

# Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) for the Fairford Neighbourhood Plan

SA Report to accompany the submission version of the  
Neighbourhood Plan

Fairford Town Council

December 2021

## Quality information

<b>Prepared by</b>	<b>Checked by</b>	<b>Verified by</b>	<b>Approved by</b>
Rosie Cox Senior Environmental Planner	Alastair Peattie Associate Director	Nick Chisholm Batten Associate Director	Nick Chisholm Batten Associate Director

## Revision History

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**Prepared for:**

Fairford Town Council

**Prepared by:**

AECOM Infrastructure & Environment UK Limited  
3rd Floor, Portwall Place  
Portwall Lane  
Bristol BS1 6NA  
United Kingdom

T: +44 117 901 7000  
aecom.com

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# Non-technical Summary

## What is a Sustainability Appraisal?

A sustainability appraisal (SA) has been undertaken to inform the Fairford Neighbourhood Plan (FNP). This process is required by the Strategic Environmental Assessment Regulations.

Neighbourhood Plan groups use SA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

## What is the Fairford Neighbourhood Plan?

The FNP has been prepared as a Neighbourhood Development Plan under the Town & Country Planning Act 1990 and Planning & Compulsory Purchase Act 2004, as amended by the Localism Act and the Neighbourhood Planning (General) Regulations 2012. The FNP presents a plan for the town of Fairford for the period to 2031. The area covered by the FNP is shown in **Figure 1.1**.

Prepared in the context of the Cotswold District Local Plan (2018), the FNP sets out a vision and range of policies for the neighbourhood area. The Fairford Neighbourhood Plan is being submitted to the Cotswold District Council for their consideration under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, as amended.

## Purpose of this SA Report

This SA Report, which accompanies the Submission version of the FNP, is the latest document to be produced as part of the SA process. The first document was the SA Scoping Report (May 2018), which includes information about the neighbourhood area's environment and community. The second document was the SA Report which accompanied the Regulation 14 consultation version of the FNP, in 2020.

The purpose of this SA Report is to:

- Identify, describe and evaluate the likely significant effects of the FNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SA process which has been carried out to date.

The SA Report contains:

- An outline of the contents and main objectives of the FNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SA Framework of objectives against which the FNP has been assessed;
- The appraisal of alternative approaches for the FNP;
- The likely significant environmental effects of the FNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the FNP; and
- The next steps for the FNP and accompanying SA process.

## Assessment of reasonable alternatives for the FNP

The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the ‘plan and reasonable alternatives taking into account the objectives and geographical scope of the plan’.

FTC have explored a number of policy options that are presented in FNP Appendix C: Strategy Options. Appendix C considers the main strategy options, in terms of policies, to meet the FNP objectives. Options are considered for the following topic areas:

- Housing allocations
- Town centre and local economy
- Spatial strategy for facilities
- Infrastructure contributions
- Green space/ countryside
- Preferred direction for future growth

As the delivery of new housing through the Neighbourhood Plan is what is most likely to have a significant effect, it was determined that this issue should be the focus of the consideration of alternatives through the SA process. The other topic areas, set out above, are not considered likely to result in significant effects and therefore are not considered through the assessment of reasonable alternatives.

The task of establishing reasonable alternatives for the delivery of new housing involved giving consideration to ‘top-down’ factors (strategic issues/ higher level policy) and ‘bottom-up’ factors (site options), before finally bringing the evidence together and establishing reasonable alternatives.

### Top-down considerations

The adopted Cotswold Local Plan (2018) sets out Fairford’s role as a ‘Principal Settlement’ (Policy DS1 (Development Strategy)) and allocates two sites within the town to deliver a total of 61 new dwellings (Policy S5 (Fairford)):

- F\_35B Land behind Milton Farm and Betterton’s Close (49 dwellings); and
- F\_44 Land to rear of Faulkner Close, Horcott (12 dwellings).

The Local Plan indicates (para 7.8.8) that because of pressure on infrastructure in Fairford, any large development should be towards the latter part of the plan period.

In 2018, FTC commissioned a comprehensive study on the hydrology and geology of the area (WRA), including groundwater levels. The results have informed subsequent work, which indicates that the site F\_44, Land to the rear of Faulkner’s Close, is unsuitable for development due of high flood risk.<sup>1</sup> Additionally, since the adoption of the Local Plan, Site F\_35B (Milton Farm) has been withdrawn, and is no longer available for development.

FTC are therefore seeking to allocate an alternative site through the FNP to deliver the 61 homes supported through the Local Plan. FTC wish to allocate a site which is more sustainable (i.e. has a reduced level of flood risk) and will provide an increased level/ mix of housing to meet local needs in line with the objectives of the FNP. FTC has been working with CDC to ensure that the proposals of the FNP are acceptable.

### Bottom-up considerations

The second step involves identifying the site options that are potentially in contention for allocation through the FNP. This process was led by FTC, with support from AECOM (through a ‘Site Options Assessment’ technical support package).

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<sup>1</sup> WRA (2018) Groundwater Monitoring and Review of Flood Risk at Fairford

Site selection for the FNP began with the Cotswold SHELAA (2017). Sites identified within the SHELAA as being included in error, withdrawn or duplicated; where development has been completed and/ or construction has started and that fall outside the neighbourhood area were not carried forward for consideration through the site assessment process.

The remaining sites identified through the SHELAA along with any additional sites proposed (based on the evidence available and consultation carried out by FTC), were assessed through the AECOM Site Assessment Report (2019).

Since 2019, a Site Assessment Report Addendum was produced in 2021 by AECOM, to reflect updated evidence and take account of the representations received through the Regulation 14 consultation on the FNP (December 2020). The following updates are of relevance for the SA:

- A new site 'Yells Yard' (Site 12) has been submitted to the Town Council for consideration through the FNP, and the SOA Addendum concludes the site is potentially suitable for development.
- Site 1 Land to rear of Faulkner's Close (F\_44) now intercepts with the recently notified extension of the Cotswold Water Park SSSI designation. Combined with previously identified constraints (notably access, ground water flood risk, heritage, biodiversity and landscape) the site is not considered suitable for development through the FNP.
- Site 3 Land Behind Milton Farm and Betterton's Close (F\_35B) is no longer available, nor deliverable and therefore not suitable for consideration through the FNP.
- Site 8 Land east of Beaumoor Place is being proposed for only ten new homes including five retirement homes and space for surgery parking.
- It is also noted that Site 5 'The southern half of Land north of Crabtree Park & Land off Leaffield Road' is now referred to as 'Land between Leaffield Rd. and Hatherop Rd'.

The conclusions of the AECOM Site Assessment Addendum (2021) are set out in **Table 4.1** of the main report, along with the site name, area in hectares, SHELAA reference, and SHELAA summary findings.

Of the sites identified, the following six are considered 'potentially suitable', and are therefore appropriate to consider as potential allocations through the FNP, if constraints are overcome:

- New Site 5: The southern half of Site 5 - Land between Leaffield Rd. and Hatherop Rd. (SHELAA Ref F\_51B & F\_51C)
- Site 7: Jones' Field (SHELAA Ref F\_15);
- Site 8: Land east of Beaumoor Place (SHELAA Ref F\_38);
- Site 10: F\_39C Field south east of granted planning permission at London Road; and
- Site 11: Land west of Terminus Cottage and Station (F\_52)
- Site 12: Yells Yard

These six sites were taken forward for further consideration by FTC.

The red line boundary of New Site 5 has since been amended to include only its southern part. The site no longer abuts Leaffield Road, following the field boundary and adjoining Hatherop Road to the east. The site will now be referred to as 'new site 5' (See **Figure 4.1** below).

## Appraisal of site options

To support the consideration of the suitability of these sites, the SA process has undertaken an appraisal of the key environmental constraints present at each of the sites and potential effects that may arise as a result of development at these locations. In this context the sites have been considered in relation to the SA Framework of objectives and decision-making assessment questions developed during SA Scoping (**Section 3.3** in the main body of this SA Report) and the baseline information.

The location of these sites can be seen in **Figure 4.1** in the main body of this SA Report.

Tables AB.1 – AB.6 within Appendix B presents the appraisal of the six site options and provide an indication of each site’s sustainability performance in relation to the eight SA themes. Summary findings of the site appraisal are presented in Chapter 4, and reproduced below in Table NTS.1:

**Table NTS.1 Summary appraisal findings for site options**

Site	Biodiversity	Climate Change	Landscape and Historic Environment	Land, soil and Water Resources	Population and Community	Health and Wellbeing	Economy and Employment	Transportation
New Site 5	Red	Yellow	Red	Red	Green	Green	Green	Green
Site 7	Red	Yellow	Red	Red	Green	Green	Blue	Yellow
Site 8	Red	Red	Blue	Red	Green	Green	Blue	Yellow
Site 10	Red	Yellow	Blue	Red	Green	Blue	Blue	Yellow
Site 11	Red	Yellow	Red	Red	Green	Blue	Green	Blue
Site 12	Red	Yellow	Red	Blue	Green	Green	Green	Blue
<b>Key</b>								
Likely adverse effect (without mitigation measures)				Red	Likely positive effect			Green
Neutral/no effect				Yellow	Uncertain effects			Blue

In terms of Biodiversity, all site options perform negatively due to the potential impacts on nationally and locally designated sites through recreational disturbance, pollution and sewage capacity issues downstream. Sites 1, 7, 8, 10, 11 and 12 also perform negatively as they have the potential to adversely impact upon BAP priority habitats, mature trees, hedgerows, and railway embankment, which are likely to be ecological diverse and support connectivity.

It is recognised that there is potential for long term positive effects on biodiversity at New Site 5 if biodiversity net gain is delivered through the provision of open space and allotments. However, this is uncertain at this stage.

Site 8 performs negatively against the Climate Change SA Theme as the site is located partially within Flood Zone 2 (south of site). There are also small areas of low risk of surface water flooding within the site.

This would preclude development at this site. While New Site 5, site 10 and 11 also include areas of high risk of groundwater flooding, these are assessed as neutral given that development could avoid the high flood risk areas.

Sites 11 and 12 perform negatively against the Landscape and Historic Environment SA Theme given the sites’ potential to impact upon open landscape, local views and the rural setting of the town. New site 5, sites 7 and 12 also have the potential to lead to negative effects due to impact on the Special Landscape Area and/ or designated heritage assets (notably Fairford Conservation Area and Grade II Listed buildings). Uncertain effects are predicted for Sites 8 and 10 given the potential for development to enhance the character and appearance of sites, particularly given the landscape and heritage setting at these locations has already been compromised by employment and residential development.

Sites 7, 8, 10 and 11 perform negatively against the Land, Soil and Water SA Theme given that they contain best and most versatile (BMV) agricultural land (Grades 1 – 3a). Development has the

potential to lead to the loss of this natural resource. Site 12 is assessed as uncertain as it is located on Grade 3 agricultural land, which could be BMV (if found to be Grade 3a). However, this is uncertain at this stage. New site 5 is also assessed negatively against this SA Theme as a result of the loss of greenfield land.

All sites are assessed positively against the Population and Community SA Theme as all sites will deliver housing which will contribute towards local needs. While it is recognised that Site 10 is now being promoted for employment, it is considered that either use would lead to positive effects against this SA theme.

All sites have the potential to contribute to the improvement of existing or provision of new services/ facilities. At this stage the level of improvements or provision that could be delivered is not known. While not as well connected to the town centre and local facilities as other sites, new site 5 is identified as leading to positive effects of greater significance for the Population and Community SA Theme given its scale. Significant positive effects are also anticipated in this respect in relation to Sites 7 and 8 given sites have been promoted for the delivery of community benefits.

All sites, with the exception of Sites 10 and 11 perform positively against the Health and Wellbeing SA Theme as all have good access to open space and recreation, and the sustainable transport offer of the town. Uncertain effects are predicted for sites 10 and 11 given the adjacent employment uses at London Road industrial estate. It is considered that residents' health may be adversely affected by noise and dust disturbance, and/or air quality pollution.

In terms of the Transportation SA Theme, Sites 7, 8 and 10 are assessed as neutral. While sites are located in close proximity to bus stops, local knowledge suggests these services are relatively unreliable, and there is not an easily accessible train station. High car use is likely to continue. Given the road access routes for Site 11 and 12 are currently undetermined, uncertain effects are predicted for these site against the Transportation SA Theme.

Uncertain effects are predicted against the Economy and Enterprise SA Theme for Site 10 as the use of the site is currently unknown. While the use of the site for employment would lead to positive effects against this SA theme, the use of the site for housing would result in the loss of a potentially suitable employment site within the neighbourhood area.

Sites 3, 7 and 8 are assessed as uncertain for the Economy and Employment SA Theme given they are not well located in terms of local employment sites, and there is uncertainty around the extent to which local services will be/ can be utilised. New site 5, sites 11 and 12 perform positively against this SA Theme as they are located in close proximity to employment sites, providing access to local jobs

## Establishing the reasonable alternatives

As set out above, the Local Plan sets out Fairford's role as a 'Principal Settlement' (Policy DS1 (Development Strategy)) and allocates two sites within the town to deliver a total of 61 new dwellings (Policy S5 (Fairford))<sup>2</sup>.

However, FTC have since commissioned a comprehensive study on the hydrology and geology of the area (WRA, 2018), with results indicating that Local Plan site allocation F\_44 (Land to the rear of Faulkner's Close), is unsuitable for development due to high flood risk.<sup>3</sup> Additionally, since the adoption of the Local Plan, Site F\_35B (Milton Farm) has been withdrawn, and is no longer available for development. FTC are therefore seeking to allocate an alternative site through the FNP to deliver the 61 homes supported through the Local Plan.

Taking account of the objectives of the Neighbourhood Plan, along with the adopted Cotswold Local Plan and wider evidence, FTC with support from AECOM, have identified five reasonable spatial strategy options based on the six sites assessed above. It should be noted that Site 8 and Site 11 were previously rejected through the SA for reasons set out in the Regulation 14 SA Report. However, following discussions between FTC and AECOM, it was decided to include them for consistency and to ensure that all reasonable alternatives were explored. These options identified are set out in **Table**

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<sup>2</sup> It is noted that in a previous iteration of the Local Plan, Policy S5 allocated 77 dwellings at Fairford.

<sup>3</sup> WRA (2018) Groundwater Monitoring and Review of Flood Risk at Fairford

**NTS.2** below, and shown in **Figure 4.2** of the main report. It is noted that a reduced capacity is now being promoted for Yells Yard, of ten homes.

**Table NTS.2: Reasonable alternative growth options**

Site	Option A	Option B	Option C	Option D	Option E
New Site 5: Land north of Crabtree Park & Land off Leaffield Road (SHELAA Ref F_51B & F_51C)	80				
Site 7: Jones' Field (SHELAA Ref F_15)		52	52	52	
Site 8: Land east of Beaumoor Place (SHELAA Ref F_38)				12	12
Site 10: F_39C Field south east of granted planning permission at London Road		31			31
Site 11: Land west of Terminus Cottage and Station (F_52)			34		34
Site 12: Yells Yard				10	10
<b>TOTAL</b>	<b>80</b>	<b>83</b>	<b>86</b>	<b>74</b>	<b>87</b>

## Appraisal of reasonable alternatives

The appraisal of the reasonable alternatives under the SA themes is presented in **Appendix C**, with summary findings presented in **Chapter 4**, and reproduced below in **Table NTS.3**: To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SA themes. This will provide an indication of the comparative sustainability performance of the reasonable alternative options in relation to each theme.

**Table NTS.3: Summary reasonable alternatives appraisal findings**

SA theme	Option A Site 5	Option B Sites 7 & 10	Option C Sites 7 and 11	Option D Sites 7, 8 and 12	Option E Sites 8, 10, 11 and 12
<b>Biodiversity</b>					
Rank of preference	2	4	1	3	4
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
<b>Climate change</b>					
Rank of preference	1	2	2	3	3
Significant effect?	Yes - positive	No	No	Yes - Negative	Yes - Negative
<b>Landscape &amp; historic environment</b>					
Rank of preference	1	2	3	4	5
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
<b>Land, soil and water resources</b>					
Rank of preference	1	4	4	2	3

SA theme	Option A Site 5	Option B Sites 7 & 10	Option C Sites 7 and 11	Option D Sites 7, 8 and 12	Option E Sites 8, 10, 11 and 12
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
<b>Population and community</b>					
Rank of preference	1	3	3	3	2
Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
<b>Health and wellbeing</b>					
Rank of preference	1	3	3	2	3
Significant effect?	Yes - positive	No	No	No	No
<b>Economy &amp; Enterprise</b>					
Rank of preference	1	4	2	3	3
Significant effect?	No	Uncertain	No	No	No
<b>Transportation</b>					
Rank of preference	1	2	3	3	4
Significant effect?	Yes - Positive	No	Uncertain	Uncertain	Uncertain

**Summary findings:**

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the FNP. The appraisal has highlighted the potential for a number of **positive effects** as a result of development at individual options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the FNP. **All options** perform equally in this respect given all will deliver a similar level of growth.
- **Option A (new site 5)** will deliver a walking route to the town's schools and provision for a future link road. While further details of the link road are unknown at this stage, it is considered that its delivery would likely provide improved accessibility in and around the town, improve safety, and reduce potential adverse effects on the local environment.
- The potential for positive effects are also considered for Sites 7 and 8 (**Options B-E**) under the population and community SA theme, given sites have been promoted for the delivery of community benefits alongside housing growth.

The appraisal has highlighted the potential for **negative effects** as a result of development at individual options, which are summarised as follows:

- **Option D** and **Option E** are have the potential to lead to negative effects in relation to the climate change SA theme given the presence of Site 8 which falls partially within Flood Zone 2.
- **Options B-E** will result in the permeant loss of BMV agricultural land, delivering long term negative effects against the land, soil and water resources SA theme. **Option A** although not constrained by BMV land, will also lead to long term negative effects through the loss of greenfield land.
- **All options** have the potential to lead to long term negative effects on the local townscape and setting of Fairford, and the important heritage offer (including Fairford Conservation area and Listed Buildings). Site 12 is notable in this respect, recognising that the conclusions of the sites' Heritage and Landscape Assessments anticipating a "*moderate adverse significance of effect*".

Alongside this, further option specific constraints are identified including:

SA theme	Option A Site 5	Option B Sites 7 & 10	Option C Sites 7 and 11	Option D Sites 7, 8 and 12	Option E Sites 8, 10, 11 and 12
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- **All options** may increase recreational and disturbance pressures related to designated biodiversity sites and include ecological features on site, with Option B and Option E identified as worst performing in this respect. It is however recognised that the design and layout of development, including potential mitigation, retention, enhancement, and net-gain opportunities will determine the overall significance of effects.
- **All options** will likely lead to continued high car use, however Options B-E are less likely to encourage modal shift than Option A given the delivery of new transport infrastructure, and the opportunities presented when delivering growth at scale on a single site (i.e. delivering connected, green, active communities). This is similarly the case for the population and community SA theme.
- **Options C-E** perform less positively in relation to for transport given road access routes for Site 11 and 12 are currently undetermined.

## Preferred approach for the FNP

The following text has been provided by FTC regarding the preferred approach for the FNP.

Using the AECOM appraisal and ranking, we have applied a score (tallied the ranking) for each of the five options

Option	Score
A	9
B	22
C	18
D	20
E	23

Option A is the preferred site for the FNP Steering Committee for the following reasons:

- The concentration of the allocation on a single site, rather than spread over several smaller sites, makes the provision of affordable housing, self-build houses and community facilities (playgrounds, landscaping, e-charging points etc) more viable. Also if the allocation is spread over several sites, there will be a number of different constraints to overcome for the different sites.
- The NPPF (2021) requires Local Planning to steer development away from areas with higher flood risk towards areas with a lower probability of flooding. Option A has enough land of low flood risk to accommodate the housing requirement.
- Option A (new site 5) is not in any water supply Source Protection Zone (SPZ).
- The development of Option A includes the provision in the layout for a future link road from Hatherop Road to Leafield Road.
- Finally, the ranking by AECOM of the options clearly shows Option A to be by far the most preferable option.

## Appraisal of the current version of the FNP

The current version of the Fairford Neighbourhood Plan presents a number of planning policies for guiding development in the neighbourhood area

Utilising the SA Framework of objectives and assessment questions developed during the earlier scoping stage of the SA, the SA process has assessed the policies put forward through the current version of the Neighbourhood Plan. The SA Report has presented the findings of the assessment under the following SA themes:

- Biodiversity and Geodiversity;
- Climate Change;
- Landscape and Historic Environment;
- Land, Soil and Water Resources;
- Population and Community;
- Health and wellbeing;
- Economy and Enterprise; and
- Transportation

The summary appraisal findings are set out overleaf in **Table NTS.4**.

**Table NTS.4: Summary of FNP appraisal**

**Summary by SA Theme**

**Biodiversity**

- Policy FNP11 (Valuing Hedgerows and Trees) will likely lead to significant positive effects on biodiversity.
- The site allocation policy FNP14 (A New Low Carbon Community at Fairford) will likely lead to minor positive effects, however there is a level of uncertainty at this stage.
- Policy FNP12 (Achieving High Standards of Design), Policy FNP09 (Protecting the Fairford-Horcott Local Gap) and Policy FNP10 (River Coln Valued Landscape) are predicted to lead to minor positive effects.
- All other policies are not predicted to impact upon biodiversity.

Overall, the Fairford Neighbourhood Plan is predicted to have a residual **uncertain long-term minor positive** effect on the Biodiversity SA theme.

**Climate Change**

- Policy FNP04 (Managing Flood Risk), Policy FNP14 (A New Low Carbon Community in Fairford) and Policy FNP15 (Sustainable Homes and Housing Need)) will lead to significant effects on climate change.
- Policy FNP08 (Protecting Local Green Spaces), Policy FNP09 (Protecting the Fairford - Horcott Local Gap), Policy FNP12 (Achieving High Standards of Design), and Policy FNP11 (Valuing Hedgerows and Trees) are predicted to lead to minor positive effects.
- All other policies are not predicted to impact upon climate change.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **minor positive effects** on the Climate Change SA theme.

**Landscape and Historic Environment**

- Policies FNP09 (Protecting the Fairford-Horcott Local Gap), FNP10 (River Coln Valued Landscape), and Policy FNP13 (Conserving Non-Designated Heritage Assets) will lead to significant positive effects on landscape and the historic environment.
- Policy FNP12 (Achieving High Standards of Design) and Policy FNP08 (Protecting Local Green Spaces) will lead to minor positive effects.
- The site allocation policy FNP14 (A New Low Carbon Community in Fairford) will lead to residual neutral effects on landscape and the historic environment.
- All other policies are not predicted to impact upon the landscape and historic environment.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **neutral effects** on the Landscape and Historic Environment SA theme.

**Land, Soil and Water Resources**

- Policy FNP05 (Investing in Utilities and Infrastructure Improvements) will lead to significant positive effects on land, soil and water resources.
- Policies FNP08 (Protecting Local Green Spaces), FNP09 (Protecting the Fairford-Horcott Local Gap), FNP10 (River Coln Valued Landscape) and FNP11 (Valuing Hedgerows and Trees) will lead to minor positive effects.
- The site allocation Policy FNP14 (A New Low Carbon Community in Fairford) will lead to minor negative effects on land, soil and water resources.
- All other policies are not predicted to impact upon land, soil and water.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **minor negative effects** on the Land, Soil and Water SA theme.

**Population and Community**

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### Summary by SA Theme

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- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP15 (Sustainable Homes and Housing Need) and Policy FNP03 (Maintaining Viable Community Facilities), will lead to significant positive effects on the population and community.
- Policy FNP02 (Providing a New Burial Ground), Policy FNP09 (Protecting the Fairford-Horcott Local Gap), and Policy FNP12 (Achieving High Standards of Design) will lead to minor positive effects.
- All other policies are not predicted to lead to significant effects, however there is the potential for indirect minor positive effects on population and community.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Population and Community SA theme.

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### Health and Wellbeing

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- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP15 (Sustainable Homes and Housing Need), Policy FNP03 (Maintaining Viable Community Facilities), and Policy FNP08 (Protecting Local Green Spaces), will lead to significant positive effects on health and wellbeing.
- Policy FNP12 (Achieving High Standards of Design) and Policy FNP15 (Providing the Right Homes) will lead to minor positive effects.
- All other policies are not predicted to lead to significant effects, however there is the potential for indirect minor positive effects on health and wellbeing.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Health and Wellbeing SA theme.

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### Economy and Employment

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- Policy FNP16 (Growing our Local Economy), Policy FNP18 (Sustaining a Successful Town Centre) and Policy FNP18 (New Visitor Accommodation) will lead to significant positive effects on economy and employment.
- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP07 (Improving Access to Visitor Attractions), will lead to minor positive effects.
- All other policies are not predicted to impact upon economy and employment.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Economy and Employment SA theme.

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### Transportation

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- The site allocation policy FNP14 (A New Low Carbon Community in Fairford) will lead to significant positive effects on transportation.
- Policy FNP12 (Achieving High Standards of Design), Policy FNP06 (Managing Traffic in the Town) and Policy FNP01 (The Fairford and Horcott Development Boundaries) will lead to minor positive effects.
- All other policies are not predicted to impact upon transportation.

Overall the Fairford Neighbourhood Plan is predicted to have residual **uncertain significant positive effects** on the Transportation SA theme.

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The assessment has concluded that the current version of the Fairford Neighbourhood Plan is likely to lead to **significant long-term positive effects** in relation to the Population and Community, Health and Wellbeing, and Economy and Enterprise SA themes. These benefits largely relate to the delivery of new housing to meet local needs; the support for employment and support for tourism growth to develop the local economy; the protection of the public realm and of settlement identities; and the provision of new and protection of existing green/ open spaces. This is also expected to lead to **minor positive effects** in terms of the 'biodiversity' SEA theme, improving connectivity and supporting net gain in new development; however, there remains some uncertainty relating to potential effects on nationally designated sites and the biodiversity value of Horcott Lakes. It is however recognised that biodiversity net gain is likely to be secured through development, leading to positive effects in this regard.

**Minor positive effects** are also predicted in relation to the Climate Change SA theme given the delivery of a New Low Carbon Community in Fairford. Policy FNP14 includes numerous requirements

for new development which support national and local mitigation and adaptation objectives, implementing the climate emergency declared by CDC. While it is recognised that land between Leafield Road and Hatherop Road is partially at high risk of ground water flooding, it is considered that there is sufficient space within the Leafield Road site for development to avoid those areas at highest risk from groundwater flooding; with neutral effects anticipated in this regard once mitigation has been adopted.

**Uncertain significant positive effects** are predicted in relation to the Transportation SA theme, and will depend on the phasing of development and associated infrastructure delivery at land between Leafield Road and Hatherop Road.

**Neutral effects** are anticipated in relation to the Landscape and Historic Environment SA theme given the criteria set out in the FNP policies and the higher-level policy framework of the Local Plan (2018) and NPPF (2021).

**Minor long term negative effects** are predicted in relation to the Land, Soil and Water SA theme due to the loss of greenfield land at land between Leafield Road and Hatherop Road; however, given this is not best and most versatile agricultural land, effects are not anticipated to be significant.

## Recommendations

To improve the sustainability performance of the Fairford Neighbourhood Plan two recommendations were made in relation to the pre submission version of the FNP in June 2020 (See **Section 4.15** of the main report). **Table NTS.4** below sets out where recommendations have been taken into consideration within the current, submission version of the FNP:

**Table NTS.4: FNP recommendations**

Recommendation June 2020	Addressed in FNP?
Part of 'land between Leafield Road and Hatherop Road' site allocation falls within a SSSI IRZ for Cotswold Water Park SSSI. It is considered that there is the potential to strengthen Policy FNP14 by including a reference to the Cotswold Water Park SSSI IRZ and requiring early consultation with NE as part of any proposal.	Yes – supporting text of Policy FNP14 states that “ <i>Any development of this site should take account of the Cotswold Water Park SSSI IRZ and should consult Natural England at an early stage.</i> ”. Furthermore, requirements set within Policy FNP14 (i.e. required improvements to the local utilities infrastructure and open space/ recreation provision) will provide a level of mitigation, recognising key issues for the SSSI relate to water quality and recreation.
To strengthen the FNP’s climate change focus, the FNP could seek to incentivise a shift away from petrol/diesel vehicles, including ensuring development proposals, where possible, realise opportunities for integrated vehicle electric charging points and associated infrastructure.	Yes - Policy FNP15 (Sustainable Homes and Housing Needs) has been revised to state that “ <i>in residential developments all garage and off-street parking must include provision for the safe charging of electrical vehicles. Schemes including communal parking areas must include a scheme for communal charging points.</i> ”

## Next steps

The Fairford Neighbourhood Plan and this SA Report are being submitted to Cotswold District Council for their consideration. Cotswold District Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the Neighbourhood Plan meeting legal requirements and its compatibility with the Local Plan (2018).

If the subsequent Independent Examination is favourable, the Fairford Neighbourhood Plan will be subject to a referendum, organised by Cotswold District Council. If more than 50% of those who vote agree with the Fairford Neighbourhood Plan, then the Neighbourhood Plan will be ‘made’. Once made, the Fairford Neighbourhood Plan will become part of the Development Plan for Fairford.

# 1. Introduction

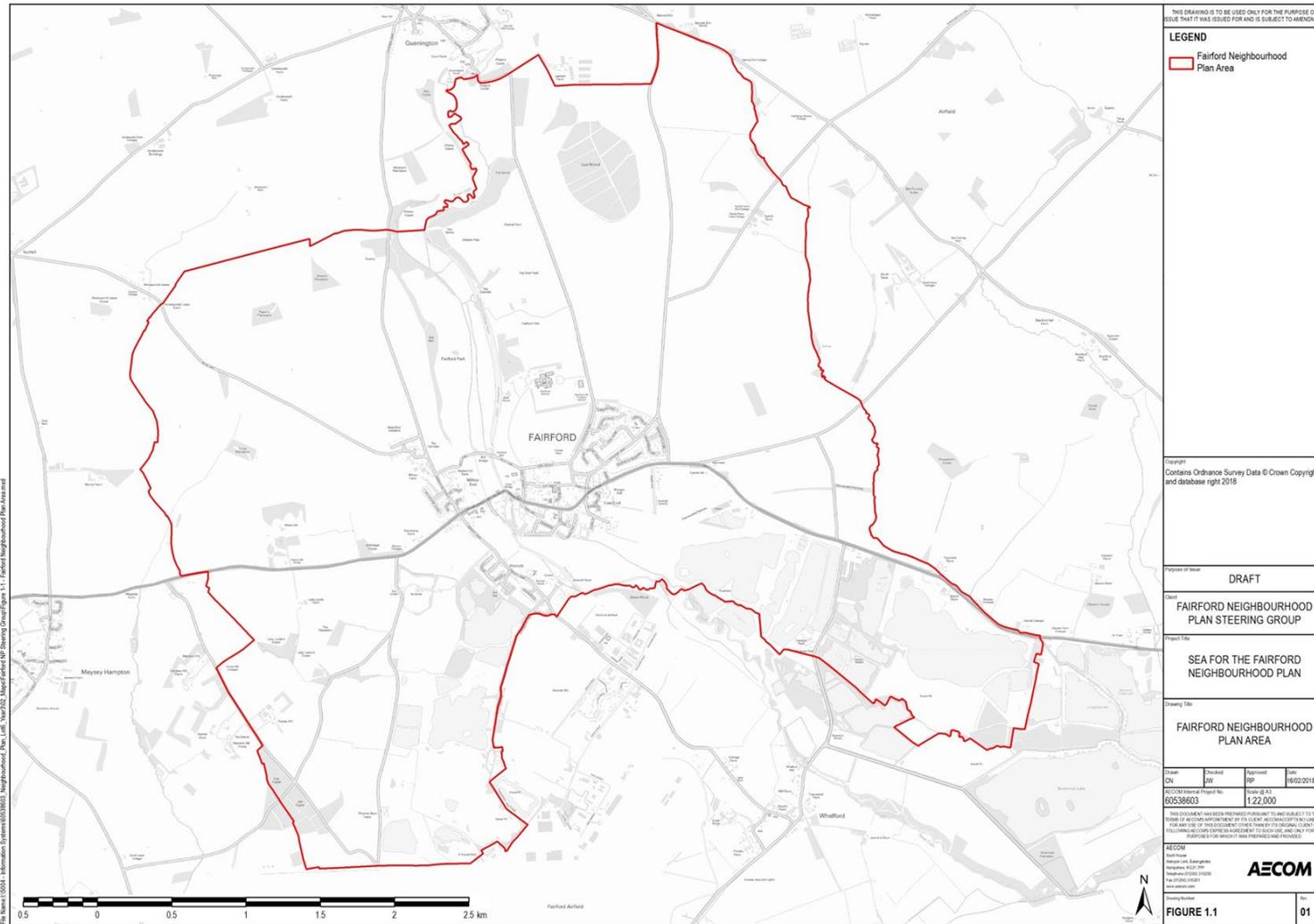
## Background

- 1.1 AECOM has been commissioned to undertake an independent Sustainability Appraisal (SA) in support of Fairford's Neighbourhood Plan.
- 1.2 The FNP has been prepared as a Neighbourhood Development Plan under the Town & Country Planning Act 1990 and Planning & Compulsory Purchase Act 2004, as amended by the Localism Act and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan has been prepared in the context of the Cotswold District Local Plan (2018). The Fairford Neighbourhood Plan is being submitted to the Cotswold District Council for their consideration under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, as amended.
- 1.3 Key information relating to the Fairford Neighbourhood Plan is presented in **Table 1.1**.

**Table 1.1: Key facts relating to Fairford Neighbourhood Plan**

Name of Responsible Authority	Fairford Town Council
Title of Plan	Fairford Neighbourhood Plan
Subject	Neighbourhood Planning
Purpose	<p>The Fairford Neighbourhood Plan has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan must meet the basic conditions.</p> <p>The Neighbourhood Plan will be used to guide and shape development within the Fairford neighbourhood area.</p>
Timescale	To 2031
Area covered by the plan	The neighbourhood area covers the parish of Fairford in Cotswold District ( <b>Figure 1.1</b> )
Summary of content	The Fairford Neighbourhood Plan sets out a vision, strategy and range of policies for the neighbourhood area.
Plan contact point	<p>Roz Capps, Deputy Clerk, Fairford Town Council</p> <p>Email: <a href="mailto:roz@fairfordtowncouncil.gov.uk">roz@fairfordtowncouncil.gov.uk</a></p>

Figure 1.1 Fairford Neighbourhood Plan area



## Sustainability Appraisal (SA) explained

- 1.4 SA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SA for the Fairford Neighbourhood Plan seeks to maximise the developing plan's contribution to sustainable development.
- 1.5 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)<sup>4</sup>. It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans; however, a Neighbourhood Plan is not a Local Plan and SA is not therefore legally required.
- 1.6 The Fairford Neighbourhood Plan has been screened by Cotswold District Council and has been determined to require a Strategic Environmental Assessment (SEA). To meet this requirement, the Neighbourhood Plan is undergoing an SA process which incorporates the requirements of the SEA Directive.
- 1.7 The SA will be undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SA will also meet submission requirements and the basic conditions in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.
- 1.8 The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.9 In line with the SEA Regulations this SA Report must essentially answer four questions:
  1. What's the scope of the SA?
  2. What has Plan-making / SA involved up to this point?
    - 'Reasonable alternatives' must have been appraised for the plan.
  3. What are the appraisal findings at this current stage?
    - i.e. in relation to the draft plan.
  4. What happens next?
- 1.10 These questions are derived from Schedule 2 of the SEA Regulations, which present the information to be provided within the report'. **Table 1.2** presents the linkages between the regulatory requirements and the four SA questions.

