COTSWOLD DISTRICT COUNCIL

23 November 2022

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# CABINET MEMBER FOR DEVELOPMENT MANAGEMENT AND LICENSING - DECISION MAKING MEETINGS

A meeting of the Cabinet Member for Development Management and Licensing - Decision Making meetings will be held at on **Thursday, 1 December 2022 at 11.00 am.**

Rob Weaver
Chief Executive

To: Members of the Cabinet Member for Development Management and Licensing - Decision Making meetings

(Councillors )

Recording of Proceedings – The law allows the public proceedings of Council, Cabinet, and Committee Meetings to be recorded, which includes filming as well as audio-recording. Photography is also permitted.

As a matter of courtesy, if you intend to record any part of the proceedings please let the Committee Administrator know prior to the date of the meeting.

# AGENDA

1. **Declarations of Interest**

2. **Fairford Neighbourhood Plan** (Pages 3 - 706)

   Purpose

   To agree a representation from the Council to the Regulation 16 consultation on the Fairford Neighbourhood Development Plan.

   Recommendation

   That the Cabinet member considers the draft representation, and subject to any amendments, agrees it for submission to inform the review by the Independent Examiner.

(END)

COTSWOLD DISTRICT COUNCIL

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| Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **Cabinet Member for Development Management and Licensing Decision Meeting – 30th November, 2022** |
| Report Number | **AGENDA ITEM 1** |
| Subject | **NEIGHBOURHOOD PLANNING: REPRESENTATION TO THE REGULATION 16 CONSULTATION ON THE FAIRFORD NEIGHBOURHOOD DEVELOPMENT PLAN** |
| Wards affected | Fairford North, Lechlade, Kempsford and Fairford South |
| Accountable member | Cllr Juliet Layton<br>Email: juliet.layton@cotswold.gov.uk |
| Accountable officer | Joseph Walker, Community Partnerships Officer<br>Email: joseph.walker@cotswold.gov.uk |
| Summary/Purpose | To agree a representation from the Council to the Regulation 16 consultation on the Fairford Neighbourhood Development Plan. |
| Annexes | Annex A Fairford Neighbourhood Plan<br>A1: Fairford Neighbourhood Plan Regulation 16 Draft<br>A2: Appendices<br>A3: Basic Conditions Statement<br>A4: Consultation Statement<br>A5: Strategic Environmental Assessment<br>A6: Habitat Regulations Assessment<br>Annex B: Cotswold District Council Draft representation |
| Recommendation(s) | a) *That the Cabinet member considers the draft representation, and subject to any amendments, agrees it for submission to inform the review by the Independent Examiner.* |

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| Corporate priorities | • Responding to the challenges presented by the climate crisis<br>• Providing good quality social rented homes<br>• Presenting a local plan that's green to the core<br>• Helping residents and communities access the support they need for good health and wellbeing<br>• Supporting businesses to grow in a green, sustainable manner, and to provide high value jobs<br>Neighbourhood Plans are prepared by or on behalf of parish councils, and express their priorities, albeit that they need to be in general conformity with the policies of the Local Plan. In this instance, the ambitions of Fairford Town Council align well with the Council's Corporate Priorities, as the Plan contains planning policies seeking to deliver housing, address climate change, promote residents' health and wellbeing and support local businesses. |
| Key Decision | NO |
| Exempt | NO |
| Consultees/ Consultation | The plan has been consulted on by the Parish Council, and is currently subject to a consultation carried out by this Council. Local residents, businesses and a range of statutory and non-statutory organisations have been informed of the consultation. It should be noted that the consultation does not present an opportunity to add to or alter the plan directly – but is instead an opportunity for consultees to raise concerns with the examiner to inform the decision on whether the submitted plan meets the Basic Conditions – the legal requirements for a Neighbourhood Development Plan to proceed to referendum. |

## 1. BACKGROUND

1.1 Fairford Town Council (FTC) applied to this Council in late 2013 to designate a Neighbourhood Area. The area applied for, and subsequently approved, was the then-future boundaries of the parish which came into effect in 2015. An earlier version of the Fairford Neighbourhood Development Plan (FNDP) was submitted in 2017. This Plan failed independent examination, so since that date, FTC has been addressing the concerns raised, and responding to changing circumstances. The amended Plan was duly consulted upon in autumn 2020 – a consultation to which this Council responded – and representations have been considered in preparing a submission draft, recently received by this Council. Following the submission of this draft to the Council, 'the Regulation 16' consultation was launched on 1 November 2022, closing on 13 December 2022.

## 2. MAIN POINTS

2.1 This consultation gives Cotswold District Council a further opportunity to seek to influence the content of the plan. Should a neighbourhood plan proceed through examination, and subsequent referendum, and be made by this Council, it will become part of the Local Development Framework through which planning applications are determined. As the Local Planning Authority making those determinations, it is in the Council's interests to ensure that so far as possible, neighbourhood plans meet the necessary legal standards and provide a useful framework for decision-making.

2.2 The representation attached at Annex B has been prepared and reviewed by a number of officers who have an involvement within Development Management, Planning Policy and Neighbourhood Planning. Through informal discussions with members of the FNDP steering group, and through the Council's representation to the Regulation 14 consultation in 2020, the Council has had earlier opportunity to share its perspective on the policies proposed by the FNDP. This consultation provides an opportunity to share that perspective with the independent examiner, to inform their judgement on whether the plan should proceed to referendum, and if so, with what modifications.

## 3. CONCLUSIONS

3.1 The draft representation at Annex B provides what is in officers' view, a reasonable commentary on the FNDP. Subject to the examiner's review and opinion, some minor amendments as suggested could improve the application of the proposed plan, without undermining the ambitions of FTC in promoting this document.

## 5. FINANCIAL IMPLICATIONS

5.1 None – this decision purely concerns the response to the current consultation.

## 6. LEGAL IMPLICATIONS

6.1 None – this decision purely concerns the response to the current consultation, and informs the independent examiner's review of the submitted FNDP.

## 7. RISK ASSESSMENT

7.1 This is a low risk decision, but mitigates the risk of the FNDP being examined without the Council's concerns being taken into account.

## 8. EQUALITIES IMPACT

8.1 Not required for this decision.

## 9. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

9.1 None directly for this decision, as it is purely a consultation response. The FNDP encourages energy efficiency and renewable energy measures, and promotes active travel, as well as supporting nature conservation, and has striven to develop local planning policies that will work in tandem with the updated Local Plan, and its ambition to be Green to the Core.

## 10. ALTERNATIVE OPTIONS

10.1 None.

## 11. BACKGROUND PAPERS

11.1 None.

(END)

# FAIRFORD NEIGHBOURHOOD PLAN

## PLAN PERIOD 2020 TO 2031

VERSION 1.2.0 / 12-SEPTEMBER-2022

FAIRFORD

A GOOD PLACE TO BE

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# FOREWORD

Fairford is a small market town in the south-east corner of Gloucestershire, on the A417 between Lechlade and Cirencester (8 miles away), just south of the Cotswolds AONB near the lower end of the River Coln catchment and close to lakes in the eastern section of the Cotswold Water Park. The nearest large town is Swindon, 10 miles away to the south, with Gloucester, Cheltenham, and Oxford also within 25 miles. The historic centre, close to the river and its surrounding green areas, contains a reasonable range of small shops and services and the 15th century St Mary's Church with its internationally renowned original set of stained-glass windows. Fairford Park on the north side of the town now contains Farmor's Secondary School (Academy) as well as a Primary School, and elsewhere around the town there are several small industrial estates providing local employment. The town has a close relationship with the RAF Fairford air base just to the south at Whelford, which is the home of the annual Royal International Air Tattoo. The shops and services of the town also help to serve the needs of surrounding villages.

Fairford has experienced rapid growth of housing in the last 10 years but with very little investment in new community infrastructure to support this, and at the same time it has also sadly lost facilities including some shops and the Sports Centre at Farmor's School. This is not sustainable as new housing continues to be demanded to meet District as well as local needs and existing facilities such as the Community Centre are increasingly in demand. Fairford deserves more and better.

There are also major new challenges from Climate Change, as more extreme weather leads to increased risks of flooding in lower-lying areas and we strive towards Zero Net Carbon targets, which may require significant changes to our lifestyles, including reducing the need for longer-distance travel.

This Neighbourhood Plan seeks to make a serious start at addressing these issues by setting planning policies to:

- Provide for some new housing as required by the Cotswold District Local Plan strategy,
- Ensure that new housing is in the most suitable places, of the right type, built to energy efficient standards fit for the 21st Century and has the necessary supporting infrastructure,
- Protect the rural and historic character of the town which is valued by both residents and visitors to the benefit of local businesses and all of us,
- Provide for the protection and enhancement of local facilities, including walking access around the river, lakes and the town, the Walnut Tree Field and the anticipated acquisition, by the Town, of the former Coln House School playing field.

This is a plan for the whole of Fairford – young and old – for the next 10 years. It will be a foundation for other plans, e.g., Transport and Business; and something that the town can extend and improve on in the future.

## ACKNOWLEDGEMENTS

The plan is the result of over 6 years work by a dedicated group of people on the Steering Group, comprising members of Fairford Town Council, Fairford Community Voice, and others at different times, who have endured a number of setbacks but persevered to finally produce a document, with supporting evidence, that is really worthy of the Town. We are extremely grateful to all who contributed to the plan.

- Neighbourhood Planning Group Joint Chairs Jon Hill and Margaret Bishop, and members Sarah Basley, Cllr Andrew Doherty, Cllr Richard Harrison, and Cllr Jennie Sanford.
- Contributors to the previous (2017) plan included Malcolm Cutler, Alison Hobson, and Rev Caroline Symcox.
- The businesses, societies, and residents of Fairford for their support and contribution to the consultation process.
- Our consultant, Neil Homer of oneill homer Ltd, who has supported us throughout.
- The Fairford Town Council team Vanessa Lawrence and Roz Morton. Thanks to Roz for her unstinting efforts supporting the very many meetings, discussions, and items of correspondence that went into the creation of the plan.

Our sincere thanks go to all those who have worked so hard to bring this plan to fruition and to the whole community for the positive responses they provided.

## OUR VISION

Fairford will accommodate the level of growth required to meet our local housing needs, while respecting its history and protecting its market town setting within the Cotswolds and alongside the River Coln. Our Neighbourhood Plan will encourage a modern, thriving and self-confident town, together with the facilities and infrastructure necessary to meet the economic, social and environmental needs of the community. As part of this, the planning process will promote sensitive development that integrates well with the rest of the town and design standards that ensure Fairford retains its distinctive character.

