



Fairford Neighbourhood Development Plan (Regulation 16 Consultation) Revised SA and Site Assessment Report only

Following a clarification meeting with the independent examiner, Mr Andrew Ashcroft, to consider points raised on the Sustainability Appraisal on 10 May, Fairford Town Council has submitted a revised Sustainability Appraisal and Sites Assessment. These two documents only are now subject to consultation for a six week period, from Friday 9th June 2017 till 17:00 on Friday 21st July.

Copies of these documents are available to view on the Cotswold District Council's website: www.cotswold.gov.uk/neighbourhoodplanning/consultations

Hard copies are also available for inspection between 9:00 and 17:00 Monday to Friday at the Council offices on Trinity Road, Cirencester, Gloucestershire, GL7 1PX.

Copies are also available for inspection at:

Fairford Community Centre
Monday – Friday 10:00 – 13:00

All comments must be received by 17:00 on Friday 21st July 2017.

There are a number of ways to make your comments:

- Complete this form and email it to: neighbourhood.planning@cotswold.gov.uk
- Print this form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX
- We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

All comments will be publicly available, and identifiable by name and (where applicable) organisation. Please note that any other personal information provided will be processed by Cotswold District Council in line with the Data Protection Act 1998.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box. Please repeat this section for subsequent comments relating to other sections of the plan.

PART A	Your Details
Full Name	David Neame
Address	Neame Sutton Limited West Suite, Coles Yard Barn, North Lane, Clanfield, Hampshire
Postcode	PO8 0RN
Telephone	02392 597139
Email	david.neame@neamesutton.co.uk
Organisation (if applicable)	Neame Sutton Limited o/b Cygnet Investments
Position (if applicable)	Director
Date	19 July 2017

PART B

To which part of the document does your representation relate?

Paragraph Number	REVISED SA	Policy Reference:	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

Cygnet Investments are encouraged that the Town Council has now included reference to saved Policy UT.1 and the equivalent emerging Policy SP5 within the SA.

The mere inclusion of these policies within the SA does not in itself address Cygnet's clear concerns in relation to the deficiencies of the SA undertaken by the Town Council Council for the following reasons:

1. The assessment of the impact of draft Policy FNP12

The assessment undertaken in the SA as summarised in the matrix on Page 32 and the text at Paragraph 8.18 indicates that the policy has a neutral effect on the local tourism economy.

This assessment is simply not correct. The wording of Policy FNP12 goes well beyond the scope of saved Policy UT.1, the emerging Policy SP5 and, the long established SPD for the Water Park. Whilst it is accepted that Neighbourhood Plans can introduce policies that provide a local tier of consideration this cannot be at the expense of the overriding requirement to be in general conformity with the Development Plan, which Policy FNP12 plainly is not.

The additional level of constraint within Policy FNP12 will result in an unnecessary restriction to tourism related development in this part of the Water Park that directly conflicts with the Development Plan and the overarching objective set out in the opening section of the Neighbourhood Plan.

The SA conclusions are not supported by any evidence and it is therefore considered that little weight can be given to the SA as a suitable and proportionate evidence base against which to assess the compliance of this part of the Neighbourhood Plan with the Basic Conditions.

2. The assessment of the alternatives to draft Policy FNP12

The Town Council's assessment of alternatives suggests on Page 42 of the SA that the only alternative is a 'policy off' approach. This is wrong. The saved Local Plan and emerging Local Plan both contain detailed policies dealing with the Water Park that are supplemented by a long standing SPD. The adopted policy and SPD in particular are tried and tested and provide sufficient detail to address development management issues in the Water Park.

The alternative to draft Policy FNP12 is not therefore policy off but instead would result in a more appropriate and, less constrained policy approach than the Town Council is currently proposing.

The deletion of Policy FNP12 would actually ensure that the objectives of the Water Park can be delivered without unnecessary constraint and would also enable the Town Council to deliver its overarching objective in relation to promotion of the tourism economy.

The SA conclusions appear in overall terms to comprise a 'retrofit' following the identification by Cygnet and others of the deficiencies in the original document and therefore lack the objective and proportionate assessment that is necessary for the SA to comprise a credible evidence base against which compliance with the Basic Conditions can be judged.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The SA therefore requires further work to properly assess the implications of the policies proposed within the Neighbourhood Plan and in particular Policy FNP12 in the light of the adopted and emerging Local Plan and accompanying SPD.

It is considered that an objective assessment is likely to reveal that Policy FNP12 is not in general conformity with the Development Plan and therefore fails to meet the basic conditions.

(Continue on separate sheet if necessary)