

On behalf of Kensington & Edinburgh Estates Limited

Representations to Fairford Neighbourhood Plan 2016-2031

Pre-examination Consultation (Regulation 16 Consultation) February 2017

These representations follow the submission of comments on behalf of Kensington & Edinburgh Estates Limited (“K&E”) as part of the public consultation on the Pre-Submission Fairford Neighbourhood Plan (“FNP”) undertaken during November/ December 2016.

Those representations objected to the exclusion of land under the control of K&E from the Settlement Boundary defined in Policy FNP1 and to the allocation of land (FNP site ref. F39C) for business uses, rather than more appropriate residential use to extend the recent adjoining housing scheme, under Policy FNP21. K&E also considered that the proposed housing allocations in the FNP would be inadequate to meet local housing demand.

Following the public consultation, the FNP Steering Group duly considered the representations that had been received and recommended in their Regulation 14 Report (January 2017) that the policies and supporting text of the FNP were changed with only minor modifications, with no requirement to allocate any further sites, and be finalised for submission for examination.

K&E’s representations to the Regulation 16 Submission Version of the FNP therefore focus again on the issues that have been raised previously and which are set out below (with updated policy reference numbers).

FNP1 Fairford Development Boundary

The Submission FNP Inset map includes within the development boundary the permitted housing development south of London Road (planning permission ref. no. 13/03793/OUT) but in so doing creates an illogical boundary that excludes the Football Club and the second team pitch on the London Road frontage (site references F_39A and F_39B). K&E maintain that as a matter of logic these sites should be included within the development boundary.

It is noted that the boundary has been extended to include site ref. F_39C in the Submission FNP, although it is proposed that this land will be allocated for business uses (under Policy FNP18). K&E’s concerns regarding this proposed allocation are discussed in the relevant section below.

K&E consider that the adjacent fields that lie immediately to the east of site ref. F_39C and to the west of the A417 London Road should also be included within the development boundary for Fairford.

FNP5 Maintaining Viable Community Facilities

This policy (formerly Policy FNP6) identifies the Fairford Town Football Club and adjacent practice playing field as community facilities and acknowledges the invaluable role that these play in community life in the town. The policy is supportive of enhanced sports facilities, however the Submission FNP does not have any regard to the potential of land east of Fairford to provide such facilities, nor does it explain how, absent enabling residential development, any enhancement of facilities will be realised. The plan needs to consider

not just aspirations but the practicalities of how these sports facilities can be enhanced, otherwise this commitment is meaningless. This should be addressed by the allocation of the parcels of land adjoining the football club for residential development linked as “enabling development” to enhanced sports facilities (site refs. F_39A; F_39B; F_39C and adjacent fields to the east). A draft proposal is shown on the enclosed outline masterplan, which was also submitted as part of K&E’s representations to the Pre-Submission FNP (drawing ref. no. 1304-sit-01 – for illustrative purposes only).

FNP21 Creating new jobs for the town (now FNP18)

This policy continues to seek the allocation land off the A417 London Road for business uses (site reference F_39C, field south east of Keble Field/ Bovis). K&E maintains its objection to this proposed allocation and note that there have also been objections by other parties to its allocation for business uses. It is not considered that the FNP Steering Group has fully justified the proposed allocation of this site for business uses in the Submission FNP or has addressed the objections that have been made.

The FNP Steering Group previously assessed the site and concluded that it is not suitable for allocation for housing in the FNP due to concerns regarding noise impact, the environmental setting, sewage/ drainage issues and access. They consider that it would be suitable as an extension to the London Road industrial area to help increase local job opportunities, however the SG site assessment identifies major constraints with the site access, stating that this may be possible through the existing industrial estate to the east but this is restricted due to present industrial activity and road width. It is therefore not clear from their assessment how the SG has arrived at the conclusion that the site is suitable for business uses.

K&E has submitted detailed representations in respect of this parcel of land and it has been considered in the Cotswold District Council SHLAA under site code F_39C. It was identified as a site available for development in the “Strategic Housing and Economic Land Availability Assessment – January 2016” within 11-15 years, but with a number of constraints.

These were identified as potential problems of highway access through the adjoining industrial estate; noise impact from adjoining employment uses; need to ensure the retention of hedges; sewage capacity issues; flood risk issues; and issues with sustainable drainage; and loss of some Grade 3A land.