# EXECUTIVE SUMMARY

The submitted plan represents the views of the local community about the future of Fairford up to 2031. It has been prepared by the Fairford Neighbourhood Plan Group (FNPG) at the direction of Fairford Town Council (FTC) and with extensive consultation with local people, statutory bodies and local organisations. Within this context it has been designed to work together with the Cotswold Local Plan (2011-2031) in the Fairford Neighbourhood Plan area.

## OUR AMBITIONS

The Plan has been designed to be a planning, land use document. However, within this important context it delivers several overlapping community ambitions in Fairford as follows:

- A wish to plan positively for growth rather than to respond on an ad hoc basis to unplanned growth and development;
- A wish to ensure that further development does not increase flood risk;
- A wish to bring forward the implementation of additional road infrastructure to relieve traffic congestion to the East of the town;
- An ambition to reduce the impact of through traffic in the town centre;
- An ambition to enhance the vitality and viability of its town centre;
- A wish to safeguard the rural character of the town;
- Delivering low carbon residential development;
- A wish to enhance biodiversity within the parish.

## SUSTAINABLE DEVELOPMENT

The submitted draft Plan has paid attention to delivering sustainable development in the neighbourhood area. We recognise its importance in both national and local planning policies. We are confident that the Plan and its suite of policies will deliver sustainable development within the context of its three dimensions as set out in the National Planning Policy Framework (NPPF) as follows:

The plan will deliver the economic dimension of sustainable development through:

- Delivering approximately 80 new homes in the most sustainable location;
- Assist in delivering the 5-year housing land supply and meeting the housing needs in the district;
- Support for renewal of commercial and employment areas in the town.

The plan will deliver the social aspect of sustainable development through:

- Enhancing the ability of local people to enjoy the character, appearance and services in the historic town centre;
- Enhancing access to recreational facilities.

The plan will deliver the environmental aspect of sustainable development through:

- Delivering housing in locations where it will not result in increased flooding risks;
- Delivering high-quality design in new developments;
- Safeguarding the character and appearance of the Fairford Conservation Area;
- Safeguarding ecological and biodiversity assets in the Plan area;
- Designating Local Green Spaces;
- Maintaining the historic green space separations that define the layout of the town.

## DELIVERING NEW HOMES WITHOUT INCREASING FLOOD RISK

The Leafield/Hatherop Road site to deliver new homes without increasing flood risk is a key element of the Plan.

The area between Leafield and Hatherop roads is considered the most suitable site to deliver new homes without increasing flood risk because it is in the most sustainable location, the revised site stays close to the existing development boundary, and the site is large enough to allow for drainage ponds and for parkland and trees to mitigate the impact on the landscape.

New hydrological evidence indicates that Site F44, Land to the rear of Faulkner's Close, is unsuitable for development and it is not allocated in this FNP. Housing development on the revised FNP14 site, the Southern part of F51B, which more than compensates for the change, is proposed as alternative. This has been accepted by Cotswold District Council (CDC).

There are specific issues related to road use and transport in Fairford due to its location on a key east-west route (A417) between Gloucestershire and Oxfordshire, the restricted historic road-layout and the presence of significant school sites that contribute to high peak time traffic flows.

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**Cotswold District Council** Cotswold District Council's Historic Environment Strategy - Sustaining and Enhancing the Historic Environment of Cotswold District [Report]. - April 2016.

**Cotswold District Council** The Cotswold District Local Plan, 2011-2031 [Report]. - 2018.

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**DEFRA** National Standards for SuDS [Report]. - 2015.

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**FTC** Fairford Health Check [Report]. - 2005.

**FTC** Fairford Horizon 2011-16 [Report]. - 2011.

**GCC** GCC Surface Water Management Plan (SWMP) [Report]. - March 2015.

**GCC** Gloucestershire County Council Population Profile [Report]. - 2019.

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**GCC** Local Flood Risk Management Strategy [Report]. - Summer 2014.

**GRCC** Fairford Housing Stock Report [Report]. - September 2018.

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**Halcrow** Strategic Flood Risk Assessment (SFRA) - Level 1 [Report]. - 2008.

**Helix Transport Consultants** Fairford Town Transport Appraisal Report [Report]. - February 2016.

**HMG** The Road to Zero [Report]. - 2018.

**Hyder** Review and Response to the Summer 2007 Floods in Cotswold District, Second Phase Report [Report]. - July 2008.

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**Thames Water** Fairford Drainage Strategy - Our Next Step [Report]. - 2019.

**Thames Water** Fairford Drainage Strategy Stage 1 [Report]. - 2015.

**Thames Water** Fairford Drainage Strategy V3 [Report]. - 2018.

**UK Government** Sub Regional Fuel Poverty [Report]. - 2019.

**VCH** Domesday Book [Report]. - 1086.

**White Associates** Landscape Character Assessments Outside AONB [Report]. - June 2000.

**WILD** WILD project Rivers Management Plan for Fairford Parish [Report]. - May 2016.

**WRA** Groundwater Monitoring and Review of Flood Risk at Fairford [Report]. - 2018.

# 1 INTRODUCTION AND BACKGROUND

1.1. Fairford Town Council (FTC) has prepared a Neighbourhood Plan for the area designated by the local planning authority, Cotswold District Council (CDC), on 20 November 2013, under the provisions of the Localism Act 2011 and of the Neighbourhood Planning (General) Regulations 2012. The designated area is shown in Plan A below.

1.2. The plan-led system is intended to empower local people to shape their surroundings and identify locations to accommodate housing development. Making the Fairford Neighbourhood Plan (FNP) empowers us as a community to develop a shared vision for the neighbourhood, based on local knowledge and conditions, and use this to produce policies which will shape future development and deliver a truly sustainable future for Fairford.

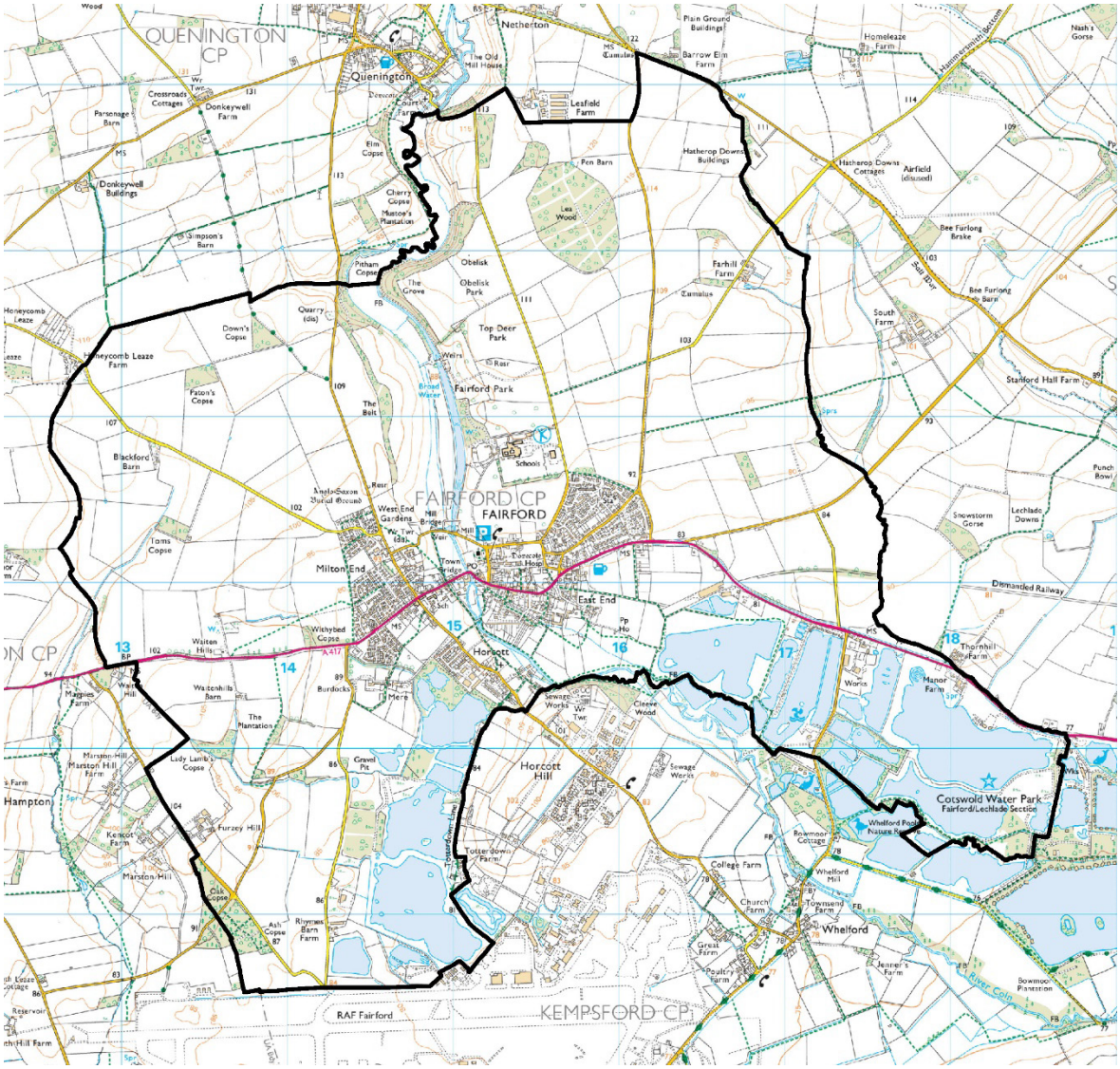


*Figure 1 Plan A: Fairford Parish Designated Neighbourhood Area*

1.3. The Neighbourhood Plan sets out a series of planning policies that will be used, alongside the Local Plan, to determine planning applications in the area. Its policies aim to plan for the growth of the town to 2031, by ensuring that development is built in the most suitable place, protecting the special historic character of the town and of its surrounding landscape and by ensuring there are crucial improvements to local infrastructure.

1.4. Neighbourhood plans can only contain land use planning policies. This often means that there are important issues of interest to the local community that cannot be addressed in a Neighbourhood Plan if they are not directly related to planning or land use.

1.5. In addition, the Town Council must be able to show that it has properly consulted local people and other relevant organisations during the process of making the Plan and it has followed the 2012 Neighbourhood Planning Regulations:

a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).

b. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

c. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

d. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

e. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

1.6. These requirements will be tested by an independent examiner once the Neighbourhood Plan is finalised. If satisfied, the examiner will recommend that the plan goes to referendum of the local electorate. If a simple majority, of those voting, vote for the Plan, it becomes adopted as formal planning policy for the area.