## Structure of this SA Report

- 1.11 This document is the SA Report for the FNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as presented in **Table 1.2**.

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<sup>4</sup> Environmental Assessment of Plans and Programmes Regulations 2004

**Table 1.2: Questions that must be answered by the SA Report in order to meet regulatory<sup>5</sup> requirements**

SA Report question	In line with the SEA Regulations, the report must include... <sup>6</sup>
What is the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
What is the sustainability 'context'?	<ul style="list-style-type: none"> <li>The relevant environmental protection <b>objectives</b>, established at international or national level</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
<b>What's the scope of the SA?</b>	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	<ul style="list-style-type: none"> <li>Key <b>problems/issues</b> and <b>objectives</b> that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>What has plan-making/SA involved up to this point?</b>	<ul style="list-style-type: none"> <li>Outline reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with <b>alternatives</b></li> <li>Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.</li> </ul>
<b>What are the assessment findings at this stage?</b>	<ul style="list-style-type: none"> <li>The likely significant effects associated with <b>the Submission version of the plan</b></li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing <b>the Submission version of the plan</b></li> </ul>
<b>What happens next?</b>	<ul style="list-style-type: none"> <li>The next steps for plan making/SA process.</li> </ul>

<sup>5</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>6</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

## 2. Local Plan context and vision for the Fairford Neighbourhood Plan

- 2.1 The FNP has been prepared in the context of the Cotswold District Local Plan, adopted 3<sup>rd</sup> August 2018.<sup>7</sup> Once made the FNP will form a part of the statutory Development Plan for the area, together with the Local Plan. The Local Plan covers the period to 2031, and is the key planning policy document for the District.
- 2.2 Policy DS1 (Development Strategy) of the Local Plan designates Fairford as a 'Principal Settlement'. Principal Settlements have been identified as the most appropriate locations to deliver future growth in the District, selected on the basis of their social and economic sustainability, including accessibility to services and facilities.
- 2.3 Policy S5 (Fairford) of the Local Plan allocates the following two sites to deliver a total of 61 new dwellings for Fairford:
- F\_35B Land behind Milton Farm and Betterton's Close (49 dwellings); and
  - F\_44 Land to rear of Faulkner's Close, Horcott (12 dwellings).
- 2.4 Policy S5 also identifies the following existing employment sites which will be protected:
- Horcott Industrial Estate (EES26);
  - London Road (EES27);
  - Whelford Land Industrial Estate (EES28); and
  - New Chapel Electronics (EES29).
- 2.5 The FNP will form a key part of the statutory development plan for Fairford alongside, but not as a replacement for the Local Plan.
- 2.6 Neighbourhood plans can develop policies and proposals to address local place-based issues, and can add detail to, or even modify, strategic policies of the Local Plan providing it is in general conformity. In this way it is intended that FTC use the Neighbourhood Plan to plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan. FTC has been working with CDC to ensure that the proposals of the FNP are acceptable. This demonstrates a collaborative approach to plan making for the town.

### Vision statement for the Fairford Neighbourhood Plan

- 2.7 The vision statement for the FNP, which was developed during earlier stages of plan development, is as follows:

*"Fairford has built upon its status as an attractive and historic Cotswold market town, retaining the old and incorporating the new to be a vibrant, thriving community that successfully serves the wider rural area.*

*Well considered planning has ensured that Fairford has only grown and developed at a level that renewed and improved infrastructure is able to support. The features of Fairford that define much of its character and attraction – with parkland and green spaces interwoven into the town and the mix of buildings from six centuries– have been preserved and enhanced.*

*A range of regular local events, and the promotion of Fairford's location as a base from which to explore the South Cotswolds, has encouraged visitors. Despite increasing visits, improved transport provision allows easy access to an attractive town centre with space for events,*

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<sup>7</sup> Cotswold District Council (2018) Cotswold District Local Plan 2011 – 2031 [online] available at: <https://www.cotswold.gov.uk/planning-and-building/planning-policy/adopted-local-plan/local-plan-2011-to-2031/>

*community groups and recreation. Increased attendance at events and activities has helped to support local businesses and the rural economy.*

*Fairford has proactively engaged with the climate change agenda to provide low carbon housing and increase the use of low (and no) carbon forms of transport. While provision has been improved for all forms of transport, targeted improvements to facilities, signage and navigation aids has reduced barriers for pedestrians, cyclists and those with limited mobility. Planning policy has been used to good effect to reduce vehicle usage and mitigate its effects in high-traffic areas of the town, and the link road to the east has reduced traffic in the town centre.*

*The local environment is key to the attractiveness of Fairford. Policies to improve provision for wildlife and to improve the ecosystem have been beneficial for people and the environment. Investing in green infrastructure has led to greater abundance and diversity of wildlife while supporting the mental and physical health of the local population.*

*Fairford has worked hard to ensure that the local economy remains vibrant. Local planning policy has ensured that residential development has not crowded out business and that space remains for a mixed local economy including light industrial, retail and service businesses.*

*The demographic challenges faced by our rural area have been met by development appropriate to the needs of residents, alongside housing, schooling and transport improvements, which encourage new families to live, work and study in Fairford.*

*Fairford truly is “A Good Place to Be”*

- 2.8 Underpinning the FNP vision statement are the Neighbourhood Plan policies. The latest iteration of these policies has been appraised in **Chapter 5**.

## 3. The Scope of the SA

### SA Scoping Report

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.<sup>8</sup> These authorities were consulted on the scope of the FNP SA in May 2018.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
  - Baseline data against which the Neighbourhood Plan can be assessed;
  - The key sustainability issues for the Neighbourhood Plan; and
  - An ‘SA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Baseline information (including the context review and baseline data) is presented in **Appendix A**.
- 3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1** below.

**Table 3.1 Consultation responses received on the SA Scoping Report**

Consultation response	How the response was considered and addressed
<b>Natural England</b>	
<b>Yana Bulachka, West Midlands Team</b>	
We have no further comments in response to the updated Fairford NDP SA Scoping report.	Comment noted.
<b>Historic England</b>	
<b>David Stuart, Historic Places Adviser South West</b>	
<p>“Thank you for your consultation on the SEA Scoping Report for the Fairford Neighbourhood Plan.</p> <p>We have been consulted previously on an SEA Scoping Report for this Plan and are unsure of the relationship between these two exercises, and the need for both.</p> <p>We have no specific comments on the Report you have provided but have attached our response to the Regulation 16 consultation (which includes our previous SEA Scoping response) as the issues highlighted therein may also have a bearing on your work, especially the gathering and assessing of relevant heritage evidence.”</p>	Comment noted.
<b>Historic England previous Scoping response (August 2016)</b>	
<b>David Stuart, Historic Places Adviser South West</b>	

<sup>8</sup> In-line with Article 6(3).of the SA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme’.

Consultation response	How the response was considered and addressed
<p>“Thank you for your consultation on the Sustainability Appraisal Scoping for the emerging Fairford Neighbourhood Plan.</p> <p>We have only a few observations to offer.</p> <p>We note that it is intended to formulate a small number of spatial options for distributing development in and around the town and that the SA/SEA framework will be used to assess these rather than the individual sites they may contain. It is important to bear in mind that the SEA process requires the assessment of both the individual and cumulative impact of impact on heritage assets, their significance and settings. Individual sites and the potential for impact on heritage assets which may occur through their selection may therefore well need to be identified and understood first in order to appropriately inform the suitability of the various spatial options. Such an exercise would include an assessment of the character and appearance of the Conservation Area, its setting and views into and out of it.”</p>	<p>Comment noted. Spatial options for development (reasonable alternatives) have been assessed against the SA Framework as set out in Chapter 5 of this SA Report.</p>
<p>“We have had little previous involvement in this Plan preparation process other than correspondence at the end of last year over whether the community might wish to engage in or otherwise promote the production of a Conservation Area Appraisal and Management Plan. Given the development pressure upon the town which apparently exists, the aspirations for the neighbourhood plan, and the potential for impact all this no doubt has upon the designated and undesignated heritage assets in the area, including the conservation area, the existence of an up to date and suitably detailed Appraisal is likely to be key evidence with which to inform the spatial option and site selection processes.”</p>	<p>Comment noted. Fairford Town Council agrees that an up to date Conservation Area Appraisal and Management Plan for Fairford is important and is working with Cotswold District Council to find a way to produce one. When possible, it is envisaged that a joint partnership model will be put in place and an up to date Conservation Area Appraisal and Management Plan will be written.</p>
<p>“An Appraisal will also help in the identification of heritage issues which the Plan might wish to address, directly through policy or proposal formulation or as part of a schedule of enhancements eligible for Community Infrastructure Levy contributions.”</p>	<p>Comment noted. As above.</p>
<p>“Otherwise, we have produced guidance on the role of heritage in the SEA/SA process and this can be downloaded from our website at <a href="https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/">https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/</a>”</p>	<p>Comment noted.</p>
<p><b>Environment Agency Thames Sustainable Places Team</b></p>	
<p>“Thank you for consulting the Environment Agency on your Sustainability Appraisal for Fairford Neighbourhood Plan.</p> <p>We regret that at present, the Thames Area Sustainable Places team is unable to review this consultation. This is due to resourcing issues within the team, a high development management workload and an increasing volume of neighbourhood planning consultations. We have had to prioritise our limited resource, and must focus on influencing plans where the environmental risks and opportunities are highest. For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted since 2012, or which have been confirmed as being compliant with the National Planning Policy Framework) as being of lower risk. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local authority area.”</p>	<p>Comment noted.</p>

Consultation response	How the response was considered and addressed
<p>“Together with Natural England, English Heritage and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:  <a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</a> “</p>	<p>Comment noted.</p>

## Key sustainability issues

3.5 Drawing on the review of the sustainability context and baseline, the SA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of SA. These issues are as follows, presented by nine SA themes.

- **Air quality**

- Air quality in the Fairford neighbourhood area is generally good as national air quality objectives are being achieved.
- There are no Air Quality Management Areas (AQMAs) within the neighbourhood area, with the nearest AQMA located in Witney, approximately 23km to the north-east of the neighbourhood area.
- Traffic and congestion have the potential to increase emissions and reduce air quality in the area; however air pollution is at a low baseline so possible effects are unlikely to be significant.
- Housing growth in the wider area may impact on traffic and congestion in the neighbourhood area, which has the potential to increase emissions and reduce air quality.

3.6 Due to the absence of any significant air quality issues within the neighbourhood area, air quality has been **scoped out** for the purpose of the SA process.

- **Biodiversity**

- There are two nationally designated sites in the north of the neighbourhood area, the Lea and the Grove Ancient Woodlands. There are also two nationally designated sites adjacent to the neighbourhood area, Cotswold Water Park Site of Special Scientific Interest (SSSI) and the Whelford Meadow SSSI. The entirety of the neighbourhood area is located within a residential, rural residential or rural non-residential Impact Risk Zone (IRZ) for one or both of these SSSIs.
- Locally important sites are located within the neighbourhood area including two Strategic Nature Areas (SNAs), the Cotswold High Wold Plateau and the Cotswold Water Park.
- A variety of Biodiversity Action Plan Priority Habitats are present within the neighbourhood area which support a range of species. These habitats should be preserved and protected in order to prevent the loss, fragmentation and deterioration of the ecological value of Fairford.

- **Climate change**

- An increase in the built footprint of the Fairford neighbourhood area (associated with the delivery of significant new housing since 2011) has the potential to increase overall greenhouse gas emissions. It is recognised that this level of growth has not been accompanied by the delivery of new employment land.
- Cotswold has had higher per capita emissions than the South West of England and England as a whole since 2005. Additionally, Cotswold has also seen a smaller reduction in emissions than the South West and England.

- Land adjacent to the River Coln and the Cotswold Water Park SNA is at the greatest risk of fluvial flooding within the neighbourhood area.
- The areas at high risk from surface water drainage and sewer flooding in Fairford include East End/London Road, Milton Street and Lakeside in Horcott. There is also a specific problem area in West End Gardens. Areas at Totterdown lane, land surrounding Rhymes Barn Farm, and sections of the A417 between Fairford town centre and Clayhill Cottages may also be vulnerable.
- The Fairford Neighbourhood Plan should seek to increase the neighbourhood area's resilience to the effects of climate change, particularly from flooding, by supporting and encouraging adaptation strategies. This may include through the planning of green infrastructure, and by diverting development to areas of lower flood risk in accordance with the NPPF.
- **Landscape and historic environment**
  - The Cotswold Area of Outstanding Natural Beauty (AONB) is located adjacent to the neighbourhood area, on the northern boundary.
  - The Fairford Parish is located within the Upper Thames Clay Vales National Character Area (NCA), however it is recognised that there is considerable variation within this area, as documented in the various sub-area character assessments for the Local Plan and previous draft Neighbourhood Plan.
  - The Local Plan (2011) designates a Special Landscape Area which covers the land in and around the river valley to the north of the town. The 2017 SLA Review concluded that this SLA remains valid as a locally designated area and that its boundaries should remain the same.
  - The neighbourhood area has a rich historic environment, with 122 listed buildings, two scheduled monuments, and one scheduled monument (adjacent to the northern boundary of the plan area), nationally designated for their cultural heritage resource.
  - High levels of HGVs passing through the town are having a damaging effect on the fabric of listed buildings and the Fairford Conservation Area through increased noise and dirt pollution.
  - Future management within the neighbourhood area should seek to protect the setting of heritage assets and landscape/townscape quality.
  - New development could lead to pressures on non-designated sites and townscapes, including from the loss of key built and natural features; for example green spaces.
  - Improvement in access to and enhancement of, historic environment assets and enhancements to local distinctiveness through high quality development has potential for positive benefits for tourism.
- **Land, soil and water resources**
  - The River Coln is the main watercourse flowing through the centre of the neighbourhood area. Threats to the water quality include 'storm' discharges from the STW.
  - Groundwater Source Protection Zones (SPZs) 1, 2 and 3 are present within the neighbourhood area.
  - There are two Nitrate Vulnerable Zones (NVZs) within the neighbourhood area: one groundwater NVZ area and one surface water NVZ area.
  - An agricultural land classification assessment has been undertaken in certain parts of the neighbourhood area, identifying Grade 2, Grade 3a and 3b agricultural land present. It should be noted that this is Pre-1988 provisional agricultural classification data.

- **Population and community**
  - Based on the most recent census data available, the population of the neighbourhood area has slightly increased between 2001 and 2011. This is in line with the increase observed for Cotswold, but less than the level of growth observed for the South West of England and England.
  - Fairford has received acute housing growth since 2011, and extant planning permissions will result in further significant growth over the next few years.
  - The population is expected to have increased considerably since 2011 on account of the recent housing growth in the area. Based on average household occupancy for the neighbourhood area, a 38.9% population increase has been calculated for the area in light of built, committed and allocated housing sites.
  - A larger number of residents within the neighbourhood area are within the older age categories (45-59 and 60+) in comparison to the regional and national trends.
  - The population of the neighbourhood area is ageing, potentially placing increased pressures on local health services and facilities.
  - There are three Lower Super Output Areas (LSOA) covering the neighbourhood area. E01022204: Cotswold 009C and E01022202: Cotswold 009A are both within the top 20% least deprived in England. E01022203: Cotswold 009B is one of the top 10% least deprived in England.
  - The level of social rented and shared ownership housing is increasing in the neighbourhood area.
- **Health and wellbeing**
  - The majority of residents within the neighbourhood area consider themselves to have 'very good health' or 'good health'. While this percentage is higher than local trends, it is lower than the totals for the South West of England, and England.
  - A larger number of residents within the neighbourhood area consider themselves to have 'bad health' or 'very bad health' in comparison to the totals for the South West of England, and England.
  - The main challenges within the Joint Strategic Needs Assessment (JSNA) for Gloucestershire link to population, equality and diversity, deprivation, children and young people, adults and older people, health, the economy, the environment, accessibility, community and community safety.
- **Economy and enterprise**
  - Fairford is designated through the Local Plan as a Principal Settlement and in terms of its role, as a District Centre.
  - Fairford plays a vital role in supporting its community, and other nearby settlements, including the nearby RAF airbase.
  - Fairford has a range of shops and services, sufficient to meet day-to day needs of local residents. However most of the town centre 'retail' premises are small, which means that although Fairford appears to have a wide range of shops and services, these do not meet the needs of existing (and therefore forthcoming) residents in total capacity terms.
  - The town's mix of shops and services are currently under strong competitive/viability pressures, with many shops lost to residential conversions.
  - The Cotswold Water Park provides a major resource for tourism in the neighbourhood area, notably water recreation and wildlife.
  - Based on the 2011 census data, a higher percentage of residents in the neighbourhood area have no qualifications compared to the Cotswolds and the South West. Additionally, there is a lower percentage of residents with Level 4 qualifications within the neighbourhood area compared with the Cotswolds. There is however a

higher percentage of residents with Level 4 qualifications within the neighbourhood area compared with the total for the South West and England.

- The three largest employment sectors for residents within the neighbourhood area are: professional occupations, skilled trades occupations, and managers, directors, and senior officials.
- **Transportation**
  - There are no railway stations located within the neighbourhood area. The nearest railway station is Kemble, located 15km away from Fairford.
  - While there are three bus services which run through the neighbourhood area, these run infrequently, finishing early in the day and therefore limiting potential usability for commuters.
  - With regard to highway networks, the A417 runs through the plan area, connecting residents to neighbouring towns.
  - Residents have access to a branch of the ‘Cotswold District Council Cycle Route 4’ which provides access to Cirencester and Northleach.
  - Over 87% of residents within the neighbourhood area have access to a car or van, perhaps in part due to the rural setting of Fairford.
  - A higher proportion of residents use a car or van to get to work, compared to local, regional, and national percentages. There is also a high level of out-commuting.

## SA Framework

3.1 The issues were then translated into an ‘SA Framework’. This SA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SA framework for the FNP is presented below in **Table 3.2**.

**Table 3.2: SA Framework for the Fairford Neighbourhood Plan**

SA theme	SA objective	Assessment questions
<b>Biodiversity &amp; geodiversity</b>	To protect and enhance all biodiversity and geological features.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the status of the nationally designated sites of significance within and/or adjacent to the neighbourhood area boundary, including the Cotswold Water Park and the Whelford Meadow SSSIs and Ancient Woodland?</li> <li>• Support the status of the locally designated sites of significance within and/or adjacent to the neighbourhood area boundary, including the Cotswold Water Park SNA and the Cotswold high Wold Plateau SNA?</li> <li>• Protect and enhance semi-natural habitats?</li> <li>• Protect and enhance priority habitats, and the habitat of priority species?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support enhancements to multifunctional green infrastructure networks?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
<b>Climate change</b>	Reduce the level of contribution to climate change made by	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the number of journeys made?</li> </ul>

SA theme	SA objective	Assessment questions
	activities within the neighbourhood area	<ul style="list-style-type: none"> <li>• Reduce the need to travel?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> </ul>
	Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding	<ul style="list-style-type: none"> <li>• Ensure that no inappropriate development takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change?</li> <li>• Divert development away from areas of higher to areas of lower flood risk and ensure flood risk to others is not increased.</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the neighbourhood area?</li> <li>• Increase the resilience of biodiversity in the plan area to the effects of climate change, including enhancements to ecological networks?</li> </ul>
<b>Landscape and historic environment</b>	Protect, maintain and enhance the cultural heritage resource within the neighbourhood area, including the historic environment and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance buildings and structures of architectural or historic interest?</li> <li>• Conserve and enhance conservation areas?</li> <li>• Support the integrity of the historic setting of key buildings of cultural heritage interest?</li> <li>• Conserve and enhance local diversity and distinctiveness?</li> <li>• Support access to, interpretation and understanding of the historic environment?</li> </ul>
	Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the integrity of the Cotswold AONB?</li> <li>• Conserve and enhance landscape character?</li> </ul> <p>Protect and enhance key landscape and townscape features?</p>

SA theme	SA objective	Assessment questions
<b>Land, soil and water resources</b>	Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Promote the use of previously developed land?</li> <li>Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 2 and 3a agricultural land?</li> </ul>
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Reduce the amount of waste produced?</li> <li>Support the minimisation, reuse and recycling of waste?</li> <li>Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</li> <li>Encourage recycling of materials and minimise consumption of resources during construction?</li> </ul>
	Use and manage water resources in a sustainable manner	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Support improvements to water quality?</li> <li>Minimise water consumption?</li> <li>Protect groundwater resources?</li> <li>Protect the River Coln and nationally designated sites from pollution?</li> </ul>
<b>Population and community</b>	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Promote the development of a range of high quality, accessible community facilities?</li> <li>Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>Minimise fuel poverty?</li> </ul>
	Reduce deprivation and promote a more inclusive and self-contained community	<ul style="list-style-type: none"> <li>Maintain or enhance the quality of life of existing local residents?</li> <li>Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> </ul>
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>Support the provision of a range of house types and sizes?</li> <li>Support enhancements to the current housing stock?</li> <li>Meet the needs of all sectors of the community?</li> <li>Provide quality and flexible homes that meet people's needs?</li> </ul>

SA theme	SA objective	Assessment questions
<b>Health and wellbeing</b>	Improve the health and wellbeing residents within the neighbourhood area.	<ul style="list-style-type: none"> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> </ul> <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Align to the five key priority areas outlined in the Joint Strategic Needs Assessment?</li> <li>• Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?</li> <li>• Reduce noise pollution?</li> <li>• Promote the use of healthier modes of travel?</li> <li>• Improve access to the countryside for recreational use?</li> </ul>
<b>Economy and enterprise</b>	Promote a thriving and sustainable local economy	<ul style="list-style-type: none"> <li>• Promote business creation and a diverse and resilient local economy?</li> <li>• Support a wide range of jobs and training opportunities?</li> <li>• Ensure the long-term availability of suitable land and buildings to support economic prosperity and change?</li> <li>• Create an attractive economically viable town centre. Provide opportunities for all employers to access: different types and sizes of accommodation; flexible employment space; and high-quality communications infrastructure?</li> <li>• Strengthen links with larger economic centres?</li> <li>• Promote and support the rural economy? Promote the development of tourism in a sustainable manner?</li> </ul>
<b>Transportation</b>	Promote sustainable transport use and reduce the need to travel	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage modal shift to more sustainable forms of travel?</li> <li>• Enable sustainable transport infrastructure enhancements?</li> <li>• Facilitate working from home and remote working?</li> <li>• Improve road safety?</li> </ul>

SA theme	SA objective	Assessment questions
		<ul style="list-style-type: none"><li>• Reduce the impact on residents from the road network?</li></ul>

## 4. What has plan making/ SA involved to this point?

### Introduction

- 4.1 In accordance with the SEA Regulations the SA Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives/ an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The ‘narrative’ of plan-making/ SA up to this point is told within this part of the SA Report. Specifically, this section explains how preparation of the current version of the FNP has been informed by an assessment of alternative locations for non-strategic scale development in the neighbourhood area.

### Overview of plan making/ SA work undertaken since 2013

- 4.3 Plan-making for the FNP has been underway since 2013. Work began with the designation of the neighbourhood area by CDC in November 2013. Since then a range of consultation events have since been carried out for the FNP to engage the community and enable their input into the plan making process. This has included leaflets, meetings, workshops, questionnaires, discussions and public consultation drop-in days, and there have been invitations throughout to participate and to make comments.
- 4.4 **Table 4.1** below summarises the key documents that have been prepared for the Neighbourhood Plan and accompanying SA process to date.

**Table 4.1 Key documents in neighbourhood plan making process**

Year	Plan-making	SA
2018	Evidence gathering	Scoping Report
2020	Regulation 14 consultation	SA Report to accompany the pre-submission consultation

- 4.5 The following sections more specifically present information on the work undertaken to develop and appraise reasonable alternatives for the Neighbourhood Plan.

### Developing the reasonable alternatives

- 4.6 The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the ‘plan and reasonable alternatives taking into account the objectives and geographical scope of the plan’.
- 4.7 FTC have explored a number of options, in terms of policies, to meet plan objectives. These are presented in FNP Appendix C: Strategy Options. Strategy Options were considered for the following topic areas:
- Housing allocations;
  - Town centre and local economy;
  - Spatial strategy for facilities;
  - Infrastructure contributions;

- Green space/ countryside; and
  - Preferred direction for future growth.
- 4.8 As the delivery of new development through the Neighbourhood Plan is what is most likely to have a significant effect on SA objectives, it was determined that this issue should be the focus of the consideration of alternatives through the SA process. The potential sites and spatial strategy options (packages of sites) for delivering development in line with the FNP objectives, will directly or indirectly influence the topic areas identified above and FTCs preferred approach.
- 4.9 The task of establishing reasonable alternatives for the delivery of new housing involved giving consideration to ‘top-down’ factors (strategic issues/ higher level policy) and ‘bottom-up’ factors (site options), before finally bringing the evidence together and establishing reasonable alternatives.

### Top-down considerations

- 4.10 Firstly, there is a need to reiterate the context of the adopted Cotswold Local Plan (2018), as already discussed above (**Section 2.1**). The Local Plan sets out Fairford’s role as a ‘Principal Settlement’ (Policy DS1 (Development Strategy)) and allocates two sites within the town to deliver a total of 61 new dwellings (Policy S5 (Fairford))<sup>9</sup>:
- F\_35B Land behind Milton Farm and Betterton’s Close (49 dwellings); and
  - F\_44 Land to rear of Faulkner Close, Horcott (12 dwellings).
- 4.11 The Local Plan indicates (para 7.8.8) that because of pressure on infrastructure in Fairford, any large development should be towards the latter part of the plan period.
- 4.12 In 2018, FTC commissioned a comprehensive study on the hydrology and geology of the area (WRA), including groundwater levels. The results have informed subsequent work, which indicates that the site F\_44, Land to the rear of Faulkner’s Close, is unsuitable for development due of high flood risk.<sup>10</sup> Additionally, since the adoption of the Local Plan. Site F\_35B (Milton Farm) has been withdrawn, and is no longer available for development.
- 4.13 FTC are therefore seeking to allocate an alternative site through the FNP to deliver the 61 homes supported through the Local Plan. FTC wish to allocate a site which is more sustainable (i.e. has a reduced level of flood risk) and will provide an increased level/ mix of housing to meet local needs in line with the objectives of the FNP. FTC has been working with CDC to ensure that the proposals of the FNP are acceptable.

### Bottom-up considerations

- 4.14 The second step involves identifying the site options that are potentially in contention for allocation through the FNP. This process was led by FTC, with support from AECOM (through a ‘Site Options Assessment’ technical support package).
- 4.15 Site selection for the FNP began with the Cotswold SHELAA (2017). Sites identified within the SHELAA as being included in error, withdrawn or duplicated; where development has been completed and/ or construction has started and that fall outside the neighbourhood area were not carried forward for consideration through the site assessment process.
- 4.16 The remaining sites identified through the SHELAA along with any additional sites proposed (based on the evidence available and consultation carried out by FTC), were assessed through the AECOM Site Assessment Report (2019).
- 4.17 Since 2019, a Site Assessment Report Addendum was produced in 2021 by AECOM, to reflect updated evidence and take account of the representations received through the Regulation 14 consultation on the FNP (December 2020). The following updates are of relevance for the SA:

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<sup>9</sup> It is noted that in a previous iteration of the Local Plan, Policy S5 allocated 77 dwellings at Fairford.

<sup>10</sup> WRA (2018) Groundwater Monitoring and Review of Flood Risk at Fairford

- A new site 'Yells Yard' (Site 12) has been submitted to the Town Council for consideration through the FNP, and the SOA Addendum concludes the site is potentially suitable for development.
- Site 1 Land to rear of Faulkner's Close (F\_44) now intercepts with the recently notified extension of the Cotswold Water Park SSSI designation. Combined with previously identified constraints (notably access, ground water flood risk, heritage, biodiversity and landscape) the site is not considered suitable for development through the FNP.
- Site 3 Land Behind Milton Farm and Betterton's Close (F\_35B) is no longer available, nor deliverable and therefore not suitable for consideration through the FNP.
- It is also noted that Site 5 'The southern half of Land north of Crabtree Park & Land off Leafield Road' is now referred to as 'Land between Leafield Rd. and Hatherop Rd'.

4.18 The conclusions of the AECOM Site Assessment Addendum (2021) are set out in **Table 4.2** below, along with the site name, area in hectares, SHELAA reference, and SHELAA summary findings.

**Table 4.2 Suitability of sites for the purposes of the Fairford Neighbourhood Plan**

Name	Size (ha)	Capacity (dwelling no.) <sup>11</sup>	SHELAA (2017) conclusion	AECOM Site Assessment Addendum (2021) conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? )
Site 1: Land to rear of Faulkner's Close, Horcott (SHELAA Ref F_44)	1.14	27	Site is available, suitable and achievable.	<p><b>No</b> – the site intercepts with the recently notified extension of the Cotswold Water Park SSSI designation. When considered in-combination with previously identified constraints (access, ground water flood risk, heritage, biodiversity and landscape) the site is not suitable for development.</p> <p>Its however recognised that the notification of additional land, which in the opinion of Natural England is of special interest, does not take effect unless and until it is confirmed by Natural England (with or without modification), and until such time the site remains subject to the effects of the previous notification.<sup>12</sup> Consequently, if the notification did not take effect then the conclusions of the February 2019 Site Assessment would remain valid. Site 1 would remain potentially suitable for development.</p>
Site 2: Land west of Horcott Road (SHELAA Ref F_50)	4.53	102	<p>Site is unsuitable:</p> <ul style="list-style-type: none"> <li>• The site prevents the coalescence of Horcott and Fairford and provides a green space that forms the setting of the Conservation Area and its relationship with the countryside, which would be removed by the site's development.</li> <li>• There are also non-designated heritage assets within the western part of the site, which is a historic stone field shelter and enclosure. These structures and their field setting would be severely compromised by development, even if retained.</li> <li>• There are also highways concerns at Horcott Road's junction with London Road.</li> </ul>	<p><b>No</b> - the site is not considered a suitable development location due to several significant constraints including landscape, historic environment, biodiversity, and access.</p>

<sup>11</sup> Indicative capacity calculated using AECOM's standard method; see Chapter 3 for further detail.

<sup>12</sup> Natural England (2020) Cotswold Water Park SSSI Notification Document [online] available at: [https://consult.defra.gov.uk/natural-england/cotswold-water-park/supporting\\_documents/Cotswold%20Water%20Park%20Notification%20Document%20notified%207%20Jan%202020.pdf](https://consult.defra.gov.uk/natural-england/cotswold-water-park/supporting_documents/Cotswold%20Water%20Park%20Notification%20Document%20notified%207%20Jan%202020.pdf)

Name	Size (ha)	Capacity (dwelling no.) <sup>11</sup>	SHELAA (2017) conclusion	AECOM Site Assessment Addendum (2021) conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? )
Site 3: Land Behind Milton Farm and Bettertons Close (SHELAA Ref F_35B)	1.97	47	Site is available, suitable and achievable.	<b>No</b> - the site is no longer available, not deliverable and not considered as an allocation.
Site 4: Land north of Farmor's School	7.30	47	N/A	<b>No</b> - the site is not considered a suitable development location due to several significant constraints including landscape, historic environment and location.
Site 5: Land north of Crabtree Park & Land off Leaffield Road (SHELAA Ref F_51B & F_51C)	17.40	261	<p>Site is available and achievable but not suitable for development:</p> <ul style="list-style-type: none"> <li>• The site is part of a field used for arable farming, which is generally flat and has long views.</li> <li>• The site has no defined northern boundary.</li> <li>• The site is adjacent to the Special Landscape Area to the west and the Conservation Area to the south-west.</li> <li>• The site's development would be an intrusion into the open countryside, the scale of which would be too large in the context of the town. It would also compromise views of the town from Public Rights of Way.</li> <li>• There are also concerns about how the site would be accessed and that the amount of development would require strategic level infrastructure upgrades.</li> </ul>	<b>Potentially</b> - the site has a number of minor to significant constraints including heritage, landscape, groundwater flood risk, and infrastructure capacity. The site is unsuitable as a whole. However, the southern half of the site is potentially suitable with no significant constraints (coinciding with the scheme proposed by ECT).
Site 6: Land east of Aldsworth Close (SHELAA Ref F_51A)	22.88	343	<p>Site is available and achievable but not suitable for development:</p> <ul style="list-style-type: none"> <li>• The site is part of a field used for arable farming, which is generally flat and has long views.</li> <li>• The site has no defined northern boundary.</li> <li>• The site's development would be an intrusion into the open countryside, the scale which would be too large in the context of the town. It would also compromise views of the town from Public Right of Ways.</li> <li>• There are also concerns about how the site would be accessed and that amount of development would require strategic level infrastructure upgrades.</li> </ul>	<b>No</b> - the site is not considered a suitable development location at this time due to several significant constraints including landscape, groundwater flood risk and infrastructure capacity.

Name	Size (ha)	Capacity (dwelling no.) <sup>11</sup>	SHELAA (2017) conclusion	AECOM Site Assessment Addendum (2021) conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? )
Site 7: Jones' Field (SHELAA Ref F_15)	2.31	52	<p>Site is available but is not achievable. Suitability is uncertain:</p> <ul style="list-style-type: none"> <li>Site forms part of Fairford's historic landscape and is an important green space within the Conservation Area, contributing to the town's setting, character and its well-defined historic edge.</li> <li>Development of the site would have a detrimental impact on the setting of Morgan Hall (a Listed Building) and the Conservation Area.</li> <li>The site contains several mature trees, which form part of an area protected by Fairford's Conservation Area and is a Wood-pasture and Parkland Biodiversity Action Plan Priority Habitat.</li> </ul>	<b>Potentially</b> - the site could be a suitable development location if the issues relating to access, heritage, and loss of best and most versatile agricultural land are resolved.
Site 8: Land east of Beaumoor Place (SHELAA Ref F_38)	0.48	12	<p>Site is not suitable:</p> <ul style="list-style-type: none"> <li>It is considered that the site's development would have unacceptable impact on setting of Morgan Hall and the Conservation Area.</li> <li>The site is also currently landlocked and has access issues, although it has been suggested that this could be overcome by the demolition of a dwelling (derelict mobile home) that is in the ownership of the landowner (this still needs to be confirmed with the landowner). CDC conclude that the demolition of a dwelling within the Conservation Area would require further consideration.</li> </ul>	<b>Potentially</b> - the site could be a suitable development location if numerous issues resolved; predominately access, heritage, amenity, ground water flood risk, and loss of best and most versatile agricultural land.
Site 9: Land at London Road (SHELAA Ref F_39D)	0.49	12	N/A	<b>No</b> - the site has planning permission and therefore it has been established that the site is suitable and available for development and does not need to be allocated.
Site 10: F_39C Field south east of granted planning permission at London Road	1.31	31	Site is developable, suitable and achievable (note for either limited housing (31 dwellings) or potentially employment development).	<b>Potentially</b> - the site could be a suitable development location if the access, biodiversity and ground and surface water flooding issues are resolved.
Site 11: Land west of Terminus Cottage and Station (F_52)	1.40	34	Site is available, suitable and achievable.	<b>Potentially</b> - the site could be a suitable development location if the access and ground and surface water flooding issues are resolved.

