

21 September 2017

Mr Andrew Ashcroft  
Independent Examiner  
Fairford Neighbourhood Plan  
C/o Cotswold District Council  
Trinity Road  
Cirencester  
Gloucestershire  
Gl7 1PX

Dear Mr Ashcroft

**FAIRFORD NEIGHBOURHOOD PLAN EXAMINATION  
COTSWOLD DISTRICT COUNCIL ADDITIONAL RESPONSE DATED 19 SEPTEMBER 2017**

I refer to the Statement issued 19 September 2017 by Cotswold District Council (“the Council”) in response to your request for clarification about the Council’s assessment of Site FNP16 Leafield Road. In response, Gleeson Strategic Land (“Gleeson”) comment as follows.

The Council seeks to rely on the White Reports<sup>1</sup> as the foundation for their landscape and visual objection to Site FNP16. Given this, it is regrettable that Site FNP16 has not been assessed by the White Consultants so as to place it on an even footing as those sites considered and assessed through the earlier version of the Strategic Housing and Economic Land Availability Assessment – rather their assessment relies solely on the views of the Council’s own officer. Regardless, I consider the broad approach that the Council has outlined as to their consideration of landscape impacts for Site FNP16 appears reasonable, and I expect nothing less as this appears not too dissimilar to the approach taken by other Local Planning Authorities.

Assessment of landscape and visual impacts ultimately requires ‘judgements’ to be made about likely impacts. The Landscape and Visual Impact Assessment (“LVIA”) prepared by ACD Environmental and submitted by Gleeson acknowledges the degree of subjectivity to these types of assessments, namely: -

*“The predictions and extent of effects cannot always be absolute. It is for each assessment to determine the assessment criteria and the significance thresholds, using informed and well-reasoned professional judgement support by thorough justification for*

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<sup>1</sup> Study of land surrounding Key Settlements in Cotswold District (June 2000); and Study of land surrounding Key Settlements in Cotswold District: Update (October 2014).

*their selection, and explanation as to how the conclusions about significance for each effect assessed have been derived...*" (Paragraph 3.5)

The aim of the LVIA prepared by ACD Environmental was to provide a full assessment of the potential landscape and visual effects of a proposed development upon the receiving landscape, in line with current legislation and guidance. It comprises two main assessments, the first for landscape and the second for visual effects.

All development brings about some degree of change. The planning issue for consideration is the scale and degree of this change and whether there is harm arising that 'significantly' and 'demonstrably' outweighs the planning benefits derived by FNP16.

It is evidenced by the 2000 White Report at paragraph 10.8 that *"the abrupt and visually harsh edge between the modern housing and the landscape means that such areas are not integrated within the landscape setting"* of Fairford. Paragraph 10.3 also acknowledged that Fairford has expanded to accommodate a considerable amount of modern development and that this is most evident in the north eastern quadrant of the town. The same quadrant which abuts Site FNP16 to the south. The 2000 White Report goes on in its analysis to confirm that the site is not *"important setting to settlement"* (see Figure F4). Accordingly, by connotation this is a less sensitive edge to the town than other locations in landscape and visual terms. That is not to say that it is automatically acceptable in planning terms, I merely imply the Council's evidence base upon which it relies suggests that this location is a possible receiving environment for new development.

The submitted LVIA assessed a total of 17 viewpoints, selected on the basis of being representative of key views or receptors in the surrounding landscape. Of these viewpoints assessed a total of 4 viewpoints<sup>2</sup> were judged by ACD Environmental as being 'significant' due to the limited visual barriers between the site and the receptor location. With the exception of 1 of these 4 viewpoints they all abutted the Leaffield Road site boundary.

Specific mitigation strategies are being explored and worked within a scheme currently. Such mitigation includes: -

- (i) A maximum of 80 residential units, which are limited to 2.5 storeys in height;
- (ii) Retention of all existing vegetation;
- (iii) Inclusion of public open space in which strategic tree planting will be included;
- (iv) Development is to be kept back from the site boundaries by at least 5 metres in order to provide space for parkland scale planting. Tree species to be selected to reflect local character, for example species which are found within adjacent hedgerows and Fairford Park;
- (v) Materials that from the external envelope and roof are to match the surrounding existing properties whilst also adhering to the design objections and policies set out within the Fairford Neighbourhood Plan;
- (vi) Landscape features which are typically found within the surrounding landscape are being incorporated into the emerging proposals, including natural stone walls, intermittent pockets of tree planting and open spaces, etc.
- (vii) At key locations outwardly looking views over the surrounding landscape are being maintained;
- (viii) A dense vegetation barrier is to be interplanted around the site; and

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<sup>2</sup> Viewpoints 1, 6, 7 and 8 (see pages 40, 45, 46 and 47 of the submitted LVIA)

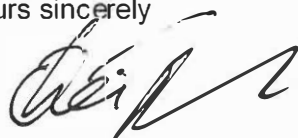
- (ix) New woodland planting is to be included within the northern extent of the site to specifically mitigate the 'significant' view from viewpoint 6 and other locations along the Public Right of Way.

I acknowledge that with the forms of mitigation being proposed, vegetation growth and weathering, significant visual impacts would remain for the 3 viewpoints<sup>3</sup> abutting the Leaffield Road site boundary. For all the remaining receptors (14 in total) the views of the proposed development have been judged to remain largely unchanged or to have only glimpsed views at such distances that it would be difficult for the causal viewer to appreciate the difference. As such and in my respectful submission, viewpoints 1, 7 and 8 represent the only material impact on either the character or appearance of the open countryside location, and it follows that there will be no material landscape effect beyond the site itself or its immediate confines. It further follows that any landscape harm is highly confined.

It is the professional opinion of my advisors (ACD Environmental), who have undertaken a detailed and objective site specific assessment of the likely landscape and visual effects development may have, that when the site is assessed in the context of the wider landscape, the visual impact would be reduced, visually blending in with the surrounding landscape. Accordingly, in my respectful submission the Council grandly elevates the alleged harm as applying to Site FNP16 and this edge of Fairford. This is clearly an exaggeration because upon ACD Environmental's site analysis there is no such impact. Further, the impact confined to the site will not (and cannot) change the landscape character of this part of Fairford which remains urban fringe. The visual impact is highly localised and is the sort of impact which will inevitably arise if housing land is to be made available anywhere within Fairford to meet the District's own objectively assessed housing need.

I trust you agree and I await your report on the examination of the Fairford Neighbourhood Plan with great interest.

Yours sincerely



**Oliver Taylor, MSc (Dev. Plan) MRICS MRTPI**  
**Strategic Land Manager**

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<sup>3</sup> Viewpoints 1, 7 and 8 (see pages 40, 46 and 47 of the submitted LVIA)