## DEVELOPMENT OF THE PLAN

1.7. The Plan has built on consultations carried out for the Fairford Health Check (FTC, 2005), Fairford Horizon 2011-16 (FTC, 2011) and Fairford Community Plan (FTC, 2014). This was updated and augmented by a residents' questionnaire, a business questionnaire, discussions with local organisations and open consultation days. An independent Transport Appraisal report and a Town Centre report and workshop were undertaken. Planning professionals, landowners, developers, local organisations, local health professionals, neighbouring Town and Parish Councils, the Cotswold District Council (CDC), Gloucestershire County Council (GCC) and other statutory consultees were all consulted.

1.8. An initial version of the Plan was prepared in challenging circumstances, at the same time as the Cotswold District Local Plan 2011 to 2031 was emerging and proposed a different allocation of housing. That initial plan was rejected at examination, partly on the grounds that it provided insufficient evidence to justify the differences.

1.9. In October 2017, a new Neighbourhood Plan Steering Group was formed to produce a revised plan with more robust evidence. Flooding is a local concern so specialists in hydrology were commissioned to produce a detailed report on the groundwater levels and flood risks in Fairford. Technical support to undertake an independent and objective assessment of the sites available for housing was commissioned, along with a Sustainability Appraisal.

1.10. In August 2018, CDC adopted its Local Plan which is now the key planning policy document for the District, providing the framework for decisions on the use and development of land in the area. This Local Plan designates Fairford as a Principal Settlement and a District Centre for retail development. Policy S5 (Fairford) of the Local Plan allocates two sites to deliver a total of 61 new dwellings for Fairford: our plan therefore must deliver at least as much housing development as the CDC Local Plan.

1.11. Further community consultation has taken place with an open day on 14th March 2019. This included a display of the 7, independently assessed, sites selected as potentially suitable for development, to assess public opinion.

1.12. Once approved by the community in a referendum and endorsed ('made') by Cotswold District Council, it will become part of the development plan for the Cotswold District. The plan will direct future development in Fairford to meet the changing needs of the community. It indicates where and when that development should take place and what additional infrastructural and community facilities should be put in place to meet the needs of these developments.

## PLAN PROCESS

1.13. The neighbourhood development plan process has several steps that need to be followed before the plan can come into force:

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| **DESIGNATING THE NEIGHBOURHOOD PLAN AREA** | The town council sought that the area covered by the plan be designated by Cotswold District Council (CDC) (the local planning authority) to enable a planning process to begin. This stage was completed in 2013. |
| **DRAFT NEIGHBOURHOOD PLAN PREPARATION** | The Fairford Neighbourhood Plan Group (established by Fairford Town Council) consults with residents and stakeholders, gathers evidence and develops a plan. This stage has just been completed. |

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| **PRE-SUBMISSION PUBLICATION AND CONSULTATION** | The FNPG publishes the draft of the plan and consults with interested parties and stakeholders. |
| **PLAN REVISIONS** | The FNPG takes onboard input from the pre-submission consultation and makes any revisions needed before the plan goes to the next stage. |
| **PLAN SUBMISSION TO THE PLANNING AUTHORITY** | The plan is submitted to the planning authority (CDC) for them to determine whether it meets the basic conditions necessary to go forward to a formal consultation process (which they undertake). This is the current stage. |
| **PLANNING AUTHORITY CONSULTATION** | The planning authority (CDC) publishes the plan and seeks consultation responses. |
| **INDEPENDENT EXAMINATION** | The plan is examined by an independent examiner (appointed by the planning authority) to determine whether it meets the necessary conditions to proceed to a referendum. |
| **REFERENDUM** | The plan is put to a referendum in the local area that it covers. |
| **PLAN MADE** | If a majority of those voting in the referendum vote in favour of the draft plan, then it is "made" by the planning authority. This means it becomes part of the local development plan for the Cotswolds and its content guides future local planning decisions. |

*Table 1: Stages of the Neighbourhood Development Plan process*

## THE PRE-SUBMISSION PLAN

1.14. The Fairford Neighbourhood Plan Group (FNPG) considered the future of the town and in particular the capacity of local infrastructure to cater for the recent and future housing growth in the town. After reviewing the relevant national and local planning policies, gathering evidence and wide consultation, the Pre-Submission version of the Fairford Neighbourhood Plan (Reg 14) was prepared. In September 2020, it was submitted for a six-week period of formal consultation by residents, stakeholders and statutory consultees.

1.15. The draft Plan was presented to obtain the views of the local community and other organisations on its proposed vision, objectives, and land use policies. The comments and representations received on this Plan were taken into consideration in preparing the final version of the Fairford Neighbourhood Plan. This process of consultation and the responses themselves are described in detail in the accompanying "Consultation Statement" for the plan.

1.16. Alongside this document, the Town Council's consultants, AECOM, has published a Draft Sustainability Appraisal report. This is a requirement of the EU Directive 42/2001 and 2004 Environmental Assessment of Plans and Programmes Regulations, as the District Council considers that the Plan has the potential to cause significant environmental effects. The Appraisal looks at how the policies of the Plan propose to avoid or mitigate those effects and it compares the proposed policies with any reasonable alternative policies that may be possible but have not been taken forward in the Plan.

## THE NEXT STEPS

1.17. This final version of the Plan, known as 'Submission Plan' (Reg 16) will be submitted to Cotswold District Council for them to determine whether it meets the basic conditions. If so, they will publish the Plan for a formal consultation process and arrange for its independent examination to determine whether it meets the necessary conditions to proceed to the referendum.

# 2 THE NEIGHBOURHOOD AREA

## INTRODUCTION

2.1. The parish of Fairford now includes Horcott. For the purposes of this document, 'Fairford' should be taken to refer to the whole parish.

2.2. Fairford, as a Principal Settlement, is expected to play its part in developing a sustainable future in the wider district, and the Neighbourhood Plan has importance in this. There are several specific issues that affect the town/parish which must be given due consideration and may not be addressed effectively by district, county and national planning policies; our Plan must address these.

2.3. Fairford is located at the far south-east corner of the county. Lying closer to Swindon than to Gloucester, Cheltenham and the M5 corridor, it lies outside the main county economic strategy area, and is much affected by cross-boundary effects and issues e.g., commuting and A419 links, nearest hospital facilities in Swindon (Wiltshire) and the Cotswold Water Park which goes beyond county boundaries. In recent years Fairford has extended significantly to both east and west, but there are significant environmental and physical constraints to expansion. The town sits in the pastoral valley setting of the River Coln which flows right through the centre towards the Upper Thames Vale to the south-east, with extensive water meadows and flood plains. The A417 road bisects the town in an east-west direction. A Special Landscape Area, including extensive landscaped parkland, lies to the north of Fairford, and beyond this the Cotswold AONB. To the south-west and south-east are large areas of lakes formed by gravel extraction, and Fairford Air Base, with its 2-mile-long runway, cuts off the town to the south. These all effectively limit expansion and reduce the capacity of the town to accommodate significant further growth without having adverse impact on its character and setting. Most recent development has been along the A417 on the east and west outskirts. Further developments are increasingly likely to be outside practical walking distance from the town centre, although it is possible to locate them close to other facilities (e.g., schools or employment) or to consider providing new facilities within them. Further growth will require consideration of traffic congestion issues and appropriate infrastructure to mitigate impacts.

2.4. Fairford's position on key cross-country routes has had a great impact on its history. The M4 and A419 relieve pressure on the A417 (classed as a District Link) which passes right through the centre of the town but increasing development and on-going local quarrying have resulted in significant problems.

2.5. These problems are exacerbated by the facts that:

- at the centre of the town, the carriageway reduces to 3.4m;
- at this and other points the A417 is essentially single track;
- there is an approx. 70° turn after Town Bridge;
- many listed and historic buildings line the A417 – the weight and emissions of vehicles, especially HGVs, are likely to have a serious detrimental effect on the soft limestone and their structural integrity.

2.6. Plans for a by-pass in the past have been abandoned as ground conditions and environmental impact of the proposed route made it infeasible. Other constraints are:

- The Special Landscape Area (SLA) to the north
- RAF Fairford (The Air Base) to the south

2.7. Two potential solutions to these issues are:

- upgrade the Thornhill-Whelford-Kempsford-Latton route (Eastern Spine Road)
- weight restriction on heavy traffic through the town

However, such action falls strictly within transport policy rather than planning policy.

2.8. In addition, the centre of the town is increasingly congested, and a bottleneck during peak periods. This is a historic centre, including a church of national importance, which allows very little room for expansion. Traffic and parking constraints have had a negative effect, particularly in the Market Place, High Street and London Street.

2.9. A potential link road connecting the Leafield /Hatherop Road area to the A417 at the eastern end of the town could decrease congestion in the Leafield Road, Mount Pleasant, Lower Croft and town centre areas by providing access to the schools and Air Base from the East of the town.

2.10. Despite recent rapid housing expansion and the promise of local economic benefits this would bring, Fairford has continued to lose key facilities: Lloyds Bank local branch, local Building Society, Post Office sorting and mail collection facility, large antique shop. In addition, several former shops have been converted to residential, reducing the number of premises available for retail/commercial use in the town centre. Most of those that remain are small, limiting the range of products and services that they can provide.

2.11. Thus, it is becoming increasingly difficult for Fairford to perform its retail role as a 'District Centre' and focal point for the rural economy effectively. Radical measures, as outlined in this Neighbourhood Plan, are needed to attract new businesses, prevent further loss of premises and improve sustainability.

2.12. The parish boasts around 11km of public footpaths including numerous riverside and rural walks. Keeping Fairford 'green' is a high priority for local people. There is a potential conflict between this and the pressures for development arising from the fact that Fairford

is within the 20% of the Cotswold District outside the Cotswolds AONB. It also has a secondary school and other services (churches, sports facilities, clubs and societies) which make it a desirable place to live and work.

2.13. Fairford is one of the most beautiful towns in the Cotswolds, with the countryside and parkland interwoven into the built area and uniquely, coming right into the heart of the town at the top of the High Street and at The Greens. This is a place of significant historical and cultural interest and it is vital to balance the needs of the future with a sensitivity to the demands of the past.

2.14. Horcott lies on the opposite side of the River Coln, a smaller but distinct settlement, on the edge of the water park with RAF Fairford to the south-east. The air base is a major NATO facility which imposes constraints on the surrounding area, including height restrictions, vulnerable building distance, and control of water-bird habitat.

2.15. Horcott comprises a small number of homes, a farm, an industrial estate and recreational facilities. In addition to schools and town-centre businesses, the other main employment areas lie on the A417 to the east of Fairford, at the old station site and at Whelford Business Park.