Name	Size (ha)	Capacity (dwelling no.) <sup>11</sup>	SHELAA (2017) conclusion	AECOM Site Assessment Addendum (2021) conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? )
Site 12: Yells Yard	0.82	25	N/A	<b>Potentially</b> - the site could be a suitable development location if numerous issues resolved; predominately access, landscape and heritage.

4.19 Of the sites identified in **Table 4.2** above, the following six are considered 'potentially suitable', and are therefore appropriate to consider as potential allocations through the FNP, if constraints are overcome:

- Site 5: The southern half of Site 5: Land between Leafield Rd. and Hatherop Rd. (SHELAA Ref F\_51B & F\_51C)
- Site 7: Jones' Field (SHELAA Ref F\_15);
- Site 8: Land east of Beaumoor Place (SHELAA Ref F\_38);
- Site 10: F\_39C Field south east of granted planning permission at London Road; and
- Site 11: Land west of Terminus Cottage and Station (F\_52)
- Site 12: Yells Yard

4.20 These six sites were taken forward for further consideration by FTC.

4.21 The red line boundary of Site 5 has since been amended to include only its southern part. The site no longer abuts Leafield Road, following the field boundary and adjoining Hatherop Road to the east. The site will now be referred to as 'new site 5' (See **Figure 4.1** below).

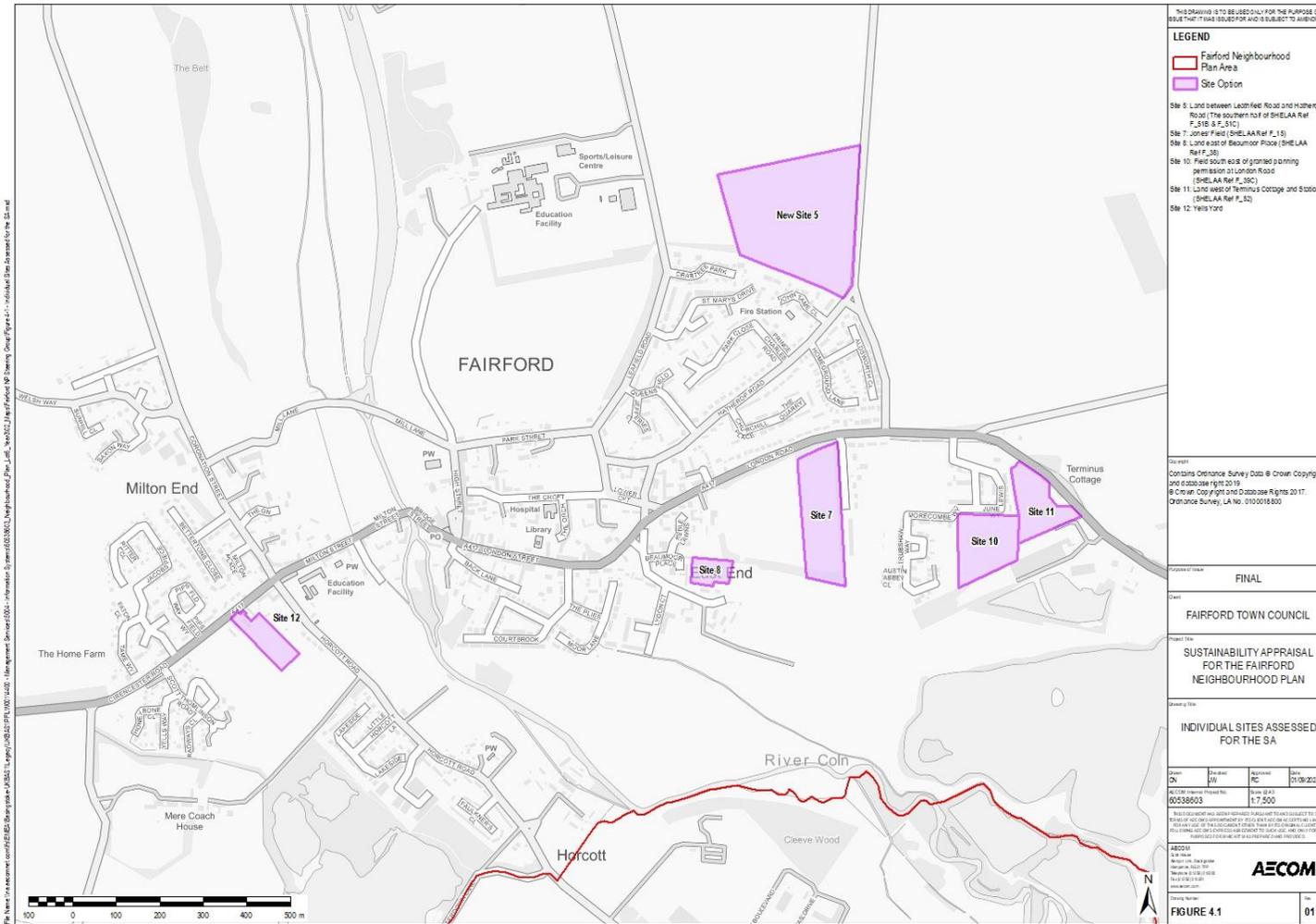
### Appraisal of site options

4.22 To support the consideration of the suitability of these sites, the SA process has undertaken an appraisal of the key environmental constraints present at each of the six remaining suitable sites and potential effects that may arise as a result of development at these locations. In this context the sites have been considered in relation to the SA Framework of objectives and decision-making assessment questions developed during SA Scoping (**Section 3.3**) and the baseline information. The location of these sites can be seen in **Figure 4.1** overleaf.

4.23 It should be noted that when considering access to community facilities and services, walking distances have been calculated from the edge of the site using google maps.

4.24 **Table 4.3** (also overleaf) presents summary appraisal findings in relation to the six individual site options, with the detailed appraisals presented within **Appendix B**.

Figure 4.1 Individual site options for appraisal



This drawing is to be used only for the purposes of which it has been issued for and is subject to amendment.

**LEGEND**

- Fairford Neighbourhood Plan Area
- Site Option

Site 5: Land between Lash Hill Road and Hatherop Road (The southern half of SHELA Ref F\_518 & F\_519)  
 Site 7: 200m Field (SHELA Ref F\_15)  
 Site 8: Land east of Beaumont Place (SHELA Ref F\_38)  
 Site 10: Field south east of granted planning permission at London Road (SHELA Ref F\_39)  
 Site 11: Land west of Terminus Cottage and Station (SHELA Ref F\_52)  
 Site 12: Yew Farm

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Project Title: **SUSTAINABILITY APPRAISAL FOR THE FAIRFORD NEIGHBOURHOOD PLAN**

Client: **FAIRFORD TOWN COUNCIL**

Project File: **INDIVIDUAL SITES ASSESSED FOR THE SA**

Drawn: <b>DN</b>	Checked: <b>PC</b>	Approved: <b>PC</b>	Date: <b>21/09/2021</b>
AECOM Reference No: <b>60538603</b>	Scale: <b>8:1</b>	Sheet: <b>17</b>	Total: <b>500</b>

AECOM  
 100 Brook Hill Drive  
 Broomfield, Essex SS16 5QU  
 Tel: 020 7041 2000  
 www.aecom.com

FIGURE 4.1

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4.25 **Table 4.3** below presents a summary of the findings of the site appraisal undertaken through the SA process.

**Table 4.3 Summary appraisal findings for site options**

Site	Biodiversity	Climate Change	Landscape and Historic Environment	Land, soil and Water Resources	Population and Community	Health and Wellbeing	Economy and Employment	Transportation
New Site 5	Red	Yellow	Red	Red	Green	Green	Green	Green
Site 7	Red	Yellow	Red	Red	Green	Green	Blue	Yellow
Site 8	Red	Red	Blue	Red	Green	Green	Blue	Yellow
Site 10	Red	Yellow	Blue	Red	Green	Blue	Blue	Yellow
Site 11	Red	Yellow	Red	Red	Green	Blue	Green	Blue
Site 12	Red	Yellow	Red	Blue	Green	Green	Green	Blue
<b>Key</b>								
Likely adverse effect (without mitigation measures)				Red	Likely positive effect			Green
Neutral/no effect				Yellow	Uncertain effects			Blue

4.26 In terms of Biodiversity, all site options perform negatively due to the potential impacts on nationally and locally designated sites through recreational disturbance, pollution and sewage capacity issues downstream. Sites 1, 7, 8, 10, 11 and 12 also perform negatively as they have the potential to adversely impact upon BAP priority habitats, mature trees, hedgerows, and railway embankment, which are likely to be ecological diverse and support connectivity.

4.27 Given the increased scale of new Site 5 compared to all other options, it is recognised that there is potential for long term positive effects on biodiversity. Biodiversity net gain could be delivered through the provision of open space and allotments on site, however, this is uncertain at this stage.

4.28 Site 8 performs negatively against the Climate Change SA Theme as the site is located partially within Flood Zone 2 (south of site), which would preclude development in this part of the site. There are also small areas of low risk of surface water flooding within the site.

4.29 While new site 5, sites 10 and 11 also include areas of high risk of groundwater flooding, these are assessed as neutral given that development could avoid the high flood risk areas.

4.30 Sites 11 and 12 perform negatively against the Landscape and Historic Environment SA Theme given the sites' potential to impact upon open landscape, local views and the rural setting of the town. New site 5, sites 7 and 12 also have the potential to lead to negative effects due to impact on the Special Landscape Area and/ or designated heritage assets (notably Fairford Conservation Area and Grade II Listed buildings). Uncertain effects are predicted for sites 8 and 10 given the potential for development to enhance the character and appearance of sites, particularly given the landscape and heritage setting at these locations has already been compromised by employment and residential development.

4.31 Sites 7, 8, 10 and 11 perform negatively against the Land, Soil and Water SA Theme given that they contain best and most versatile (BMV) agricultural land (Grades 1 – 3a). Development has the potential to lead to the loss of this natural resource. Site 12 is assessed as uncertain

- as it is located on Grade 3 agricultural land, which could be BMV (if found to be Grade 3a). However, this is uncertain at this stage. New site 5 is also assessed negatively against this SA Theme as a result of the loss of greenfield and agricultural land.
- 4.32 All sites are assessed positively against the Population and Community SA Theme as all sites will deliver housing which will contribute towards local needs. While it is recognised that Site 10 is now being promoted for employment, it is considered that either use would lead to positive effects against this SA theme.
- 4.33 All sites have the potential to contribute to the improvement of existing or provision of new services/ facilities. At this stage the level of improvements or provision that could be delivered is not known. While not as well connected to the town centre and local facilities as other sites, new site 5 is identified as leading to positive effects of greater significance for the Population and Community SA Theme given its scale. Significant positive effects are also anticipated in this respect in relation to sites 7 and 8 given sites have been promoted for the delivery of community benefits.
- 4.34 All sites, with the exception of Sites 10 and 11 perform positively against the Health and Wellbeing SA Theme as all have good access to open space and recreation, and the sustainable transport offer of the town. Uncertain effects are predicted for sites 10 and 11 given the adjacent employment uses at London Road industrial estate. It is considered that residents' health may be adversely affected by noise and dust disturbance, and/or air quality pollution.
- 4.35 In terms of the Transportation SA Theme, sites 7, 8 and 10 are assessed as neutral. While sites are located in close proximity to bus stops, local knowledge suggests these services are relatively unreliable, and there is not an easily accessible train station. High car use is likely to continue. Given that the road access routes for sites 11 and 12 are currently undetermined, uncertain effects are predicted for these sites against the Transportation SA Theme.
- 4.36 Uncertain effects are predicted against the Economy and Enterprise SA Theme for Site 10 as the use of the site is currently unknown. While the use of the site for employment would lead to positive effects against this SA theme, the use of the site for housing would result in the loss of a potentially suitable employment site within the neighbourhood area.
- 4.37 Sites 3, 7 and 8 are assessed as uncertain for the Economy and Employment SA Theme given they are not well located in terms of local employment sites, and there is uncertainty around the extent to which local services will be/ can be utilised. New site 5, sites 11 and 12 perform positively against this SA Theme as they are located in close proximity to employment sites, providing access to local jobs.

## Establishing the reasonable alternatives

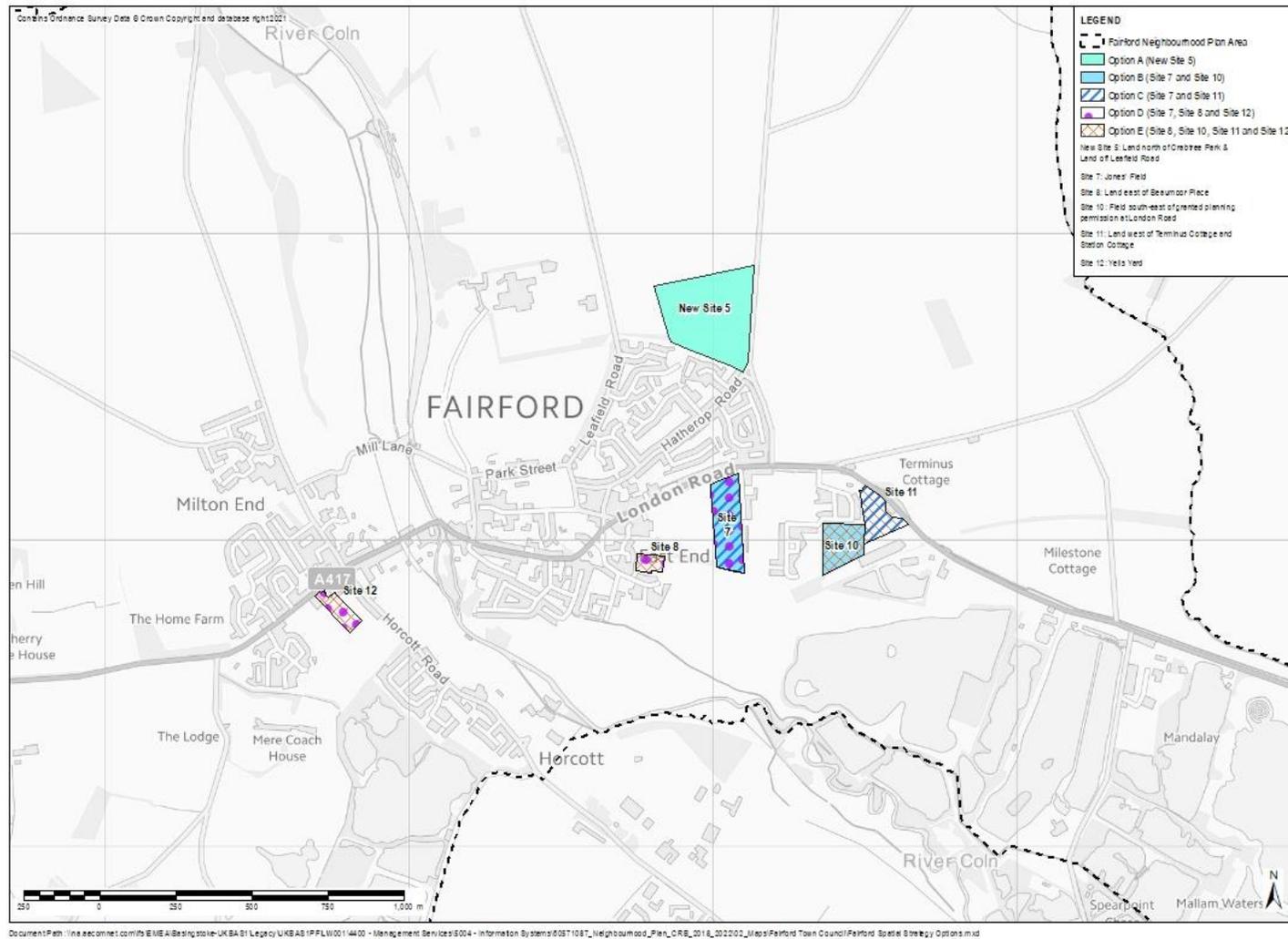
- 4.38 In light of the above FTC, with support from AECOM, have identified five reasonable spatial strategy options based on the six sites assessed above. It should be noted that Site 8 and Site 11 were previously rejected through the SA for reasons set out in the Regulation 14 SA Report. However, following discussions between FTC and AECOM, it was decided to include them for consistency and to ensure that all reasonable alternatives were explored. These options identified are set out in **Table 4.3** below, and shown in **Figure 4.2**, also overleaf. It is noted that a reduced capacity is now being promoted for Yells Yard, of ten homes.

**Table 4.3 Reasonable alternative growth options**

Site	Option A	Option B	Option C	Option D	Option E
New Site 5: Land north of Crabtree Park & Land off Leaffield Road (SHELAA Ref F_51B & F_51C)	80				
Site 7: Jones' Field (SHELAA Ref F_15)		52	52	52	
Site 8: Land east of Beaumoor Place (SHELAA Ref F_38)				12	12

Site 10: F_39C Field south east of granted planning permission at London Road		31			31
Site 11: Land west of Terminus Cottage and Station (F_52)			34		34
Site 12: Yells Yard				10	10
<b>TOTAL</b>	<b>80</b>	<b>83</b>	<b>86</b>	<b>74</b>	<b>87</b>

Figure 4.2 Reasonable alternatives



## Appraisal of reasonable alternatives

4.39 The detailed appraisal of the reasonable alternatives under the SA themes is presented in **Appendix C**, with summary findings presented in **Table 4.4** below. To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SA themes. This will provide an indication of the comparative sustainability performance of the reasonable alternative options in relation to each theme.

**Table 4.4 Summary reasonable alternatives appraisal findings**

SA theme	Option A Site 5	Option B Sites 7 & 10	Option C Sites 7 and 11	Option D Sites 7, 8 and 12	Option E Sites 8, 10, 11 and 12
<b>Biodiversity</b>					
Rank of preference	2	4	1	3	4
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
<b>Climate change</b>					
Rank of preference	1	2	2	3	3
Significant effect?	Yes - positive	No	No	Yes - Negative	Yes - Negative
<b>Landscape &amp; historic environment</b>					
Rank of preference	1	2	3	4	5
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
<b>Land, soil and water resources</b>					
Rank of preference	1	4	4	2	3
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
<b>Population and community</b>					
Rank of preference	1	3	3	3	2
Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
<b>Health and wellbeing</b>					
Rank of preference	1	3	3	2	3
Significant effect?	Yes - positive	No	No	No	No
<b>Economy &amp; Enterprise</b>					
Rank of preference	1	4	2	3	3
Significant effect?	No	Uncertain	No	No	No
<b>Transportation</b>					

SA theme	Option A Site 5	Option B Sites 7 & 10	Option C Sites 7 and 11	Option D Sites 7, 8 and 12	Option E Sites 8, 10, 11 and 12
Rank of preference	1	2	3	3	4
Significant effect?	Yes - Positive	No	Uncertain	Uncertain	Uncertain

**Summary findings:**

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the FNP. The appraisal has highlighted the potential for a number of **positive effects** as a result of development at individual options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the FNP. **All options** perform equally in this respect given all will deliver a similar level of growth.
- **Option A** will deliver a walking route to the town’s schools and provision for a future link road. While further details of the link road are unknown at this stage, it is considered that its delivery would likely provide improved accessibility in and around the town, improve safety, and reduce potential adverse effects on the local environment.
- The potential for positive effects are also considered for Sites 7 and 8 (**Options B to E**) under the population and community SA theme, given sites have been promoted for the delivery of community benefits alongside housing growth.

The appraisal has highlighted the potential for **negative effects** as a result of development at individual options, which are summarised as follows:

- **Options D and E** are have the potential to lead to negative effects in relation to the climate change SA theme given the presence of Site 8 which falls partially within Flood Zone 2.
- **Options B to E** will result in the permeant loss of BMV agricultural land, delivering long term negative effects against the land, soil and water resources SA theme. **Option A** although not constrained by BMV land, will also lead to long term negative effects through the loss of greenfield and agricultural land.
- **All options** have the potential to lead to long term negative effects on the local townscape and setting of Fairford, and the important heritage offer (including Fairford Conservation area and Listed Buildings). Site 12 is notable in this respect, recognising that the conclusions of the sites’ Heritage and Landscape Assessments anticipating a “*moderate adverse significance of effect*”.

Alongside this, further option specific constraints are identified including:

- **All options** may increase recreational and disturbance pressures related to designated biodiversity sites and include ecological features on site, with Options B and E identified as worst performing in this respect. It is however recognised that the design and layout of development, including potential mitigation, retention, enhancement, and net-gain opportunities will determine the overall significance of effects.
- **All options** will likely lead to continued high car use; however, Options B to E are less likely to encourage modal shift than Option A given the delivery of new transport infrastructure, and the opportunities presented when delivering growth at scale on a single site (i.e. delivering connected, green, active communities). This is similarly the case for the population and community SA theme.
- **Options C to E** perform less positively in relation to for transport given road access routes for Site 11 and 12 are currently undetermined.

## Preferred approach for the FNP

4.40 The following text has been provided by FTC regarding the preferred approach for the FNP.

4.41 Using the AECOM appraisal and ranking, we have applied a score (tallied the ranking) for each of the five options

Option	Score
A	9
B	22
C	18

D	20
E	23

4.42 Option A is the preferred site for the FNP Steering Committee for the following reasons:

- The concentration of the allocation on a single site, rather than spread over several smaller sites, makes the provision of affordable housing, self-build houses and community facilities (playgrounds, landscaping, e-charging points etc) more viable. Also if the allocation is spread over several sites, there will be a number of different constraints to overcome for the different sites.
- The NPPF (2021) requires Local Planning to steer development away from areas with higher flood risk towards areas with a lower probability of flooding. Option A has enough land of low flood risk to accommodate the housing requirement.
- Option A (new site 5) is not in any water supply Source Protection Zone (SPZ).
- The development of Option A includes the provision in the layout for a future link road from Hatherop Road to Leafield Road.
- Finally, the ranking by AECOM of the options clearly shows Option A to be by far the most preferable option.
- Finally, the ranking by AECOM of the options clearly shows Option A to be by far the most preferable option. Scoring the sites using AECOM's ranking, Option A scores 9 compared to 18 to 23 for the other options.

## Preliminary appraisal of the FNP

4.43 In June 2020 AECOM assessed an initial draft of the Pre-Submission Regulation 14 Neighbourhood Plan, providing the following recommendations:

- Part of 'land between Leafield Road and Hatherop Road' site allocation falls within a SSSI IRZ for Cotswold Water Park SSSI. It is considered that there is the potential to strengthen Policy FNP14 by including a reference to the Cotswold Water Park SSSI IRZ and requiring early consultation with NE as part of any proposal.
- To strengthen the FNP's climate change focus, the FNP could seek to incentivise a shift away from petrol/diesel vehicles, including ensuring development proposals, where possible, realise opportunities for integrated vehicle electric charging points and associated infrastructure.

4.44 FTC subsequently updated the draft Neighbourhood Plan in response to the recommendations proposed through the SA Report, updated evidence, and in light of responses received to Regulation 14 consultation.

## Development of Neighbourhood Plan policies

4.45 To support the implementation of the vision for the FNP, discussed in **Section 2.8**, the FNP puts forward 18 policies to guide development in the neighbourhood area.

4.46 The policies, which were developed following extensive community consultation and evidence gathering, are set out below in **Table 4.5** overleaf.

**Table 4.5: Fairford Neighbourhood Plan policies**

<b>Policy Number</b>	<b>Policy Title</b>
<b>FNP01</b>	The Fairford and Horcott Development Boundaries
<b>FNP02</b>	Providing a New Burial Ground
<b>FNP03</b>	Maintaining Viable Community Facilities
<b>FNP04</b>	Managing Flood Risk
<b>FNP05</b>	Investing in Utilities and Infrastructure Improvements
<b>FNP06</b>	Managing Traffic in the Town
<b>FNP07</b>	Improving Access to Visitor Attractions
<b>FNP08</b>	Protecting Local Green Spaces
<b>FNP09</b>	Protecting the Fairford-Horcott Local Gap
<b>FNP10</b>	River Coln Valued Landscape
<b>FNP11</b>	Valuing Hedgerows and Trees
<b>FNP12</b>	Achieving High Standards of Design
<b>FNP13</b>	Conserving Non-Designated Heritage Assets
<b>FNP14</b>	A new Low Carbon Community In Fairford
<b>FNP15</b>	Sustainable Homes and Housing Need
<b>FNP16</b>	Growing our Local Economy
<b>FNP17</b>	Sustaining a Successful Town Centre
<b>FNP18</b>	New Visitor Accommodation

## 5. Appraisal findings at this current stage?

### Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current version of the FNP. This chapter presents:
- An appraisal of the current version of the FNP under the eight SA theme headings; and
  - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

### Appraisal method

- 5.2 The appraisal is structured under the eight SA themes taken forward for the purposes of the SA and that are linked to the SA objectives, see **Table 3.2**.
- 5.3 For each theme ‘significant effects’ of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect ‘characteristics’ are described within the assessment as appropriate.
- 5.4 Every effort is made to identify/ evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

## Appraisal of the Neighbourhood Plan

### Biodiversity

- 5.5 There are no internationally designated sites for biodiversity within the neighbourhood area ; however, the neighbourhood area lies approx. 5.5km from the North Meadow & Clattinger Farm Special Area of Conservation (SAC), which is within, albeit on the outer edge, of a typical Zone of Influence (Zol) for inland Habitats (European) sites. It was therefore concluded at the Habitats Regulations Assessment (HRA) ‘Screening’ stage that without mitigation, Appropriate Assessment (AA) was required to further consider whether the FNP, alone or in-combination with other plans and projects, would adversely affect the integrity of internationally designated sites. Specifically, the ‘recreational disturbance’ and ‘water quantity, level and flow’ impact pathways were screened in for further assessment.
- 5.6 In applying the integrity test at AA stage – the HRA considered that *“the additional growth in the Neighbourhood Plan would not result in an adverse effect on the integrity of the SAC. This is based on the package of visitor management measures already devised by Natural England, the relative distance of Fairford town from the SAC (8km) and comparative difficulty accessing the SAC compared to other closer areas of attractive semi-natural greenspace, and the overarching policy framework in the Local Plan and Neighbourhood Plan including a Local Plan commitment to develop strategic mitigation for the district.”*
- 5.7 Policies that help prevent adverse effects on the integrity of European Sites are also included in the Cotswold District Local Plan (CDLP), and the protection of European Sites is further strengthened in FNP Policy EN9 (Biodiversity and Geodiversity: Designated Sites), which clarifies that *‘1. Internationally designated wildlife sites... will be safeguarded from development that could cause a significant effect that would adversely affect their integrity.’* Overall, these

- policies ensure that residential development which would result in unsustainable, adverse recreation impacts will not be permitted.
- 5.8 In consultation with Cotswold District Council (CDC), it was suggested that, notwithstanding the conclusion above, reference should be made in both the HRA and Fairford Neighbourhood Plan to the need for any developer of a housing site in Fairford to comply with the emerging Interim Mitigation Strategy for North Meadow that is currently being prepared by a consultant on behalf of Swindon Borough Council for their Local Plan Review.
- 5.9 In line with advice from CDC it was recommended through the HRA that *“for the avoidance of doubt a reference to the emerging Interim Mitigation Strategy and the need for developers to comply with it should be added to Policy FNP14.” Overall, it is determined that, with this addition to policy text, there will be no adverse ‘in combination’ effects of the Fairford NP. No policy recommendations are made.*” Policy FNP14 has subsequently been updated in light of this recommendation, stating in relation to ‘land between Leaffield Road and Hatherop Road’, that *“The development of this site will be required to mitigate its impact on the Special Area of Conservation (SAC) at North Meadow near Cricklade, in accordance with the mitigation strategy being developed by Swindon Borough Council.”*
- 5.10 In terms of the ‘water quantity, level and flow’ pathway, the HRA highlights that ‘Thames Water’s WRMP does not involve water resource options that are hydrologically linked to the North Meadow & Clattinger Farm SAC. Furthermore, the CDLP contains a policy framework that protects the hydrological conditions in European Sites. Therefore, the HRA concludes that *“the Fairford NP will not result in adverse effects on the SAC regarding water level, flow and volume ‘in-combination’ with other plans and projects. No additional policy recommendations for inclusion in the Fairford NP are made.”*
- 5.11 In terms of nationally designated sites, the Cotswold Water Park Site of Special Scientific Interest (SSSIs) now covers most of the southern part of the Parish (in light of the extension to the SSSI January 2021)<sup>13</sup>, including Horcott. Additionally, adjacent to the neighbourhood area is Whelford Meadow SSSI to the south. Consequently, the entirety of the falls within a SSSI Impact Risk Zone (IRZs) for these SSSIs.<sup>14</sup> The IRZ varies depending on the proximity to the SSSI, and as such the south/ south eastern extent of the neighbourhood area is within a SSSI IRZ for *‘all development proposals*, i.e. an application for any type or scale of development, while areas north of the settlement are within an IRZ for *‘any residential development of 50 or more houses outside existing settlements/ urban areas’*.
- 5.12 In terms of the Neighbourhood Plan site allocation (Policy FNP14 (A New Low Carbon Community in Fairford)), part of the site, to the south east, falls within the Cotswold Water Park SSSI IRZ for 50 residential units. Policy FNP14 supports proposals for housing developments of *“around 80 homes”*, and as such, development has the potential to impact upon the SSSI, for example through recreational disturbance and indirectly through pollution. The Cotswold Local Plan (2018) provides protection to nationally designated sites, in particular Policy EN9 (Biodiversity and Geodiversity: Designated Sites) states that any development likely to have an adverse effect upon a nationally designated site will not be permitted. Furthermore, Policy EN9 requires that any permitted development provides appropriate mitigation or compensation.
- 5.13 Policy FNP14 (A New Low Carbon Community in Fairford) supports the development of around 80 homes subject to a number of criteria. Two of these criteria will help to reduce the impacts of any development at this site on the Cotswolds Water Park SSSI. Firstly, in terms of water pollution, Policy FNP14 requires that development is not commenced until the necessary upgrade and improvements to the local utilities infrastructure are completed, as provided for by Policy FNP05. Secondly, in terms of recreational disturbance, Policy FNP14 requires that *“the scheme provides one or more areas of publicly accessible open space, including a children’s play area and a community garden or allotments.”* It is considered that the protection and policy mitigation provided through Cotswold Local Plan Policy EN9 and Neighbourhood Plan Policy FNP14 should be sufficient to ensure that there are residual neutral effects on nationally

<sup>13</sup> Natural England (2021) Cotswold Water Park [online] available at: <https://www.gov.uk/government/news/cotswold-water-park-given-greater-protection-by-natural-england>

<sup>14</sup> IRZs are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location

designated sites as a result of development at Land between Leafield Road and Hatherop Road.

- 5.14 Policy FNP11 (Valuing Hedgerows and Trees) requires that *“Development proposals that require the removal of trees should make provision for their replacement with trees of (wherever possible) native species within the site boundary. Where appropriate each tree removed should be replaced with at least two new trees.”* Policy FNP14 subsequently states that *“the form of development would need to incorporate appropriate measures, including tree planting to mitigate the visual effects of the development on the countryside to the west, north and east of the site, with provision for this to be maintained in perpetuity”*. This will contribute positively towards ensuring no net loss of biodiversity, with the potential for net-gain, supporting the integrity and connectivity of ecological networks in the neighbourhood area .
- 5.15 Policy FNP14 also makes provision for a link road to the east of the town, to be delivered in accordance with the emerging Gloucestershire Local Transport Plan (2020).<sup>15</sup> Given the exact location of the link road is not currently known, it is noted that there is potential for development to lead to negative effects on the local biodiversity resource through habitat loss and disturbance. However, it is assumed that the location of the link road and impacts on biodiversity will be considered through a planning application for the site. In light of the requirements of the wider FNP policy framework, the Local Plan (2018), and NPPF (2021), any residual effects are unlikely to be significant.
- 5.16 The delivery of a ‘New Low Carbon Community’ at Land between Leafield Road and Hatherop Road has the potential to realise opportunities on site such that the net effect is positive for biodiversity. This approach is known as securing biodiversity ‘net gain’, with the emerging Environment Bill set to mandate that all qualifying schemes secure a 10% net gain. This is likely to be achieved through the delivery of *“one or more areas of publicly accessible open space” alongside housing development, “including a community garden/allotments.”* Green infrastructure within the development delivers a net enhancement of biodiversity quality by avoiding, mitigating, and compensating for impacts on existing biodiversity, and restoring, creating and enhancing biodiversity, where possible within the boundary of the scheme. Given the requirement that *“development satisfies, as a minimum, the Building with Nature – Design level”*, on-going monitoring and remediation of green infrastructure assets is likely to be required, leading to positive effects on the local biodiversity resource in the long term.<sup>16</sup>
- 5.17 The delivery of natural spaces and biodiverse allotments will further support ecological connectivity throughout the neighbourhood area . A wider commitment to biodiversity enhancements is seen through Policy FNP12 (Achieving High Standards of Design), which requires development proposals to be of the *highest design standards, in accordance with the Cotswold Design Code*. As set out in the Design Code, *“opportunities should be taken within all areas of GI (and the built environment) to enhance biodiversity through species choice, creation of new habitats, land management etc. There should be linkages with existing biodiversity assets and networks, and increasing access to nature for people.”* Requiring high standards of design in line with CDC’s key design principles is likely to lead to minor long-term positive effects for biodiversity, improving resilience to current and future pressures; as identified through the NPPF (2021), and the Governments 25-year Environment Plan (2018).
- 5.18 A number of FNP policies seek to more broadly support the overall biodiversity value of the neighbourhood area , placing focus on the protection and enhancement of local features and networks. In this context Policy FNP09 (Protecting the Fairford-Horcott Local Gap) and Policy FNP10 (River Coln Valued Landscape) provide protection to open landscape within the neighbourhood area . Notably, the Local Gap includes fields and paddocks which may hold a level of biodiversity value. It is also considered that Policy FNP08 (Protecting Local Green Spaces) will deliver positive effects in this regard; preventing development of valued green spaces such as the Walnut Tree Field.

<sup>15</sup> Gloucestershire Local Transport Plan (2020 – 2031) [online] available at:

<https://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2020-2041/gloucestershire-ltp-2020-2041/>

<sup>16</sup> Building with Nature (2019) Building with Nature User Guide

[https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/5df1fad773bd391193145473/1576139482317/Building+with+Nature+User+Guide+v1.4\\_new.pdf](https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/5df1fad773bd391193145473/1576139482317/Building+with+Nature+User+Guide+v1.4_new.pdf)

- 5.19 In summary, once the above recommendation has been adopted, it is considered that the Neighbourhood Plan and Local Plan policies provide sufficient protection, as well as mitigation, to ensure that there are no residual significant negative effects as a result of proposed development. Overall, the Fairford Neighbourhood Plan is predicted to have a residual **uncertain long-term minor positive effect** on biodiversity given the biodiversity net-gain likely to be secured through development.

