

RE: Neighbourhood Planning - Representation to the Fairford Submission Draft Neighbourhood Development Plan

Received via e-mail on 04 April 2017

Dear Joseph,

I am writing in support of the Officer's report and the proposed comments from CDC on the Fairford Neighbourhood Development Plan (NDP).

It is of course essential that the Plan is soundly based. It is even more important that the residents of Fairford understand the implications of the plan as drafted.

The risks associated with the Leaffield Road site have not, in my view, been adequately explored with the community and it would be most unfortunate if we were to see a repeat of the Pips Field scenario where a development outside of the Parish Boundary leads to excessive development (Bloor 1 and 2) that far outweighs the community benefit linked to the original (Pips Field) exception site.

I also believe that the two alternative sites were included in the NDP on the assumption that they could be substituted for the two sites identified through the SHLAA process and included in the Local Plan. The authors of the plan have been consistently advised by both officers and Ward Councillors that this is not the case. The very real risk of including these alternative sites is that they will be given permission **in addition to** the Local Plan sites resulting in yet more development in Fairford at a time when most residents are saying that there has been too much already.

I would hope that the Fairford NDP could be revised and improved based on the constructive comments included in the report.

Regards,

Sue

Cllr Sue Coakley BA(Hons) MBA

Cabinet Member Environment

Cotswold District Council

Lechlade, Kempsford & Fairford South

Representation to Cotswold District Council on Fairford's submission draft Neighbourhood Plan by Cllr Stephen Andrews, Ward Member Lechlade Kempsford and Fairford South Ward

The very substantial amount of research, debate and preparation that has been put into the NDP by the authors is acknowledged. It is however hoped that the following comments will be treated as constructive criticism aimed at ensuring that the NDP is as comprehensive as possible and as strong as possible in shaping the future of Fairford. There should be a realistic plan for the development of Fairford that takes into account both its own needs and, as an important Market Town, the needs of the settlements and communities that it serves.

Chapter 3 – The Planning Policy Context

Whilst it is recognised that the NDP must focus upon the local plan area, Fairford, as the local Market Town, is an important centre of services to local settlements and communities outside of that area. Whilst this is recognised in very broad terms (p.10 2.17) the detailed analysis does not take account of this. An example of this, as illustrated at Figure 1, is that the catchment area for Fairford Surgery includes a number of local settlements and communities. Any development in these will impact upon the provision of services by, and the continuing viability of, Fairford Surgery out to 2031 and should be part of that assessment.