## A BRIEF HISTORY OF FAIRFORD

2.16. Fairford has a long and rich history, with land around the crossing point of the River Coln, the 'fair-ford', inhabited for thousands of years. Archaeological investigations prompted by gravel extraction and property development in the parish in recent decades has greatly enhanced our understanding of early communities living in the area, with significant remains from Neolithic, Bronze Age, Iron Age and Romano-British periods now documented. New housing developments on the west side of town have revealed extensive remains of Anglo-Saxon occupation, the settlement associated with the rich contemporary cemetery focused on Tanners Field, and the predecessor of today's town.

2.17. The river, the proximity of the River Thames, and the fertility of the land where the high ground of the limestone Wolds descends to meet the gravel beds of the Upper Thames basin, have all played their part in the development of the settlement and some continue to affect the town today.

2.18. Two Scheduled Monuments in the Parish date from this early period: at Tanners Field (an Anglo-Saxon cemetery) and land south of Burdocks (a Bronze Age hengiform barrow mound and ring ditch).

2.19. The earliest written record of Fairford is in 850 CE and Fairford appears in the 1086 Domesday Book (VCH, 1086 p. 78) [Vol7, Ref.18]. Fairford Mill is mentioned.

2.20. The town grew up at the river crossing and its ancient roots can be seen in the layout of the roads and buildings around a web of important tracks which have developed over the centuries around/from Iron Age, Roman, Anglo-Saxon and medieval drove roads and salt routes.

2.21. By the 12th century, the town was recorded as having ancient borough status with a market. It was, however, in the early 14th century that the town, positioned in an area of sheep farming, began to prosper.

2.22. In the mid-15th century Fairford grew in stature as a stronghold of the Earl of Warwick (the Kingmaker) and a staging post on the route between London and Ludlow Castle (a Yorkist stronghold in the Wars of the Roses).

2.23. The late 15th century saw an expansion of its economic fortunes on the back of the wool trade, leading to a period of considerable growth. Much of the early town dates from the Tudor period.

2.24. Today's road layout through the centre of Fairford is the legacy of John Tame, a wealthy wool merchant who rebuilt the older church at this time (completed 1497) – the main road was diverted, and present-day London Street became the main road as we see today. The Market Place has the same layout as in the 16th century.

2.25. John Tame's splendid tomb still survives in the chancel of the church he had rebuilt, which was later endowed with a wonderful set of late-medieval stained-glass windows, the only near--complete set still existing in any parish church in England. St Mary's Church and its windows attract an average of ten thousand visitors every year, from all over the world (figures PCC annual report).

2.26. In 1660 the manor of Fairford was bought by a wealthy Bristol merchant, Andrew Barker, who built a new mansion, Fairford Park, ~400m north of the town centre. The Park was further landscaped in the 1780s and two features still remain of that landscaping: the Votive Column (the Obelisk near the northern edge of the Park) and the picturesque bridge to the north of the Mill Pond.

*Figure 2 Gloucestershire Archives P141/M1/7/1 Map of the Parish of Fairford 1834 NB Horcott not shown as in Parish of Kempsford at this date*

2.27. All the older town is a Conservation Area and there are more than 120 listed buildings, all dating from 19th century and earlier. The Market Place and High Street are mostly Georgian and earlier.

2.28. Fairford Park and other land was purchased by Ernest Cook in 1945 and in 1952 was passed to the Ernest Cook Trust (ECT), an educational charity with its head office at Fairford Park and extensive landholdings to the north of the town and elsewhere in the country.

2.29. RAF Fairford was established to the south of the town in 1943-44 and played a role in the airborne landings in Normandy. Post-war the airfield saw the testing flights of Concorde before becoming an important American air base, still used by the United States Air Force.

2.30. The construction of the airfield effectively cut Horcott off from the rest of its Parish of Kempsford and closer ties developed with Fairford. In 1987 it became part of the Parish of Fairford but retained its own distinct town councillors on Fairford Town Council until 2015.

*Figure 3 Horcott: OS 25inch Gloucestershire L11.16 (includes Fairford, Kempsford 1877 ([109728025] Reproduced with permission of the National Library of Scotland*

2.31. The air base is the venue for the annual Royal International Air Tattoo. Despite the short duration of the event, its size makes it important to employment in the town and many local businesses are supported by the boost it provides. Visitors come for the whole duration of the event and stay in local hotels, homes and camping sites.

2.32. Development in the town since 1945 can be divided into 3 stages (there is a temporary peak during the 1940's because of wartime activity).

- Steady flow with significant expansion in each of the 1950s, 1960s, 1970s, and 1990s (see Figure 4 Fairford Population Growth).
- A few small infill developments 2000-2012.
- A major burst of housing, from 2013 through 2019, saw the town grow by over 33% in a few years, with building to both east, west and north-west of the town.

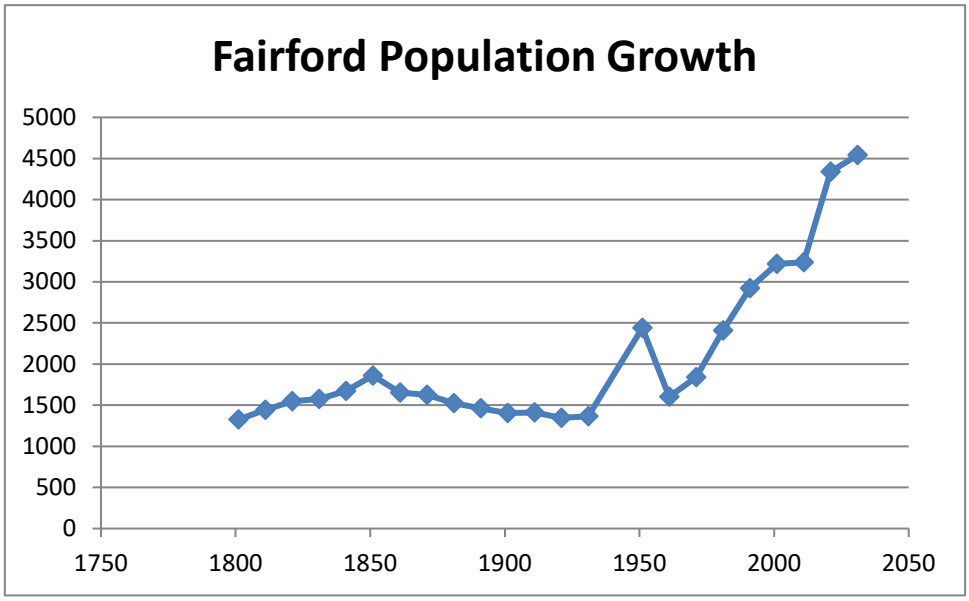


*Figure 4 Fairford Population Growth*

2.33. Further details of the history of Fairford and Horcott can be found in the evidence base documents, particularly the Character and Design Assessment.

## THE PARISH TODAY

2.34. The population has now grown to approach 4500 as the major housing schemes of recent years have been completed and occupied.

2.35. The town serves as a District Centre serving a wider rural area including the villages of Kempsford, Whelford, Meysey Hampton, Quenington, Coln St Aldwyns, Hatherop, Southrop and Eastleach. The slightly smaller town of Lechlade is about 5 miles to the east, with the towns of Cirencester, Burford, Carterton, Faringdon, Highworth, Cricklade and Swindon also within 17 miles.

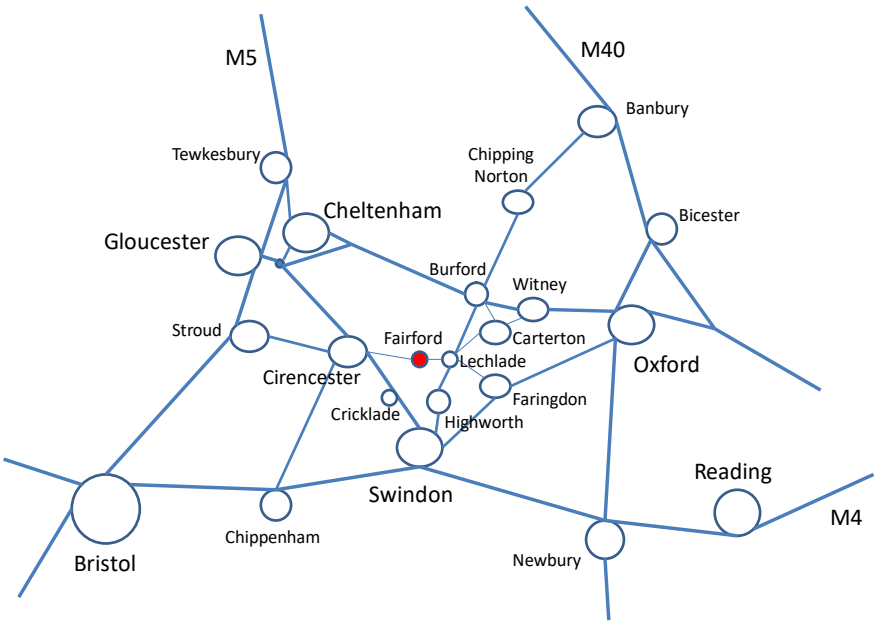


*Figure 5 Fairford's Connections to the Wider Region*

2.36. Although relatively small for a town, Fairford has maintained a range of local services, including a small but reasonably successful town centre (albeit there has been a loss of shops to residential conversions over the years and Lloyd's Bank closed the only local bank branch in November 2016). Current shops/facilities include two convenience stores, a Post Office, a chemist, a butcher, an hotel, cafes, a restaurant, hairdressers, beauticians and several take-aways. There is also a community centre, event spaces, a library, primary and secondary schools, health services, churches, sports facilities and many clubs and societies.

2.37. Unfortunately, growth of facilities has not kept pace with the increase in population and there is now an infrastructure deficit, particularly with regard to health services, water supplies, sewage and wastewater disposal. Internet connection speeds are relatively poor. Fairford is subject to flooding and in addition to river flooding, has experienced groundwater, surface water and sewage flooding.

2.38. Mineral extraction (mainly sand and gravel) has been an important activity in the area for a long time and has increased significantly since World War II. This has led to the creation of more than 140 lakes in the Cotswold Water Park, many of which are now managed for recreational and wildlife purposes, as part of restoration programmes. These now play a significant part in the area's recreation and tourism.