## Climate Change

- 5.20 The Neighbourhood Plan proposes Land between Leafield Road and Hatherop Road for a low, or zero, carbon residential development. Policy FNP14 (A New Low Carbon Community in Fairford) proposes that the new development should only be delivered using low and zero carbon housing in line with Policy FNP15 (Sustainable Homes and Housing Need). This will lead to long-term positive effects in terms of supporting national and local emissions reduction targets to achieve carbon neutrality by 2050 and 2045, respectively.<sup>17,18</sup> Policy FNP15 provides support for *“innovative approaches to the construction of low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported.”* Examples listed include earth sheltered, rammed earth, or straw bale construction, construction to Passivhaus standards, and conversion to EnerPHit standards.
- 5.21 The FNP recognises that non-residential development must also respond to the need for energy efficient, low carbon development and that the BREEAM standard provides a benchmark for this. Therefore in line with Policy FNP16 (Growing Our Local Economy) *“All new non-residential buildings should achieve the BREEAM Excellent standard”*.
- 5.22 While promoting sustainable development, Policy FNP15 also seeks to capitalise upon Fairford’s rich historic environment; encouraging *“the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings”*. While listed buildings generally represent a greater challenge in terms of retrofitting for carbon reduction, it is possible in most cases to avoid causing harm to the special architectural character or historic interest of the building.<sup>19</sup> Positive effects are therefore anticipated in terms of delivering energy efficiency in homes; in line with the NPPF (2021), and the Cotswold Local Plan (2018). Notably, Policy INFO10 (Renewable and Low Carbon Energy Development) of the Local Plan seeks positively to encourage renewable and low carbon energy development while ensuring any adverse impact is satisfactorily addressed.
- 5.23 Adapting to the effects of climate change is a key challenge for the Neighbourhood Plan. Situated in a river basin within the Cotswold Water Park, Fairford has historically suffered many flooding incidents, from overspill from the River Coln but also groundwater, surface water and sewage flooding. The hydrology of the area is therefore complex, and as such detailed work was commissioned by FTC and produced in 2018 (WRA, ‘Groundwater Monitoring and Review of Flood Risk at Fairford’), which provided FTC with a better understanding of the groundwater levels and flood risk around prospective housing development sites.<sup>20</sup> In terms of the 80 dwellings allocated at Land between Leafield Road and Hatherop Road (Policy FNP14), the Hydrology Report indicates that parts of the site (southern parts of Land north of Crabtree Park and Land off Leafield Road, as well as an area around the ditch between these), are subject to high ground water levels and surface water flooding at times.<sup>21</sup> This has therefore been a key consideration for the FNP policy framework.
- 5.24 The FNP highlights that hydrological constraints favour larger sites with space to place housing away from flow routes and to provide attenuation ponds. To this effect, Policy FNP14 (A New Low Carbon Community in Fairford) states that development at the site will only be supported where *“The scheme keeps housing away from areas prone to surface or ground water flooding and incorporates measures to contain and attenuate surface water either in low lying areas*

<sup>17</sup> In June 2019 legislation passed to commit the UK to a legally binding target of net zero emissions by 2050

<https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>

<sup>18</sup> In July 2019 Cotswold District Council resolved to acknowledge that there is a climate emergency and will work towards being a carbon neutral organisation by 2045 <https://www.climateemergency.uk/blog/cotswold/>

<sup>19</sup> Historic England (2015) Planning Responsible Retrofit of Listed Buildings <https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/responsible-retrofit-trad-bldgs/>

<sup>20</sup> Water Resource Associates (2018) Groundwater Monitoring and Review of Flood Risk at Fairford

<sup>21</sup> Ibid.

- within the site boundary or on other land within the control of the applicant in accordance with Policy FNP4*". This seeks to alleviate the potential for adverse effects, addressing recommendations made by the Cotswold District Strategic Flood Risk Assessment (SFRA) Update (2016), in addition to the findings of the Hydrology Report (2018).<sup>22</sup>
- 5.25 Policy FNP04 (Managing Flood Risk) builds upon the provisions of the NPPF (2021), and Local Plan Policy EN14 (Managing Flood Risk) in terms of addressing the wider flood risk issues in the neighbourhood area . Policy FNP04 identifies a number of principles for development within the neighbourhood area , stating that *"Proposals to develop land defined by the Environment Agency as lying within either Flood Zone 2 or 3, or in areas of Flood Zone that have flooding from sources other than fluvial e.g. groundwater or surface water, will be resisted."* Further to this, *"Land in Flood Zone 1 that has high groundwater levels or holds large amounts of water in wet seasons will be safeguarded for flood storage purposes."* This is anticipated to positively address flood risk in the area, ensuring that appropriate measures are put in place to deal with flooding from all sources, and diverting development to more sustainable sites.
- 5.26 The FNP takes a green infrastructure approach to development, recognising that there can be opportunities for targeted development to deliver flood risk enhancement benefits. Policy FNP14 (Delivering a New Low Carbon Community in Fairford) requires that that development *"satisfies, as a minimum, the standards required for the "Building with Nature – Design" level. Developments that meet the higher levels ("Good", "Excellent") of the standard would be strongly supported."* To be eligible for either level ("Good", "Excellent"), the user guide states that an applicant must demonstrate that they have met all five core standards; multifunctional network, environmental context, policy context, environmental impact and climate change, management and maintenance. The standard requires green infrastructure to be designed in light of the local context, to ensure features effectively meet local priorities and needs.<sup>23</sup> In this way, the development's green infrastructure can contribute to strategic objectives relating to ecological constraints and opportunities, priorities relating to natural water management, and the social and cultural benefits of green infrastructure, as well as opportunities to enhance quality of life.<sup>24</sup>
- 5.27 The wider FNP policy framework will also deliver positive effects supporting the ongoing development of high quality multifunctional green infrastructure networks throughout Fairford. Policies of specific relevance include Policy FNP08 (Protecting Local Green Spaces), Policy FNP09 (Protecting the Fairford - Horcott Local Gap), and Policy FNP11 (Valuing Hedgerows and Trees).
- 5.28 Sustainable travel is discussed in depth under the Transportation SA theme; however, it is noted that Policy FNP12 (Achieving High Standards of Design) requires development proposals to be of the *highest design standards, in accordance with the Cotswold Design Code*". As set out in the Design Code, *"the walking and cycling network, should encourage "active travel", in line with the highway user hierarchy principle. On-site routes should link to off-site non-vehicular routes, particularly those that lead to key destinations such as shops, schools and railway stations. These routes should be designed so that they are also available to the existing residents and businesses in the locality, and they should be implemented early in the delivery of the development."* Requiring high standards of design in line with CDC's key design principles is likely to lead to minor long-term positive effects in relation to the Climate Change SA theme. Improvements to the local footpath network are also supported through at a site-specific scale through FNP14 (Delivering a New Low Carbon Community in Fairford).
- 5.29 The FNP will further contribute towards an emissions reduction (and addressing congestion in the town), through Policy FNP15 (Sustainable Homes and Housing Need), which supports a modal shift away from high emission vehicles. Policy FNP15 states that *"in residential developments all garage and off-street parking must include provision for the safe charging of electrical vehicles. Schemes including communal parking areas must include a scheme for*

<sup>22</sup> Cotswold District Council (2016) Strategic Flood Risk Assessment (SFRA) Update [online] available at: [http://consult.cotswold.gov.uk/portal/fp/sfra\\_l2/sfra\\_l2](http://consult.cotswold.gov.uk/portal/fp/sfra_l2/sfra_l2)

<sup>23</sup> CIWEM, 2010

<sup>24</sup> Building with Nature (2019) Building with Nature User Guide [https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/5df1fad773bd391193145473/1576139482317/Building+with+Nature+User+Guide+v1.4\\_new.pdf](https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/5df1fad773bd391193145473/1576139482317/Building+with+Nature+User+Guide+v1.4_new.pdf)

*communal charging points.*” Requiring new development to deliver electric vehicle charging points will contribute positively towards delivering the ‘low carbon community’ proposed through the FNP, and meeting the UK and Cotswolds’ net zero commitments. Furthermore, it is noted that a ban on selling new petrol, diesel or hybrid cars in the UK will be brought forward from 2040 to 2035 at the latest, under government plans.<sup>25</sup>

- 5.30 Overall, assuming the above recommendation is reflected through the FNP policy framework, it is considered that the delivery of a new low carbon community in Fairford will lead to positive effects on climate change. Policy FNP14 includes numerous requirements for new development which support national and local mitigation and adaptation objectives, implementing the climate emergency declared by CDC. Notably this includes requiring low or zero carbon residential development, meeting the standards required for the “Building with Nature – Design” level, and providing new publicly accessible green space. While it is recognised that Land between Leafield Road and Hatherop Road is partially at high risk of ground water flooding, it is considered that there is sufficient space within the site for development to avoid those areas at highest risk from groundwater flooding. Furthermore, it is important to note that groundwater flooding is a key issue throughout the neighbourhood area, with very few locations not at risk. As such it the requirements of Policy FNP14 (A New Low Carbon Community in Fairford and Policy FNP04 (Managing Flood Risk) are considered to sufficiently mitigate against adverse effects. This is in accordance with paragraph 155 of the NPPF (2021), which states that *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).”*
- 5.31 Taking the above into account, it is predicted that the FNP will have a **minor positive effect** on climate change.

## Landscape and Historic Environment

- 5.32 The neighbourhood area has a valued landscape and a rich historic environment. The town is characterised by the countryside and parkland interwoven into the built area, situated in in the setting of the Special Landscape Area (SLA), and the Coln Valley river basin. The FNP therefore requires that consideration is given to the landscape when locating development within the town; notably Policy FNP01 (The Fairford and Horcott Development Boundaries) seeks to ensure the delivery of *“appropriate development within the built-up area and in the countryside”*. Policy FNP01 will have the effect of focussing future housing and economic development on the existing urban area, where there will continue to be opportunities for appropriate infill and redevelopment over the plan period. This will provide protection to the sensitive landscape character areas surrounding the settlement, while also protecting the identity of the town itself.
- 5.33 The characteristic landscape features and visual integrity of the town is further protected through Policies FNP09 (Protecting the Fairford-Horcott Local Gap) and FNP10 (River Coln Valued Landscape). The designation (Policy FNP10) complements the proposed Local Gap (Policy FNP09) to its west and together they are intended to appropriately manage development proposals that may risk undermining the special character of the landscape. In this context, Policy FNP09 seeks to prevent the visual coalescence of Fairford and Horcott, requiring that *“development proposals within the Local Gap will only be supported if they do not harm, individually or cumulatively, its open character.”* Similarly, through Policy FNP10, proposals on land between the River Coln and Fieldway (i.e. the River Coln Valued Landscape), that may otherwise be suited to a countryside location, will only be supported if *“they will maintain the essential open character of the land”*. This local designation complements the wider FNP growth strategy and higher level policy designations through Preserving the wider countryside setting, and limiting housing development in undesirable locations. Positive effects may also be delivered in terms of planning for green infrastructure.
- 5.34 The site allocation proposed through Policy FNP14 (A New Low Carbon Community in Fairford) seeks to deliver around 80 new homes to the north of the settlement. Given its size, there is

<sup>25</sup> Department for Transport and Office for Low Emission Vehicles (2020) Consultation on ending the sale of new petrol, diesel and hybrid cars and vans [online] available at: <<https://www.gov.uk/government/consultations/consulting-on-ending-the-sale-of-new-petrol-diesel-and-hybrid-cars-and-vans>> last accessed [23/03/20]

- the potential for development at this location to adversely impact upon the SLA northwest of the site, and to impact upon the setting and character of the town; including views from the PRoW. Policy FNP14 therefore sets out criteria to ensure adverse effects in relation to landscape are mitigated against where possible. Notably, Policy FNP14 requires that *“The layout and landscape scheme incorporate appropriate measures, including tree planting, to mitigate the visual effects of the development on the countryside to the west, north and east of the site, with provision for this to be maintained in perpetuity.”* This will contribute positively towards reducing potential adverse effects on the characteristics of the SLA, local townscape, and setting.
- 5.35 Further to the site-specific requirements of FNP14 (A New Low Carbon Community in Fairford), Policy FNP12 (Achieving High Standards of Design) states that *“Proposals for new development, including extensions to existing buildings, should be of the highest design standards, in accordance with the relevant policies of the Cotswold Local Plan and the Cotswold Design Code”*. The Cotswold Design Code (2018) seeks to ensure the highest standards of new development, respecting the Cotswolds as *“an outstandingly beautiful area, rich in built and natural heritage.”*<sup>26</sup> Further to this, Policy FNP12 provides specific protection to the SLA, stating that *“proposals should have specific regard to enhancing key views, particularly to the [...] Special Landscape Area to the surrounding countryside”* and *“maintaining key views listed in Appendix 3”*. Policy FNP12 reinforces the higher-level policies of the Local Plan (2018) (Policy EN2 (Design of the Built and Natural Environment) and Policy EN6 (Special Landscape Areas)), providing an additional level of protection for the area’s sensitive landscape.
- 5.36 In terms of the local historic environment, there is a variety of historical features within the neighbourhood area, including Grade I, II\* and II Listed Buildings, two Scheduled Monuments, Fairford Conservation Area, and numerous non-designated heritage assets (see Appendix A). Policy FNP13 (Conserving Non-Designated Heritage Assets) seeks to protect and enhance significant non-designated heritage assets in the town, while Policy FNP12 (Achieving High Standards of Design) requiring development *“to be of the highest design standards, in accordance with the Cotswold Design Code”*. Further to this, Policy FNP12 sets out the requirement for development to have specific regard for *“key views, particularly to the [Grade I Listed] Church of St Mary, across Upper and Lower Green, and from within the Fairford Conservation Area”*. This recognises the contribution local heritage assets make to the character of the town and the wider environment; and seek to ensure their protection and enhancement through development proposals where possible. Supporting the protection and enhancement of the intrinsic qualities and setting of heritage assets is of particular importance for the neighbourhood area given the absence of a Conservation Area Character Appraisal/ Management Plan. This will also reinforce higher level policies of the NPPF (2021) and Local Plan (2018) (notably Policy EN1 (Designated Heritage Assets - Conservation Areas)).
- 5.37 As discussed above, the policies of the FNP perform positively in terms of protecting and enhancing the special qualities of the public realm, supporting local distinctiveness and protecting townscape character. In this context, Policy FNP08 (Protecting Local Green Spaces) seeks to preserve the distinct character of the town, protecting open spaces which contribute to the character and appearance of Fairford Conservation Area. Notably, The Walnut Tree Field is located within the Conservation Area and has been identified through community consultation (questionnaire responses) as *“the most highly valued community green space”*. The designation of the Field as Local Green Space will therefore provide an additional level of protection and enhancement for the Conservation Area.
- 5.38 Looking specifically at the housing site allocation (Policy FNP14 (A New Low Carbon Community in Fairford)), it is noted that the site is approximately 160m north east of the Fairford Conservation Area, which covers the centre of the village, extending up along Leafield Road. Development of the site therefore has the potential to impact upon the setting of the asset, however the site is screened almost entirely from the Conservation Area by dense belts of trees, which will likely reduce the potential for adverse effects. To further ensure adverse effects are avoided, Policy FNP14 requires that *“The design and landscaping have regard for the setting of the Fairford Conservation Area”*, and *“The layout and landscape scheme*

<sup>26</sup> Cotswold District Council (2018) Cotswold Design Code [online] available at: <https://www.cotswold.gov.uk/cotswold-design-guidance/cotswold-design-code/>

*incorporate appropriate measures, including tree planting, to mitigate the visual effects of the development on the countryside to the west, north and east of the site, with provision for this to be maintained in perpetuity*". The layout and landscape scheme also *"includes provision of a link road to the A417"*. While the exact location of the road is not currently known, it is considered that criteria set out within Policy FNP14 will ensure any residual adverse effects on the landscape and historic environment are not significant. It is noted that a Conservation Area Management Plan/ Appraisal does not currently exist for Fairford Conservation Area.

- 5.39 Policy FNP15 (Sustainable Homes and Housing Need) supports *"the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings"*. Historic England acknowledges the importance of making reasonable alterations to the existing building stock to mitigate climate change and states that often the energy efficiency of the historic buildings can be increased in ways sympathetic to their historic character.<sup>27</sup> Policy FNP15 further highlights the importance of *"safeguarding the special characteristics of these heritage assets for the future."*
- 5.40 Overall, in light of the criteria set out in Policy FNP12 (Achieving High Standards of Design), FNP14 (A New Low Carbon Community in Fairford), and the higher level policy provisions (Cotswold Local Plan (2018) and NPPF (2021)), in addition to the requirements set out in the Cotswold Design Codes (2018); it is considered that development proposed through the Neighbourhood Plan will not significantly impact upon the landscape and the historic environment. Further to this, it is considered that the FNP policies provide a robust basis for the conservation and enhancement of landscape and townscape character through the protection of the Fairford-Horcott Gap and identification of settlement boundaries. **Residual neutral effects** are predicted overall against this SA theme.

## Land, Soil and Water Resources

- 5.41 The FNP highlights that growth of facilities has not kept pace with the increase in population and there is now an infrastructure deficit within the town. Sewage and waste water disposal in particular is a key issue for the neighbourhood area . Policy FNP05 (Investing in Utilities Infrastructure Improvements) seeks to address this, stating that *"New homes must not be occupied until it can be demonstrated that the sewage system has adequate capacity to accommodate the additional flow generated by the development."* Thames Water prioritises long-term drainage interventions and does not have any planned for Fairford in the next Business Plan period, 2020 to 2025. However, Thames Water has stated that *"the capacity of the sewage treatment works is being reviewed due to the amount of new development now proposed within the catchment. Assessments will be undertaken to understand the phasing of the proposed future development and growth, and the operational implications for the existing sewage works."* It is considered that this will contribute positively towards ensuring that there is capacity for infrastructure to accommodate growth in the long term, and that the issue is not exacerbated by future development in the neighbourhood area . The FNP also notes that Thames Water have worked with FTC to resolve several drainage issues and set out plans for further intervention in their "Fairford Drainage Strategy v3". The delivery of the Strategy will likely lead to long term positive effects in this regard.
- 5.42 In terms of the local soil resource, it is recognised that the site allocation at Land between Leafield Road and Hatherop Road (Policy FNP14 (A New Low Carbon Community in Fairford)) is located on Grade 4 agricultural land, and therefore avoids development of best and most versatile agricultural land. While this will protect the area's highest quality land, development will nonetheless lead to the loss of greenfield and poorer quality agricultural land. Minor negative effects are therefore anticipated in relation to the land, soil and water resources SA theme.
- 5.43 The Neighbourhood Plan's focus on protecting and supporting habitats and species and facilitating enhancements to Green Infrastructure will support the quality of land and water resources. This will promote the ability of natural processes to support soil and water quality. Key policies in this regard include Policies FNP08 - FNP11, and the site allocation at Land

<sup>27</sup> Historic England (2020) Climate Change <https://historicengland.org.uk/whats-new/statements/climate-change/>

between Leaffield Road and Hatherop Road (Policy FNP14 (A New Low Carbon Community in Fairford)).

- 5.44 Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. As of February 2018, SPZ 1, 2 and 3 are present within the Neighbourhood plan.<sup>28</sup> There is a small SPZ 1 (Inner zone) area located from Fairford town centre to the southern boundary of the plan area. There is a larger SPZ 2 (Outer zone) area covering the area from the town centre to the northern boundary of the plan area. Finally, the remaining western section of the neighbourhood area region is an SPZ 3 (Total Catchment) area. The site allocated through FNP14 lies outside of an SPZ, and the FNP is therefore considered to perform positively in terms of ensuring new development is not constrained in this respect. No specific policy is included in this respect within the FNP as it is considered that sufficient policy is provided through the higher level policy suite (i.e. Local Plan and NPPF (2021)).
- 5.45 Nonetheless, overall, as a result of the permanent loss of greenfield land and poorer quality agricultural land, it is considered that the Fairford Neighbourhood Plan has the potential to lead to **long term minor negative effects** in relation to the Land, Soil and Water Resources SA Theme.

## Population and Community

- 5.46 Policy FNP14 (A New Low Carbon Community in Fairford) seeks to deliver around 80 dwellings to the north of the neighbourhood area. This will contribute positively towards meeting local housing needs, with the potential for significant long-term positive effects on this SA theme.
- 5.47 It is highlighted through the FNP that the population of Fairford will have increased by around 1/3 since 2012 which has created a strain on all aspects of local infrastructure including schools and health services, which will need addressing by increasing school places, developing the right housing mix and protecting community facilities. In terms of the mix of housing to be delivered, Policy FNP15 (Sustainable Homes and Housing Need) requires that *“Proposals for housing development should provide a mix of housing types that have an emphasis on two and three-bedroom houses.”* This will contribute positively towards ensuring local housing supply maintains a wide variety of stock in the town, addressing local issues such as the considerable number of younger people living in Fairford who are unable to buy a house.
- 5.48 In terms of local infrastructure, public consultation carried out in 2016 highlighted that the *“town has grown too quickly and infrastructure has not kept up causing pressure on public services e.g. schools and GP surgery.”* Policy FNP03 (Maintaining Viable Community Facilities) seeks to address this through setting out a list of nine key community facilities in the town, and stating that *“Proposals that will result in either the loss of, or significant harm to a facility will not be supported unless it can be clearly demonstrated that the operation of the facility, or the ongoing delivery of the community value of the facility, is no longer financially viable.”* This will contribute positively towards maintaining and enhancing the vitality of the town, restricting further loss of local facilities.
- 5.49 Policy FNP03 is anticipated to lead to further positive effects against the Population and Community SA Theme through stating that *“Proposals to improve the viability of a community facility, by way of the extension or partial redevelopment of existing buildings, will be supported”*. In this context, it is recognised that the protection of existing, and support for new/improved community infrastructure is a key focus of the FNP.
- 5.50 Policy FNP14 (A New Low Carbon Community in Fairford) seeks to, alongside housing development, deliver “one or more areas of publicly accessible open space, including a children’s play area and a community garden or allotments”. Policy FNP14 also includes provision for *“a link road to give access between the schools and the A417 to the east of the town, for a dropping-off point away from the school and a safe walking route to the schools”*.

<sup>28</sup> Environment Agency (2018): ‘Groundwater Source Protection Zones Map’, [online] available to access via <http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

Policy FNP14 is therefore likely to lead to long term positive effects for this SA theme by improving access to key services and facilities in the neighbourhood area, and increasing open space/ green infrastructure provision to improve the public realm.

- 5.51 The FNP further seeks to deliver community benefits through Policy FNP02 (Providing a New Burial Ground). Policy FNP02 supports proposals for a new burial ground in the town, recognising that this has been a local community request for some time now; as identified by the Fairford Community Plan and the Local Plan (2018). The delivery of a new burial ground will further improve the local facilities offer of the town, and increase levels of neighbourhood satisfaction.
- 5.52 Positive effects for the community are also anticipated through the designation of Fairford-Horcott Local Gap. Policy FNP09 (Protecting the Fairford-Horcott Local Gap), will reduce the potential for coalescence between Fairford and Horcott and conserve the countryside surrounding the town, providing long-term protection of Fairford's identity, and positive effects for the health of the local community.
- 5.53 Overall, it is considered that the FNP is likely to deliver significant positive effects in terms of delivering housing to meet local needs; and that the type of housing being developed is likely to support the various needs of the local community. Further to this the FNP seeks to improve accessibility in and around the town centre; delivering local green space to support community cohesion. **Significant long-term positive effects** are therefore predicted in relation to this SA theme.

## Health and Wellbeing

- 5.54 As discussed above, there is a strong focus within the FNP on the protection, enhancement, and provision of accessible open/ green space. In this context, Policy FNP12 (Achieving High Standards of Design) requires that development proposals should be of the *“highest design standards, in accordance with the Cotswold Design Code”*. As set out in the Design Code, *“High quality, well integrated and carefully designed green infrastructure (GI) and landscape provision is crucial to the long-term success of developments, ensuring that the maximum multi-functional benefits are achieved for those that live in, work at and visit new developments”*. Requiring high standards of design in line with CDC's key design principles is likely to lead to minor long-term positive effects, supporting healthy, integrated communities and high quality public realm.
- 5.55 Site specific green/ community infrastructure is proposed predominately through Policy FNP14 (A New Low Carbon Community in Fairford). Policy FNP14 requires that *“the scheme provides one or more areas of publicly accessible open space, including a children's play area (LEAP) and a community garden or allotments”*. Green infrastructure is further embedded in Policy FNP15 through the requirement for development to *“satisfy, as a minimum, the standards required for the “Building with Nature – Design” level”*. Notably, six 'wellbeing' standards are set out to secure health and wellbeing outcomes through green infrastructure delivery:<sup>29</sup>
- Accessible: Ensure that all people can use, enjoy and positively contribute to green infrastructure.
  - Inclusive: Ensure that green infrastructure is designed to recognise the needs and strengths of local people, and how these may change over time.
  - Seasonal enjoyment: Ensure that green infrastructure features can be used and enjoyed at all times of year.
  - Reducing health inequalities: Ensure that green infrastructure features are designed and located to reduce and/or prevent health inequalities in existing and new communities.

<sup>29</sup> Building with Nature (2019) Building with Nature User Guide  
[https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/5df1fad773bd391193145473/1576139482317/Building+with+Nature+User+Guide+v1.4\\_new.pdf](https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/5df1fad773bd391193145473/1576139482317/Building+with+Nature+User+Guide+v1.4_new.pdf)

- Socially sustainable: Ensure that green infrastructure creates a sense of social cohesion and inclusion, thereby improving community wellbeing and increasing the likelihood of social sustainability.
  - Distinctive: Ensure that green infrastructure contributes to place distinctiveness, with the aim of creating a place where people feel a sense of belonging and pride in their neighbourhood.
- 5.56 The delivery of FNP14 (A new Low Carbon Community in Fairford) will therefore lead to significant long-term positive effects for health and wellbeing in terms of providing for healthy lifestyles and promoting community engagement. This supports higher level policies of the NPPF (2021) and the Local Plan (2018), notably Policy INF2 (Social and Community Infrastructure).
- 5.57 Consideration is also given in this respect to the wider FNP policy framework. Notably Policy FNP08 (Protecting Local Green Spaces) will further protect and enhance the green infrastructure offer, stating that *“New development will not be permitted on land designated as Local Green Space except in very special circumstances.”* Policy FNP08 designates three new Local Green Spaces and will further ensure that the community continues to have access to a wide range of open space, including natural green space; for recreation and relaxation.
- 5.58 Healthy lifestyles are further promoted through the delivery of new housing of differing types and tenures (Policy FNP14 and Policy FNP15) to meet local needs and protect health through access to decent and affordable homes.
- 5.59 Positive effects on health and wellbeing are also anticipated through the FNP policies which support the uptake of sustainable and active travel. In this context, Policy FNP12 (Achieving High Standards of Design) is of relevance again, recognising that the Cotswold Design Codes supports accessibility and requires that proposals have specific regard to *“improving footpath and cycle links from the town to the countryside and within the town”*. Improvements to the local footpath network are further supported at a site-specific scale through Policy FNP14 (A New Low Carbon Community in Fairford). This may increase journeys in and around the town by healthier, more environmentally-friendly modes; providing numerous physical and mental health benefits.
- 5.60 Overall, **significant long-term positive effects** are predicted for the health and wellbeing SA theme. This is primarily through the protection and enhancement of the town’s high-quality environment, local facilities, and public realm. Notably Policy FNP14 (A New Low Carbon Community in Fairford) prioritises the delivery of green infrastructure; recognising that it is valued for its multifunctionality and connectedness; delivering improved community cohesion, and providing leisure and recreation opportunities.

## Economy and Employment

- 5.61 The FNP recognises that while Fairford has increased in size, it must offer better employment opportunities, as well as enhancing the attractiveness of the town centre shops and services to encourage use by current residents and visitors and remain sustainable. Policy FNP16 (Growing our Local Economy) sets out support for *“proposals to intensify the existing business uses on the Whelford Lane Industrial Estate”*, and *“B1 business use”* at Coln House School, which would provide increased local employment opportunities and support self-containment. Positive effects on the local economy are also anticipated through Policy FNP17 (Sustaining a Successful Town Centre) which seeks to positively manage retail and non-retail space and development in the town centre. The strategy set out in FNP17 seeks to improve the long-term self-sufficiency of Fairford particularly in relation to the provision of services.
- 5.62 Conversion of many former shops to residential use over the years has greatly reduced the number of premises available for retail use in the town centre, and most of those that remain are of small size, limiting the range of products that they can hold. Policy FNP17 therefore seeks to ensure this conversion trend does not continue, stating that *“proposals for the conversion of A1 retail or B1 business premises in the town centre to residential use will not be supported.”* Protecting and enhancing the retail and employment offer of the town centre will contribute positively towards enabling Fairford to perform its role as District Centre effectively.

- 5.63 Enabling the town to be more self-sufficient in provision of services will also likely reduce competition from other centres. Policy FNP17 highlights the importance of improvements to the Market Place *“to create a more attractive environment for shoppers and visitors”*, which will further promote Fairford as a high-quality centre, encouraging both business and tourism investment.
- 5.64 The growth of the tourism economy is further supported through Policy FNP07 (Improving Access to Visitor Attractions) and Policy FNP18 (New Visitor Accommodation). While it is recognised that there is currently limited provision of publicly advertised visitor accommodation in Fairford, Policy FNP18 encourages proposals to create new visitor accommodation in and around the town. In line with Policy FNP18 *“Proposals for the development of new visitor accommodation or for a change of use to such accommodation will be supported, provided they are located either within the defined Fairford Development Boundary or comprise the appropriate and sustainable reuse of a redundant agricultural building in the countryside.”* It is considered that improvements in the local tourism offer will contribute positively towards the growth of the local economy through increasing visitor footfall, providing a level of employment, and supporting self-containment.
- 5.65 Overall, the FNP is predicted to lead to **significant long-term positive effects** in relation to the Economy and Enterprise SA theme. The FNP supports the vitality and viability of the neighbourhood area through supporting intensification of existing employment sites, protecting and enhancing town centre uses, and facilitating the growth of the existing tourism offer. This will contribute positively towards improving the long-term self-sufficiency of Fairford.

## Transportation

- 5.66 High car reliance is likely to continue as a key issue for the neighbourhood area, given its rural nature and lack of sustainable transport connections to larger settlements in terms of bus and rail. Policy FNP14 (A New Low Carbon Community in Fairford) allocates around 80 homes to the north of the settlement, which would likely exacerbate existing issues on the road network (notably the A417). To mitigate against adverse effects, Policy FNP14 requires that *“The scheme includes provision for a link road between the schools and the A417.”* This will provide access to the schools and Air base from the east of the town, which would relieve congestion in the historic town centre, in accordance with Gloucestershire Local Transport Plan (2020). Given the number of constrained and hazardous junctions currently seen to the east of the town, it is considered that the link road would contribute positively towards easing highway capacity issues and better facilitating integration with the town centre. It is therefore expected that the delivery of housing at land between Leafield Road and Hatherop Road will lead to positive effects on the existing road network.
- 5.67 Local transport issues are further addressed through Policies FNP12 (Achieving High Standards of Design) and FNP06 (Managing Traffic in the Town). In this context, Policy FNP12 requires that proposals support *“active travel”, in line with the highway user hierarchy principle* (See Section 5.20). Improved access to the local footpath network is further supported at a site specific scale; key reasons for allocating Land between Leafield Road and Hatherop Road (Policy FNP14) is its *“ability to include provision of significant public open space, links to other footpaths and a drop-off/pick-up facility away from the schools but within easy walking distance, helping to relieve traffic on Lower Croft and Leafield Road in particular”*. In addition to reducing congestion levels, Policy FNP14 will likely limit the need for on-street parking; improving road safety which in turn may encourage modal shift.
- 5.68 Additionally it is considered that an improved public realm (through the commitment for development to meet *“the standards required for the “Building with Nature – Design” level”*) will enhance walking and cycling throughout the neighbourhood area, encouraging residents and visitors to utilise active travel links between accessible green infrastructure features.<sup>30</sup>
- 5.69 Policy FNP01 (The Fairford and Horcott Development Boundaries) supports new dwellings within the defined settlement boundaries of Fairford and Horcott, restricting development in the open countryside with poor accessibility to the town’s local amenities. Policy FNP01 will

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<sup>30</sup> Natural England (2010); BRE (2012)

therefore lead to a minor positive effect in relation to this SA theme by supporting development in areas with good accessibility to local services/ facilities and discouraging the use of the private vehicle. However, as set out under the 'Climate Change' SA theme, it is recommended that the FNP could seek to incentivise a shift away from petrol/ diesel vehicles, in order to further support sustainable travel in the FNP area in line with national and local climate change commitments.

- 5.70 Overall, it is considered likely that high car reliance will continue throughout the Neighbourhood Plan during the Neighbourhood Plan period. However, it is recognised that Policy FNP14 (A New Low Carbon Community in Fairford) seeks to deliver significant improvements in this respect, considering the existing capacity issues of the local transport network and the benefits provided by the enhanced road capacity stimulated by new development. This link road is anticipated to provide appropriate transport capacity for the new homes at Land between Leafield Road and Hatherop Road, provide connectivity for the allocated site to the services and facilities in the town and also provide link to the existing road network within the eastern side of the town. The significance of effects will however be dependent on the phasing of development and associated infrastructure delivery. Residual **uncertain significant positive effects** are therefore predicted.
- 5.71 Additionally, establishing a suite of design principles and defining settlement boundaries is considered likely to lead to long term improvements in accessibility for the majority of residents.

## Conclusions at this stage

5.72 **Table 5.1** below provides a summary of the Fairford Neighbourhood Plan appraisal.

**Table 5.1 Summary of FNP appraisal**

### Summary by SA Theme

#### Biodiversity

- Policy FNP11 (Valuing Hedgerows and Trees) will likely lead to significant positive effects on biodiversity.
- The site allocation policy FNP14 (A New Low Carbon Community at Fairford) will likely lead to minor positive effects, however there is a level of uncertainty at this stage.
- Policy FNP12 (Achieving High Standards of Design), Policy FNP09 (Protecting the Fairford-Horcott Local Gap) and Policy FNP10 (River Coln Valued Landscape) are predicted to lead to minor positive effects.
- All other policies are not predicted to impact upon biodiversity.

Overall, the Fairford Neighbourhood Plan is predicted to have a residual **uncertain long-term minor positive** effect on the Biodiversity SA theme.

#### Climate Change

- Policy FNP04 (Managing Flood Risk), Policy FNP14 (A New Low Carbon Community in Fairford) and Policy FNP15 (Sustainable Homes and Housing Need) will lead to significant effects on climate change.
- Policy FNP08 (Protecting Local Green Spaces), Policy FNP09 (Protecting the Fairford - Horcott Local Gap), Policy FNP12 (Achieving High Standards of Design), and Policy FNP11 (Valuing Hedgerows and Trees) are predicted to lead to minor positive effects.
- All other policies are not predicted to impact upon climate change.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **minor positive effects** on the Climate Change SA theme.