The majority of these issues are now addressed through the grant of consent for, and development of, residential development on two sides of this site. We therefore contend that this site should be allocated for housing and that this would be a more suitable and logical land use than the current FNP proposal for business use.

In terms of access, a legal right of access to parcel F_39C is retained through the Bovis development that is presently under construction. This takes access from a new junction on London Road that can safely support additional vehicular traffic for residential development but would be unsuited to employment traffic.

With regard to noise impact, this parcel is no closer to (and in fact has a shorter boundary with) the adjoining employment site than the now consented Bovis development to the west.

The submitted noise assessment that accompanies that consented development advises at Para 5.4 that:

“Noise control will be necessary to habitable rooms for bedrooms and living rooms facing the timber yard. This assessment has determined that noise control can be achieved, even in the most exposed and noise sensitive locations. Since final design of elevations would be completed post grant of permission, it is

recommended that a condition be included in the permission to require the submission of detailed noise mitigation proposals for approval prior to commencing construction work”

A similar approach would be appropriate in respect of this representation site.

In terms of hedging and landscaping, as the consented scheme illustrates, a suitable design and layout can be achieved while retaining key hedges and trees and through supplemental planting.

With regard to drainage and flood risk, these issues were considered comprehensively as part of the consented development. The site does not fall within an EA defined flood zone. Work undertaken on the adjoining site, which included borehole testing, demonstrated that a suitable sustainable drainage solution could be achieved. Issues of sewage capacity were also addressed through that application by way of contributions to secure upgrading of existing infrastructure.

The classification of this site is mixed 3A and 3B which is identical to the adjoining sites that now have planning permission. This remaining parcel is now enclosed on all sides by development and its potential for agriculture must be tempered by this context.

The site is in the control of the developer who has developed the adjoining sites. These sites have been brought forward promptly in conjunction with a national housebuilder. This demonstrates the track record of this developer in the delivery of much needed local housing.

The site is established in the current SHELAA as one with potential to deliver housing within the next 11-15 years subject to addressing identified constraints. As outlined above, the grant of permission on the adjoining site illustrates that these constraints are capable of prompt resolution.

It is noted that the Cotswold District Council SHELAA identifies the site as having an area of 1.09 hectares and a capacity of 27 dwellings. The site is actually 1.7 hectares and at a density of 30 units per hectare has capacity of up to 51 dwellings.

K&E do not consider that this site should be included under Policy FNP18 for business uses but should instead be allocated for residential use.

FNP Housing allocations

(FNP16 – Reserving land for new homes off Leaffield Road & FNP22 – Delivering new homes at Horcott Lakes)

The Submission FNP continues to seek to allocate only two sites in Fairford for the delivery of housing to 2031 (FNP16 and FNP22), neither of which are included within the emerging Cotswold District Local Plan. The reliance on so few housing allocations presents in our view a serious risk to the delivery of the housing target for Fairford.

It is noted that Site FNP16 (formerly FNP18) has not been considered through the SHLAA process thus far and was only recently submitted for consideration during the ‘Call for Sites’ consultation in August 2016. It performs no better in sustainability terms than sites to the east of Fairford.

Site FNP22 (formerly FNP19) is not considered to be in a sustainable location and the FNP Steering Group site assessment itself identifies that it is remote from the town and its facilities (2.2km from town centre; 2.75km from doctor’s surgery, 3.9km from major employment, London Road industrial estate).

It is noted that Cotswold District Council has also raised concerns about both of these proposed housing site allocations in their response to the Pre-Submission FNP.

K&E maintains that there ought to be a more equitable distribution of housing allocations across the town, particularly to the east of Fairford, to meet the pressing need for housing and affordable housing.

There is also the potential for the allocation and subsequent development of sites such as F_39C to make a meaningful contribution towards improved community and sporting facilities, i.e. at the Fairford Town Football Club.

Conclusion

To conclude, site F_39C and land adjoining to the east are available and deliverable as housing sites within 5 years. As recently submitted representations to the Cotswold District Council SHELAA Call for Sites demonstrates, all previously identified constraints of F_39C have been addressed. Site F_39C represents a viable, realistic and immediately deliverable site that will make a genuine contribution to identified housing need and improved community and sporting facilities. The FNP should be modified accordingly to reflect this.

Mango Planning & Development Limited
April 2017

AH/FE/110024/N0006