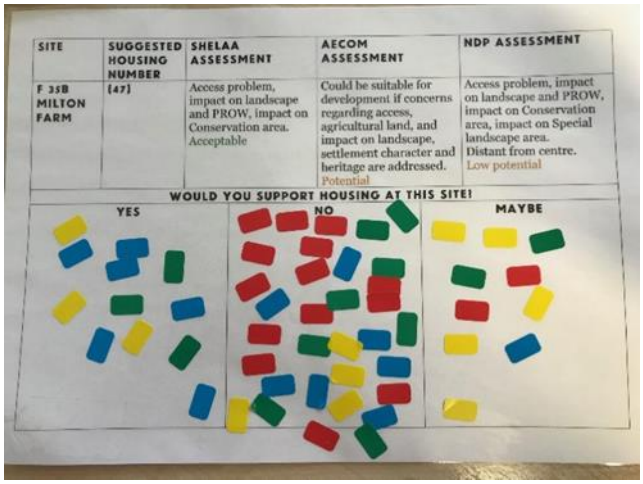
Site	Location	Yes	No	Maybe	Total	Yes (%)	No (%)	Maybe (%)
F_44	Faulkner's Close (Horcott Lake)	2	37	1	**40**	5%	93%	3%
F_35B	Milton Farm	12	33	10	**55**	22%	60%	18%
F_38	East of Beaumoor Place	2	38	3	**43**	5%	88%	7%
F_15	Jones's Field	8	31	12	**51**	16%	61%	24%
F_51B/C	Leafield Road	41	15	9	**65**	63%	23%	14%
F_39C	South of London Road	5	23	10	**38**	13%	61%	26%
F_52	West of Terminus Cottage	0	26	7	**33**	0%	79%	21%

VOTING BOARDS USED

Photographs of the various voting board used follow.



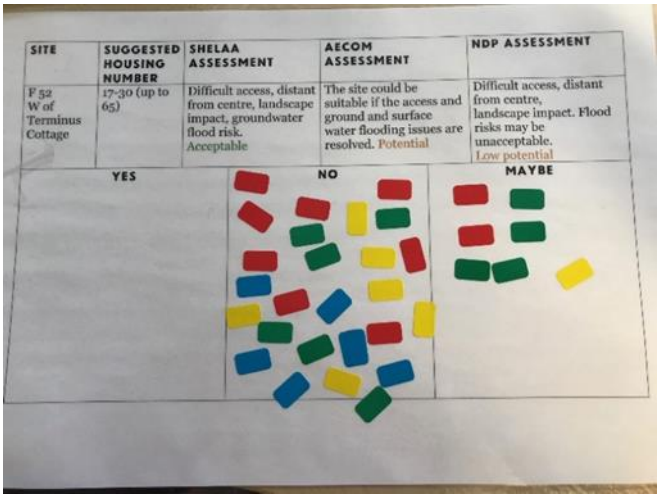




SITE	SUGGESTED HOUSING NUMBER	SHELAA ASSESSMENT	AECOM ASSESSMENT	NDP ASSESSMENT
F 15 Jones Field	About 20 (up to 50)	Conservation area, limited access, impact on landscape and PROW, (Morgan Hall) Acceptable.	The site could be a suitable development location if the issues relating to access, heritage, and loss of agricultural land are resolved. Potential	Could be suitable if access and heritage issues mitigated. Potential. Could provide Parking area and allotments

WOULD YOU SUPPORT HOUSING AT THIS SITE?