#### Landscape and Historic Environment

- Policies FNP09 (Protecting the Fairford-Horcott Local Gap), FNP10 (River Coln Valued Landscape), and Policy FNP13 (Conserving Non-Designated Heritage Assets) will lead to significant positive effects on landscape and the historic environment.
- Policy FNP12 (Achieving High Standards of Design) and Policy FNP08 (Protecting Local Green Spaces) will lead to minor positive effects.
- The site allocation policy FNP14 (A New Low Carbon Community in Fairford) will lead to residual neutral effects on landscape and the historic environment.
- All other policies are not predicted to impact upon the landscape and historic environment.

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## Summary by SA Theme

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Overall, the Fairford Neighbourhood Plan is predicted to have residual **neutral effects** on the Landscape and Historic Environment SA theme.

### Land, Soil and Water Resources

- Policy FNP05 (Investing in Utilities and Infrastructure Improvements) will lead to significant positive effects on land, soil and water resources.
- Policies FNP08 (Protecting Local Green Spaces), FNP09 (Protecting the Fairford-Horcott Local Gap), FNP10 (River Coln Valued Landscape) and FNP11 (Valuing Hedgerows and Trees) will lead to minor positive effects.
- The site allocation Policy FNP14 (A New Low Carbon Community in Fairford) will lead to minor negative effects on land, soil and water resources.
- All other policies are not predicted to impact upon land, soil and water.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **minor negative effects** on the Land, Soil and Water SA theme.

### Population and Community

- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP15 (Sustainable Homes and Housing Needs) and Policy FNP03 (Maintaining Viable Community Facilities), will lead to significant positive effects on the population and community.
- Policy FNP02 (Providing a New Burial Ground), Policy FNP09 (Protecting the Fairford-Horcott Local Gap), and Policy FNP12 (Achieving High Standards of Design) will lead to minor positive effects.
- All other policies are not predicted to lead to significant effects, however there is the potential for indirect minor positive effects on population and community

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Population and Community SA theme.

### Health and Wellbeing

- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP15 (Providing the Right of Homes), Policy FNP03 (Maintaining Viable Community Facilities), and Policy FNP08 (Protecting Local Green Spaces), will lead to significant positive effects on health and wellbeing.
- Policy FNP12 (Achieving High Standards of Design) and Policy FNP15 (Providing the Right Homes) will lead to minor positive effects.
- All other policies are not predicted to lead to significant effects, however there is the potential for indirect minor positive effects on health and wellbeing.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Health and Wellbeing SA theme.

### Economy and Employment

- Policy FNP17 (Growing our Local Economy), Policy FNP18 (Sustaining a Successful Town Centre) and Policy FNP18 (New Visitor Accommodation) will lead to significant positive effects on economy and employment.
- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP07 (Improving Access to Visitor Attractions), will lead to minor positive effects.
- All other policies are not predicted to impact upon economy and employment.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Economy and Employment SA theme.

### Transportation

- The site allocation policy FNP14 (A New Low Carbon Community in Fairford) will lead to significant positive effects on transportation.
- Policy FNP12 (Achieving High Standards of Design), Policy FNP06 (Managing Traffic in the Town) and Policy FNP01 (The Fairford and Horcott Development Boundaries) will lead to minor positive effects.
- All other policies are not predicted to impact upon transportation.

Overall the Fairford Neighbourhood Plan is predicted to have residual **uncertain significant positive effects** on the Transportation SA theme.

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- 5.73 The assessment has concluded that the current version of the Fairford Neighbourhood Plan is likely to lead to **significant long-term positive effects** in relation to the Population and Community, Health and Wellbeing, and Economy and Enterprise SA themes. These benefits largely relate to the delivery of new housing to meet local needs; the support for employment and tourism growth to develop the local economy; the protection of the public realm and of settlement identities; and the provision of new and protection of existing green/ open spaces. This is also expected to lead to **minor positive effects** in terms of the 'biodiversity' SEA theme, improving connectivity and supporting net-gain in new development; however, there remains some uncertainty relating to potential effects on nationally designated sites and the biodiversity value of Horcott Lakes. It is however recognised that biodiversity net gain is likely to be secured through development, leading to positive effects in this regard.
- 5.74 **Minor positive effects** are also predicted in relation to the Climate Change SA theme given the delivery of a New Low Carbon Community in Fairford. Policy FNP14 includes numerous requirements for new development which support national and local mitigation and adaptation objectives, implementing the climate emergency declared by CDC. While it is recognised that land between Leaffield Road and Hatherop Road is partially at high risk of ground water flooding, it is considered that there is sufficient space within the Leaffield Road site for development to avoid those areas at highest risk from groundwater flooding; with neutral effects anticipated in this regard once mitigation has been adopted.
- 5.75 **Uncertain significant positive effects** are predicted in relation to the Transportation SA theme, and will depend on the phasing of development and associated infrastructure delivery at land between Leaffield Road and Hatherop Road.
- 5.76 **Neutral effects** are anticipated in relation to the Landscape and Historic Environment SA theme given the criteria set out in the FNP policies and the higher-level policy framework of the Local Plan (2018) and NPPF (2021).
- 5.77 **Minor long term negative effects** are predicted in relation to the Land, Soil and Water SA theme due to the loss of greenfield land at land between Leaffield Road and Hatherop Road; however, given this is not best and most versatile agricultural land, effects are not anticipated to be significant.

## Recommendations

- 5.78 To improve the sustainability performance of the Fairford Neighbourhood Plan two recommendations were made in relation to the pre submission version of the FNP in June 2020 (See **Section 4.15**). **Table 5.2** below sets out where recommendations have been taken into consideration within the current, submission version of the FNP:

**Table 5.2 FNP recommendations**

<b>Recommendation June 2020</b>	<b>Addressed in FNP?</b>
Part of 'land between Leaffield Road and Hatherop Road' site allocation falls within a SSSI IRZ for Cotswold Water Park SSSI. It is considered that there is the potential to strengthen Policy FNP14 by including a reference to the Cotswold Water Park SSSI IRZ and requiring early consultation with NE as part of any proposal.	Yes – supporting text of Policy FNP14 states that <i>“Any development of this site should take account of the Cotswold Water Park SSSI IRZ and should consult Natural England at an early stage.”</i> . Furthermore, requirements set within Policy FNP14 (i.e. required improvements to the local utilities infrastructure and open space/ recreation provision) will provide a level of mitigation, recognising key issues for the SSSI relate to water quality and recreation.
To strengthen the FNP’s climate change focus, the FNP could seek to incentivise a shift away from petrol/diesel vehicles,	Yes - Policy FNP15 (Sustainable Homes and Housing Needs) has been revised to state that <i>“in residential developments all garage and off-</i>

including ensuring development proposals, where possible, realise opportunities for integrated vehicle electric charging points and associated infrastructure.

*street parking must include provision for the safe charging of electrical vehicles. Schemes including communal parking areas must include a scheme for communal charging points.”*

## 6. What are the next steps?

- 6.1 The Neighbourhood Plan and Environmental Report will be submitted to CDC for their consideration. CDC will consider whether the plan is suitable to go forward to Independent Examination in terms of the Fairford Neighbourhood Plan meeting legal requirements and its compatibility with the Local Plan (2018).
- 6.2 If the subsequent Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by CDC. If more than 50% of those who vote agree with the Neighbourhood Plan, then the Neighbourhood Plan will be 'made'. Once made, the Neighbourhood Plan will become part of the Development Plan for Fairford.

# Appendix A Context review and baseline

## Biodiversity

### Context Review

At the European level, the EU Biodiversity Strategy was adopted in May 2011 in order to deliver an established new Europe-wide target to *'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'*.<sup>31</sup>

The NPPF (2021) highlights that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity.<sup>32</sup> This includes utilising a strategic approach to maintaining and enhancing networks of habitats and green infrastructure at the wider catchment or landscape scale.

The Natural Environment White Paper (NEWP) sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:<sup>33</sup>

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'.<sup>34</sup>

The South West Biodiversity Implementation Plan (BIP) highlights key policies and actions to protect biodiversity in the South West. Biodiversity South West also identifies target habitats and species, which are prioritised for conservation within the region.<sup>35</sup>

The Cotswold District Local Plan 2011-2031 aims to 'Conserve and enhance the high-quality, local distinctness and diversity of the natural and historic environment'. The local plan policies provide protection for national and local designated sites (policy EN7) and Trees, woodlands and hedgerows (policy EN5). Policy SP5 (Cotswold Water Park Post-Mineral Extraction after Use) specifically protects and enhances biodiversity at the Cotswold Water Park nature area. Finally, policy EN6

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<sup>31</sup> European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <[http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP\\_resolution\\_april2012.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf)>

<sup>32</sup> Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>33</sup> Defra (2012): 'The Natural Choice: securing the value of nature (Natural Environment White Paper)', [online] available at: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>>

<sup>34</sup> DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] available to download from: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>>

<sup>35</sup> Biodiversity South West (2004): 'South West Biodiversity Implementation Plan', [online] available to download from: <[http://www.biodiversitysouthwest.org.uk/home\\_abo\\_bip.html](http://www.biodiversitysouthwest.org.uk/home_abo_bip.html)>

(Biodiversity and Geodiversity: Features, Habitats and Species) aims to ensure that development does not result in a net loss of biodiversity and/or nature conservation value.

## Summary of Current Baseline

There are two nationally designated sites located adjacent to the neighbourhood area ; Cotswold Water Park Site of Special Scientific Interest (SSSI) and Whelford Meadow SSSI. There are also two Strategic Nature Areas (SNAs) located within the neighbourhood area , and a variety of BAP Priority Habitats and Species present. These are discussed below.

### Nationally Designated Sites

#### *Grove and Lea Ancient Woodland*

Ancient woodland takes hundreds of years to establish and is important for its:

- wildlife (which include rare and threatened species)
- soils
- recreational value
- cultural, historical and landscape value

It's any area that's been wooded continuously since at least 1600 AD. It includes:

- ancient semi-natural woodland mainly made up of trees and shrubs native to the site, usually arising from natural regeneration; and
- plantations on ancient woodland sites - replanted with conifer and broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi.

#### *Cotswold Water Park SSSI*

The Cotswold Water Park (CWP) consists of 177 current and former gravel workings, making it the most extensive marl lake system in Britain.

There are two principal blocks of lakes: a larger one in the west centred on Ashton Keynes and a smaller eastern one centred on Fairford, with stepping-stones formed by recent workings in between.

Just 10 lakes covering 135 hectares within CWP were designated as being of Special Scientific Interest for their aquatic plants back in 1994. The park has since become of national importance for its bird and plant populations. The new designation (January 2021) covers all 177 lakes, protecting the large populations of breeding and wintering birds that live there, as well as the aquatic plants. Most of the southern part of the Parish, including Horcott, lies within the Cotswold Water Park. The citation for the SSSI states:<sup>36</sup>

*"The site is of special interest for its non-breeding populations of eight species: shoveler *Spatula clypeata*; gadwall *Mareca strepera*; pochard *Aythya ferina*; tufted duck *A. fuligula*; great crested grebe *Podiceps cristatus*; coot *Fulica atra*; green sandpiper *Tringa ochropus*; lesser black-backed gull *Larus fuscus* and an assemblage of over 20,000 non-breeding waterbirds [...]*

*In recent years several rare wetland bird species have summered in the Cotswold Water Park, with some now breeding. Bittern *Botaurus stellaris* is now established as a breeding species, and great white egret *Ardea alba* bred successfully for the first time in 2020. Other species now regular visitors in summer include cattle egret *Bubulcus ibis*, crane *Grus* and marsh harrier *Circus aeruginosus*.*

*Eleven species of stonewort (charophyte) are present within the lakes of the Cotswold Water Park. One of these starry stonewort *Nitellopsis obtusa* is Vulnerable and Nationally Rare. "*

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<sup>36</sup> Natural England (2021): Cotswold Water Park SSSI', [online] available to access via: <  
<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1006005.pdf> >

Based on the most recent condition assessments undertaken in 2021, 100% of the SSSI is classified as 'Favourable'.<sup>37</sup>

### **Whelford Meadow SSSI**

The Whelford Meadow SSSI was notified in 1985 under Section 28 of the Wildlife and Countryside Act 1981 and is 1.86 ha in size. The SSSI is situated just outside the southern border of the neighbourhood area. This site is a meadow habitat which contains uncommon and rare plant species. Additionally, scrubs located on the margins, enable passerines such as Warblers to breed. The citation for the SSSI states:<sup>38</sup>

*'The meadow is dominated by meadowsweet Filipendula ulmaria and common couch Agropyron repens and contains a wide range of other plants. Nine species of sedge have been recorded including the nationally rare downy-fruited sedge Carex tomentosa with distant sedge C. distans, false fox sedge C. otrubae and carnation sedge C. panicea. Other plants of interest are the southern marsh orchid Dactylorhiza praetermissa and large numbers of adder's tongue Ophioglossum vulgatum. A good population of fritillary Fritillaria meleagris, the other nationally rare plant species, is present on part of the site.'*

Based on the most recent condition assessment undertaken in 2015, 100% of the SSSI is classified as 'Unfavourable - No change'.

The entirety of the neighbourhood area is located within a SSSI Impact Risk Zone (IRZ) for one or more of the SSSIs for the type of development likely to be promoted through the Neighbourhood Plan. SSSI IRZs are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs.

### **Locally Designated Sites**

Strategic Nature Areas (SNAs) are landscape-scale areas defined by the Gloucestershire Nature Partnership where there is opportunity for both the maintenance of and the restoration/expansion of Priority Habitat. There are two SNA's located in the neighbourhood area and these are discussed below.<sup>39, 40</sup>

#### **Coln Corridor SNA**

Coln Corridor SNA sits within the Cotswold Water Park. Located along the south west border of the neighbourhood area, the Cotswold Water Park SNA is a low-lying area, within the Thames floodplain. It is characterised by very shallow slopes and mineral restoration has resulted in a wetland landscape. Being the most extensive marl lake system in Britain, Cotswold Water Park SNA creates a biodiversity-rich habitat.

#### **Bibury SNA**

Bibury SNA sits within the Cotswold high Wold Plateau. Extending from the centre to the northern border of the Neighbourhood Plan, Cotswold high Wold Plateau SNA is a generally open landscape, with blocks of woodland and arable farmland. These habitats contrast the narrow, enclosed valleys which are also present within the SNA.

### **Key Wildlife Sites**

The Gloucestershire County Council environmental map identifies numerous Key Wildlife Sites (which are Biodiversity Opportunity Areas) within and surrounding the neighbourhood area.<sup>41</sup> One Key Wildlife Site is located to the north of Fairford, four are located to the south west of Horcott, and there

<sup>37</sup> Ibid.

<sup>38</sup> Natural England (no date): Whelford Meadow SSSI', [online] available to access via: <<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1003804>>

<sup>39</sup> Gloucestershire's Natural Environment: 'Strategic Nature Areas', available to access via: <<http://www.gloucestershirenature.org.uk/actionplan/imap.php>>

<sup>40</sup> Gloucestershire Centre for Environmental Records: 'Local Features in Gloucestershire Map', available to access via: <<http://www.qcer.co.uk/doublemap3.html>>

<sup>41</sup> Gloucestershire County Council (2018) Environmental Constraints Map [online] available at: <<https://gis.gloucestershire.gov.uk/LocalViewPub/Sites/MINWASTE3/>>

is a larger series of Key Wildlife Sites located to east of the main town area, partially coinciding with the Cotswold Water Park.

### **Biodiversity Action Plan habitats**

The Biodiversity Action Plan (BAP) habitats present within the neighbourhood area include:<sup>42</sup>

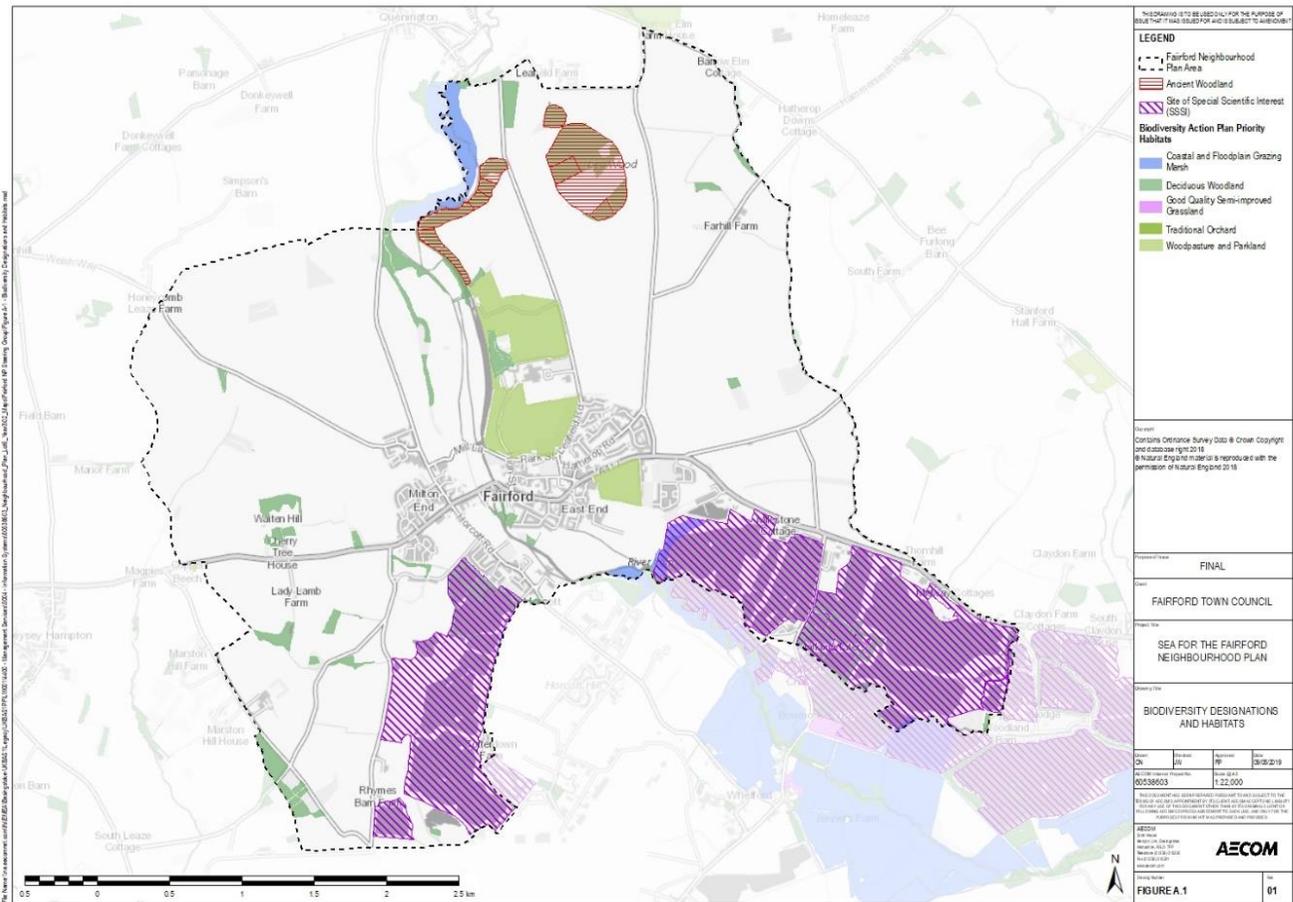
- Coastal and Floodplain Grazing Marsh: There is a small area of this habitat type on the north border of the neighbourhood area near Obelisk and near the south border close to Cotswold Water Park SNA.
- Deciduous Woodland: There is a network of Deciduous Woodland patches located throughout the neighbourhood area .
- Wood pasture and Parkland: There is a large section of this habitat situated in the centre of the neighbourhood area . Notably there are two areas at Fairford Park and Morgan Hall.

**Figure A.1** (overleaf) shows the designated biodiversity sites located within the neighbourhood area .

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<sup>42</sup> MAGIC (2017): 'Interactive Map – Habitats and Species' [online database] available to access via: <http://www.magic.gov.uk/MagicMap.aspx>

Figure A.1 Biodiversity designations



## Summary of Future Baseline

Habitats and species will possibly face increasing pressures from future development within the neighbourhood area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats. Benefits for biodiversity have the potential to arise from the increasing integration of biodiversity considerations within decision making, as observed in a number of policies outlined in the emerging Cotswold District Local Plan 2011-2031.

## Climate Change

### Context Review

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report to achieve the following:

*'Based on the latest understanding of current, and future, climate risks and opportunities, vulnerability and adaptation, what should the priorities be for the next UK National Adaptation Programme?'*<sup>43</sup>

The evidence report contains six priority risk areas requiring additional action in the next five years, see below:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals

The UK Climate Change Act was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.<sup>44</sup>

The Climate Change Act includes the following:

- **2050 Target.** The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
- **Carbon Budgets.** The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.

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<sup>43</sup> GOV.UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

<sup>44</sup> GOV.UK (2008): 'Climate Change Act 2008', [online] available to access via <http://www.legislation.gov.uk/ukpga/2008/27/contents>

The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.

The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page.<sup>45</sup>

The NPPF (2021) requires proactive planning to both mitigate and adapt to climate change.<sup>46</sup> Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that contribute to radical reductions in greenhouse gas emissions, and deliver long-term resilience, including through reuse, regeneration and conversion.

Notably, access to a network of high-quality open spaces can deliver wider benefits for nature, supporting efforts to address climate change, while improvements in green and other infrastructure can reduce the causes and impacts of flooding.

There is a key role for planning in securing radical reductions in greenhouse gas (GHG) emissions, including in terms of meeting the targets set out in the Climate Change Act 2008.<sup>47</sup> Specifically, planning policy should support the move to a low carbon future through:

- Planning for new development in locations and ways which reduce GHG emissions;
- Actively supporting energy efficiency improvements to existing buildings;
- Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
- Positively promoting renewable energy technologies and considering identifying suitable areas for their construction;
- Encouraging those transport solutions that support reductions in GHG emissions and reduce congestion;
- Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act highlights that alternatives to traditional engineering approaches to flood risk management include:<sup>48</sup>

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and

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<sup>45</sup> Committee on Climate Change (2017): 'UK Adaptation Policy' [online] available to access via <<https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/>>

<sup>46</sup> Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>47</sup> The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO<sub>2</sub> emissions of at least 26% by 2020, against a 1990 baseline.

<sup>48</sup> Flood and Water Management Act (2010) [online] available to access via <<http://www.legislation.gov.uk/ukpga/2010/29/contents>>

- Creating sustainable drainage systems (SuDS)<sup>49</sup>

Further guidance is provided in the document 'Planning for SuDS'.<sup>50</sup> This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'. Note that SuDS systems are likely to be ineffective in areas with a high water table.

At the regional level, Gloucestershire County Council's Local Flood Risk Management Strategy (LFRMS) aims to work with the local community and local organisations, to understand and manage flood risk, support flood recovery and increase public awareness toward flooding.<sup>51</sup>

Released in 2014, the most recent Cotswold District Council Strategic Flood Risk Assessment (SFRA) aims to provide an assessment of the impact of all potential sources of flooding within the region in order to provide recommendations of suitable mitigation measures. Furthermore, at the local level, the Cotswold District Local Plan 2011-2031, policy EN14 (Managing Flood Risk), aims to minimise flood risk and provide resilience to flooding. Policy ING8 (Water Management Infrastructure), and INF19 (Renewable and Low Carbon Energy Development) also directly relate to the Climate Change SA theme.<sup>52</sup>

## Summary of Current Baseline

### *Contributions to Climate Change*

In relation to GHG emissions, source data from the Department of Energy and Climate Change suggests that the Cotswold District has had consistently higher per capita emissions total than that of both the South West of England and England as a whole since 2005. Cotswold District has also seen an 11% reduction in the percentage of total emissions per capita between 2005 and 2012, lower than the reductions for the South West (16.4%) and England (16.7%).

### *Potential Effects of Climate Change*

The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team.<sup>53</sup> UKCP09 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the South West by 2050 for a medium emissions scenario are likely to be as follows:<sup>54</sup>

- The central estimate of increase in winter mean temperature is 2.1°C and an increase in summer mean temperature of 2.7°C; and
- The central estimate of change in winter mean precipitation is 17% and summer mean precipitation is - 20%.

Resulting from these changes, a range of risks may exist for the neighbourhood area. These include:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;

<sup>49</sup> N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDS.

<sup>50</sup> CIRIA (2010) 'Planning for SuDS – making it happen' [online] available to access via <[http://www.ciria.org/Resources/Free\\_publications/Planning\\_for\\_SuDS\\_ma.aspx](http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx)>

<sup>51</sup> Cotswold District Council (2014), 'Cotswold District Council Strategic Flood Risk Assessment' [online] available to access via: <<http://www.cotswold.gov.uk/media/1346820/Strategic-Flood-Risk-Assessment-SFRA-Level-2-June-2014.pdf>>

<sup>53</sup> The data was released on 18th June 2009: Available to access via: <<http://ukclimateprojections.metoffice.gov.uk/>>

<sup>54</sup> UK Climate Projections (2009) South West 2050s Medium Emissions Scenario [online] available to access via: <<http://ukclimateprojections.metoffice.gov.uk/23687?emission=medium>>

- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

### **Flood Risk**

The areas at highest risk of flooding in the neighbourhood area are those near the River Coln, specifically near the slow-moving wide section called the Broad Water, near Cotswold Water Park SNA, areas around lakes 103 and 104, and areas around Horcott Lakes. These areas are mainly in Flood Zone 3, indicating that there is a 1% (1 in 100) or greater chance of flooding happening each year. Some areas surrounding Cotswold Water Park SNA are in Flood Zone 2, showing that the chance of flooding each year is between 0.1% (1 in 1000) and 1% (1 in 100). There are many residential properties within Fairford which lie within or in close proximity to areas of Flood Zone 2 and 3, and surface water flooding occurs in Flood Zone 1 areas at times.

It is noted that parts of Fairford have suffered frequent flooding in areas of Flood Zone 1. A flood alleviation scheme for river flooding was carried out in 2013/14, but this has not solved the problem as there has been flooding from other sources.

Surface water drainage and sewer flooding is also a risk for some parts of the neighbourhood area. There is low-medium flood risk along the highways network and land adjacent to water bodies and drainage ditches. Additionally, the following areas are at high-risk from surface water drainage and sewer flooding within the plan area:

- East End and London Road in Fairford;
- Coronation Street and Milton Street in west Fairford;
- Totterdown lane and the land surrounding Rhymes Barn Farm; and
- Sections of the A417 between Fairford town centre and Clayhill Cottages.

Fairford has been identified by Thames Water as subject to sewer and drain flooding. The water table is high in wet seasons, which means that SuDS drainage systems may be ineffective and inappropriate. Emphasis could be placed on utilising the environment to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water; and identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere.

The complex and multi-faceted nature of flood risk at Fairford is shown by the number of projects and studies conducted over the past few years. These include:

- The report on the 2007 Floods (Environment Agency, 2008) and the resultant Environment Agency Fairford Flood Alleviation Scheme (2008–2013) (Environment Agency, 2013?) which reduced the risk of “riparian” (main river) flooding.
- The “GCC Groundwater Intermediate Assessment” (Atkins, April 2015) for South Cotswold District concluded that Fairford has now been identified as subject to groundwater flooding and that further housing development on sites with high groundwater level is likely to exacerbate the problem.

The drainage strategy (Thames Water, 2018) reports on “intervention” works already done on:

- clearing the Court Brook stream;

- diverting surface water on Quenington Road; and
- fixing sewer defect at East End.

The drainage strategy concludes that sustainable drainage solutions (SuDS) using infiltration are unlikely to be effective in the low-lying areas to the south of the town because of frequent high groundwater levels.

CDC's Strategic Flood Risk Assessment Report (JBA, 2014) also suggests that SuDS drainage using infiltration is unlikely to be feasible for those areas to the south and southeast of Fairford with high groundwater levels.

To supplement this existing body of work, FTC commissioned a study by Water Research Associates' (WRA) to monitor groundwater levels around Fairford and to review the overall flood risk.

Their report "Groundwater Monitoring and Review of Flood Risk at Fairford" (WRA, 2018) described Fairford's geology as characterised by superficial deposits of alluvium, "Northmoor" sand and gravel and "Cornbrash" overlying the solid Oxford and Kellaway clays and Forest Marble clay and limestone. The groundwater levels were found to rise quickly in winter and fall similarly quickly in summer. Water levels in Fairford wells and boreholes varied by 1.0 to 2.5 metres during the 2018 monitoring period. The report concluded:

- Development should avoid the several spring lines along the Cornbrash / Northmoor boundary (for example just south of Beaumoor Place in East End)
- Development should avoid the area south of Cornbrash / Kellaway boundary (for example south of Cinder Lane).
- There is no scope for SuDS drainage using infiltration in the low-lying areas associated with alluvial deposits of the Coln valley due to frequent high groundwater levels" (Section 6-2-3).
- Ideally development should be directed away from the Coln and Court Brook corridor" (Section 6-2-5).

## Summary of Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Fairford neighbourhood area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. More importantly, climate change will increase the intensity of precipitation events throughout the year. This is likely to increase the risks associated with climate change, recognising that fluvial, surface water, and/or sewer flooding are risks for a significant part of the neighbourhood area. As such there is an increased need for resilience and adaptation.

In terms of climate change contribution, per capita GhG emissions generated in the neighbourhood area may decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the neighbourhood area (following the trend of significant new housing delivery since 2011) would contribute to increases in overall levels of GhG emissions. It is noted that the new residential development delivered since 2011 has not been accompanied by the delivery of new employment land. The continued mismatch in delivery of housing and of employment in the neighbourhood area has the potential to lead to increased emissions, primarily through increased vehicular use.

A number of policies within the emerging Cotswold District Local Plan seek to increase the uptake of renewable energy and improve the provision of public and sustainable transport. The effective implementation of such policies has the potential to reduce future emissions within the neighbourhood area.

# Landscape and Historic Environment

## Context Review

The National Planning Policy Framework (NPPF) (2021) requires the protection and enhancement of valued landscapes, giving particular weight to those identified as being of national importance.<sup>55</sup> The scale and extent of development within designated landscape areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

The NPPF also seeks to conserve and enhance historic environment assets in a manner appropriate to their significance. The NPPF seeks planning policies and decisions which are sympathetic to local character and history without preventing or discouraging appropriate innovation of change. The NPPF supports the use of area-based character assessments, design guides and codes and masterplans to help ensure that land is used efficiently while also creating beautiful and sustainable places.

As set out in the NPPF, it should be ensured that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code. Design Codes can set out a necessary level of detail in sensitive locations, for example, with heritage considerations, and they can set out specific ways to maintain local character.

The 25-year Environment Plan (2018) and National Design Guide (2019) complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats.<sup>56</sup> Design is focused on beautiful, enduring and successful places, which respond to local character and provide a network of high quality green open spaces.

The Government's Statement on the Historic Environment for England sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.<sup>58</sup>

Areas of Outstanding Natural Beauty (AONBs) aim primarily to conserve and enhance the natural beauty of the landscape. They aim to 'meet the need for quiet enjoyment of the countryside, and to have regard for the interests of those who live and work there. The Cotswold AONB Management Plan 2013-2018 sets out the following 20-year vision for the AONB:<sup>59</sup>

*"A landscape which retains its remarkable visual unity and scenic diversity; is richer in nature, and where the historic heritage is conserved; is home to vibrant communities supported by a sustainable local economy; provides a warm welcome and high-quality experience for everyone seeking inspiration, tranquillity and to be active outdoors; and is adapting successfully to a changing climate and economic conditions."*

The Cotswold District Local Plan 2011-2031 aims to conserve the historic environment in the area. The following policies from the local plan directly relate to the landscape and historic environment SA theme:

- EN3 – Cotswolds Area of Outstanding Natural Beauty (AONB)
- EN10 – Designated Heritage Sites
- EN11 – Designated Heritage Assets – Conservation Areas
- EN12 – Non-designated Heritage Assets

<sup>55</sup> Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>56</sup> The 25 Year Environment Plan (2018) [online] available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>57</sup> The National Design Guide (2019) [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

<sup>58</sup> HM Government (2010): 'The Government's Statement on the Historic Environment for England', [online] available to download via: [http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference\\_library/publications/6763.aspx](http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx)

<sup>59</sup> Cotswold Area of Outstanding Natural Beauty (no date): 'Cotswold AONB Management Plan', [online] available to download via: <http://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/>

- EN4 – The Wider Natural and Historic Landscape
- EN6 – Special Landscape Areas

## Summary of Current Baseline

### Landscape

#### **Cotswold Area of Outstanding Natural Beauty (AONB)**

The Cotswold AONB, designated in 1966, is located adjacent to the northern boundary of the neighbourhood area. At 2,038 km<sup>2</sup>, it is the largest AONB in England and is made up of hills of Jurassic Limestone. The Cotswold AONB is managed by an independent statutory body called the Cotswold Conservation Board, which is made up by local authorities and community representatives.<sup>60</sup>

#### **National Character Areas (NCA)**

NCAs are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The neighbourhood area is located within NCA Profile: 108 Upper Thames Clay Vales.<sup>61</sup> The Upper Thames Clay Vales NCA is described as lowland farmland on Jurassic and Cretaceous clays. The area consists of livestock farming, meadows and wetland habitats.

It is recognised that there is considerable variation within this area, as documented in the various sub-area character assessments for the Local Plan and previous draft Neighbourhood Plan.

#### **Area of Special Landscape Value**

The Special Landscape Area (SLA) designation protects locally significant landscapes that, although not nationally designated, are of comparable quality to, and abut, the AONB. Their designation is based on a formal assessment of the landscape qualities of the area. SLAs were introduced in Gloucestershire in 1982. They are attractive landscapes in their own right, but may also provide important foreground settings and effective buffers for the AONB.

There are nine SLAs in Gloucestershire, six of which lie wholly or partly in the Cotswold District, with one covering much of the land to the north of the town. Coln Valley north of Fairford SLA is in a gentle transitional landscape between the Cotswolds dip slope to the north and the Thames Valley to the south. The northern part of the SLA lies within the Cotswold NCA107. The southern part lies in the Upper Thames Clay Vales NCA108 (discussed above).<sup>62</sup>

The 2017 SLA Review concluded that this SLA remains valid as a locally designated area and that its boundaries should remain the same.<sup>63</sup>

It is noted that the landscape to the south of the town also plays an important role in defining its character. Additionally, the 'gap' between the main town and Horcott is also becoming of increasing local importance given the recent growth of the town.

### Historic Environment

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The neighbourhood area contains the Grade I listed 'Church of St Mary', four Grade II\* listed buildings, and 117 Grade II listed buildings.

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England, there are two

<sup>60</sup> Cotswold Area of Outstanding Natural Beauty (no date): 'Cotswold Conservation Board', [online] available to download via: <<http://www.cotswoldsaonb.org.uk/about-us/boards-role/>>

<sup>61</sup> Natural England (2014): 'National Character Area – Upper Thames Clay Vales', [Online] Available to access via: <<http://publications.naturalengland.org.uk/publication/1911063?category=587130>>

<sup>62</sup> White Consultants (2017) Cotswold District Special Landscape Area Review: Landscape context and physical changes: Final Report [online] available at: <<http://www.cotswold.gov.uk/residents/planning-building/planning-policy/emerging-local-plan/local-plan-examination/>>

<sup>63</sup> Ibid.

scheduled monuments located within, and one scheduled monument located adjacent to, the neighbourhood area:<sup>64</sup>

- Fairford Saxon cemetery (North West of Fairford Town Centre, off Coronation Street);
- Hengiform Barrow and associated ring ditch south of Burdocks (South West of the plan Area, situated to the West of Horcott); and
- Burrow Elm round barrow (South of Hatherop – adjacent to Northern boundary of the neighbourhood area).

