

## Position Statement on Local Plan Proposals

Fairford Town Council is making this statement to clarify our position on CDC's Regulation 18 proposals for the benefit of residents and highlight a number of questions on which CDC needs to provide clear answers before the next stage to avoid the 'submission' Plan being found unsound and undeliverable (with all the consequences that would ensure).

We believe the upward adjustment in the standard method for the District's housing requirement figure is unjustified and wholly inappropriate in the context of the particular demographic and housing market characteristics of Cotswold District. In simple terms, the 'workplace-based' earnings measure used in the 'affordability ratio' does not take account of the significant proportion of people living in the District but commuting to higher-paid jobs outside (or simply not accounted for in the very limited sample of the data) and is largely unrelated to the profile of the people buying the more expensive houses, including second and holiday homes, which are clearly boosted by the built-up equity of people moving and/or retiring to the District from more expensive (and urban) parts of the country. These people are moving to the Cotswolds because it is **a beautiful rural area** and prices are high because development and hence the amount of housing in the National Landscape area (AONB) is necessarily restricted. The houses that are bought here can clearly be afforded by the people that are buying them, so the appropriateness of the 'affordability' measure has to be questioned. Large urban extensions to small towns like Fairford with very limited facilities, overstretched infrastructure and poor access to employment are clearly not the solution to this demand. What is needed to solve the real affordability problem is more affordable homes in locations where people can easily access employment etc.

**CDC needs to challenge the target on this basis, as other councils in a similar position elsewhere have been advised to do, rather than simply dividing up the highly inflated figure and dumping it on those settlements which are outside the AONB, whose infrastructure and facilities are unable to accommodate it (at least partly due to previous planning failures).**

As regards feasibility, there are a number of major issues:

- 1) Thames Water is already indicating that there is a problem meeting the water supply requirements of new (smaller) developments and significant new projects will be needed to meet the new proposals. It is unclear what these are or how they are to be financed. Water supply is a fundamental need. This affects the whole area (i.e. most of Cotswold District).
- 2) The Fairford sewage treatment works is currently operating well beyond capacity, with 'dry storm' discharges into the river Coln happening for significant periods, and there is still uncertainty over the completion of the planned upgrade which is needed to serve existing built and planned development. A further 'Growth scheme' would be needed to support significant further development, but TW's owners/creditors are reportedly seeking to cut back on such projects rather than increase them and to have an exemption from environmental requirements for the next 15 years. A decision to allocate further development in Fairford without a Government-underwritten solution to this would essentially be a decision to 'pollute baby, pollute' – including the SSSI lakes downstream of the Fairford STW, and hence arguably contrary to CDC's statutory environmental duty as well and their 'Ecological Emergency' policy.
- 3) Over the last 15 years CDC has, through planning decisions and otherwise, and often apparently contrary to its own development plan policies, facilitated the loss of important frontages in

Fairford's very constrained town centre and other facilities such as the Fairford Sports Centre (to Farmor's School). It is also failing to enforce s106 requirements concerning (among other things) the provision of the Leisure Facility (including swimming pool) at the Lakes 103, 103A, 104 and Milestone holiday development.

- 4) There are also significant issues regarding the capacity of health services for the ageing population, schools and parking in the town centre (since much of the proposed new development is outside recognised easy walking distance from this). Peak traffic flows through pinch points on the A417 through the town (and elsewhere, including Lechlade) need to be properly modelled so that solutions which do not undermine the viability of the town centre can be clearly identified and incorporated in the final plan. It may well be that a bypass or 'relief road' is needed, although it is not at all clear where this could be routed.

All these facilities are needed to make Fairford a genuinely sustainable location for major new development.

Key questions that Cotswold District Council needs to answer on these proposals are:

- 1) What is it doing to challenge the overall 'housing requirement' figure (on the demographic and market basis outlined above)? Will it progress and alternative plan (if necessary in parallel) based on a more realistic housing requirement figure?
- 2) What is it doing to develop the plan on a Unitary-wide (essentially, this means Gloucestershire) basis, at least as regards housing contributions, to address some of the Cotswold-specific issues and make it more sustainable?
- 3) How are conflicts with the Cotswold Water Park Nature Recovery Plan going to be overcome?
- 4) How does CDC intend to obtain/provide sufficient certainty regarding the ability of Thames Water to provide the necessary water supply capacity within the timescale of producing the plan?
- 5) Ditto for the sewage treatment capacity – Also, where will the additional sewage treatment capacity be located?
- 6) What other studies on infrastructure, services etc. is CDC going to carry out to address the in-combination impacts and needs to support the proposals?
- 7) Where do they think the 64 assumed 'windfalls' in Fairford are going to come from, in addition to the 265 homes from 'non-strategic' allocations?
- 8) Where are the jobs that are going to pay the mortgages for all these new homes?
- 9) How many will be genuinely 'affordable' for people with local connections?
- 10) How is CDC (or the anticipated new Unitary authority) going to ensure that there are adequate public transport services to access employment etc elsewhere on a practical basis?
- 11) How is CDC going to ensure that there is an adequate local retail/service and employment provision in the town to support the proposed greatly increased population? Will they incorporate this as an element of mixed development in the proposed 'strategic extension', and how will they ensure that this complements and doesn't damage the vitality/viability of the existing centre?

CDC suggest in the consultation document that they will filter out or ignore comments that do not relate to 'material planning considerations' (something which the guidance on the link indicates is relevant to planning decisions and appeals). Although this is potentially quite broad (depending on how it is interpreted), we don't believe it is legally consistent with the wording of the actual Regulation 18, which requires the local planning authority to invite representations "about what a local plan with that subject ought to contain" and also states "(3) In preparing the local plan, the

local planning authority must take into account any representation made to them in response to invitations under paragraph (1)". So don't be put off from saying anything you think is reasonable and relevant.