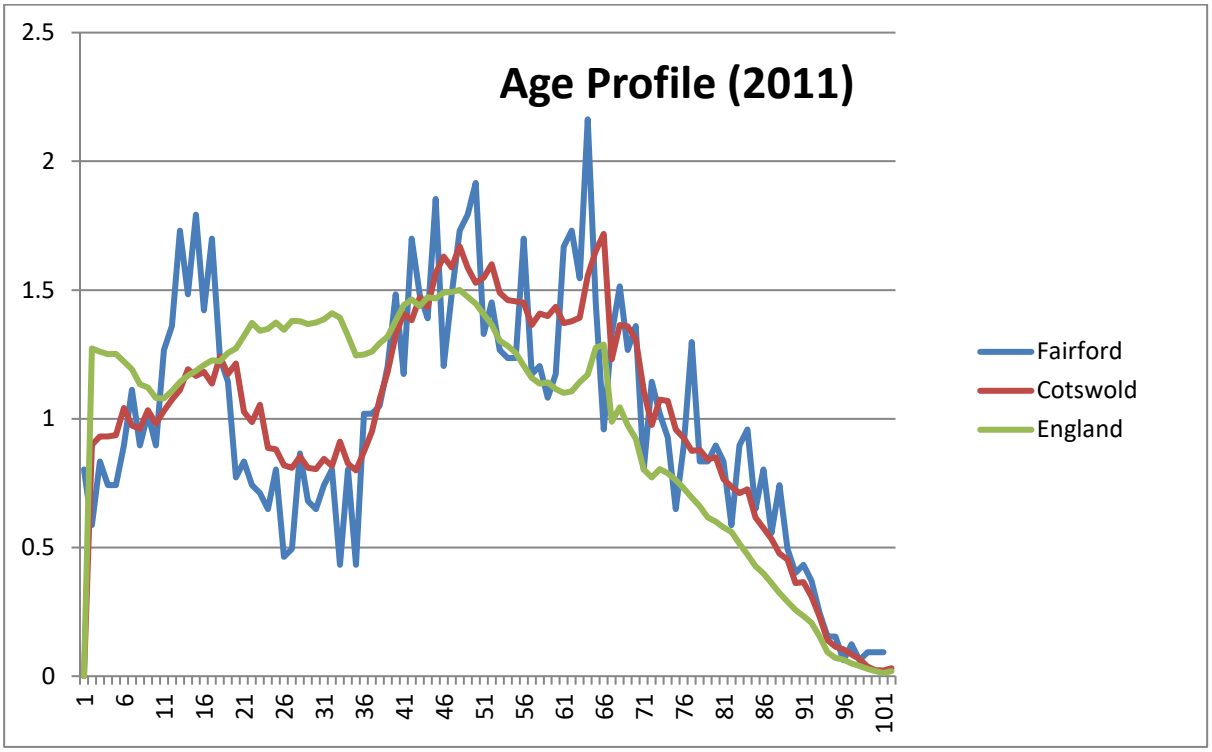


*Figure 6 Population Age Profile*

2.39. The age profile (2011 Census) is generally like that for Cotswold District as a whole, with a higher percentage of older people than the national average. However, there are relatively more young people of secondary school age (reflecting the presence of Farmor's School), and fewer in their 20s and 30s, reflecting a tendency to move away for employment, as well as housing cost issues.

2.40. The population surge is not expected to continue to 2030 because of physical constraints on the land but will be influenced by the amount of growth and development of the Airbase, at present uncertain. Continuation of growth at the present (2020) rate would suggest population around 4500 to 4600 by 2031 with the peak age profile increased by about 10 years. Housing development in Fairford must meet the needs of an aging population

2.41. About one third of the population is in professional or skilled trade occupation. Comparison of employment occupations with figures for Cotswold District as a whole, shows slightly less in professional occupations, more in skilled trades, administrative/secretarial and elementary occupations, with fewer in higher level managerial and official roles, probably reflecting a small business focus and proximity to industrial employers in Swindon as well as the local area.

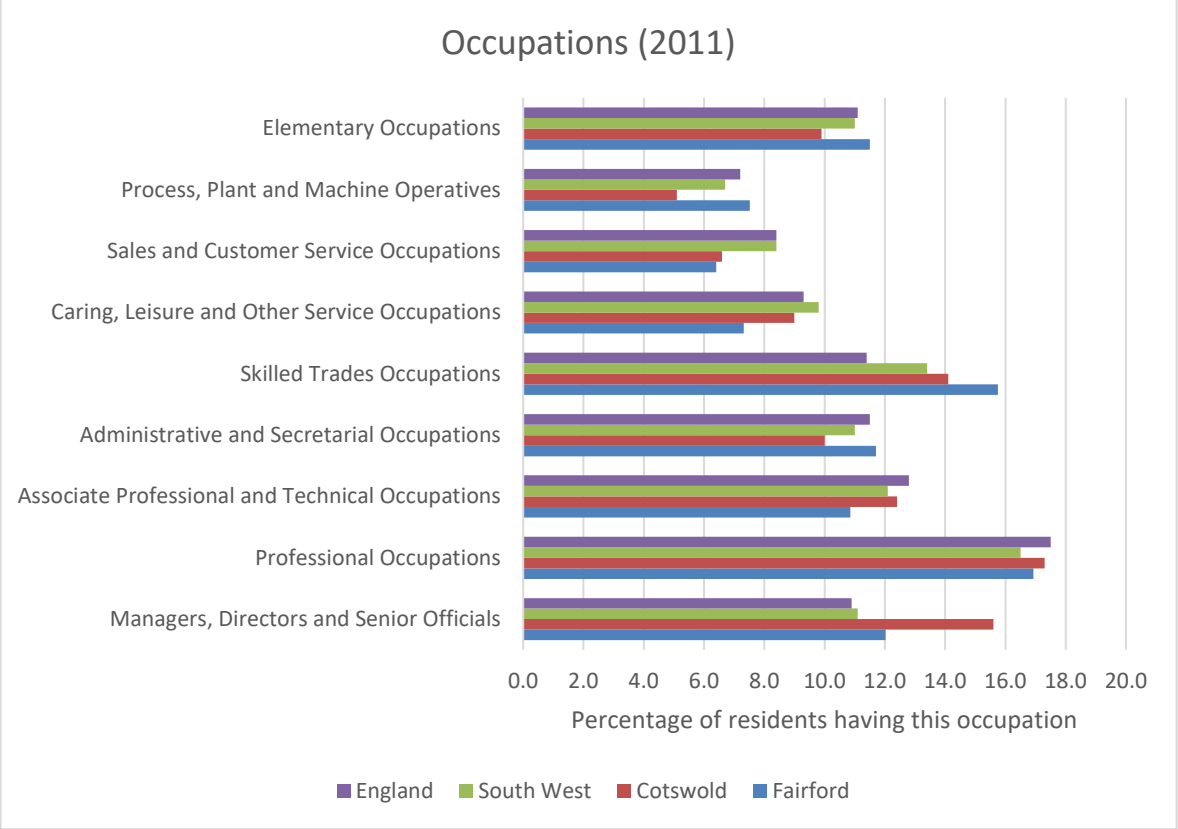


*Figure 7 Local Occupations*

## GEOLOGY, TOPOGRAPHY AND HYDROLOGY

2.42. Since Fairford has suffered from surface water, groundwater, and sewage flooding in the recent past, it is important to understand the special geology, topography and hydrology of the area. The Environment Agency Report on the 2007 floods (section 1.3.2) (Environment Agency, 2008) describes how the special shape and geology of the River Coln catchment affect the groundwater and spring flows at Fairford.

2.43. Another special feature of Fairford is that most of the gravel beds to the south and east of the town have been extracted, resulting in several deep lakes which feed and are fed by groundwater and surface water. Although these lakes do act as a flood reservoir, they do not protect the town since they are downstream, to the south and east.

2.44. The Court Brook collects overflow from the River Coln in the wet season and channels flow into these lakes. Fairford Drainage Strategy section 2.1 (Thames Water, 2015).

2.45. The report (Environment Agency, 2008) on the 2007 floods states in Section 1.3.3 that the "significantly urbanised" nature of Fairford Town means that a high proportion of rainfall flows directly into the River Coln.

2.46. The rise and fall of groundwater and river levels is of course seasonal but the rate of rise after rainfall is dependent on how dry the soil is prior to that rain. Soil Moisture Deficit

(SMD) measures how much rainfall is needed before direct runoff into watercourses starts. This is especially relevant to Fairford with its flood plain proximity and permeable geology.

2.47. The complex and multi-faceted nature of flood risk at Fairford is shown by the number of projects and studies conducted over the past few years. These include:

- The report on the 2007 Floods (Environment Agency, 2008) and the resultant Environment Agency Fairford Flood Alleviation Scheme (2008–2013) (Environment Agency, 2013?) which reduced the risk of "riparian" (main river) flooding.
- The "GCC Groundwater Intermediate Assessment" (Atkins, April 2015) for South Cotswold District concluded that Fairford has now been identified as subject to groundwater flooding and that further housing development on sites with high groundwater level is likely to exacerbate the problem.

2.48. The drainage strategy (Thames Water, 2018) reports on "intervention" works already done on:

- clearing the Court Brook stream,
- diverting surface water on Quenington Road,
- fixing sewer defect at East End.

The drainage strategy concludes that sustainable drainage solutions (SuDS) using infiltration are unlikely to be effective in the low-lying areas to the south of the town because of frequent high groundwater levels.

2.49. CDC's Strategic Flood Risk Assessment Report (JBA, 2014) also suggests that SuDS drainage using infiltration is unlikely to be feasible for those areas to the south and southeast of Fairford with high groundwater levels.

2.50. To supplement this existing body of work and to provide that "hard evidence" requested by the Examiner of the first Plan, FTC commissioned a study by Water Research Associates' (WRA) to monitor groundwater levels around Fairford and to review the overall flood risk. Their report "Groundwater Monitoring and Review of Flood Risk at Fairford" (WRA, 2018) described Fairford's geology as characterised by superficial deposits of alluvium, "Northmoor" sand and gravel and "Cornbrash" overlying the solid Oxford and Kellaway clays and Forest Marble clay and limestone. The groundwater levels were found to rise quickly in winter and fall similarly quickly in summer. Water levels in Fairford wells and boreholes varied by 1.0 to 2.5 metres during the 2018 monitoring period. The report concluded:

a) Development should avoid the several spring lines along the Cornbrash / Northmoor boundary (for example just south of Beaumoor Place in East End)

b) Development should avoid the area south of Cornbrash / Kellaway boundary (for example south of Cinder Lane).

c) There is no scope for SuDS drainage using infiltration in the low-lying areas associated with alluvial deposits of the Coln valley due to frequent high groundwater levels" (Section 6-2-3).

d) "Ideally development should be directed away from the Coln and Court Brook corridor" (Section 6-2-5).

2.51. Flood risk issues need to be addressed at the pre-application stage. Flood Risk Assessments (FRAs) should address groundwater as well as surface water flooding and should consider loss of natural flood storage capacity.

2.52. Many areas in Fairford are not suitable for development and should be preserved as green spaces which can store floodwater. Development should be diverted to more sustainable sites with less flood risk, in accordance with NPPF.