A large amount of General Archaeological Records and Archaeological Events are recorded within and around Fairford, through the Gloucestershire Historic Environment Record.<sup>65</sup> These are located throughout the neighbourhood area, with many focused along the A417. Records range from Neolithic flint axes to Romano-British Finds, through to Roman buildings and enclosures, Iron Age to Roman Age settlements, and a variety of monuments.

Conservation areas are designated because of their special architectural and historic interest.<sup>66</sup> Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area, and can be developed into a management plan. The Fairford Conservation area is located within the neighbourhood area, covering the historic core of the town centre. As of May 2020 an associated appraisal or management plan has not been prepared by CDC for the Fairford Conservation area, but a full character appraisal has been carried out for the Neighbourhood Plan.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I, Grade II and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. The 2016 Heritage at Risk Register for South West England revealed that there are no historic features within or adjacent to the neighbourhood area that are at risk.<sup>67</sup>

Whilst there are no historic features listed on the Heritage at Risk Register, heritage assets face risk of damage from high levels of HGVs passing through the town. The Fairford Volume Class Traffic Survey (2017) shows that along the A417, East of Whelford Turn, the percentage of traffic attributed to HGV's is 10.8%.<sup>68</sup> It is recognised that HGV movement can have a damaging effect on the fabric of listed buildings and Conservation Areas through increased noise and dirt pollution. Local knowledge suggests this may be a particular issue along London Street, Bridge Street and Milton Street.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life - whether at home, work or leisure. Although not designated, the following buildings and areas are of historic interest and are seen as important by the local community:

- Palmer Hall
- Fayre Court
- Fairford Cottage Hospital
- Library / Old School
- Hyperion House
- The Old Piggery
- Yells Yard

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<sup>64</sup> Historic England (2018): 'National Heritage List for England': Available to access via: <<http://list.historicengland.org.uk>>

<sup>65</sup> Gloucestershire County Council (2016) Gloucestershire Historic Environment Record

<sup>66</sup> Historic England (2018): 'Conservation Areas', [online] available to access via: <<https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>>

<sup>67</sup> Historic England (2016): 'Heritage at Risk 2016 Register – South West', [online] available to download via:

<<https://www.historicengland.org.uk/images-books/publications/har-2016-registers/>>

<sup>68</sup> A417 Fairford Volume Class Traffic Survey 2017

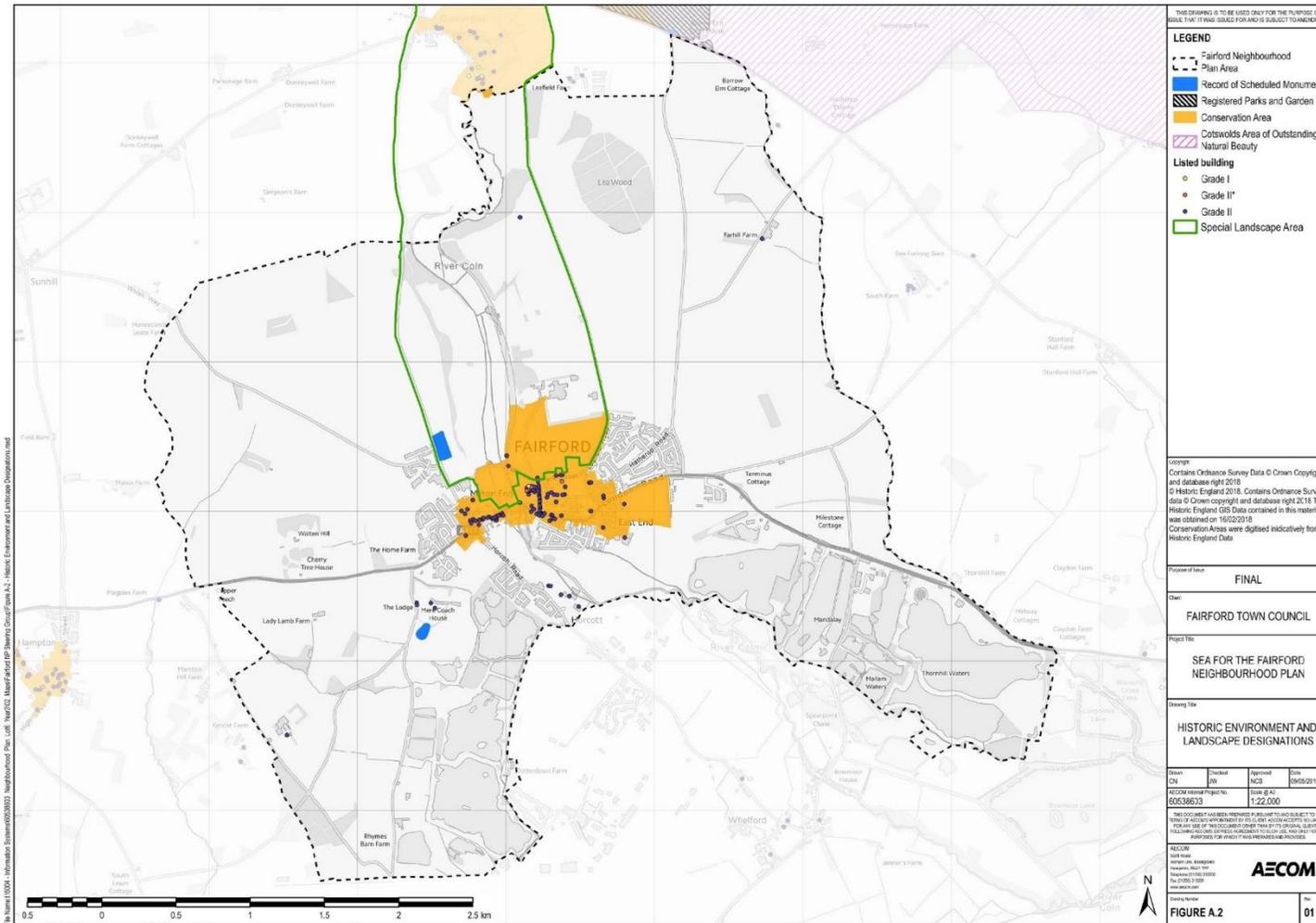
- Park Farm House
- Waiten Hill Farm House
- Milton Farm House
- Milton Farm Stone Barns
- The Swedish Houses in The Plies
- Bridge over disused railway
- Gable Cottages
- Dynevor Terrace
- Eastbourne Terrace
- Vines Row
- Terrace of Houses between Mr Ernest in the Market Place and The Plough, London Street: 7A, Tynedale, The Plough Inn
- Terrace of Cottages on Milton Street backing onto Lower and Upper Green
- 2, 3, 3a High Street
- 9 High Street
- 29, 30, 33 London Street
- 35 London Street
- 5-9 Coronation Street
- Park Villas
- Linden Cottage
- Glebe Court canopy
- The Oxpens
- Mill Lane
- Cotswold Stone Field Shelter
- Cattle Trough in Carters Ground
- Cattle Trough by Track in Field East of Polish Camp Site
- Fairford Gate South Stile
- The Short Piece Stile
- Virgills Stile
- Milton Street Stile
- Upper Green Stile
- Oxpens Stile
- Gassons Field Stile
- Garretts Stile
- Waiten Hill Stile
- Gassons Field Water Tower
- Milestone
- Red Pillar Box, Market Place
- Telephone Box: Queensfield
- Telephone Box: The Green, Coronation Street

- Iron Railings on Mill Bridge
- Iron Gates to Waterloo Cottage
- Stone Gate Pillar – Hatherop Lane
- Stone Gate Pillar – Lovers Walk
- Stone Gate Pillar – Leafield Road
- Entrance arch and Ernest Cook Estate Yard
- The Boathouse
- Pump House by The Cascades
- The Cascades
- Fairford Park
- Reservoir – East
- Reservoir - West
- Paddock on Coronation Street
- Morgan Hall Park including Jones' Field Fieldway

It is noted that this is not an exhaustive list and further non-designated heritage assets may be identified in the future that meet the criteria provided in the Cotswold District Local Plan 2011-2013.

**Figure A.2** overleaf shows the designated landscapes and historical sites within the neighbourhood area.

Figure A.2 Designated landscape and historic sites



## Summary of Future Baseline

New development in the neighbourhood area has the potential to impact on the fabric and setting of cultural heritage assets; for example through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to cultural heritage assets and their settings.

New development has the potential to lead to incremental but small changes in landscape and townscape character and quality in and around the neighbourhood area. This includes from the loss of landscape features and visual impact. However, new development need not be harmful to the significance of a heritage asset, and in the context of the neighbourhood area there is opportunity for new development to enhance the historic setting of the town and better reveal assets' cultural heritage significance, educating both local residents and visitors.

## Land, Soil and Water Resources

### Context Review

The EU's Soil Thematic Strategy presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.<sup>69</sup>

The EU Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

The National Planning Policy Framework (NPPF) (2021) seeks to protect high quality soil resources, and improve the water environment; recognising the wider benefits of natural capital and derived from ecosystem services.<sup>70</sup> Furthermore, the NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains.

The 25-year Environment Plan (2018) presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, clean and plentiful water, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts. This leads on from and supports the soil strategy for England (Safeguarding our soils) which seeks to ensure that all England's soils will be managed sustainably and degradation threats tackled successfully by 2030, as well as the national water strategies which seek to secure sustainable and resilient water resources and improve the quality of waterbodies, and the national waste plan which seeks to identify measures being taken to move towards a zero waste economy.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England, which sets out a vision for soil use in England, and the Water White Paper, which sets out the

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<sup>69</sup> European Commission (2006): 'Soil Thematic Policy', [online] available to access via:  
<[http://ec.europa.eu/environment/soil/index\\_en.htm](http://ec.europa.eu/environment/soil/index_en.htm)>

<sup>70</sup> Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Government's vision for a more resilient water sector.<sup>71,72</sup> It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.<sup>73</sup>

The Cotswold District Local Plan 2011-2031 policy EN11 (Pollution, Contaminated Land and Hazardous Substances) supports development that does not result in unacceptable pollution levels, seeking to safeguard human health and the environment.

## Summary of Current Baseline

### Land Quality

Whilst the neighbourhood area does not have a history of heavy industrial land use, former minerals workings have the potential for localised soil or groundwater contamination to be present. There has been one recorded significant pollution incident by the Environment Agency under the EC Integrated Pollution Prevention and Control Directive (IPCC), detailed below:<sup>74</sup>

- Date: 28<sup>th</sup> July 2004; Pollutant: Not Identified; Impact to water: significant.

### Quality of Agricultural Land

The Agricultural Land Classification categorises land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 are of poorer quality. In terms of the location of the best and most versatile agricultural land, there is Grade 2, Grade 3a and Grade 3b agricultural land within the neighbourhood area.<sup>75</sup> Grade 2 areas are identified mainly south of the A417 and there is a section of Grade 3a land located near the river, in the south east corner of the neighbourhood area. There are also patches of Grade 3a and 3b agricultural land near Fairford town centre, close to the neighbourhood area's southern boundary and in the south west of the plan. It is however noted that this is based on Pre-1988 provisional agricultural classification data.

### Recycling centres

There is no Household Waste and Recycling Centre (HWRC) located within the neighbourhood area. The nearest HWRC is Fosse Cross located approximately 15km north-west of Fairford.<sup>76</sup>

There is a clothing and tetrapak recycling centre at the Fire Station, Hatherop Road, Fairford.

### Watercourses

The main watercourse flowing through the neighbourhood area is The River Coln, which flows through the centre of the neighbourhood area.

A major road, A417, crosses the River Coln in the middle of the neighbourhood area and is a potential source of river pollution from accidental hazardous load spillage.

Thames Water operate a sewage works for properties in and around the neighbourhood area which discharges into the River Coln within the neighbourhood area; when the load on the sewage works exceeds six times the 'dry weather flow', then Thames Water are entitled to discharge untreated effluent into the River Coln. The Environment Agency reports annually on the environmental performance of the nine water and sewerage companies. The 2020 data shows 1138 storm overflows/

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<sup>71</sup> Defra (2009): 'Safeguarding our Soils: A strategy for England', [online] available to download from: <<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>>

<sup>72</sup> Defra (2011): 'Water for life (The Water White Paper)', [online] available to access via: <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>>

<sup>73</sup> Defra (2011) Government Review of Waste Policy in England [online] available at: <<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>>

<sup>74</sup> Environment Agency Interactive Map: 'Pollution Incidents', [online] available to access via: <<http://apps.environment-agency.gov.uk/wiyby/default.aspx>>

<sup>75</sup> MAGIC Interactive Map (2018): 'Landscape; Post 1988 Agricultural Land Classification (England)' [online] layer available to view using the following mapping tool: <<http://www.magic.gov.uk/MagicMap.aspx>>

<sup>76</sup> Gloucestershire County Council (no date): 'Household recycling centres (HRCs)', [online] available to access via: <<http://www.recycleforgloucestershire.com/household-recycling-centres-hrcs/>>

spills by Thames Water during 2020, for a total duration of 2491.52 hours.<sup>77</sup> This is also a source of pollution potentially affecting the downstream SSSIs and may be the cause of the recorded decline in their condition.

Pollution of minor watercourses such as the Court Brook and the ditch along the A417 east of Fairford could/would also affect the downstream SSSIs.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. As of February 2018, SPZ 1, 2 and 3 are present within the Neighbourhood plan.<sup>78</sup> There is a small SPZ 1 (Inner zone) area located from Fairford town centre to the Southern boundary of the plan area. There is a larger SPZ 2 (Outer zone) area covering the area from the town centre to the northern boundary of the plan area. Finally, the remaining western section of the neighbourhood area region is an SPZ 3 (Total Catchment) area.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs), and as such, they are recognised as being at risk from agricultural nitrate pollution. Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. NVZs for 2017-2020 started on January 1st 2017, including new areas of NVZs and excluding areas that have been de-designated.<sup>79</sup> As of February 2018, there are two NVZs within the neighbourhood area. A Groundwater NVZ Area is located along the northern border of the plan area, extending down to the Broad Water section of the River Coln. There is also a surface water NVZ area located along the western boundary of the neighbourhood area.

## Summary of Future Baseline

Due to increasing legislative and regulatory requirements, there are increasing pressures to improving recycling and composting rates.

In terms of water quality, the requirements of the Water Framework Directive (and its replacement) are likely to lead to continued improvements to water quality in watercourses in the wider area. Water quality has the potential to be affected by pollution incidents in the area, the presence of non-native species and future physical modifications to water bodies.

## Population and Community

### Context Review

The National Planning Policy Framework (NPPF) (2021) seeks to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.<sup>80</sup>

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the*

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<sup>77</sup> Environment Agency (2021) Water and sewerage companies in England: environmental performance for 2020 [online] available at: <https://www.gov.uk/government/publications/water-and-sewerage-companies-in-england-environmental-performance-report-2020>

<sup>78</sup> Environment Agency (2018): 'Groundwater Source Protection Zones Map', [online] available to access via <<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>>

<sup>79</sup> GOV.UK (2017): 'Nutrient Management: Nitrate Vulnerable Zones' [online] available to access via: <<https://www.gov.uk/guidance/nutrient-management-nitrate-vulnerable-zones>>

<sup>80</sup> Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

*implications and without urgent action this great boon could turn into a series of miserable crises*'.<sup>81</sup> The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

The Cotswold District Local Plan 2011-2031 has a range of policies which are related to Population and Community, these are as follows:

- H1 – Housing Mix and Tenure to Meet Local Needs
- H2 – Affordable Housing in Principle Settlement
- H3 – Affordable Housing Outside Principle Settlements
- H4 – Specialist Accommodation for Older People
- H5 – Dwellings for Rural Workers Outside Settlement
- EC7 – Retail Hierarchy
- EC8 – Main Town Centre Uses

## Summary of Current Baseline

### Population

The population of Fairford has slightly increased between 2001 and 2011. This is similar to that of Cotswold, which has also seen a small population growth between these years. In comparison, the South West of England and England have seen a greater increase in population over the same period.

While the 2011 census data provides an insight into the population change in Fairford between 2001 and 2011, it is recognised that this data may not accurately reflect the current situation at this stage.

GRCC calculated population figure at August 2018 was 4,411 an estimated population increase of 1,193 (27%) since 2013.<sup>82</sup>

According to the census data, there were 1,375 households in the FNP area in 2011.<sup>83</sup> The housing growth that has occurred since 2011, demonstrating a 39% household increase in the area (when considering total built, committed and Local Plan site allocations). The high delivery rates are partly caused by the strong local housing market, which provides a great incentive to build housing quickly once planning permission is granted.

It is recognised that a 39% increase in housing will have an impact upon Fairford's population.

According to the census data the population of Fairford was 3,236 in 2011, comprising 1,375 households. This equates to an average of 2.35 persons per household (which is identical to the average of 2.35 for Gloucestershire County as a whole). Based on this information we are able to calculate the expected population growth of the area using 536 as an indicative net housing number.

It is therefore estimated that there are an additional 1,259 new residents in the FNP area since 2011. This translates to a 38.9% percent increase on the 2011 figure.

### Age Structure

Generally, there are a greater number of residents within the 60+ age category within the neighbourhood area (33.1%) in comparison to the totals for the South West (26.4%) and England (22.3%). However, the values for the neighbourhood area broadly align with the value for Cotswold

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<sup>81</sup> Select Committee on Public Service and Demographic Change (2013): 'Ready for Ageing?', [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

<sup>82</sup> Gloucestershire Rural Community Council (2018) Fairford Neighbourhood Plan Infrastructure Report

<sup>83</sup> Gloucestershire Rural Community Council (2015) Fairford Neighbourhood Plan Housing Report [online] available at: <http://www.fairfordneighbourhoodplan.org.uk/>

(30.0%), indicating a district-wide trend. In contrast there are fewer residents within the working age categories (25-44 and 45-59) in the neighbourhood area (40.8%) in comparison to the totals for Cotswold (44.2%), the South West of England (44.7%) and England (46.9%). Additionally, there are fewer younger residents (0-15 and 16-24) in the neighbourhood area (26.1%) compared with the totals for the South West of England (28.9%) and England (30.8%). However, the number of younger residents (0-15 and 16-24) in the neighbourhood area is consistent with the total for Cotswold (25.9%).

### **Household Deprivation**

6.3 Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long-term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

6.4 A larger proportion of households are deprived in 1 or more dimensions within the neighbourhood area (51.8%) in comparison to Cotswold (48.9%). However, a lower percentage of households are deprived in 1 or more dimension within the neighbourhood area compared to the South West (55.2%) and England (57.4%). Out of the 51.8% of households which are deprived in the neighbourhood area, the majority are deprived in one or two dimensions, which is similar to the regional and national trends.

### **Index of Multiple Deprivation**

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

**Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).

**Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.

**Education, Skills and Training:** The lack of attainment and skills in the local population.

**Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.

**Crime:** The risk of personal and material victimisation at local level.

**Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains:

- 'Geographical Barriers': relating to the physical proximity of local services
- 'Wider Barriers': relating to access to housing, such as affordability.

**Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.

- 'Indoors Living Environment' measures the quality of housing.
- 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

**Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.

**Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

There are three LSOAs that are either fully or partially in the neighbourhood area. Analysis of the data reveals the following trends set out below.

### General Trends

E01022202: Cotswold 009A covers approximately 45% of the neighbourhood area, covering the east of the area. There are notable contrasts between the IMD categories for this LSOA. The LSOA is within the top 10% least deprived deciles for the Income domain, the Employment domain, the Income Deprivation Affecting Children Index, and the Wider Barriers sub-domain. Comparatively, the LSOA is within the top 10% most deprived deciles for the Geographical Barriers sub-domain and within the top 30% most deprived deciles for the Barriers to Housing and Services domain, and the Indoor sub-domain. Overall, this LSOA is one of the top 20% least deprived in England.

E01022203: Cotswold 009B covers approximately 50% of the neighbourhood area, covering the west of the area. The LSOA is within the top 40% least deprived decile for all of the IMD categories, with the exception of the Children and Young People sub-domain and the Geographical Barriers sub-domain which are in the 50% most deprived decile. Overall, the LSOA is one of the top 10% least deprived in England.

E01022204: Cotswold 009C covers approximately 5% of the neighbourhood area, containing the majority of the Fairford Town centre. There are some contrasts between the IMD categories for this LSOA. The LSOA is within the top 10% least deprived deciles for the Living Environment domain and the Outdoors sub-domain, and within the top 20% least deprived deciles for the Crime and Wider-Barriers sub-domain. Overall, this LSAO is within the top 20% least deprived in England.

### Similarities between the LSOAs

- All three of the LSOAs within the neighbourhood area are within the top 20% least deprived decile for the outdoors sub-domain.
- All three of the LSOAs within the neighbourhood area are within the top 30% least deprived decile for the Crime domain, Wider Barriers sub-domain and Income Deprivation Affecting Children Index.

### Contrasts between the LSOAs

- E01022202: Cotswold 009A is within the top 30% most deprived decile for Barriers to Housing or Services. Comparatively, E01022203: Cotswold 009B and E01022204: Cotswold 009C are within the top 30% least deprived deciles for the same IMD category.
- E01022202: Cotswold 009A is within the top 30% most deprived decile for the Indoors sub-domain. Comparatively, E01022203: Cotswold 009B and E01022204: Cotswold 009C are within the 40% least deprived deciles for the same IMD category.

### Housing Tenure

Within the neighbourhood area, the 2011 Census data shows that 73.2% of residents either own their home outright or with a mortgage, compared to 65.7% for Cotswold, 67.4% for the South West and 63.3% for England. There are also fewer residents within socially rented accommodation in the neighbourhood area (13.2%) in comparison to the District (14.9%) and national totals (17.7%). However, the percentage of Fairford residents in socially rented accommodation aligns with the South West regional percentage (13.3%).

In terms of the live affordable housing stock in Fairford and current numbers of home seekers, **Table A.1** and **Table A.2** demonstrate what we understand to be the existing situation, based on information provided by Cotswold District Council.

In terms of home seekers, **Table 7.7** includes those with a local connection to Cotswold District and a preference for Fairford. It is noted that the emergency figures in the Fairford area are likely to be higher at present, due to applicants being served Demolition Notices in Kempsford (while they live in Kempsford now, they may want to move to Fairford and see this as an opportunity to do so).

**Table A.1 Current housing stock in Fairford<sup>84</sup>**

<i>Rented</i>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>
<b>Flat</b>	65	27	0	0
<b>House</b>	0	72	78	133
<b>Bungalow</b>	3	40	0	0
<i>Shared Ownership</i>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>
<b>Flat</b>	3	0	0	0
<b>House</b>	0	4	4	2
<b>Bungalow</b>	0	0	0	0
<i>Discounted Sale Homes</i>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>
<b>Flat</b>	0	0	0	0
<b>House</b>	0	4	4	2
<b>Bungalow</b>	0	0	0	0

**Table A.2 Current number of households on Home seeker Plus<sup>85</sup>**

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>
<b>Emergency</b>	2	6	3	0
<b>Gold</b>	0	1	0	0
<b>Silver</b>	10	8	4	1
<b>Bronze</b>	74	37	8	5

<sup>84</sup> Cotswold District Council (2018)

<sup>85</sup> Cotswold District Council (2018)

## Summary of Future Baseline

The population of the neighbourhood area slightly increased between the years 2001-2011. Since 2011, a considerable increase in new housing development in Fairford is predicted to result in a significant growth in the area's population (39%). This recent trend of growth is expected to continue, and will likely place strain on local services and facilities.

33.1% of residents are aged 60+, indicating the presence of an older population within the neighbourhood area. In common with other areas, the population of the neighbourhood area is ageing.

There are notable contrasts in the levels of deprivation between the three LSOAs in the neighbourhood area, particularly between the barriers to housing and services domain and the indoor sub-domain. The suitability of housing for local requirements depends in part on the successful implementation of policies outlined in the emerging Cotswold District Local Plan 2011-2031.

## Health and Wellbeing

### Context Review

The NPPF (2021) seeks to enable and support healthy lifestyles through provision of appropriate infrastructure, services and facilities, including; green infrastructure, access to healthier food, allotments and the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas.<sup>86</sup>

The NPPF recognises the role of development plans in helping to deliver access to high quality open spaces and opportunities for sport and physical activity which contribute to the health and wellbeing of communities, and can deliver wider benefits for nature and support efforts to address climate change. The health benefits of access to nature, green spaces and green infrastructure is further reiterated through the 25-year Environment Plan.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them.<sup>87</sup> Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The Joint Strategic Needs Assessment (JSNA) for Gloucestershire identifies key features of interest within the area and raises important issues for discussion. The main challenges in Gloucestershire are linked to population, equality and diversity, deprivation, children and young people, adults and older people, health, the economy, the environment, accessibility, community and community safety.<sup>88</sup>

By 2031, the Cotswold District Local Plan 2011-2031, aims to have '*helped to create more healthy, sustainable and mixed communities*'. Policy EN11 (Pollution and Contaminated Land) ensures that public health and safety are protected against new development.

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<sup>86</sup> Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>87</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <http://www.apho.org.uk/resource/item.aspx?RID=106106>

<sup>88</sup> Gloucestershire County Council (2017): 'Understanding Gloucestershire - A Joint Strategic Needs Assessment', [online] available to download via: <https://inform.gloucestershire.gov.uk/MainMenu.aspx?page=UnderstandingGloucestershire-JSNA>

## Summary of Current Baseline

### *Health Indicators and Deprivation*

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail. 82.5% of residents in the neighbourhood area consider themselves as having 'very good health' or 'good health', lower than the totals for the South West of England (81.4%) and England (81.4%), however higher than the total for Cotswold (83.9%). The number of residents in the neighbourhood area considering themselves to have 'bad health' or 'very bad health' is 4.5%, compared with 3.8% in Cotswold, 5.2% in the South West of England and 5.4% in England.

The percentages of 'very good health' and 'good health' in Fairford are lower than the District level but higher than regional and national levels. 7.4% of residents in Fairford report that their daily activities are limited 'a lot', compared to 6.5% for Cotswold, 8.3% for the South West of England, and 8.3% for England.

## Summary of Future Baseline

Health and wellbeing levels within the neighbourhood area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low percentage of residents reporting that their activities are limited in some way. While the percentages for the neighbourhood area are higher than the regional and national trends, they are less favourable than the local trend in Cotswold.

An ageing population within the neighbourhood area is likely to place future pressures on health services in the area. Similarly, ongoing cuts to community services and an increase in housing development in the FNP area has the potential to lead to effects on health and wellbeing over the long term.

In addition to the main challenges outlined in the JSNA for Gloucestershire, obesity is seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

## Economy and Enterprise

### Context Review

The National Planning Policy Framework (NPPF) (2021) supports competitive town centre environments and sets out policies for the management and growth of centres over the plan period.<sup>89</sup> Focus is placed on the need to have a clear understanding of business needs within the economic markets operating in and across the local areas – work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability. Furthermore, plan-making should be proactive to meet the development needs of business and support an economy fit for the 21st century. Economic growth in rural areas should be supported in order to create jobs and prosperity. Specifically, support should be given to sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centre.

The Cotswold District Local Plan 2011-2031 has a range of policies which are related to Population and Community, these are as follows:

- EC1 – Employment Development
- EC2 – Safeguarding Employment Sites

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<sup>89</sup> Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- EC3 –Proposals for Employment-Generating Uses
- EC5 – Rural Diversification
- EC6 – Conversion of Rural Buildings
- EC7 – Retail Hierarchy
- EC8 – Main Town Centre Uses
- EC9 – Retail Impact Assessments
- EC10 – Development of Tourist Facilities and Visitor Attractions
- EC11 – Tourist Accommodation

## Summary of Current Baseline

### *Local Economy*

Fairford is designated through the Local Plan as a 'Principal Settlement', serving as a Local Service Centre for a wider rural area including the villages of Kempsford, 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, Farringdon, Highworth, Cricklade and Swindon also within 17 miles.

Cotswold District as a whole has no City Centres, and as such, market towns such as Fairford play a vital role in supporting its communities, and other nearby settlements, including the nearby RAF airbase. **Table A.3** provides a breakdown of the existing businesses in Fairford.

**Table A.3** identifies that Fairford has a range of shops and services, sufficient to meet day-to-day needs of local residents. However, it has been identified through local consultation that most of the town centre 'retail' premises are small, which means that although Fairford appears to have a wide range of shops and services, these do not meet the needs of existing (and therefore forthcoming) residents in total capacity terms. **Table A.3** also shows that Fairford has a relatively large number of take-aways and hair/beauty service businesses, which consultation has shown seem to be generally regarded as a negative indicator for vitality in the town.

The Fairford Neighbourhood Plan Input to Cotswold District Retail Update (2016) identifies that the most frequently used facility in the town is convenience stores, being used once a week or more by 86% of residents. Following this, 39% of residents using the Post Office once a week or more, and 31% using the Chemist once a week or more. However, local opinion is that the capacity of some services fall short of that in other centres.

As discussed above, the town has seen significant levels of housing development since 2011. Local experience has found that infrastructure, including community services and facilities, has not been sufficiently invested in to meet the needs of new (and existing) residents. In some cases, the town has experienced a decline in services. The town's mix of shops and services are currently under strong competitive/viability pressures, with many shops lost to residential conversions. Significant recent changes include the Cotswold Volunteers Charity Shop closing April 2017 and (in August 2016) Lloyds Bank announcing (without prior consultation) their decision to close the town's only Bank branch in November 2016. This is a considerable loss for the town considering the results of the Retail Update (2016) discussed above, which highlight the frequent use of the bank by residents.<sup>90</sup>

Further business closures in the town include Josh Hair, Blenheim Antiques, and C B Slade. Additionally Cotswold Volunteers has been replaced by Lynwood, and Orient food takeaway has been replaced by Peter Vallance Foundation charity shop.

The Housing Land Supply Report (2017) identifies that there are issues of achieving the timely implementation of infrastructure and enabling these developments to 'bed in' before further growth

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<sup>90</sup> Fairford Town Council (2016) Fairford Neighbourhood Plan Input to Cotswold District Retail Update 2016

occurs.<sup>91</sup> This highlights the importance of safeguarding, protecting, and where possible expanding provisions (particularly A1 class premises) in the town.

**Table A.3 Businesses in Fairford<sup>92</sup>**

Location	Business	Description
<b>High Street / Market Place</b>		
1	Cotswold Volunteers	Charity
4-5	Coln Bookshop/Gallery	Bookshop
8	Purely Divine body & beauty	Service
10	Kim Sutton Gallery	Gallery/Shop
11	Fairford Opticians	Medical/Service
	Family Osteopath	Medical/Service
	AMM bookkeeping	Financial service
	Flying Start Nursery	Nursery
(14)	Boots	Chemist
	Blenheim Antiques	Antiques
	Josh Hair	Hairdresser
4A	Barbury	Barber's Shop
4	Cooperative Food	Convenience store
	Andrew Butler	Butcher
	Ridgeway	Estate Agent
	Mitchell & Sarjent	Financial service
	Fairford Fish Bar	Takeaway
	Mister Ernest	Hairdresser
	Bull Hotel	Hotel
	Coffee Post	Post Office/Cafe
	Colosseo	Restaurant
<b>London Street</b>		
	Curry King	Takeaway
	Fairford Kebab & Pizza	Takeaway
	7A	Cafe
	Fairford Therapy Centre	Medical/Service
	Plough Inn	Pub
	White Cottage	Dentist
	Enntwine	Gifts
	Orient	Takeaway
	New Peking House	Takeaway
	Londis	Convenience store
	Inspirations	Hairdresser
	Row Electrical	Electrician
<b>Outside Official Town Centre:</b>		
<b>London Road</b>		
	Eight Bells	Pub
	Railway Inn	Pub
<b>Milton Street</b>		

<sup>91</sup> Cotswold District Council (2017) Housing Land Supply [online] available at: <http://www.cotswold.gov.uk/residents/planning-building/planning-policy/emerging-local-plan/local-plan-examination/local-plan-examination-documents/> > last accessed 16/04/18

<sup>92</sup> Fairford Town Council (2018)

	Vet Surgery	Vet
	Marlborough Arms	Pub
<b>Other</b>		
	Park Close Stores	Convenience store
	Thornhill Filling Station	
	Lechlade Garden Centre	

## Employment

Fairford has a reasonable employment base with a higher than average proportion of those jobs in growth sectors. The following three occupation categories support the most residents:

- Professional occupations (16.9%)
- Skilled trades occupations (15.8%)
- Managers, directors, senior officials (12.0%)

Overall, 44.7% of residents within the neighbourhood area are employed in one of the above three occupation categories, compared with 41.0% in the South West and 39.7% in England. This suggests that the neighbourhood area has a highly skilled workforce compared to regional and national percentages. However, Fairford has fewer residents residing in these skilled occupations than Cotswolds District total (47.0%). This finding is also supported by the trends in number of residents with a Level 4 qualification (previously discussed). Generally, there are fewer residents within the neighbourhood area employed within the sales and customer service occupation categories, and the caring, leisure and other service occupations categories compared to the regional and national percentages.

Fairford's employment role, however, is in danger of decreasing as there is a poor balance of jobs to workers. In this context, given the close proximity of Swindon (12 miles), Fairford's self-containment (the percentage of travel to work journeys that start and finish in the ward) is lower than some of the District's other larger settlements.

## Education

Based on the 2011 census data, 21.4% of residents in the neighbourhood area have no qualifications, higher than the percentages for Cotswold (18.5%), the South West (20.7%) but aligning with the national total (22.5%). Comparatively, there are a higher number of residents with Level 4 qualifications within the neighbourhood area (29.9%), compared with the totals for the South West (27.4%) and England (27.4%). However there are a lower percentage of Fairford residents with Level 4 qualifications compared to the Cotswold District (33.7%). The number of residents in the neighbourhood area with either a Level 1 or Level 3 qualification broadly aligns with the regional and national trends.

## Tourism

Tourism is important to Fairford's economy. The Cotswold Water Park is the largest area of man-made lakes in the UK; covering an area of 40 sq. miles (33 sq. miles in Cotswold District). Restoration programmes in the area provide a major resource for tourism, notably water recreation and wildlife, promoting the town's commercial role in the District.

The emerging Local Plan identifies that future development will play an important role in managing proposals for hotel and other types of accommodation and the development of visitor attractions.

## Broadband

Cotswold District is a primarily rural area, and therefore the telecommunications infrastructure often has poor capacity and coverage. Significant parts of the District experience slow broadband speed and poor telecommunication signals.

The emerging Local Plan seeks to deliver improvements to the telecommunications infrastructure to address this problem and thereby help to combat social exclusion of residents, improve access to services (including emergency services), and reduce the need to travel.