YES NO MAYBE



SITE	SUGGESTED HOUSING NUMBER	SHELAA ASSESSMENT	AECOM ASSESSMENT	NDP ASSESSMENT
F 52 W of Terminus Cottage	17-30 (up to 65)	Difficult access, distant from centre, landscape impact, groundwater flood risk. Acceptable	The site could be suitable if the access and ground and surface water flooding issues are resolved. Potential	Difficult access, distant from centre, landscape impact. Flood risks may be unacceptable. Low potential

YES NO MAYBE

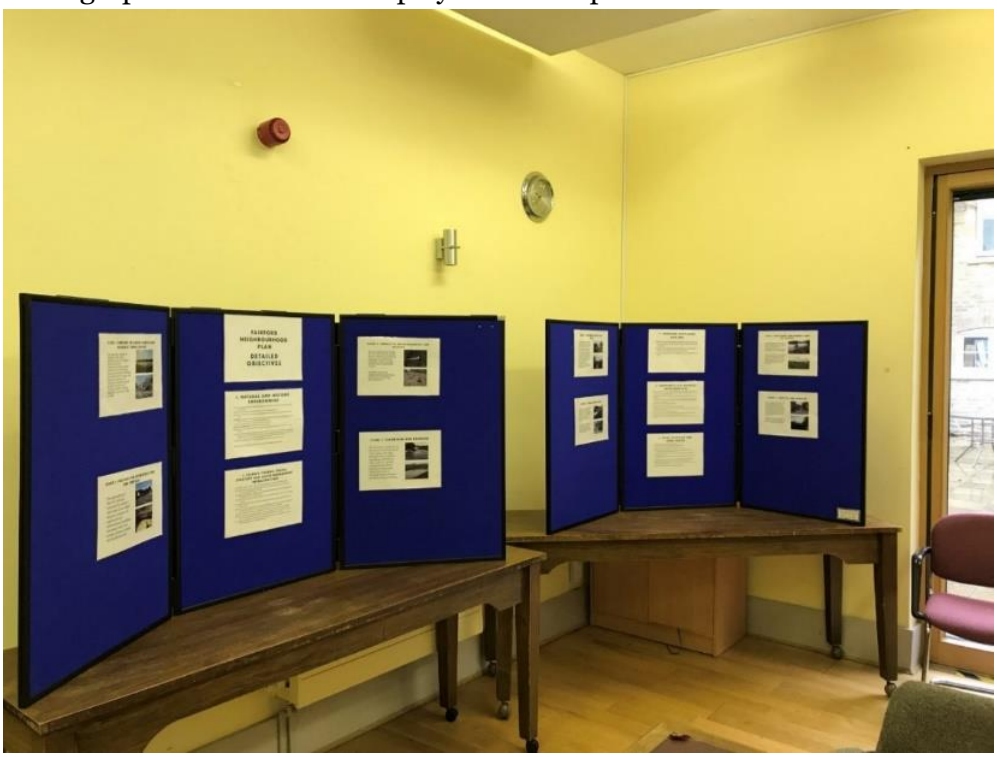
SITE	SUGGESTED HOUSING NUMBER	SHELAA ASSESSMENT	AECOM ASSESSMENT	NDP ASSESSMENT
F 39C S of London Road	32	Access problem, landscape impact, groundwater flood risk. Acceptable	The site could be suitable if the access and ground and surface water flooding issues are resolved. Potential	Access could be via Industrial site. Flood risks may be unacceptable. Low potential. Could be employment site

WOULD YOU SUPPORT HOUSING AT THIS SITE?

YES NO MAYBE

PUBLIC CONSULTATION DISPLAYS

Photographs of the various displays from the public consultation follow.



A2. MATERIAL FROM 2017 NEIGHBOURHOOD PLAN.

Original material from the 2017 consultation statement can be found in the following documents and locations.

2017 CONSULTATION STATEMENT

Document Name: FNP-Consultation-statement-Feb-2017-Final.pdf

Link: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/FNP-Consultation-statement-Feb-2017-Final.pdf

2017 CONSULTATION STATEMENT APPENDICES

Document Name: FNP-Consultation-Statement-Appendix-Feb-2017-Final.pdf

Link: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/FNP-Consultation-Statement-Appendix-Feb-2017-Final.pdf