# FUTURE CHALLENGES

## IMPLICATIONS OF CLIMATE CHANGE

2.53. The world's climate is changing and will continue to change as a result of greenhouse gas emissions, even if global warming is limited to 1.5°C above pre-industrial level. In England, hotter drier summers, milder wetter winters, rising sea levels and more extreme weather events are expected in future. Projected changes in climate are expected to have a large impact on the water environment as a result of changes in sea level, river flow, groundwater recharge and water temperatures. Flooding, caused by intense or prolonged rainfall, as well as by sea level rise and coastal storm surges, has become more likely in recent years and this trend is expected to continue. Many people will experience climate change through its effects on water, and especially through floods and droughts.

2.54. The single most important impact for Fairford, an inland town with historic flooding issues, is the likelihood of serious flooding. Bigger, more frequent floods are expected over the 21st century, particularly during the winter season when flows and groundwater levels are increased, and the community must prepare for this. Therefore, the FNP directs development to areas with lower flood risk.

2.55. Green Infrastructure planning is increasingly being recognised as an effective and efficient response to projected climate change. We need to protect natural green spaces, which as well as contributing to the attractiveness of the river and lakeside areas, serve a vital function as water storage areas. Future land management practices should aim to create more flood water storage capacity for storm events, treating stormwater at its source while delivering environmental, social, and economic benefits. It is important to recognise the benefits that green infrastructure provides, in mitigating the impacts of climate change, alleviating flooding, and improving air quality as well as contributing to the health and well-being of communities and creating better places for wildlife.

Therefore, the FNP gives protection to local green spaces. Fairford has a responsibility to reduce the factors contributing to climate change by:

- Diverting development to areas of lower flood risk

- Reducing emissions from travel by encouraging use of public transport and providing employment near to homes.
- Making available allotments for residents to grow their own food.
- Encouraging local markets selling local produce.
- Protecting existing trees and hedges and encouraging the planting of more trees.
- Ensuring the new buildings meet or exceed best environmental practices.
- Protecting the banks and water quality of watercourses, especially the River Coln.

## IMPLICATIONS OF THE CHANGING ROLE OF RAF FAIRFORD

2.56. RAF Fairford was opened in January 1944 in preparation for D Day. It served both British and American forces and in 1950 was transferred to the United States Air Force for strategic bomber operations. A 10,000-foot runway was constructed for long-range bomber operations, completed in 1953, and up-graded since. Because of this runway, which can accommodate the largest and heaviest planes, Fairford was chosen in 1969 as the British test centre for the Concorde aircraft until 1977, and also as an abort landing site for the Space Shuttle in 1983 until the end of the programme.

2.57. The role and use of the Airfield has varied over the years, but it is designated as a forward operating location for the US Air Force, and has been used extensively for aerial re-fuelling, heavy- bomber operations and NATO operations and exercises, and provides the venue every July for the Royal International Air Tattoo.

2.58. Up to 2010, the Air Base was well integrated into the Fairford community, and a major source of local employment, but in 2010, USAF withdrew all their uniformed staff from the station leaving a civilian operating unit to maintain the base on a "care and maintenance" basis, though capable of immediate reactivation within 48 hours. In November 2018, it was announced that, as part of the US European Infrastructure Consolidation programme, the Boeing RC-135 surveillance aircraft mission would transfer to Fairford as Forward Operating Location, and the two Squadrons which support it would relocate to Fairford by 2024.

2.59. This change would have seen around 887 US military personnel and 1240 family members moving into the area, from 2023. These would be housed on the base and dispersed into the community over a wide area, within 50km or 30 minutes' drive from the base.

2.60. These plans have now changed, and the RC-105 mission and supporting squadrons will not now be relocated to Fairford. However, expansion is still taking place although precise plans have not yet been released. In addition to improving the surface of the runway and building a facility for squadron operations, they intend to renovate the 106 houses already on the base and improve domestic facilities. The USAF is committed to building good relationships with their British hosts and will seek to reduce any harmful impact of the increased numbers but provide additional employment and boost the local economy.

## THREATS TO HERITAGE

2.61. Cotswold District Local Plan Policy (EN1) defines a policy requirement to ensure that new development protects and enhances existing historical assets.

2.62. Cotswold District Council's Historic Environment Strategy[1] (Cotswold District Council, April 2016) further identifies heritage risks and guidance for development to ensure that the historic environment is fully considered in the determination of planning applications.

2.63. The impact of vibration and pollution from heavy vehicles damages the soft limestone of listed buildings in the town centre, particularly along the A417.

## ISSUES/VULNERABILITIES

2.64. The story of Fairford is thus one of change and replacement, reflecting political, economic and social change over the ages, with signs of the major past phases of development still visible (e.g. Plantagenet, Tudor, and commerce-funded development). Unfortunately, much of the evidence of that greater history has been lost over the ages or is no longer visible. However, those elements that are left, principally from the Tudor, Georgian and Victorian periods, are worthy of preservation as key elements of the town's character and identity as well as being a record of the consequences of social and economic change.

2.65. The Site Assessment Report prepared by AECOM for the Fairford Neighbourhood Plan states that "All development in and adjacent to a Conservation Area should be carried out in conjunction with the Conservation Area Appraisal and Management Plan prepared for the Conservation Area. However, an appraisal has not been carried out for Fairford Conservation Area. It is recommended that this is further investigated by FTC, and is supported by CDC and Historic England. This will provide an appropriate basis for the protection and enhancement of the Conservation Area, and provide guidance for proposed development."

2.66. In response to consultations on the Scoping Reports (2016 and 2018) for the Sustainability Appraisals (incorporating SEA) of the Fairford Neighbourhood Plan, Historic England has previously highlighted the value of up to date and suitably detailed Conservation Area Appraisals to inform/support the formulation of policies for the Neighbourhood Plan, both in the selection sites and spatial options and the identification of heritage issues which the Plan might wish to address.

2.67. As stated above, a formal Conservation Area Appraisal has not yet been carried out for the Fairford CA. However, there is a County Planning Policy Statement (under the Civil Amenities Act 1967) relating to the original designation in 1970, and the boundary of the CA was apparently reviewed (and re-confirmed) in 1990. A local Character and Design Assessment has been prepared and can be seen in the supporting evidence set.

2.68. Without an Appraisal, the fall-back arrangement is for the LPA to provide partial assessments on a case-by-case basis in relation to individual planning applications. There

[1] https://www.cotswold.gov.uk/media/jhzhfuxh/5201-historic-environment-strategy-apr-2016.pdf

is a danger that this could be inconsistent, because it does not put these in an overall context and may focus unduly on particular aspects associated with individual applications.

2.69. 'Lack of Conservation Area appraisals' is specifically recognised as one of a number of 'Threats or Weaknesses' in a SWOT analysis included in CDC's historic environment strategy (Cotswold District Council, April 2016), along with the following:

- Impact of new housing developments on the settings of historic towns and villages and on the transition between the existing built environment and the wider countryside
- Incremental small-scale losses of quality of assets, through inappropriate management and / or change
- Permitted development rights, particularly for undesignated heritage assets and within Conservation Areas (This could be addressed by an Article 4 Direction or Directions)
- Owners' expectations and their relative affluence, leading to potential aggrandisement and suburbanisation
- The desire to adapt the historic environment for modern styles of living (which could include meeting the specific needs of an aging population)
- The sheer numbers and volume of heritage assets can lead to complacency about the importance of these assets
- Article 4 compensation issues.

2.70. Public transport (i.e. buses) provision is poor, and there is no railway connection. This encourages car use and disadvantages those on lower incomes as access to jobs and entertainment in larger towns such as Swindon is restricted to those with private vehicles.

2.71. The percentage of over 70's is likely to increase, and provision will be needed for their accommodation, health and wellbeing.

2.72. Additional specific threats particularly relevant to Fairford include the impact of the loss of local shops on historic frontages and the loss of other features of specific local character.

2.73. There are strong pressures for infill developments. Key features of Cotswold villages/towns are the indented, open edges and fields which penetrate into the settlement (see White Report 2000, p.4, para. 2.19). These features are particularly strong in Fairford, witness the open landscape at the Town Bridge and the various small paddocks, playing fields, parkland and large gardens present within the town. In recent years infill pressure has seen the disappearance of a market garden area (The Nurseries) and large gardens (Fayre Court, Lygon Court), as well as proposals which would have the effect of 'straightening up' the boundary line. The town is thus vulnerable to developments which could severely detract from its Cotswold character and result in damaging suburbanisation.

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# 3 THE PLANNING POLICY CONTEXT

3.1. The Neighbourhood Area lies within Cotswold District in the County of Gloucestershire.

3.2. The National Policy Planning Framework (NPPF) published by the Government (revised in 2018, 2019 and 2021) is an important guide in the preparation of local plans and neighbourhood plans. The Neighbourhood Plan must demonstrate that it is consistent with the provisions of the NPPF. The following paragraphs of the revised NPPF are considered especially relevant:

- supporting a prosperous rural economy (paragraph 83, etc);
- good design (paragraph 127, etc);
- promoting healthy communities (paragraph 92, etc);
- protecting local green spaces (paragraph 99, etc);
- conserving and enhancing the natural environment (paragraph 170, etc);
- conserving and enhancing the historic environment (paragraph 185, etc);
- neighbourhood planning (paragraph 21, 28-30);
- ensuring the vitality of town centres (paragraph 85);
- meeting the challenge of climate change, flooding … (paragraph 150, 155, 157-163).

National Planning Practice Guidance and the new National Design Code provide further clarification and guidance.

3.3. The Neighbourhood Plan must also be able to show that its policies are in general conformity with the strategic policies of the development plan, which currently comprises policies or saved policies of the Cotswold District Local Plan 2011-2031, of the Gloucestershire Minerals Local Plan 1997 – 2006 and of the Gloucestershire Waste Core Strategy 2012 - 2027. The second document is in the process of being replaced, it passed the-pre-submission consultation stage and is expected to be adopted within the next year.

3.4. The FNP policies will have regard to the relevant policies and saved policies of the adopted plans and will be informed by the relevant strategies, policies and evidence base of the new plans.

3.5. The adopted Local Plan contains several policies (see below) that are relevant to the FNP, notably those on protecting the natural environment, protecting heritage, development inside and outside of defined development boundaries, and promoting rural economic development and good design. The Policies Map (Plan B in Appendix 1: Maps) shows the development boundary and areas of protected open space, the Fairford-Horcott local gap, a special landscape area, the conservation area and the town centre boundary. Most of the southern part of the Parish, including Horcott, lies within the Cotswold Water Park area and is subject to related supplementary planning guidance (for the Water Park) as well as

policy SP5, which focuses on recreational development and sustainable transport while protecting access and the character and settings of settlements. Policy EN14 (Managing Flood Risk) is also particularly relevant in this area.