Broadband improvements are taking place as part of the 'Fastershire' scheme across Gloucestershire. It is expected that all homes and businesses in the identified 'exchange' areas for the

Cotswolds will have the capability to receive a minimum of 2Mbps. Further improvements are planned, subject to funding availability.<sup>93</sup>

## Summary of Future Baseline

Fairford has a good range of services and facilities in the town, supporting local residents through providing local employment and meeting the day-to-day needs of Fairford residents and those from surrounding settlements. However, the capacity of existing services and facilities is an issue for the town. New housing development is likely to place pressure on the town's mix of shops and services. There is still pressure for further housing growth and this could exacerbate the existing trend of the loss of local shop closures for alternative (residential) use.

The neighbourhood area has a highly skilled and qualified workforce compared to regional and national percentages. Self-containment in the town is low, with a high level of out commuting to Swindon.

Tourism is important to Fairford's economy, and the wider Cotswold Water Park.

## Transportation

### Context Review

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

Notably, the NPPF (2021) seeks the consideration of transport issues from the earliest stages of plan-making and development proposals to address any known issues and maximise opportunities to increase accessibility, particularly by walking, cycling and public transport.<sup>94</sup> Larger developments are expected to be delivered in areas which are or can be made sustainable by limiting the need to travel and offering a genuine choice of transport modes. However, it is recognised that sustainable transport solutions will vary between urban and rural environments.

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. Gloucestershire's Local Transport Plan (2015-2031) aims to deliver 'a resilient transport network that enables sustainable economic growth by providing door to door travel choices'. To achieve this, the strategy has four overarching objectives:<sup>95</sup>

- Support sustainable economic growth
- Enable community connectivity
- Conserve the environment
- Improve community health and wellbeing

The Cotswold District Local Plan 2011-2031, Policy INF3 (Sustainable Transport) allows development which enables the Gloucestershire's Local Transport Plan 2020-2041, particularly focusing on the following areas:

- Travel choice
- Cyclist and pedestrian priority

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<sup>93</sup> Cotswold District Council (2017) Cotswold District Local Plan 2011-2031: Submission Draft Reg. 19 Tracked Changes with Focussed Changes and Minor Mods [online] available at: < <http://www.cotswold.gov.uk/residents/planning-building/planning-policy/emerging-local-plan/local-plan-examination/> >

<sup>94</sup> Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>95</sup> Gloucestershire County Council (2020) Gloucestershire's Local Transport Plan 2020-2041'. [online] available to download via: < <https://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2020-2041/>

- Unacceptable noise, vibration or air pollution
- Green infrastructure
- Restoration of former railways
- Secure bicycle parking and charging plug-in for electric vehicles
- Efficient delivery of goods and supplies
- Needs of citizens with disabilities

Additionally Policy S5 ensures that the Fairford to Lechlade multi-use path is protected and aims to improve footpath and cycle links in the area.

## Summary of Current Baseline

### ***Rail Network***

There are no local railway stations within the neighbourhood area. The nearest Railway station is Kemble, which is approximately 17km to the east of Fairford. Kemble train station provides frequent services to a variety of destinations. These include Swindon, London Paddington, Gloucester and Cheltenham Spa.

### ***Bus Network***

There are three bus routes through the neighbourhood area. The 76/77 runs throughout the day connecting residents to Highworth, Lechlade, Quenington, and Cirencester. The 855 morning bus service terminates in Fairford (at the school) and the afternoon service (from the school) runs to Cirencester at the same time as the 77. It is recognised that services are infrequent and finish early in the day, reducing potential usability for commuters.

The 72F is a demand responsive service, running on Thursday mornings, providing access to Fairford shops.

### ***Road Network and Congestion***

There is one 'A' road passing through the neighbourhood area, the A417 which goes through the centre to the east and west boundaries. The A417 links Fairford to the neighbouring towns of Cirencester (approximately 9 miles east of the neighbourhood area) and Lechlade on Thames (Approximately 5 miles west of the neighbourhood area). At Lechlade on Thames, the A417 connects residents to the A361.

The A417 is reduced to one-way traffic at narrow points, which due to the high levels of HGVs on the road (10.8%), leads to considerable congestion at peak times.<sup>96</sup>

The majority of the neighbourhood area is accessible via 'C' roads or country lanes, including (but not limited to) Coronation street and Leafield Road in the northern section, Leafield Road and Hatherop Road in the central section, and Horcott Road in the southern section.

### ***Cycle and Footpath Network***

There are no National Cycle network routes within the neighbourhood area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford neighbourhood area. These are a network of safe, quiet, country lanes, connecting Fairford residents to Cirencester and Northleach. There are also a range of footpaths in the area.

### ***Availability of Cars and Vans***

Based on the 2011 census data 87.78% of households in the neighbourhood area have access to at least one car or van, which is in line with the percentage for Cotswold (87.38), but higher than the percentages for the South West (81.1%) and England (74.0%). This reflects the poor public transport facilities in this rural area.

### ***Travel to Work***

The most popular method of travelling to work in the neighbourhood area is via driving a car or van (47.1%), which is higher than the totals for Cotswold (40.4%), the South West of England (41.4), and

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<sup>96</sup> A417 Fairford Volume Class Traffic Survey 2017

England (37.0%). This may be attributed to the high level of residents out-commuting for employment.

Additionally, 7.8% of Fairford residents chose to walk to work. This is slightly higher than the national average (7.0%), however lower than local (9.6%) and regional (9.0%) averages. A higher percentage of the neighbourhood area work mainly at or from home (5.1%), compared to averages for the South West of England (4.6%) and England (3.0%). However, the percentage of Fairford residents working at or from home is lower than Cotswold averages (7.8%).

## Summary of Future Baseline

New development has the potential to increase traffic and cause congestion within the neighbourhood area, particularly along the A417. Additionally, public transport use has the potential to remain low compared with private car use; likely to due to the infrequent nature of the bus services, the lack of railway stations and the rural setting of the parish.

There is likely to be an increase in the amount of people working from home due to an increase in modern working patterns, including agile and flexible working. Nonetheless, there will be a continuing need for development to be situated in accessible locations to further limit the need to travel by private car.

## Appendix B Site options appraisal

This appendix presents the detailed findings of the appraisal of six individual site options within the neighbourhood area, as established within Section 4.38 - 4.39 of the main report. These are set out below:

- New Site 5: The southern half of Site 5: Land between Leaffield Rd. and Hatherop Rd. (SHELAA Ref F\_51B & F\_51C)
- Site 7: Jones' Field (SHELAA Ref F\_15);
- Site 8: Land east of Beaumoor Place (SHELAA Ref F\_38);
- Site 10: F\_39C Field south east of granted planning permission at London Road; and
- Site 11: Land west of Terminus Cottage and Station (F\_52)
- Site 12: Yells Yard

The locations of these sites are presented in Figure 4.1 of this SA Report.

### Methodology

Each of the site options listed above were considered against the SA Framework of objectives and decision-making appraisal questions developed during SA scoping (Section 3.3) and the baseline information.

It should be noted that when considering access to community facilities and services, walking distances have been calculated from the edge of the site using google maps.

Tables AB.1 - AB.6 overleaf present this appraisal and provide an indication of each site's sustainability performance in relation to the nine SA themes.

Summary findings are presented in Section 4.40 of the main report.

**Table AB.1 New Site 5: Land between Leaffield Road and Hatherop Road’ (The southern half of SHELAA Ref F\_51B & F\_51C)**

SA theme	Commentary, New Site 5: Land between Leaffield Road and Hatherop Road’ (The southern half of SHELAA Ref F_51B & F_51C)
Biodiversity	<p>There are no significant biodiversity constraints present on the site.</p> <p>In terms of European designated sites, North Meadow &amp; Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area. New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.</p> <p>In terms of nationally designated biodiversity sites, the site is located approximately 800m north west of the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07<sup>th</sup> January 2021) and within a SSSI Impact Risk Zone (IRZ) for 50 residential units. Given the site is being promoted for around 80 dwellings, development has the potential to impact upon the SSSI, for example through recreational disturbance and indirectly through pollution. Notably, significant development at this site could lead to increased sewage pollution issues in/from the Coln downstream of the Sewage Treatment Works, and improved sewage provision on a timely basis would be a pre-requisite for development at this site. This may affect the Cotswold Water Park SSSI (via overflow or groundwater feed from river).</p> <p>The site is not located within close proximity to any locally designated biodiversity sites. In terms of habitats, no Biodiversity Action Plan Priority Habitats are present on or adjacent to the site. The site however has a level of biodiversity value given the thick mature hedgerows which run along its boundary, and trees and hedgerows sporadically located throughout the site itself. It is noted that hedgerows present are likely to hold ecological value through providing habitat corridors and aiding connectivity, and will need to be retained.</p> <p>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, <b>Figure A.1</b>.</p>
Climate Change	<p>Development of the site will not significantly increase greenhouse gas emissions because the proposal is for a low-carbon development.</p> <p>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of fluvial flooding. The site however contains areas of medium/ high surface water flood risk along the southern site boundary and around the ditch running north-south through the site.</p> <p>Groundwater flooding is a key issue for the town. The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that <i>“at this site, groundwater levels are artesian and close to the surface during winter at several locations. The low-lying parts of this area do not achieve the desired freeboard; and would be subject to groundwater flooding.”</i> Part of the site, to the south, is therefore at high risk of groundwater flooding.</p> <p>It is noted that development of the site will avoid the high surface flood risk area, avoiding adverse effects in this respect.</p>
Landscape and Historic Environment	<p>The site consists of agricultural land, located immediately north of the existing settlement, adjacent to Farmor’s School to the west, and open landscape to the north and east. The proposed landscape buffer means that development of the site would not extend the built form into the open countryside to the north, and minimises the potential to impact upon the Special Landscape Area (SLA) northwest of the site. Screening proposals would limit the impact upon landscape character and the setting of the town, including views (notably from the Public Right of Way (PRoW) along the southern site boundary).</p> <p>The site is approximately 160m north east of the Fairford Conservation Area, which covers the centre of the village, extending up along Leaffield Road. Development of the site therefore has the potential to impact upon the setting of the asset, although it is recognised that the site is screened almost entirely from the Conservation Area by dense belts of trees which may limit the potential for adverse effects. Ultimately, the nature and significance of effects are dependent on the design and layout of development.</p> <p>The historical sites located within the neighbourhood area can be seen within Appendix A, <b>Figure A.2</b>.</p>

SA theme	Commentary, New Site 5: Land between Leafield Road and Hatherop Road' (The southern half of SHELAA Ref F_51B & F_51C)
Land, Soil and Water Resources	<p>Development of the site would not result in the loss of best and most versatile agricultural land (Grades 1 – 3a). However the site is wholly greenfield, and therefore would lead to loss of greenfield land. The site is not within a Source Protection Zone (SPZ), although SPZ2 is adjacent to the site.</p>
Population and Community	<p>The proposed capacity for this site is around 80 dwellings. However, development is only anticipated to cover 2.7ha of the 5.1ha site, with part of the site allocated for screening and public open space (children’s playground, community allotments or orchard. While it is noted that CDC has not set a level of housing ‘need’ to be met in the neighbourhood area, residential development would nonetheless contribute positively towards the growth and vitality of the town.</p> <p>Given the level of development proposed, it is considered that development at the site would contribute to the improvement of existing or provision of new services/ facilities. This would be facilitated through Community Infrastructure Levy (CIL) charges. In this context a link road is expected to be delivered as part of the proposal, improving access between the schools and the A417 to the east of the town. This will provide a drop-off point away from the school and a safe walking route to the schools. Further details are to be provided by the site promoter.</p> <p>While the southern extent of the site is located adjacent to existing residential development within Fairford, and is therefore likely to positively integrate with the local community, the northern extent of the site is not so well connected. In terms of access to local facilities and services, the site is not particularly well located, being over 800m from the town centre and shops, a GP surgery and local employment. However, it is noted that a level of community infrastructure will be provided alongside development, including new footpath links, which will improve accessibility for new residents. Specific details of this are uncertain at this stage.</p> <p>The site has good access to public transport links; in addition to the PRoW running along the site boundary the site is within 400m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford. Given the community benefits anticipated as a result of development, residual positive effects are predicted.</p>
Health and Wellbeing	<p>The site has limited access to local health services, being over 800m from the nearest GP surgery (Fairford Surgery). The site however has suitable access to health facilities located at Fairford Hospital in the centre of the town.</p> <p>The site has good access to open space, given Farmor’s sports centre is located to the west of the site. Additionally the southern boundary of the site coincides with a PRoW which will provide access to the surrounding countryside.</p> <p>The site has good access to public transport links; in addition to the adjacent PRoW the site is within 400m of a bus stop. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford.</p> <p>It is also noted that a link road is expected to be delivered as part of development proposals, supporting active, safe travel throughout the town. Further details are to be provided by the site promoter.</p>
Economy and Employment	<p>The site has good access to the A417 via Hatherop Road, although the site is over 800m from the town’s existing employment offer.. Given the recent business closures in the town and the site’s location on the outskirts of the settlement with easy access to the A417, it is considered that residents would likely out commute for employment to Swindon and Oxford.</p> <p>Local opinion indicates the capacity of services in Fairford falls short of surrounding towns. Therefore given the capacity of the site it is more likely to provide a greater CIL contribution and therefore have a greater positive effect on the local economy, for example through attracting more residents/ visitors and supporting the overall growth of Fairford..</p> <p>It is also considered that the delivery of a link road alongside development, together with footpath links, will provide improved accessibility for new and existing residents within the town. This may also encourage new businesses in the town. Further details are to be provided by the site promoter.</p>

SA theme	Commentary, New Site 5: Land between Leafield Road and Hatherop Road' (The southern half of SHELAA Ref F_51B & F_51C)		
Transportation	<p>The site has reasonable access to public transport links; there is a PRow along the southern boundary of the site and the site is within 400m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford. The site also benefits from being within walking distance to schools, which enables and encourages sustainable travel use (walking/ cycling) for parents and children.</p> <p>In light of the above, private car use is anticipated to remain high in the neighbourhood area, leading to increased levels of congestion. Given the level of housing proposed, development seeks to alleviate pressure on the road network through delivering a link road. This will provide improved accessibility for new and existing residents within the town, with further details to be provided by the site promoter.</p>		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

**Table 4.3 Site 7: Jones’ Field (SHELAA Ref F\_15)**

SA theme	Commentary, Site 7: Jones’ Field (SHELAA Ref F_15)
Biodiversity	<p>There are no significant biodiversity constraints present on the site.</p> <p>In terms of European designated sites, North Meadow &amp; Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area . New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.</p> <p>In terms of nationally designated biodiversity sites, the site is located approximately 200m from the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07th January 2021), and within a SSSI Impact Risk Zone (IRZ) for Cotswold Water Park SSSI for 50 residential units. The site has a capacity of 47 dwellings, which just falls short of the 50 dwellings threshold. Development is therefore not anticipated to lead to significant adverse effects. Notably, significant development at this site could lead to increased sewage pollution issues in/from the Coln downstream of the Sewage Treatment Works, unless the appropriate uprating is provided for on a timely basis. This may affect the Cotswold Water Park (via overflow or groundwater feed from river) and Whelford Meadow SSSIs. It is also considered that pollution of the Court Brook or ditch along the A417 could affect the Lake 116 SSSI nearer Lechlade.</p> <p>The site is not located within close proximity to any locally designated biodiversity sites. In terms of habitats, the site contains Woodpasture and Parkland BAP Priority Habitat. A number of mature trees are protected by a blanket Tree Protection Order (TPO). These trees form part of, and are protected by, Fairford’s Conservation Area. The trees, and other vegetation present are likely to provide valuable habitats for species, providing wildlife corridors, and aiding connectivity.</p> <p>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, <b>Figure A.1</b>.</p>
Climate Change	<p>Development of the site will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, although these are unlikely to be significant. In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of fluvial flooding.</p> <p>Groundwater flooding is a key issue for the town. However, the Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that <i>“data suggests that [the site] satisfies requirements and the development area could be larger.”</i> The site is therefore considered to be at low risk of groundwater flooding.</p>
Landscape and Historic Environment	<p>This site is predominately a rural grassed field to the south of London Road. The site is adjacent to the built form north of London Road; however, it is enclosed to some extent by areas of mature trees and hedgerows to the east and south, and Cotswold stone wall to the north. There is a Public Right of Way (PRoW) along the east of the site, views from which are likely to be protected by vegetative screening. The site joins the grounds of Morgan Hall to the west; however, it is noted that there is dense vegetation lining the site at this location, which may reduce potential adverse effects.</p> <p>The site is located within Fairford Conservation Area and adjoins the grounds of Grade II listed Morgan Hall (discussed above) to the west. The site also contains part of the historic ha-ha which was part of Morgan Hall. Development therefore has potential to impact on the setting of Morgan Hall and of the Conservation Area. However, it is noted that the site is well screened by vegetation and mature trees, limiting adverse effects on setting and character.</p> <p>It is noted that access is a constraint for this site (particularly on to the A417). Creating a new access point or widening the existing one would likely require demolition of part of a Cotswold stone wall which is located within the Conservation Area. This may lead to adverse effects. Ultimately, the nature and significance of effects are dependent on the design and layout of development.</p> <p>The historical sites located within the neighbourhood area can be seen within Appendix A, <b>Figure A.2</b>.</p>
Land, Soil and Water Resources	<p>The site is located within best and most versatile agricultural land (Grades 1 – 3a). Development at the site would therefore result in the loss of this high-quality soil resource.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>

SA theme	Commentary, Site 7: Jones' Field (SHELAA Ref F_15)	
Population and Community	<p>The site is being promoted for 20 lifetime home houses, public realm improvements, and a social hub pavilion. This will contribute positively towards specialist housing needs of the area. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area, residential development would nonetheless contribute positively towards the growth and vitality of the town. Particularly, Lifetime homes offer a level of flexibility that can contribute positively to the creation of stable and popular neighbourhoods and communities. The delivery of a social hub and public realm improvements would also lead to positive effects in terms of community cohesion and overall neighbourhood satisfaction.</p> <p>The site is located adjacent to existing residential development along London Road, and is therefore expected to positively integrate with the local community. In terms of access to the town centre and its facilities, the nearest shop and local employment site is over 800m; however, Fairford GP Surgery is approximately 350m from the site to the west. Access to these services would involve crossing the A417. Local knowledge suggests that access onto the A417 is not straightforward, with restricted visibility likely to cause safety concerns.</p> <p>The site has good access to public transport links; in addition to the PRoW extending along the eastern boundary, the site is within 400m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.</p> <p>Given the community infrastructure provision to be delivered alongside development, positive effects are predicted.</p>	
Health and Wellbeing	<p>The site has good access to local health services, being within 350m from the nearest GP surgery (Fairford Surgery). The site is also well located in relation to health facilities located at Fairford Hospital in the centre of the town. It is however noted that access is limited to some extent by the A417 (visibility concerns).</p> <p>The site has good access to open space, being adjacent Fairford Football Club on Cinder Lane. It is however noted that the football pitches are not public access. Additionally, it is recognised that the site itself is promoted for public realm improvements and a social hub pavilion. This will lead to positive effects in terms of health and wellbeing through providing opportunity for sport and recreation, promoting community cohesion, and delivering a high-quality living environment.</p> <p>The site has good access to public transport links; in addition to the adjacent PRoW the site is within 400m of a bus stop. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford.</p>	
Economy and Employment	<p>The site is not well connected to the existing employment offer of the town, being located over 800m from the nearest employment site. Given the recent business closures in the town and the site's location adjacent to the A417, it is considered that residents are more likely to commute for employment in Swindon and Oxford. Additionally, given local opinion indicates the capacity of services in Fairford falls short of surrounding towns, it is uncertain whether new residents would utilise the service offer of Fairford or travel elsewhere for day-to-day needs. As such the residual effect of new housing development on the local economy is uncertain at this stage.</p>	
Transportation	<p>The site has good access to public transport links; there is a PRoW along the eastern boundary of the site and the site is within 400m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford. Private car use is therefore anticipated to remain high in the neighbourhood area, and development may exacerbate localised traffic/ congestion, notably along the A417. However, given the capacity of the site this is not anticipated to be significant.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 4.4 Site 8: Land east of Bea Moor Place (SHELAA Ref F\_38)**

SA theme	Commentary, Site 8: Land east of Bea Moor Place (SHELAA Ref F_38)
Biodiversity	<p>There are no significant biodiversity constraints present on the site.</p> <p>In terms of European designated sites, North Meadow &amp; Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area. New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.</p> <p>In terms of nationally designated biodiversity sites, the site is located approximately 450m west of the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07th January 2021), and within a SSSI Impact Risk Zone (IRZ) for Cotswold Water Park SSSI for 50 residential units. The site has a capacity of 10 dwellings and therefore does not reach the IRZ threshold. Development is therefore not anticipated to lead to significant adverse effects. Development at this site could lead to increased sewage pollution issues in/from the Coln downstream of the Sewage Treatment Works, unless the appropriate upgrading is provided for on a timely basis. This may affect the Cotswold Water Park (via overflow or groundwater feed from river) and Whelford Meadow SSSIs. However given the low capacity of the site (10 dwellings) any adverse effects in this respect are unlikely to be significant.</p> <p>The site is not located within close proximity to any locally designated biodiversity sites.</p> <p>In terms of habitats, the site is bordered on the south and east by thick hedgerows and trees, which provide a natural habitat for nesting birds, insects, rabbits and other wildlife. These biodiversity features may also provide connectivity with the wider area.</p> <p>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, <b>Figure A.1</b>.</p>
Climate Change	<p>Development of the site will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, although these are unlikely to be significant.</p> <p>In relation to adapting to the effects of climate change, the site is located partially within Flood Zone 2 (south of site). There are also small areas of low risk of surface water flooding within the site.</p> <p>Groundwater flooding is a key issue for the town and the site. Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that the site is close to a “monitoring well at Riverdale which showed a risk of groundwater flooding in T200 conditions” and that ground water levels show a rising trend. The site is therefore considered to at risk of groundwater flooding.</p>
Landscape and Historic Environment	<p>The site is in a rural grassed field, relatively enclosed by a Cotswold stone wall to the south, hedgerows to the east, hedgerows backing onto three bungalows on the South and Bea Moor retirement home to the west. Development would likely impact views from the bungalows on the south side of the site and Bea Moor Place retirement homes adjacent to the west side of the site, as well as from the PRoW through the north of the site. It is noted that there is a level of screening provided by vegetation, which would likely reduce potential adverse effects to some extent.</p> <p>The site is located within Fairford Conservation Area. The Grade II listed Moor Farmhouse is 100m south of the site and the Grade II listed Morgan Hall is 120m north of the site. Development of the site may impact upon the integrity of the Conservation Area, and the overall setting of these heritage assets. However, screening provided by vegetation could limit adverse effects, in addition to the proposed demolition of the bungalow on site to create vehicular access. The inspector at the previous Regulation 14 consultation on the FNP concluded that the bungalow’s demolition “has the clear potential to enhance the character and appearance of the Conservation Area”.</p> <p>Furthermore, a Heritage Feasibility Study has been carried out for the site (2020) which concludes that the site makes very small contribution to the character and appearance of the Conservation Area. Residual effects in this respect are uncertain at this stage, and will depend on the design and layout of proposed development.</p> <p>The historical sites located within the neighbourhood area can be seen within Appendix A, <b>Figure A.2</b>.</p>
Land, Soil and Water Resources	<p>The site is located within best and most versatile agricultural land (Grades 1 – 3a). Development at the site would therefore result in the loss of this high-quality soil resource.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>

SA theme	Commentary, Site 8: Land east of Beaumont Place (SHELAA Ref F_38)	
Population and Community	<p>The site is being promoted for 10 new homes including 5 retirement homes and space for surgery parking. This will lead to positive effects, contributing positively towards specialist housing needs of the area. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area, residential development would nonetheless contribute positively towards the growth and vitality of the town. Particularly, retirement homes offer a level of flexibility that can contribute positively to the creation of stable and popular neighbourhoods and communities. The delivery of surgery parking will likely lead to positive effects in terms of addressing infrastructure capacity needs; supporting accessible communities and increasing overall neighbourhood satisfaction.</p> <p>The site is located adjacent to existing residential development along Beaumont Road, and is well connected in terms of access to the GP surgery (particularly given parking provision proposed), and is therefore expected to positively integrate with the local community. However to access the town centre and its facilities, residents would need to cross the A417. Local knowledge suggests that access onto the A417 is not straightforward, with restricted visibility likely to cause safety concerns. Furthermore the nearest local employment site is over 800m.</p> <p>The site has good access to public transport links; in addition to the PRoW which runs through the north of site providing community value (recreation/dog walking), the site is within 800m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.</p> <p>Given the community infrastructure provision to be delivered alongside development, positive effects are predicted.</p>	
Health and Wellbeing	<p>The site is being promoted for ten new homes including five retirement homes and space for surgery parking. This will lead to positive effects, delivering viable and feasible solution to the long-term parking needs of the health facility, while also providing excellent access for new residents to the adjacent surgery.</p> <p>The site has good access to local health services, being in close proximity to, and providing parking which could increase access to, Fairford Surgery. The site is also well located in relation to health facilities located at Fairford Hospital in the centre of the town. It is however noted that access is limited to some extent by the A417 (visibility concerns).</p> <p>The site has good access to open space, being within 400m of Fairford Bowling Club at East End and 800m from Fairford Football Club on Cinder Lane. It is however noted that the football pitches are not public access.</p> <p>The site has good access to public transport links; in addition to the adjacent PRoW the site is within 400m of a bus stop. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford.</p>	
Economy and Employment	<p>The site is not well connected to the existing employment offer of the town, being located over 800m from the nearest employment site. Given the recent business closures in the town and the site's location adjacent to the A417, it is considered that residents are more likely to commute for employment in Swindon and Oxford. Additionally, given local opinion indicates the capacity of services in Fairford falls short of surrounding towns, it is uncertain whether new residents would utilise the service offer of Fairford or travel elsewhere for day-to-day needs. As such the residual effect of new housing development on the local economy is uncertain at this stage.</p>	
Transportation	<p>The site has good access to public transport links; there is a PRoW along the eastern boundary of the site and the site is within 800m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford. Private car use is therefore anticipated to remain high in the neighbourhood area, and development may exacerbate localised traffic/ congestion, notably along the A417. However, given the capacity of the site this is not anticipated to be significant.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 4.5 Site 10: Field south east of granted planning permission at London Road (SHELAA Ref F\_39C)**

SA theme	Commentary, Site 10: Field south east of granted planning permission at London Road (SHELAA Ref F_39C)
Biodiversity	<p>There are no significant biodiversity constraints present on the site.</p> <p>In terms of European designated sites, North Meadow &amp; Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area. New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.</p> <p>In terms of nationally designated biodiversity sites, the site is located approximately 70m north of the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07th January 2021) and 1.1km northwest of Whelford Meadow SSSI. The site is within a SSSI Impact Risk Zone (IRZ) for Cotswold Water Park SSSI for 10 residential units. Given the indicative capacity of the site is 31 residential units, development has the potential to adversely impact upon the SSSI. As the adjacent industrial site has historically experienced sewage capacity and water run-off issues, it is highlighted that development may impact upon the biodiversity value of the SSSI through disturbance and indirectly through pollution. There is also potential impact on SSSIs downstream (via overflow or groundwater feed from river). Additionally, pollution of the Court Brook or ditch along the A417 could affect the Lake 116 SSSI nearer Lechlade.</p> <p>In terms of locally designated biodiversity sites, there is a Key Wildlife Site (KWS) located 60m south of the site. Development has the potential to adversely impact upon these designated sites through habitat fragmentation and/or loss, and possible pollution during construction. However, considering the existing development surrounding the site it is thought that any adverse effects would be localised, and not significant.</p> <p>In terms of habitats, no Biodiversity Action Plan Priority Habitats are present on or adjacent to the site. The site however has a level of biodiversity value given the mature hedgerows/ trees surrounding the site, and the presence of the old railway embankment. This likely to be rich in biodiversity, including hedgerows, birds, rabbits and insects. The railway embankment and hedgerows are likely to hold ecological value through providing habitat corridors and aiding connectivity.</p> <p>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, <b>Figure A.1</b>.</p>
Climate Change	<p>Development of the site will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, although these are unlikely to be significant.</p> <p>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of fluvial flooding. There are however small areas of low risk of surface water flooding within the site.</p> <p>Groundwater flooding is a key issue for the town. The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that <i>“part of the site is likely not to have sufficient freeboard”<sup>97</sup></i>. Part of the site is therefore at high risk of groundwater flooding. It is considered that development could avoid the high flood risk area, resulting in residual neutral effects.</p>
Landscape and Historic Environment	<p>Currently, the site is in agricultural use (fallow field formally used for crop production), and is located adjacent to the settlement boundary, to the south east of the town.</p> <p>Development of the site may lead to adverse effects on landscape due to visual impact and impact on setting, particularly from surrounding residential dwellings to the north and west on Cinder Lane and London Road. However, the site is adjacent to an industrial area to the east with no views in or out. The site is well screened by dense hedgerows along the north, east and southern boundaries. Any adverse effects on the landscape are therefore likely to be minor, given the openness of the wider landscape has already been compromised by the industrial estate and adjacent housing development. Ultimately, the nature and significance of effects are dependent on the design and layout of development.</p> <p>The site is not located, within, or within close proximity to, any designated or non-designated heritage assets.</p>

<sup>97</sup> Freeboard is the distance from the water level to the ground level. Negative freeboard indicates water level above ground level.

SA theme	Commentary, Site 10: Field south east of granted planning permission at London Road (SHELAA Ref F_39C)	
Land, Soil and Water Resources	<p>The site is located within best and most versatile agricultural land (Grades 1 - 3a). Development at the site would therefore result in the loss of this high-quality soil resource.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>	
Population and Community	<p>The site has capacity for 31 dwellings or B-Class employment use. Developing the site for residential use will contribute positively towards the local housing needs of the area. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area, residential development at the site would nonetheless contribute positively towards the growth and vitality of the town.</p> <p>However, it is noted that allocating the site for housing would likely lead to negative effects in terms of the local economy, as the potential to deliver local employment at this site would be lost. The site is however well located in terms of local employment, being adjacent to the London Road employment site. However, it is noted that suitable access to the employment site cannot be assumed. Without this, access would be via the incomplete footpath along the A417; which is recognised by local residents as 'hazardous', being a fast trunk road with no footpaths outside of town.</p> <p>If the site were to be delivered for employment uses then there is also the potential for a positive effect through improved access to employment opportunities for residents.</p> <p>The site is located on the edge of the settlement, and is not considered to be well connected to the town or local community. Additionally, the site is over 800m from the local shop and GP surgery.</p> <p>It is assumed that any proposal for development at this site could contribute to the improvement of existing or provision of new services/ facilities. At this stage the level of improvements or provision that could be delivered is not known.</p> <p>The site has good access to public transport links; there is a Public Right of Way (PRoW) just south of the site, it is within 400m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north east of the site. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.</p> <p>While development of the site for housing would result in the loss of a potential employment site, residual positive effects are anticipated given 32 new homes in the town will contribute positively towards meeting local needs.</p>	
Health and Wellbeing	<p>The site has limited access to local health services, being over 800m from the nearest GP surgery (Fairford Surgery). The site however is with 1km of Fairford Hospital located in the centre of the town.</p> <p>The site has good access to open space, being within 800m of Fairford Football and Social Club, and the small playground on the Keble Fields estate. Fairford Bowling Club is also nearby, although access would be via the A417. Additionally, just south of the site is a PRoW which will provide access to the surrounding countryside. This will provide residents with opportunities for sport and recreation, leading to positive effects in terms of overall health and wellbeing.</p> <p>The site has good access to public transport links; in addition to the nearby PRoW the site is within 400m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north east of the site. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford.</p> <p>While positive effects are anticipated in relation to the above, it is noted that the site is located adjacent to the London Road industrial estate, which currently includes two timber merchants (Timber Paul Engineering and Howarth Timber Engineered Solutions Ltd), a plumber's merchant (Fairford Plumbase) and electronics manufacturer (New Chapel Electronics). It is considered that residents' health may be adversely affected by noise and dust disturbance, and/or air quality pollution. Residual uncertain effects are therefore anticipated in relation to this SA theme.</p>	

SA theme	Commentary, Site 10: Field south east of granted planning permission at London Road (SHELAA Ref F_39C)	
Economy and Employment	<p>The site is well connected to the existing employment offer of the town, being located adjacent to the London Road employment site. However, it is noted that suitable access to the employment site cannot be assumed from this site if housing to be delivered. Without this, access would be via the incomplete footpath along the A417; which is recognised by local residents as 'hazardous'.</p> <p>It is noted that the site is suitable for the delivery of residential (32 dwellings) or B-class employment. Therefore, allocating the site for housing would likely lead to negative effects in terms of the local economy, as it would lead to the loss or partial loss of a potentially suitable employment site within the neighbourhood area. However, if the site were to deliver new employment then there is the potential for a long term positive effects against this theme. As a result, the residual effect at this stage is uncertain.</p>	
Transportation	<p>The site has good access to public transport links; there is a PRoW just south of the site, the site is within 400m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north east of the site. However, bus services are infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.</p> <p>Private car use is anticipated to remain high in the neighbourhood area, and development may exacerbate localised traffic/congestion, notably along the A417. However, given the capacity of the site this is not anticipated to be significant.</p> <p>If the site were to deliver housing then access would be through the existing industrial estate and this could result in potential issues, as the entrance is currently locked off at weekends. However, it is assumed that this issue could be resolved at the planning application stage.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 4.6 Site 11: Land west of Terminus Cottage and Station (SHELAA Ref F\_52)**

SA theme	Commentary, Site 11: Land west of Terminus Cottage and Station (SHELAA Ref F_52)
Biodiversity	<p>There are no significant biodiversity constraints present on the site.</p> <p>In terms of European designated sites, North Meadow &amp; Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area. New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.</p> <p>In terms of nationally designated biodiversity sites, the site is located approximately 200m north of the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07th January 2021), and 1.2km northwest of Whelford Meadow SSSI. The site is predominately within a SSSI Impact Risk Zone (IRZ) for 50 residential units, with a small area to the south of the site within an IRZ for 10 units. Given the indicative capacity of the site is 34 residential units, overall, development is not likely to lead to significant adverse impacts on the SSSI. However, as the adjacent industrial site has historically experienced sewage capacity and water run-off issues, it is highlighted that development may impact upon the SSSI downstream (via overflow or groundwater feed from river).</p> <p>In terms of locally designated biodiversity sites, there is a Key Wildlife Site (KWS) located 200m south of the site. Development has the potential to adversely impact upon this designated site through habitat fragmentation and /or loss, and possible pollution during construction. However, considering the existing development surrounding the site it is thought that any adverse effects would be localised, and not significant.</p> <p>In terms of habitats, no Biodiversity Action Plan Priority Habitats are present on or adjacent to the site. The site however has a level of biodiversity value given the rough pasture present on the site itself, and trees and hedgerows extending along the field boundaries particularly to the north, east, and west. These biodiversity features are likely to hold ecological value through providing habitat corridors and aiding connectivity.</p> <p>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, <b>Figure A.1</b>.</p>
Climate Change	<p>Development of the site will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, although these are unlikely to be significant.</p> <p>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of fluvial flooding. There is, however, an area of medium surface water flood risk to the north of the site.</p> <p>Groundwater flooding is a key issue for the town. The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that <i>“part of the site is likely not to have sufficient freeboard.”</i><sup>98</sup> Part of the site is therefore at high risk of groundwater flooding. It is considered that development could avoid the high flood risk area, resulting in residual neutral effects.</p>
Landscape and Historic Environment	<p>This site is currently in use as a horse paddock with some rough pasture and several outbuildings. The site is located adjacent to the settlement boundary, to the south east of the town. The site is neighbored by an employment estate to the south, new housing to the west and open countryside to the north and south-west. The site is well screened by vegetation with no views in or out; and it is considered that new development would be in keeping with the built form to the south and west. However, the site currently acts as a green buffer between the A417 and the new housing, and is valued by local residents for its contribution to the character of the town, acting as a highly utilised green space.</p> <p>Development of the site would likely lead to the loss of this buffer, resulting in adverse effects on the local landscape and setting. Ultimately, the nature and significance of effects are dependent on the design and layout of development.</p> <p>The site is not located in, or within close proximity to, any designated or non-designated heritage assets.</p>
Land, Soil and Water Resources	<p>The site is located within best and most versatile agricultural land (Grades 1 – 3a). Development at the site would therefore result in the loss of this high-quality soil resource.</p> <p>The site is not located in a Groundwater Source Protection Zone.</p>

<sup>98</sup> Freeboard is the distance from the water level to the ground level. Negative freeboard indicates water level above ground level.