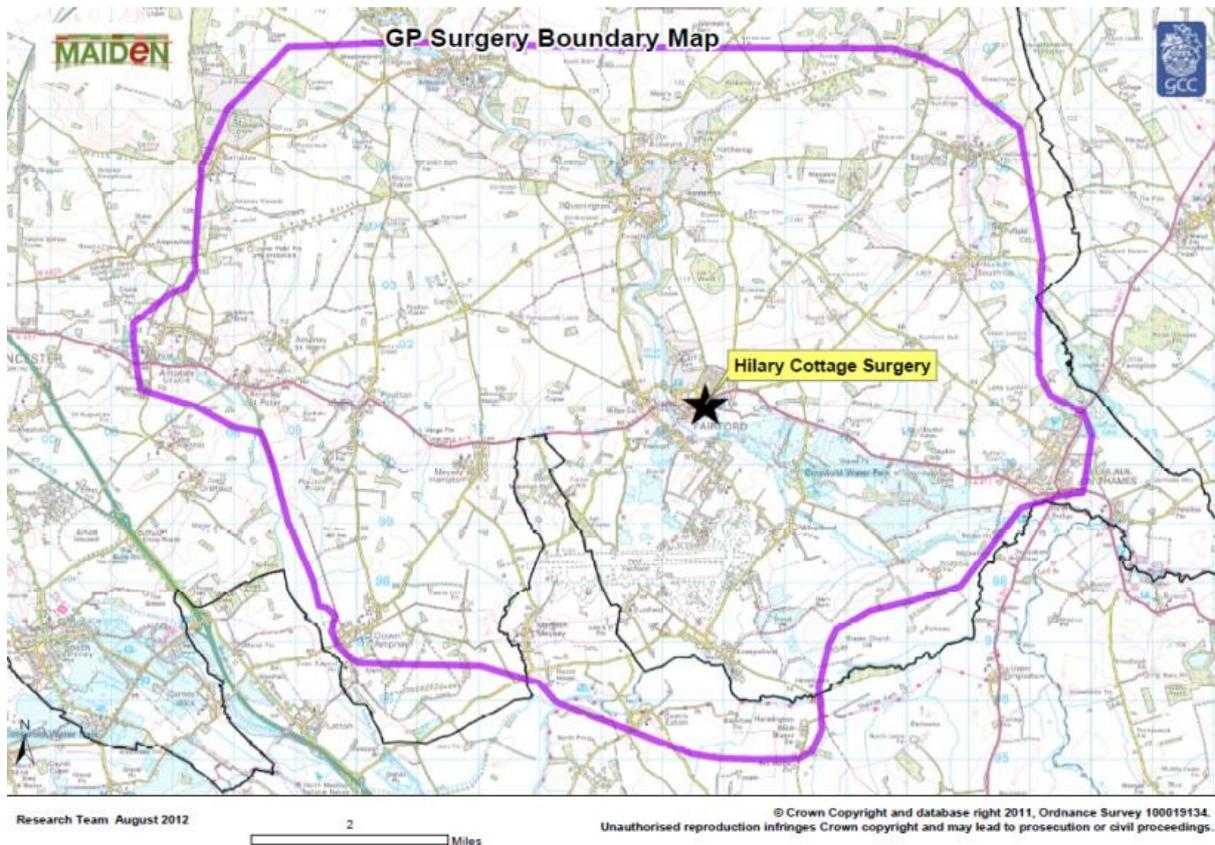


Figure 1 - Fairford Surgery Catchment Area (Source: Gloucestershire CCG)

There are a number of other areas where Fairford is the hub for a wider community, such as Schools and even the link between it and bordering areas in promoting and providing facilities for employment and tourism.

Recommendation: Given the importance of Fairford as a focal Market Town for the wider area, the Fairford NDP be reviewed to explicitly assess the impact of development in that wider area on the provision of services within Fairford in order to ensure that service provision is appropriate to service delivery out to 2031.

FNP3 Building New Retirement Homes & A Car Park at East End

The assumption has been made, without any authoritative reference, that the GP Surgery will remain fit for purpose until at least 2031, the time horizon of the NDP, and that therefore the only problem is car parking.

In parallel with the development of the NDP Gloucestershire CCG has been developing its Sustainability and Transformation Plan (STP). Of particular significance is the Primary Care Strategy¹ included within that, which indicates an increased role for GP surgeries. These are areas currently being tracked by the Fairford Surgery Patient Participation Group (PPG) who were not a specific NDP consultee.

Within that context, the Gloucestershire CCG Primary Care Infrastructure Plan² recognises that Fairford Surgery is already some 24% below its ideal spatial size. Development within the Fairford Surgery catchment area, together with the move to increase, as envisaged by the STP, services provided by the Surgery, will only exacerbate that spatial shortfall.

Without detailed analysis showing the contrary, FNP3, as it is currently described, may provide an unsustainable solution to wider issues whilst concentrating on what is a current problem – inadequate parking provision at the present site of Fairford Surgery.

Recommendation: The NDP review the underlying assumption that the Fairford Surgery will remain fit for purpose until 2031 by including an analysis of potential increased use as a result of both increased service provision, as envisaged by the STP, and additional development within the Fairford Surgery catchment area adding patients. Should this not be confirmed, the NDP should offer an alternative sustainable solution.

FNP16 Delivering new Homes at Leaffield Road

Your comment on this is fully endorsed. I cannot identify any planning reasons presented within the NDP that support this policy given the lack of consideration of any alternative options.

FNP22 Horcott Lakes

The future commercial exploitation of Horcott Lakes is predicated upon the need to sustainably manage water flow within the Dudgrove Catchment area. At a meeting with the current owner of the site, in June 2016 it was agreed that the first step would be a Hydrology Survey that would allow the complexity of the problem to be understood so that an appropriate sustainable solution for the management of the lakes could be put in place. Whilst it was accepted that this might involve a commercial element, this was not a given. FNP22 is based upon the assumption that commercial

¹ Gloucestershire CCG Primary Care Strategy 2016 – 2021 dated 11th October 2016.

² Gloucestershire CCG Primary Care Infrastructure Plan 2016 to 2021 dated 12th April 2016.

involvement in the sustainable development of the lakes is a necessity. Emerging information indicates that there are no complications in the sustainable management of the lakes and the assumption underlying FNP22 is unlikely to be valid.

Recommendation: FNP22 be withdrawn in its present form and be replaced by a policy that maximises public access, including the establishment of PROWs and cycle routes, to the whole of the area whilst allowing for appropriate sustainable management of water flows within the area.