3.6. Fairford is defined as a Principal Settlement and District Centre and has a development boundary (Policy 18 in the old plan and DS2 in the new one). Housing development has been much greater than envisaged in 2001, with very significant levels of housing growth in the last decade.

## COTSWOLD DISTRICT LOCAL PLAN (CDLP)[2]

3.7. The FNP needs to be in general conformity with the strategic policies of the adopted CDLP (Cotswold District Council, 2018). Those that have a specific relevance to Fairford are listed below:

- Policy DS2: Development Boundaries – to update the current defined development boundaries to take account of the new site allocation (FNP14) and the withdrawal of site F_35B;
- Policy DS4: Open Market Housing Outside Principal and Non-Principal Settlements;
- Policy SA1: Infrastructure Delivery South Cotswolds principal settlements;
- Policy S5: Fairford;
- Policy H1 & H2: Housing Mix & Tenure and Affordable Housing – requiring schemes to provide a mix of types and tenures;
- Policy EC1: Employment Development – supporting local employment and the local economy;
- Policy EC2: Safeguarding employment sites - allowing for the managed expansion of existing facilities and protecting against their unnecessary loss;
- Policy EC3: Employment Generating Uses – offering qualified support for new employment uses in Principal Settlements like Fairford;
- Policies EC7 & EC8: Town Centres and Uses – defining Fairford as a 'District Centre' to encourage the provision of new local shops and to manage the mix of retail and other uses;
- Policy EC11: Tourist Accommodation;
- Policy EN1: Built, Natural and Historic Environment – including managing habitats and green infrastructure;
- Policy EN2: Design of the Built and Natural Environment – including application of the Cotswold Design Code and consistency with local character;

[2] https://www.cotswold.gov.uk/planning-and-building/planning-policy/adopted-local-plan/local-plan-2011-to-2031/

- Policy EN4: The Wider Natural and Historic Landscape;
- Policy EN6: Special Landscape Areas;
- Policy EN7: Trees, Hedgerows and Woodlands;
- Policy EN8: Features Habitats and Species;
- Policy EN9: Designated Sites;
- Policy EN10: Historic Environment: Designated Heritage Assets;
- Policy EN11: Historic Environment: Designated Heritage Assets - Conservation Areas;
- Policy EN12: Non-Designated Heritage Assets;
- Policy EN14: Managing Flood Risk;
- Policy INF2: Social and Community Infrastructure;
- Policy INF7: Green Infrastructure;
- Policy INF8: Water Management Infrastructure;
- Policy SP5: Cotswold Water Park Post Mineral Extraction After Use.

3.8. The most important CDLP policy specifically on Fairford is S5 (see below). S5 has allocated two sites – at Milton Farm and Faulkners Close – for a total of 61 homes (net), as well as protecting the town's key employment sites and setting out a series of local infrastructure projects. It also requires that development schemes contribute to the delivery of infrastructure projects across the South Cotswolds Sub-Area set out in its Policy SA1. Those projects contain only one specifically in Fairford - improvements to the junction of the A417 and Whelford Road. However, this does not preclude other projects being funded by either Section 106 contributions (S106) or Community Infrastructure Levy (CIL) in the future.

Policy S5

**FAIRFORD**

**Allocated housing development sites:**

- F_35B Land behind Milton Farm and Bettertons Close (49 dwellings net)
- F_44 Land to rear of Faulkner Close, Horcott (12 dwellings net)

**Established employment sites:**

- Horcott Industrial Estate (EES26)
- London Road (EES27)
- Whelford Lane Industrial Estate (EES28)
- New Chapel Electronics (EES29)

**The following non-strategic (local) infrastructure projects are proposed:**

a. The route for the multi-use path from Fairford to Lechlade along the line of the former railway will be safeguarded;

b. Improvements to the provision of footpath and cycle links between Fairford and the riverside, the Cotswold Water Park and canal route;

c. The provision of suitable land for allotments; and

d. The provision of suitable land for a burial ground.

*Figure 8 Local Plan Policy S5*

3.9. FTC has been working with the CDC so that the proposals of the FNP are acceptable. This demonstrates a collaborative approach to plan making for the town. New hydrological evidence, and changes to the Water Park SSSI boundary, indicate that site F44, Land to the rear of Faulkner's Close, is unlikely to be developable. It should be noted that the previously allocated site F35B (Milton Farm) has now been withdrawn. An alternative site is proposed; the revised Leafield/Hatherop Road site, (Southern part of F51B).

3.10. Other material considerations for the FNP include:

- Designated Ministry of Defence (MoD) aircraft safeguarding areas for both RAF Fairford and RAF Brize Norton, and USAF future plans.
- Thames Water have worked with FTC to resolve several drainage issues and set out plans for further intervention in their "Fairford Drainage Strategy v3" (Thames Water, 2018).

# 4 COMMUNITY VIEWS

4.1. The Fairford Neighbourhood Plan (FNP) is based upon the results of wide consultation with the local community. This process has included leaflets, meetings, workshops, questionnaires, discussions and public consultation drop-in days, and there have been invitations throughout to participate and to make comments.

## BACKGROUND

4.2. There have been three previous consultations resulting in the comprehensive Fairford Health Check (2005), Fairford Horizon 2011-16 (2011) and Fairford Community Plan (2014).

4.3. The first stage of the FNP project was to identify the issues - all known community organisations were consulted, and a letter was delivered to every household in Fairford raising awareness of the FNP and its purpose and inviting their participation. A website[3] was set up, aiming to attract, inform and invoke response, and an email address and mobile phone number were provided for contact. Four Working groups were then set up – Housing; Infrastructure and Environment (including Heritage); Business and Employment, and Community Services and Facilities. There was a general invitation for anyone interested to join any of the groups. An independent Transport Appraisal report (Helix Transport Consultants, February 2016) and a Town Centre report and workshop were commissioned (Place Studio, December 2015). Evidence gathering and research into existing conditions continued and there was a display about the aims and activities of the steering group at the Fairford Festival. The website was continued after the initial FNP was rejected, with explanation and information about the review and steps being taken to produce a successful revised FNP.

4.4. In the second stage - a six-page questionnaire (31 questions) was prepared, with help from Gloucestershire Rural Community Council (GRCC), and this was delivered to every household within the parish boundary. It was also put onto the website and people encouraged to reply online. The response was very good - 645 in total, including around 60 online (just over 40% of households). After discussions with business and tradespeople a separate business questionnaire was produced and businesses, tradespeople and retailers invited to participate. Thames Water held a drop-in day to get feedback on sewage flooding problems and at the event there was a display about the Neighbourhood Plan's proposals with hand-out leaflets. GRCC also carried out community facility audits and an assessment of future infrastructure needs. GRCC collated the responses of the questionnaire using specialist software. This identified key themes regarding needs and concerns. With these in mind, and after discussions with planning professionals, landowners, developers, local organisations, health professionals, schools, neighbouring Town and Parish Councils, Cotswold District Council (CDC) and Gloucestershire County Council (GCC), and having

[3] www.fairfordneighbourhoodplan.org.uk

considered previous publications, the various sites were considered and plans and options drawn up.

4.5. In the third stage - wide publicity was given to two public consultation days held on Sunday 18th and Thursday 22nd September 2016. People were invited to come and see the proposals and give their opinion. Maps and plans were displayed, and options presented. Members of the team were present to explain and answer questions. The attendance was good - 330 visitors over the two days and nearly 90 comment sheets completed.

4.6. After CDC decided in October 2017 on the advice of the Examiner, that the submitted plan should not proceed to referendum, there was a delay for further evidence gathering and revision of the Plan. Fairford Town Council (FTC) was awarded technical support from an independent company, AECOM, through the Neighbourhood Planning program, to undertake an independent and objective assessment of the sites available for housing for possible inclusion in the FNP. For the current FNP, a further public consultation day was held on 14th March 2019.

4.7. The key findings from the 2016 public consultation were as follows:

- **Strengths of the Town** - Community spirit, attractive historic market town, rural feel and access to countryside, green spaces, river and lakeside areas.
- **Problems** - River, surface water and sewer flooding. Traffic congestion and HGV's on A417 and in town centre. Dangerous road junctions. Parking, especially in Market Place, London Road and at Hilary Cottage Doctor's Surgery. Town has grown too quickly, and infrastructure has not kept up causing pressure on public services e.g. schools and surgery. Poor public transport with bus services decreasing. Lack of facilities for young people. Loss of shops.
- **Concerns** - Keeping Fairford green, protecting the heritage, improving infrastructure especially sewage system. Reserving areas with high groundwater for water storage. Protection from inappropriate development proposals.
- **Support** - for FNP policy recommending future new housing developments to be built off Leafield Road. Facilities to encourage new employment/businesses. Improvements to the town centre, to walks and Public Rights of Way. Provision of safe routes to school.

4.8. Some of these issues have been addressed in the intervening period. The Primary school has been extended, and some safer pathways to school have been provided. Thames Water has carried out investigations and some improvements to the sewage network and is preparing a comprehensive Drainage Strategy for Fairford.

4.9. During 2018, CDC adopted a new Local Plan (2011 to 2031), and this allocates two sites, F35B (47 houses) and F44 (12 houses) for development in Fairford. It indicates (par.7.8.8) that because of pressure on infrastructure in Fairford, any large development should be towards the latter part of the plan period.

4.10. FTC commissioned a comprehensive study (WRA, 2018) on the hydrology and geology of the area, including groundwater levels. This reported in November 2018 and the results have informed subsequent work.

4.11. More than 100 people attended the drop-in public consultation day on 14th March 2019. There were displays on local green spaces, the Hydrology report, and the five main themes which had been identified, these were:

- Natural and Historic Environment;
- Climate Change, Spatial Strategy and Water Management Infrastructure;
- Housing Provision and Mix;
- Community and Business Infrastructure; and
- Local Economy and Town Centre

There was also a display of the seven sites which AECOM had selected as potentially suitable for development, with pros and cons. People were asked 'would you support housing at this site?' and invited to indicate, with stickers, whether the answer was Yes, No, or Maybe.

Members of the steering group were available to answer questions, and forms were provided for comments.

The comments from the public consultations were very supportive of the proposals presented, particularly the protection of local green spaces. The site survey showed a strong preference for the Leafield/Hatherop Road site. This site had 25 more Yes than No answers, the only site with a net positive response. Full results are available from FTC.