SA theme	Commentary, Site 11: Land west of Terminus Cottage and Station (SHELAA Ref F_52)
Population and Community	<p>With a proposed capacity of 34 dwellings, development of the site will contribute positively towards the local housing needs of the area. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area, residential development would nonetheless contribute positively towards the growth and vitality of the town.</p> <p>The site is located on the edge of the settlement and is distant from the town centre and facilities. Additionally, the site is over 800m from the local shop and GP surgery. The site is recognised as having limited access on to the A417, with restricted visibility likely to cause safety concerns.</p> <p>It is assumed that any proposal for development at this site could contribute to the improvement of existing or provision of new services/ facilities. At this stage the level of improvements or provision that could be delivered is not known.</p> <p>The site is well located in terms of local employment, being adjacent to the London Road employment site. This will provide residents with access to local employment opportunities and may improve levels of self-containment in the town.</p> <p>The site has good access to public transport links; there are Public Rights of Way (PRoW) 200m south and 400m west of the site, it is within 800m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north of the site. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.</p>
Health and Wellbeing	<p>The site has limited access to local health services, being over 800m from the nearest GP surgery (Fairford Surgery). The site however is with 1km of Fairford Hospital located in the centre of the town. It is however noted that access is limited to some extent by the A417 (visibility concerns).</p> <p>The site has good access to open space, being within 800m of Fairford Football and Social Club. Additionally, there are PRoW 200m south and 400m west of the site, providing access to the surrounding countryside. This will provide residents with opportunities for sport and recreation, leading to positive effects in terms of overall health and wellbeing.</p> <p>It is however noted that access to the facilities mentioned above would likely be via the incomplete footpath along the A417, unless Site 10 was also developed. Local knowledge suggests this footpath is 'hazardous', and therefore may preclude safe access to the town centre. This is uncertain at this stage.</p> <p>The site has good access to public transport links; there are PRoW 200m south and 400m west of the site, the site is within 800m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north of the site. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford.</p> <p>While positive effects are anticipated in relation to the above, it is noted that the site is located adjacent to the London Road industrial estate, which currently includes two timber merchants (Timber Paul Engineering and Howarth Timber Engineered Solutions Ltd), a plumber's merchant (Fairford Plumbase) and electronics manufacturer (New Chapel Electronics). It is considered that residents' health may be adversely affected by noise and dust disturbance, and/or air quality pollution.</p> <p>Residual uncertain effects are therefore anticipated in relation to this SA theme given the uncertain access from the site, and the potential for noise and dust disturbance.</p>
Economy and Employment	<p>The site is well connected to the existing employment offer of the town, being located adjacent to the London Road employment site. This may provide employment opportunities for new residents. However, it is noted that suitable access to the employment site cannot be assumed. Without this, access would be via the incomplete footpath along the A417; which is recognised by local residents as 'hazardous'.</p> <p>Nonetheless, levels of self-containment in the town are likely to be encouraged. Given the recent business closures in the town and the site's location close on the settlement edge, residents may out commute for employment to Swindon and Oxford. Additionally, given local opinion indicates the capacity of services in Fairford falls short of surrounding towns, it is uncertain whether new residents would utilise the service offer of Fairford or travel elsewhere for day-to-day needs. Nonetheless, given the sites location adjacent to London Road employment site, residual minor positive effects are predicted.</p>

SA theme	Commentary, Site 11: Land west of Terminus Cottage and Station (SHELAA Ref F_52)		
Transportation	<p>The site has good access to public transport links; there are PRow 200m south and 400m west of the site, the site is within 800m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north of the site. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.</p> <p>As discussed above, access to facilities in the town centre would likely be via the incomplete footpath, which is identified by local residents as 'hazardous'. This however is uncertain at this stage.</p> <p>Private car use is therefore anticipated to remain high in the neighbourhood area, and development may exacerbate localised traffic/ congestion, notably along the A417. However given the capacity of the site, this is not anticipated to be significant.</p>		
<b>Key</b>			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

**Table 4.7 Site 12: Yells Yard**

SA theme	Commentary, Site 12: Yells Yard
Biodiversity	<p>There are no significant biodiversity constraints present on the site.</p> <p>In terms of European designated sites, North Meadow &amp; Clattinger Farm Special Area of Conservation (SAC) is located approx.. 5.5km to the south-west of the neighbourhood area . New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.</p> <p>In terms of nationally designated biodiversity sites, the site is located approximately 200m north east of the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07<sup>th</sup> January 2021), and within a SSSI Impact Risk Zone (IRZ) for ten residential units. Given the site is being promoted for ten residential units, development has the potential to adversely impact upon the SSSI through disturbance and indirectly through pollution. In terms of locally designated biodiversity sites, there is a Key Wildlife Site (KWS) located 200m from site, which coincides with the recently notified SSSI extension. Development has the potential to adversely impact upon this designated site as identified above.</p> <p>In terms of habitats, no Biodiversity Action Plan Priority Habitats are present on or adjacent to the site. There are mature hedgerows along the southwest boundary of the southeast field, which may hold ecological value through providing habitat corridors and aiding connectivity. However it is noted that these are identified as ‘gappy’ and mostly dominated by hawthorn.</p> <p>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, <b>Figure A.1</b>.</p>
Climate Change	<p>Development of the site will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, although these are unlikely to be significant.</p> <p>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of fluvial flooding.</p> <p>Groundwater flooding is a key issue for the town. Within the Groundwater Monitoring and Review of Flood Risk at Fairford (2018), Yells Yard falls partially with area \$01. The Report concludes that “<i>area \$01 is partially susceptible to groundwater flooding (i.e. freeboard to a 200 year high groundwater level less than 1.0m).</i>” The northern section covering Yells Yard is not susceptible. The nearby borehole indicates a freeboard of 1.2m for a 200 year high which is acceptable for development. The site is therefore not considered to be at high risk of groundwater flooding.</p>

SA theme	Commentary, Site 12: Yells Yard
Landscape and Historic Environment	<p>The site lies on the south-western edge of Fairford along Cirencester Road, mostly surrounded by housing and commercial buildings, with small grassland fields to the southwest and southeast.</p> <p>The site includes a yard, part of a residential property and garden, and grassland field to the southeast with few notable features. While the site is well contained there is relatively open countryside to the south. Site boundary features screen the site to some extent from neighbouring properties along Cirencester Road and the rear of properties along Horcott Road; however, visibility remains with the potential for adverse effects on long and short distance views. The open countryside to the south is locally distinctive and valued; notably given the footpath crossing the southern extent of the paddock extending into the countryside south of the site. The landscape assessment carried out for the site (2020) concludes that <i>“the change of view from the PRow to be most important, with sensitivity of receptors considered high due to the nature of their activity, their attention being focussed on the landscape and their susceptibility to changes in the view.”</i></p> <p>Furthermore, the assessment states that development proposals would <i>“introduce built form to an undeveloped portion of the site which is outside of the development boundary and would alter views of the conservation area to the north west. The duration of this effect would be permanent and generally irreversible.”</i></p> <p>Overall the landscape assessment concludes that, <i>“having a high sensitivity to visual change combined with a medium magnitude of change is likely to result in a moderate adverse significance of effect (‘degree of significance’ if using the parlance of the submitted LVIA). This means the change in view has the potential to be a significant change.”</i></p> <p>In terms of heritage assets, some of the Buildings in Yells Yard are considered ‘curtilage listed’ with Ivy Villa and hence treated as Designated Heritage Assets as part of Ivy Villa. Additionally the front portion of the site is within the Fairford Conservation Area. These Buildings, together with the Old Piggery Buildings, are identified as Non-Designated Local Heritage Assets, holding great significance locally in recent years as they mark an increasingly fragile boundary between ‘old and new’, and ‘town and countryside’.</p> <p>The Heritage Assessment carried out alongside the planning application for the site (2020) states proposed that development <i>“by virtue of the erosion of the rural, edge-of-settlement character of the site, would neither preserve nor enhance the character and appearance of the Fairford Conservation Area, nor sustain its significance as a designated heritage asset. The harm would be less-than-substantial albeit considerable, but not be outweighed by any resultant public benefits.”</i></p> <p>The paddock to the rear of Yells Yard forms part of the green corridor referred to as the ‘Horcott Gap’ which lies within the setting of the Fairford Conservation Area. The Heritage Assessment further states, in regards to the application for 18 new dwellings, that <i>“the encroachment of residential development into this important, green space, would harm aspects of the setting of the Fairford Conservation Area that contribute positively to its significance as a designated heritage asset. The harm would be less-than-substantial albeit considerable, but not be outweighed by any resultant public benefits.”</i></p> <p>It is therefore concluded that there would be some impact to the setting of the listed and curtilage buildings in Yells Yard and the character and appearance of Fairford Conservation Area. There is also high potential for archaeological deposits at the site. The historical sites located within the neighbourhood area can be seen within Appendix A, <b>Figure A.2.</b></p>
Land, Soil and Water Resources	<p>The site is located on Grade 3 agricultural land. Given recent land classification has not taken place at this location, it is not possible to establish whether this land is Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) or Grade 3b land (which is land not classified as such). If found to be Grade 3a, development would result in the loss of the area’s high-quality soil resource.</p>

SA theme	Commentary, Site 12: Yells Yard	
Population and Community	<p>With a proposed capacity of 25 dwellings, development of the site will contribute positively towards the local housing needs of the area. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area, residential development would nonetheless contribute positively towards the growth and vitality of the town.</p> <p>The site is located adjacent to existing residential development within Fairford and is therefore expected to positively integrate with the local community. However, the site lies on the south-western edge of Fairford along Cirencester Road with only reasonable access to the town's services and facilities, being approximately 600m from the town centre and shops, and over 800m from a GP surgery. The site is however within 400m of local employment at Horcott Industrial Estate.</p> <p>It is assumed that any proposal for development at this site could contribute to the improvement of existing or provision of new services/ facilities. At this stage the level of improvements or provision that could be delivered is not known.</p> <p>The site has reasonable access to public transport links; being within 400m of a bus stop and there is a PRoW within the undeveloped south of the site. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.</p>	
Health and Wellbeing	<p>The site has limited access to local health services, being over 800m from the nearest GP surgery (Fairford Surgery). The site however has suitable access to health facilities located at Fairford Hospital in the centre of the town.</p> <p>The site has good access to open space, being within 400m of Coln House playing field. Additionally, there is PRoW present within the undeveloped south of the site which will provide access to the surrounding countryside. This will provide residents with opportunities for sport and recreation, leading to positive effects in terms of overall health and wellbeing.</p> <p>The site has good access to public transport links; in addition to the adjacent PRoW the site is within 400m of a bus stop. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford.</p>	
Economy and Employment	<p>The site is well connected to the existing employment offer of the town, being located within 400m of Horcott Industrial Estate. This may provide employment opportunities for new residents. However, given the recent business closures in the town and the site's location close on the settlement edge, residents may out commute for employment to Swindon and Oxford. Additionally, given local opinion indicates the capacity of services in Fairford falls short of surrounding towns, it is uncertain whether new residents would utilise the service offer of Fairford or travel elsewhere for day-to-day needs. Nonetheless, given the sites location in close proximity to Horcott Industrial Estate, residual minor positive effects are predicted.</p>	
Transportation	<p>There are concerns regarding the suitability of providing access to the site. A new vehicular access into the site would be required off the Cirencester Road requiring the removal of an existing wall. The site has reasonable access to public transport links; there is a PRoW present within the undeveloped south of the site, and the site is within 400m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.</p> <p>Private car use is therefore anticipated to remain high in the neighbourhood area, and development may exacerbate localised traffic/ congestion, notably along the A417. However, given the capacity of the site this is not anticipated to be significant.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

# Appendix C Reasonable alternatives appraisal

This appendix presents the detailed findings of the appraisal of alternative spatial strategy options within Fairford, as established within Section 4.37 of this SA Report. These are set out below:

Site	Option A	Option B	Option C	Option D	Option E
Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C)	80				
Site 7: Jones' Field (SHELAA Ref F_15)		52	52	52	
Site 8: Land east of Beaumont Place (SHELAA Ref F_38)				12	12
Site 10: F_39C Field south east of granted planning permission at London Road		31			31
Site 11: Land west of Terminus Cottage and Station (F_52)			34		34
Site 12: Yells Yard				10	10
<b>TOTAL</b>	<b>80</b>	<b>83</b>	<b>86</b>	<b>74</b>	<b>87</b>

The locations of these spatial options are presented in **Figure 4.2** of this SA Report.

## Methodology

For each of the options, the appraisal examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). Considering this, there is a need to make considerable assumptions regarding how options will be implemented 'on the ground' and what the effect on certain receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SA perspective with 1 performing the best.

Finally, it is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects.

## Appraisal findings

**Table AB.1** overleaf presents the findings for the SA of the spatial options.

The summary findings of this detailed appraisal are presented in **Section 4.38** of the main report.

<b>Biodiversity</b>					
<b>Options</b>	<b>A (New Site 5)</b>	<b>B (Sites 7 &amp; 10)</b>	<b>C (Sites 7 &amp; 11)</b>	<b>D (Sites 7, 8 &amp; 12)</b>	<b>E (Sites 7, 8, 11, &amp; 12)</b>
<b>Rank</b>	<b>2</b>	<b>4</b>	<b>1</b>	<b>3</b>	<b>4</b>
<b>Significant effect?</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>	<b>Uncertain</b>
<b>Discussion</b>	<p>In terms of European designated sites, North Meadow &amp; Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area. New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given all options are anticipated to deliver a similar level of growth, at a similar distance from the SAC, effects are considered to be broadly consistent under all options.</p> <p>All options are constrained to some extent by nationally designated biodiversity sites, specifically the recently notified Cotswold Water Park Site of Special Scientific Interest (SSSI) extension. However only New Site 5 (Option A), Site 10 (Option B) and Site 12 (Option D and E) fall within Impact Risk Zones (IRZ) and propose a level of growth likely to have impacts on the SSSI according to NE. Notably, significant development at Option A could lead to increased sewage pollution issues in/ from the Coln downstream of the Sewage Treatment Works, and improved sewage provision on a timely basis would be a pre-requisite for development at this site. This may affect the Cotswold Water Park SSSI (via overflow or groundwater feed from river). Sewage capacity and water run-off issues are also a constraint for Site 7 (Option B-E), Site 8 (Option D &amp; E), and Site 11 (Option C &amp; E), with development possibly impacting upon SSSIs downstream.</p> <p>Site 10 (Option B) and Site 11 (Option C &amp; E) are constrained by a Key Wildlife Site (KWS) located 60m and 200m south of the sites, respectively. While there is the potential for adverse effects, considering the existing development surrounding the KWS, any adverse effects would likely be localised, and not significant. Site 7 (Options B-E) notably contains Woodpasture and Parkland BAP Priority Habitat, and a number of mature trees are protected by a blanket Tree Protection Order (TPO).</p> <p>Features such as hedgerows, trees, and rough pasture are present at site 5 (Option A), Site 8 (Option D &amp; E), Site 10 (Option B) and Site 11 (Option C &amp; E) which may hold ecological value, providing habitat corridors and aiding connectivity.</p> <p>It is noted that proposals for New Site 5 (Option A) indicate that the hedgerow present is to be retained. Proposals for new Site 5 (Option A) also include the future provision of a link road to improve access between the schools and the A417 to the east of the town. Given any further details of the link road (i.e. exact location) are unknown at this stage, potential effects on biodiversity are uncertain, although it is assumed that the location of the link road and impacts on biodiversity will be considered through a planning application for the site. Furthermore, given the distance to designated sites and the absence of BAP priority habitat/ species in and around Site 5 (Option A) significant adverse effects are not anticipated. Additionally, a level of net-gain in biodiversity is being explored. However, this is uncertain at this stage, and it is recognised that development at all options have the potential to deliver biodiversity net-gain, albeit opportunities may be greater at New Site 5 (Option A) given the scale of development proposed.</p> <p>Overall, it is considered that all options have the potential to lead to negative impact on biodiversity assets if development is located inappropriately with poor design and layout. However, it is likely that development schemes would be landscape led, comprising green infrastructure where possible; with the potential for positive effects through enhancing the local biodiversity resource and supporting wider connectivity. In terms of ranking the options, Option C is best performing as it does not fall within</p>				

a SSSI IRZ, and Site 7 does not hold any notable ecological value. Although it is noted that there is potential for Option C to impact upon SSSIs downstream, and that Option C is also constrained by priority habitat and a KWS in the town.

Option B and E are worst performing of the options given both options include sites that are constrained by nationally and locally designated sites, include priority habitat and ecological features on site. Options A and D are ranked more positively than Options B and E given they are less constrained overall. Option A performs more positively than Option D as development is proposed at one single site, and therefore has the greatest potential for biodiversity improvements/enhancement/ connectivity on site. However a level of uncertainty remains, as it is considered that the potential effects on biodiversity will depend on elements such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features.

Climate change					
Options	A (New Site 5)	B (Sites 7 & 10)	C (Sites 7 & 11)	D (Sites 7, 8 & 12)	E (Sites 7, 8, 11, & 12)
Rank	1	2	2	3	3
Significant effect?	Yes - Positive	No	No	Yes - Negative	Yes - Negative
Discussion	<p>Development under all options will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, however New Site 5 (Option A) seeks to utilise opportunities associated with increased scale, and a 'low or no carbon development' is proposed.</p> <p>In terms of access to services/ facilities/ employment in the town, all sites are equally constrained, being located either on the edge of the town/ built up area, or presented with difficulty crossing the A417 (with restricted visibility likely to cause safety concerns). It is therefore difficult to make any meaningful conclusions in terms of where options may help to reduce contributions from per capita emissions, with the exception of Option A given proposals for New Site 5 include the delivery of a link road. While further details of the link road are unknown at this stage, it is considered that helping to reduce road congestion at this location will likely lead to positive effects in terms of climate change mitigation; in turn reducing the level of greenhouse gas emissions. It is also noted that Site 7 (Options B-E) and Site 8 (Options D &amp; E) have been promoted for the delivery of community benefits, which will improve accessibility for residents and may reduce travel.</p> <p>In relation to adapting to the effects of climate change, Site 8 (Options D &amp; E) is worst performing as it is located partially within Flood Zone 2 (south of site). There are also small areas of low risk of surface water flooding within the site. All other sites are located within Flood Zone 1, which is of low risk of flooding.</p> <p>Site 5 (Option A), Site 8 (Option C, D and E), Site 10 (Option B) and Site 11 (Option C &amp; E) include areas of high risk of groundwater flooding; however, the Groundwater Monitoring and Review of Flood Risk at Fairford (2018) concludes that development could avoid the high flood risk areas. Nonetheless, Option D performs most positively in this respect, given most of its component sites are not constrained by groundwater flooding.</p> <p>Overall, it is considered that Option A performs most positively through the delivery of low carbon development and a link road. Options B and C also positively as they are not constrained by fluvial flood risk and are include sites being promoted for community benefits. Option D and Option E are worst performing given the presence of Site 8 which falls partially within Flood Zone 2.</p>				

Landscape & historic environment					
Options	A (New Site 5)	B (Sites 7 & 10)	C (Sites 7 & 11)	D (Sites 7, 8 & 12)	E (Sites 7, 8, 11, & 12)
Rank	1	2	3	4	5
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>All options perform negatively against the SA theme as all have the potential to adversely impact upon Fairford's rural, characteristic landscape. Site 11 (Option C &amp; E) and Site 12 (Option D &amp; E) are likely to lead to negative effects of greatest significance given the sites' potential to impact upon open landscape, local views and the rural setting of the town. Site 11 (Option C &amp; E) currently acts as a green buffer between the A417 and the new housing, and is valued by local residents for its contribution to the character of the town. Development of the site would likely lead to the loss of this buffer, which could result in adverse effects on the local landscape and setting; depending on design and layout of development. There is open countryside to the south of Site 12 (Option D &amp; E) which is locally distinctive and valued, particularly given the footpath present. Development would introduce built form to an undeveloped portion of the site which is outside of the development boundary and would likely alter views of the conservation area to the north west. The Landscape Assessment has been carried out for Site 12 which concludes <i>"landscape having a high sensitivity to visual change combined with a medium magnitude of change is likely to result in a moderate adverse significance of effect ('degree of significance' if using the parlance of the submitted LVIA). This means the change in view has the potential to be a significant change."</i> There is also high potential for archaeological deposits at Site 12.</p> <p>Views also have the potential to be impacted by extending built form into the open countryside on one large, single site under Option A (Site 5). This may impact upon the setting of the Special Landscape Area (SLA) to the northwest. Additionally, the link road proposed through Site 5 (Option A) has the potential to impact upon locally distinctive views, although the potential significance of effects cannot yet be determined as the location of the link road is currently unknown. It is considered that all options have the potential to utilise existing screening provided by hedgerows, woodland, and other vegetation present at the sites to reduce adverse effects on the landscape. Additionally schemes may seek to incorporate appropriate measures, including tree planting, to mitigate the visual effects of the development on the wider countryside.</p> <p>Site 7 (Options B-E), Site 10 (Option B) and Site 12 (Option D &amp; E) also have the potential to lead to negative effects due to impact on the SLA and/ or designated heritage assets (notably Fairford Conservation Area and Grade II Listed buildings). Site 5 (Option A) is adjacent to Fairford Conservation Area to the south-west. Site 7 (Options B-E) is located within Fairford Conservation Area, adjoins the grounds of Grade II listed Morgan Hall to the west, and also contains part of the historic ha-ha which was part of Morgan Hall; with potential for adverse effects. Site 10 (Option B) currently provides a visual, rural and green space corridor for the SLA. The Heritage Assessment carried out for Site 12 (Option D &amp; E) concludes that development would lead to some impact to the setting of listed and curtilage buildings in Yells Yard and the character and appearance of Fairford Conservation Area. Specifically, <i>"the harm would be less-than-substantial albeit considerable, but not be outweighed by any resultant public benefits."</i></p>				

Uncertain effects are predicted for Site 8 (Options D & E) and Site 10 (Option B) given the potential for development to enhance the character and appearance of sites, particularly given the landscape and heritage setting at these locations has already been compromised by employment and residential development. Site 11 (Option C & E) is not constrained by heritage assets.

Overall, Option E is worst performing given it includes the most constrained sites in relation to both heritage and landscape. This is followed by Option D, which also includes Site 12 and Site 7 which are identified as having potential to lead to adverse effects on heritage assets. Option C also performs negatively due to constraints at Site 7 and Site 11; however, effects are not likely to be as significant as those identified at Site 12 (Option D & E). Option A is best performing as it is not constrained by the setting of the Conservation Area, compared to Option B which falls within Fairford Conservation Area, and is constrained by further assets present at Site 8. It is considered that effects on the setting of the Conservation Area and SLA through development of Option A are could be mitigated, particularly given development is focussed on one larger site which has the potential for the design and layout of the scheme to be landscape led. However, it is recognised that uncertainties exist for Option A in relation to the location of the link road, and specific details relating to design and layout of the scheme.

<b>Land, soil and water resources</b>					
<b>Options</b>	<b>A (New Site 5)</b>	<b>B (Sites 7 &amp; 10)</b>	<b>C (Sites 7 &amp; 11)</b>	<b>D (Sites 7, 8 &amp; 12)</b>	<b>E (Sites 7, 8, 11, &amp; 12)</b>
<b>Rank</b>	<b>1</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>	<b>Yes - Negative</b>
<b>Discussion</b>	<p>Option A is the only option which does not contain best and most versatile (BMV) agricultural land (Grades 1 – 3a), with surveys indicating the site is Grade 3b. Site 7 (Option B-E) Site 8 (Option D &amp; E), Site 10 (Option B) and Site 11 (Option C &amp; E) are all constrained in this respect, and development has the potential to lead to the loss of this natural resource. Site 12 (Options D &amp; E) is uncertain as it is located on Grade 3 agricultural land, which could be BMV (if found to be Grade 3a).</p> <p>Option A although not constrained by BMV land, will however also lead to long term negative effects through the loss of greenfield and agricultural land. New Site 5 (Option A) is the only site located close to a Source Protection Zone (SPZ), being on the edge of SPZ II. However, it is recognised that if there were the potential for negative effects in this regard, there is mitigation available through national policy and the WCS to ensure that there are no residual significant effects.</p> <p>Overall, Option A is best performing as it will not lead to the loss of high quality agricultural land, however it will result in the loss of greenfield and agricultural land and therefore also leads to negative effects in the long term. In terms of ranking the remaining options, Option D, followed by Option E are next best performing as it is currently uncertain if high quality agricultural land is present at Site 12. Options B and C are ranked equally as the worst performing options as all component sites within the options would result in the loss of BMV agricultural land.</p>				

<b>Population and communities</b>					
<b>Options</b>	<b>A (New Site 5)</b>	<b>B (Sites 7 &amp; 10)</b>	<b>C (Sites 7 &amp; 11)</b>	<b>D (Sites 7, 8 &amp; 12)</b>	<b>E (Sites 7, 8, 11, &amp; 12)</b>
<b>Rank</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>3</b>	<b>2</b>
<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>	<b>Yes - Positive</b>
<b>Discussion</b>	<p>A key consideration for this SA Theme is the delivery of new homes to meet identified housing needs within the community. As all options are proposing a similar level of growth, it is considered that all options perform equally with the potential for significant long term positive effects.</p> <p>In terms of access to services/ facilities/ employment in the town, all sites are equally constrained, being located either on the edge of the town/ built up area, or presented with difficulty crossing the A417 (with restricted visibility likely to cause safety concerns). It is therefore difficult to make any meaningful conclusions in terms of where options may help to reduce contributions from per capita emissions, with the exception of Option A which as discussed above will deliver a link road with the potential for long term positive effects. Site 7 (Options B-E) and Site 8 (Options D &amp; E) are also notably promoted for the delivery of community benefits, which will improve accessibility for residents and may also reduce travel.</p> <p>Delivering growth on one single site (Option A) also notably presents an opportunity for coordinated, landscape led development which can include infrastructure delivery, and support connectivity, delivering net gains in green infrastructure through new development and public realm enhancements. This will likely support social inclusion and integrated communities.</p> <p>Overall, Option A is best performing given the opportunities presented by delivering growth at scale on one single site, including the delivery of a link road; followed by Option E given it includes two sites likely to include additional community benefits to support the town. Given Options B-D will deliver a similar level of growth on sites reasonably located to the town centre, options are ranked equally.</p>				

<b>Health and wellbeing</b>					
<b>Options</b>	<b>A (New Site 5)</b>	<b>B (Sites 7 &amp; 10)</b>	<b>C (Sites 7 &amp; 11)</b>	<b>D (Sites 7, 8 &amp; 12)</b>	<b>E (Sites 7, 8, 11, &amp; 12)</b>
<b>Rank</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>3</b>
<b>Significant effect?</b>	<b>Yes - Positive</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Discussion</b>	<p>All sites, with the exception of Site 10 (Option B) and Site 11 (Option C &amp; E) have good access to open space and recreation. Option A (New Site 5), through the delivery of growth on one single site may present opportunities for development to be landscape led, incorporating open spaces and green infrastructure to support connected, healthy communities. However, this is uncertain at this stage. Site 10 (Option B) and Site 11 (Option C &amp; E) perform less positively being located further from open space, recreation and transport connectivity.</p> <p>Uncertain effects are also predicted for Site 10 (Option B) and Site 11 (Option C &amp; E) given the adjacent employment uses at London Road industrial estate. It is considered that residents' health may be adversely affected by noise and dust disturbance, and/or air quality pollution. The delivery of the link road under Option A (Site 5) has the potential to improve safety by reducing congestion, traffic and flow and the risk of accidents. While the details of this are not yet confirmed, it is considered that there is the potential for long-term positive effects.</p> <p>Overall Option A is best performing, given the potential opportunities presented through delivering growth at scale in one location, including the proposed link road. Option D is next best performing given component sites have good access to open space and are not constrained by adjacent employment uses. Option B, C and E perform equally as all include either Site 10 or Site 11.</p>				

<b>Economy and employment</b>					
<b>Options</b>	<b>A (Site 5)</b>	<b>B (Sites 7 &amp; 10)</b>	<b>C (Sites 7 &amp; 11)</b>	<b>D (Sites 7, 8 &amp; 12)</b>	<b>E (Sites 7, 8, 11, &amp; 12)</b>
<b>Rank</b>	<b>1</b>	<b>4</b>	<b>2</b>	<b>3</b>	<b>3</b>
<b>Significant effect?</b>	<b>No</b>	<b>Uncertain</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Discussion</b>	<p>Uncertain effects are predicted against the Economy and Enterprise SA Theme for Option B as it is recognised that Site 10 was promoted for either housing or employment. For the purposes of this assessment the site is assumed to be delivering housing and therefore could result in the loss of a potentially suitable employment site within the neighbourhood area.</p> <p>Site 7 (Option B-E) and Site 8 (Option D &amp; E) are assessed as uncertain for the Economy and Employment SA Theme given they are not well located in terms of local employment sites, and there is uncertainty around the extent to which local services will be/ can be utilised. Site 5 (Option A), Site 11 (Option C &amp; E) and Site 12 (Option D &amp; E) perform positively against this SA Theme as they are located in close proximity to employment sites, providing access to local jobs.</p> <p>Overall, Option B is the worst performing option as the development of housing at Site 10 would lead to the loss of a potential employment site for the town. Option A is best performing as focussing growth at Site 5 would provide good access to the local employment offer. Options D and E perform equally as both contain Site 7 and Site 8 which are less well connected to local employment. Option C performs reasonably, given it contains one site with good access to employment (Site 11) and one less accessible site (Site 7).</p>				

Transportation					
Options	A (Site 5)	B (Sites 7 & 10)	C (Sites 7 & 11)	D (Sites 7, 8 & 12)	E (Sites 7, 8, 11, & 12)
Rank	1	2	3	3	4
Significant effect?	Yes - Positive	No	Uncertain	Uncertain	Uncertain
Discussion	<p>Sustainable transport opportunities in Fairford are limited, and therefore it is difficult to make a meaningful distinction between options based on their ability to support sustainable, and active travel use - i.e. while all sites are located in reasonable proximity to bus stops, local knowledge suggests these services are relatively unreliable, and there is not an easily accessible train station in or in close proximity to the town. All options are located within close proximity to, or contain, a Public Right of Way (PRoW):</p> <ul style="list-style-type: none"> <li>• Site 12 has a PRoW within the south of the site;</li> <li>• There is a PRoW across the eastern boundary of Site 7 and Site 8;</li> <li>• There is a PRoW across the southern boundary of New Site 5;</li> <li>• A PRoW is located just south of Site 10; and</li> <li>• There is a PRoW 200m south and 400m west of Site 11.</li> </ul> <p>However as discussed above, all options have less than satisfactory access to the town's facilities and services, and therefore high car use and local congestion is likely to continue under all options. The exception to this is Option A, as focusing all growth at New Site 5 will enable the delivery of a link road. The development of 80 homes at Site 5 seeks to alleviate pressure on the road network through the future provision of a link road, put forward alongside development, and will also provide improved accessibility for new and existing residents within the town. Further details are to be provided by the site promoter.</p> <p>Consideration is also given to access routes for options, with Site 11 (Option C &amp; E) and Site 12 (Option D &amp; E) currently facing accessibility issues. Site 12 (Option D &amp; E) would require a new vehicular access into the site off the Cirencester Road via the removal of an existing wall. At Site 11 (Option C &amp; E), pedestrian access from the site would likely be via the incomplete footpath, which is identified by local residents as 'hazardous'.</p> <p>Overall, Option A is best performing given the opportunity to deliver a link road through developing at scale at Site 5. Option E is worst performing given it includes both Site 11 and Site 12 which have accessibility issues. Option B performs more positively than Option C and Option D as it does not include Site 11 or Site 12.</p>				

### Summary of appraisal

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the FNP. The appraisal has highlighted the potential for a number of **positive effects** as a result of development at individual options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the FNP. **All options** perform equally in this respect given all will deliver a similar level of growth.
- **Option A (Site 5)** sets out provision for a future link road to be delivered as part of the development. While further details of the link road are unknown at this stage, it is considered that its delivery would likely provide improved accessibility in and around the town, and reduce potential adverse effects on the local environment.
- The potential for positive effects are also considered for Sites 7 and 8 (**Options B-E**) under the population and community SA theme, given sites have been promoted for the delivery of community benefits alongside housing growth.

The appraisal has highlighted the potential for **negative effects** as a result of development at individual options, which are summarised as follows:

- **Options D and E** have the potential to lead to negative effects in relation to the climate change SA theme given the presence of Site 8 which falls partially within Flood Zone 2.
- **Options B to E** will result in the permeant loss of BMV agricultural land, delivering long term negative effects against the land, soil and water resources SA theme. **Option A** although not constrained by BMV land, will also lead to long term negative effects through the loss of greenfield land.
- **All options** have the potential to lead to long term negative effects on the local townscape and setting of Fairford, and the important heritage offer (including Fairford Conservation area and Listed Buildings). Site 12 is notable in this respect, recognising that the conclusions of the sites' Heritage and Landscape Assessments anticipating a "*moderate adverse significance of effect*".

Alongside this, further option specific constraints are identified including:

- **All options** may increase recreational and disturbance pressures related to designated biodiversity sites and include ecological features on site, with Option B and Option E identified as worst performing in this respect. It is however recognised that the design and layout of development, including potential mitigation, retention, enhancement, and net-gain opportunities will determine the overall significance of effects.
- **All options** will likely lead to continued high car use, however Options B to E are less likely to encourage modal shift than Option A given the delivery of new transport infrastructure, and the opportunities presented when delivering growth at scale on a single site (i.e. delivering connected, green, active communities). This is similarly the case for the population and community SA theme.
- **Options C-E** perform less positively in relation to for transport given road access routes for Site 11 and 12 are currently undetermined.