Lakes 103 and 104

Lakes 103 and 104 are located to the South of the A417 between Fairford and the Whelford Pools SSSI. Links between Whelford Pools through Coln Park to Lechlade are currently being established in cooperation with landowners. No mention is made in the NDP of this important amenity and the need to ensure that PROW and cycle routes around Lakes 103 and 104 link up completing this network of PROW and cycle routes between Fairford to Lechlade.

Recommendation: The requirement for the establishment of PROW and cycle routes around Lakes 103 and 104 linking with Whelford Pools and Coln Park should be included within an appropriate NDP policy, perhaps one related to the Fairford Town Council "Access to the Countryside" initiative.

Fitness and Health Facilities

Farmors Leisure centre provides fitness and health facilities to Fairford and the wider community. The running of this facility was transferred from Cotswold District Council to Farmors Academy as part of a streamlining of service provision within the District. Despite the importance placed on such facilities³ by Gloucestershire CCG as part of its STP no consideration has been made of this area within the NDP.

Recommendation: The provision of services and facilities that promote the health and wellbeing of the residents of Fairford and its wider community should be considered within the NDP.

³ Gloucestershire CCG Prevention and Self Care Plan dated 6th January 2017.

RE: Neighbourhood Planning - Representation to the Fairford Submission Draft Neighbourhood Development Plan

Received via e-mail on 06 April 2017.

Dear Joseph,

I do not feel I have the necessary planning knowledge and expertise to comment on the NDP or CDC comments in terms of specific planning points or technical items, however I have engaged with local stakeholders to understand their position on various of the comments and concerns raised by the AECOM document.

Much of the commentary seems to arise from disconnects in understanding and differences in approach taken by CDC and the Fairford group. The local group feels they have engaged the relevant professional expertise but that CDC has lacked the necessary neighbourhood planning expertise to allow them to work together effectively.

I'm concerned that some of the comment wording attributes positions to the Fairford NDP group that are not supported, e.g.:

"While it may be the Town Council's aspiration that CDC cease to allocate sites within Fairford, the neighbourhood plan cannot make this happen. ..."

... the phrasing of this implies that the TC desires to prevent there being more development within Fairford. Interaction with local groups would show that this is not the Town Council's desire at all. Their aspiration is to achieve a better allocation of sites within Fairford and to ensure that sites are assessed and developed to accurately reflect local needs and constraints. As I understand it this is the whole intent of the NDP process, to meet overall housing goals while establishing an improved framework for local development.

There are conflicts in approach that appear more dogmatic than pragmatic, for example (in reference to P.19 Paragraph 3.11) ...

"We do not intend to drop the proposed site allocations in favour of sites, even if the Fairford Neighbourhood Plan is made prior to the adoption of the Local Plan. The sites may be undeliverable, or, due to the conditions attached, may only develop with a reduced amount of affordable housing (which in turn affects the delivery of the Local Plan objectives)."

... yet, given discussions with the local NDP group it would seem that they may have a greater body of evidence (notably specific interaction with landowners and developers) to demonstrate the sustainability, deliverability and viability of their chosen sites as compared to that for the CDC suggested sites. This comment gives the impression that CDC's aim is to press on regardless so as to avoid the additional work required to reconsider proposed allocations – even where those allocations may no longer be supported by available evidence.

A final observation is that much of the commentary in the AECOM report appears to be based on a “desktop review”. There are a number of instances in the text (e.g. Page 11 “Views/Visual Impact”) where it is unclear that the reviewer has actually visited the site. If they had, then the comments made would be unlikely to have been included. It also appears that the review did not have access to the latest available documentation in respect of some points mentioned in the report.

I should say that the Fairford NDP group has stated a willingness to engage with the inspection and review process, to address errors and inconsistencies in the NDP and to change and improve where the inspector makes requests in relation to the plan. They would also like to work more closely with CDC to ensure that such plans as these are better aligned and that all the plans that may apply in respect of development locally are robust and effective. I think that would be desirable for all neighbourhood plan efforts

While many of the specific technical points in the AECOM report may help to improve the effectiveness and robustness of the Fairford NDP, I am concerned that overall impression given – mainly by Page 1 and 2 – is that CDC simply wishes to push on regardless with its existing approach. Since several NDPs are in development across the district we risk appearing to put parish and district level planning activities in conflict. I suggest that is not the impression we should be creating in our commentary.

Regards, Andy.

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