

Fairford Neighbourhood Plan Hearing - Additional Questions

Introduction

A public hearing was held to examine the Fairford Neighbourhood Plan on Thursday 14th September 2017. The following issues arose at the hearing:

1. A summary of the methodology employed in making the landscape assessment that informed the SHELAA, including confirmation of whether the site was assessed with and/or without potential mitigation.
2. A view on how the assessment undertaken for the SHELAA compares (as evidence) to the LVIA undertaken on behalf of the promoter.

The Council confirmed that it would provide additional clarity following the close of the hearing and a deadline for responding was set for Tuesday 19th September 2017.

Question 1 – Summary of methodology

The Council commissioned White Consultants to assess land surrounding 18 key settlements in Cotswold District in 2000¹ and again in 2014². The scope of the 2014 study is set out in chapter one and specifically the study takes into account:

- the impact of any physical change since 2000,
- any revised assessments, policies and up-to-date guidance; and
- the strategic housing land availability assessment (now referred to as the SHELAA) sites identified as deliverable in 2014 and 2015.

The report (and its subsequent updates) reviewed sites identified as deliverable, through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process, and which were adjacent to the edge of settlements.

Sites promoted during 2016 and 2017 and subsequently assessed in the recently published SHELAA (September 2017)³ have not been assessed by White Consultants. For example, Land at Leaffield Road F_51 (Neighbourhood Plan policy FNP 16) was first made available through the SHELAA process in 2016 and therefore has not been assessed by the study.

¹ NS016 [Study of Land Surrounding Key Settlements in the Cotswold District](#) Jun 2000, White Consultants

² EB045 to EB048 [Study of Land Surrounding Key Settlements in Cotswold District](#)

³ EB012 a to c [Strategic Housing and Economic Land Availability Assessment \(Sept 2017\)](#)

Be that as it may, suitably qualified and experienced Council Officers visited the site and assessed the potential landscape and visual impacts of residential-led development on the site, as part of the September 2017 SHELAA⁴ and neighbourhood plan making process. The outputs from that assessment were recorded in summary within the September 2017 SHELAA. In considering the potential impact of residential development at this site, Council Officers were mindful of the “standard” type of mitigation that is normally delivered as part of a residential development and how that can minimise impact on landscape character and visual appearance. No detailed mitigation proposals were submitted as part of the SHELAA process.

In undertaking the assessment, the Council evaluated the sensitivity of the receiving landscape and visual receptors, as well as taking into account the likely magnitude of change associated with residential-led development of the site. Particular constraints considered by Officers included any potential impacts on the setting of the AONB; the setting of the Special Landscape Area; the setting of the non-designated heritage asset of Fairford Park; important trees and hedgerows (including a number of trees in the vicinity that are subject to Tree Preservation Orders); and the setting of the Conservation Area. The Council was mindful of the published landscape character assessments for the area around Fairford and the impact of any development on the landscape character. These landscape character assessments include:

- National Character Area Profile: 108 Upper Thames Clay Vales (NE570) (2014) Natural England;
- National Character Area Profile: 107 Cotswolds (NE420) (2013) Natural England;
- Gloucestershire Landscape Character Assessment (2006) LDA Design;
- Assessment of Landscapes outside the Cotswolds AONB (White Consultants 2000) Largely superseded by the 2006 LDA Design report;
- Study of Land Surrounding Key Settlements in Cotswold District (White Consultants 2000 and updates);
- Local Countryside Designation Review: Special Landscape Areas (White Consultants 2001);
- Cotswold Water Park - Integrated Landscape Character Assessment (LDA Design 2009) (The boundary of the study area encompasses the wider setting of the Cotswold Water Park);

It was concluded that development at this site would lead to an unacceptable intrusion into the open countryside and would not be in character with the local landscape.

⁴ EB012 a to c – Strategic Housing and Economic Land Availability Assessment (Sept 2017)

Question 2 – Comparing assessments

The Study of Land Surrounding Key Settlements in Cotswold District: Update - Final Report (including its updates)⁵ is a key piece of 'local plan making' landscape assessment evidence. It assesses the sensitivity of defined potential sites for residential or economic development within the context of the settlement and surrounding landscape. The study identifies the following areas where development is not suitable in Fairford (see para 12.12):

- *The floodplain due to the intrinsic scale, character and quality of the landscape, its contribution to the town's setting and because of its flooding characteristics.*
- *The northern and western margin of the settlement core due to the scale, character and quality of the valley and parkland landscape and its important contribution to the setting of the town, and in particular the church.*
- *Extensions of the town into the larger scale open arable/agricultural landscape that surrounds the town would be likely to be prominent.*
- *Open land between Fairford and Horcott in order to maintain the separate identity of the settlements.*

These conclusions reinforce conclusions made in the June 2000 study⁶, which found there are very few sites in and around Fairford that are acceptable in landscape terms⁷. The 2000 study identifies possible locations for development and it identifies the east and southeast as potential areas of search should large-scale expansion of the town be required. It should be noted that the 2000 study supported the successful adoption of the extant Cotswold District Local Plan (adopted 2006).

The Council has not had the benefit of being able to fully consider the LVIA as if it were submitted as part of a planning application. However, the Council can provide a full review of the LVIA at the request of the Examiner, although this will take at least a week. The Council has taken a neutral view when undertaking landscapes assessments and it has done so using a consistent methodology across 18 key settlements – an approach that was found robust at the 2004 Cotswold District Local Plan Inquiry.

The two assessments differ in the way the findings are presented. The findings of the assessment undertaken by Council Officers are set out in summary form in the SHELAA. The findings of the Landscape and Visual Impact Assessment (LVIA) undertaken by ACD Environmental on behalf of Gleeson are set out in a detailed report. Nonetheless, in essence the two assessments are based on a similar methodology. Both are based on an evaluation of the sensitivity of the receiving landscape

⁵ **EB045 to EB048** [Study of Land Surrounding Key Settlements in Cotswold District](#)

⁶ **NS016** [Study of Land Surrounding Key Settlements in the Cotswold District](#) Jun 2000, White Consultants

⁷ Paragraph 10.17

(and in particular landscape character) and visual receptors, taking into account the likely magnitude of change associated with residential-led development. Both assessments involved suitably qualified professionals assessing likely landscape and visual impacts from a number of viewpoints around the site

The ACD Environmental assessment noted instances where existing visual barriers “...created by topographical and vegetation features are minimal.” The Council Officer assessment also noted the long views and absence of a defined northern boundary. The ACD Environmental assessment concluded that while parts of the development would be visible, for the majority of receptors such views would be glimpsed and would not have significant visual effects in planning terms. It also concluded, however, that from nearby views the site would remain noticeable with little barrier effect from either mitigation planting or its juxtaposition with Public Rights of Way. In these views, the residual effects would remain significant in planning terms.

Council officers concluded that development would be an intrusion into the open countryside. Officers were therefore concerned that residential-led development on this site would be likely to result in significant visual effects, taking into account likely mitigation (and the potential impacts on the local landscape character of the mitigation itself). The findings of the two assessments overlap in some respects, but there is a difference of professional judgement in terms of the overall conclusion. The council officer assessment concludes that for the purposes of the SHELAA the site should be deemed unsuitable for development.