# 5 VISION AND OBJECTIVES

## VISION STATEMENT

By 2031 the vision is that …

*Fairford has built upon its status as an attractive and historic Cotswold market town, retaining the old and incorporating the new to be a vibrant, thriving community that successfully serves the wider rural area.*

*Well considered planning has ensured that Fairford has only grown and developed at a level that renewed and improved infrastructure is able to support. The features of Fairford that define much of its character and attraction* – with parkland and green spaces interwoven into the town and the mix of buildings from six centuries– *have been preserved and enhanced.*

*A range of regular local events, and the promotion of Fairford's location as a base from which to explore the South Cotswolds, has encouraged visitors. Despite increasing visits, improved transport provision allows easy access to an attractive town centre with space for events, community groups and recreation. Increased attendance at events and activities has helped to support local businesses and the rural economy.*

*Fairford has proactively engaged with the climate change agenda to provide low carbon housing and increase the use of low (and no) carbon forms of transport. While provision has been improved for all forms of transport, targeted improvements to facilities, signage and navigation aids has reduced barriers for pedestrians, cyclists and those with limited mobility. Planning policy has been used to good effect to reduce vehicle usage and mitigate its effects in high-traffic areas of the town, and the link road to the east has reduced traffic in the town centre.*

*The local environment is key to the attractiveness of Fairford. Policies to improve provision for wildlife and to improve the ecosystem have been beneficial for people and the environment. Investing in green infrastructure has led to greater abundance and diversity of wildlife while supporting the mental and physical health of the local population.*

*Fairford has worked hard to ensure that the local economy remains vibrant. Local planning policy has ensured that residential development has not crowded out business and that space remains for a mixed local economy including light industrial, retail and service businesses.*

*The demographic challenges faced by our rural area have been met by development appropriate to the needs of residents-alongside housing, schooling and transport improvements, which encourage new families to live, work and study in Fairford.*

*Fairford truly is "A Good Place to Be"*

## ISSUES HIGHLIGHTED

5.1. The vision reflects how we expect the key issues in the future life of Fairford to be resolved for our shared benefit. The population of Fairford has increased by around a third since 2012, which has put a strain on all aspects of local infrastructure including the mains water and sewage systems, schools and health services. The location of Fairford at the lower end of the River Coln valley with high ground water levels for significant periods of time, calls for careful consideration when placing development within the town to avoid drainage problems.

5.2. Traffic has increased because of the rise in population in the town and other nearby settlements, as has congestion, particularly on the very constrained A417 through the town centre. This inhibits walking/cycling to schools etc. as well as impacting the local environment including damage to the soft limestone of listed buildings. However, the Special Landscape Area, river, lakes and Air Base impose constraints which have prevented a bypass route being found.

5.3. The historical setting of Fairford, with lakes, parkland, green corridors and green spaces interwoven into the town, and the mix of buildings from six centuries including the High Street frontage, are distinctive features of Fairford which are greatly valued by both residents and visitors, therefore having significant economic value, which would be lost if they are harmed by inappropriate development.

5.4. It is currently not clear what impact the plans for an expanded role for the Air Base will have on Fairford and its services. Many more servicemen and their families may need to be accommodated on the Base and in the wider locality. This would add to traffic and congestion but provide additional employment and boost the local economy.

5.5. Fairford has a population age profile that is relatively elderly but differs from the Cotswold average in that there are more teenagers but fewer people in their 20s and 30s (GCC, 2019; GRCC, September 2018). There is also a long-standing shortage of affordable housing for local young people; unfortunately, the recent tranche of development has not ensured an on-going supply for this purpose.

5.6. Fairford has increased in size but the low ratio of local employment to housing means that this growth has had relatively little benefit for the sustainability of the small-town centre, which is struggling to maintain 'critical mass', because out-commuters tend to shop elsewhere. Maintenance/enhancement of the attractiveness of the town centre, including shops and services, are important to encourage greater use by current residents and visitors and help it remain sustainable.

## OBJECTIVES

5.7. To achieve this shared vision, the FNP needs to focus on a small number of key objectives.

## [1] NATURAL AND HISTORIC ENVIRONMENT

a. Ensure that any further housing development respects the character of the town and its rural setting.

b. Bring local infrastructure up to an appropriate level to meet the needs of the expanded town.

c. Ensure development and drainage designs protect environmental sites and groundwater sources (in accordance with Local Plan policies), including that they do not add to the amount of foul material entering the River Coln under 'storm' conditions.

d. Ensure new development helps to maintain/enhance amenity and access.

e. Protect wildlife and enhance local biodiversity.

f. Maintain Horcott's historic identity as a separate settlement.

## [2] CLIMATE CHANGE

a. Consider flooding issues at the site selection stage.

b. Avoid locating new housing in areas prone to flooding (all types[4]) or where it may increase risk of flooding to others.

c. Ensure that drainage designs for new housing developments are based on sound data and analysis, including wet season groundwater levels.

d. Ensure that new residential developments meet low carbon requirements, and that charging points for electric vehicles are provided.

## [3] HOUSING PROVISION AND MIX

a. Ensure that new residential developments provide the right housing mix for the existing and projected future demographic profile in Fairford.

b. Ensure that development is phased to meet local infrastructure constraints.

## [4] COMMUNITY AND BUSINESS INFRASTRUCTURE

a. Protect and support updating of existing facilities and development of appropriate new ones to cater locally for employment, sport, recreation, and social needs.

b. To provide a sports/community building and associated ancillary facilities on the Coln House Playing Field (LGS) to support the use of the field for outdoor sporting and recreational purposes.

## [5] LOCAL ECONOMY AND TOWN CENTRE

a. Address imbalance between housing and local employment

b. Facilitate good quality employment developments

[4] flooding can arise from several sources, namely fluvial (river), groundwater, surface water (highways) and from foul sewers

c. Promote appropriate mix of retail, service, community and tourism facilities to encourage business and increase footfall

d. Make Fairford Town Centre an attractive and convenient place to visit and shop

e. Identify suitable locations for new visitor accommodation (or conversions)

# 6 LAND USE POLICIES

## INTRODUCTION

6.1. This section sets out the land use policies that are intended to collectively achieve the vision and objectives set out in §5. Land use policies are used to determine planning applications made for development proposals. They can establish the principles for retaining or changing the use of land in settlements and in the countryside. They can also set out the conditions against which development proposals will be judged, in terms of, for example, their design or access.

6.2. The purpose of these policies is to encourage planning applications to be made for potential development that reflect the vision. The policies have been clearly written so that they can be easily interpreted and applied in the consideration and determination of planning applications.

6.3. The Fairford Neighbourhood Plan (FNP) deliberately avoids repeating existing national or local planning policies. The proposed policies therefore focus on a relatively small number of key land-use development issues in the town. For all other planning matters, the national and local policies of other planning documents, the NPPF and CDLP policies will continue to be used.

*6.4. (Paragraph deleted in v1.1.2 but number kept as to preserve paragraph numbers following during final edits).*

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# FNP1 THE FAIRFORD AND HORCOTT DEVELOPMENT BOUNDARIES

FNP1.1. The Neighbourhood Plan redefines the Development Boundaries at Fairford and Horcott, as shown on the Policies Map (Plan B, Appendix 1: Maps). Within the Development Boundaries applications for development will be permissible in principle. New-build open market housing will not be permitted outside the Development Boundaries unless it is in accordance with other policies that expressly deal with residential development in such a location.

6.5. This policy redefines the Development Boundaries at Fairford and Horcott that have been defined by Policy DS2 of the adopted Local Plan. It does so to firstly accommodate the developable area of the proposed site allocation in Policy FNP14 and secondly to remove the housing site allocated by Policy S5 of the adopted Local Plan (Milton Farm) that CDC accepts is no longer deliverable.

6.6. The policy restates the provisions of policies DS2 and DS4 of the adopted Local Plan in relation to the principles of development inside and outside the Boundaries. This will enable the policy to continue to operate with the full weight of the development plan in decision making in the event that the weight of the Local Plan policies is compromised by housing supply and/or delivery factors at the District level, but the provisions of NPPF §14 apply.

6.7. The policy will have the effect of focusing future housing and economic development on the existing urban area, where there will continue to be opportunities for redevelopment over the plan period. The policy does not rule out development outside the two settlements, but they do seek to confine proposals that are either necessary or especially suited to a countryside location. Other policies of the Neighbourhood Plan make provision for growing the town in the right place and at the right time, so the mistakes of the past in terms of lagging infrastructure investment should not repeated. This policy defines the development boundaries at Fairford and Horcott, to enable the application of the relevant settlement and countryside policies of the Local Plan in this area (notably policies DS1 and DS2 of the Cotswold District Local Plan (CDLP)).

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# FNP2 PROVIDING A NEW BURIAL GROUND

FNP2.1. Proposals for a new burial ground will be supported, provided:

a) ancillary buildings and structures are kept to a minimum for the operations of the use and are designed to minimise their effects on the landscape;

b) they provide sufficient off-street car parking spaces where this is necessary to manage the impact on the local highway network; and

c) The location is appropriate in terms of ground condition and flood risk

6.8. This policy encourages proposals to come forward to increase the capacity of local burial facilities. The existing burial ground has limited remaining capacity; the need for a new burial ground has been recognised for some time and is supported by both the Fairford Community Plan and the CDC Local Plan. No suitable sites have been made available during the plan preparation process. However, the FNP provides a positive and supportive policy over the plan period.

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# FNP3 MAINTAINING VIABLE COMMUNITY FACILITIES

FNP3.1. The Neighbourhood Plan identifies the following land and buildings as community facilities for the purpose of applying Local Plan policies in relation to their protection and improvement:

a) Fairford Community Centre

b) Palmer Hall

c) Fairford Library

d) The Fairford Town Football Club ground and adjacent practice playing field

e) Fairford Bowling Club

f) Fairford Cricket Club Ground

g) The Fairford Junior Rugby Club pitches

h) The Fairford Rugby Club pitches (at Coln House School)

i) Fairford Youth Football Club pitches

j) Fairford Tennis Club

k) Farmor's Sports Centre

l) Riverside Garden

6.9. This policy acknowledges the invaluable role that the existing community facilities in the town play in community life. Policy INF2 of the Local Plan contains the necessary policy provisions to protect them from unnecessary loss or from proposals that will undermine their function and to encourage proposals that will enable them to remain viable, modern facilities to meet changing community needs. Policy FNP3 simply makes clear to which facilities in the town that Policy INF2 will apply and the value of each is summarised below. A map of the facilities can be seen in Appendix 1: Maps (MAP D: Community Facilities).

## FAIRFORD COMMUNITY CENTRE

6.10. As part owners of Fairford Community Centre, with St. Mary's Church, the Town Council has a responsibility for maintaining the fabric of the building and wishes to ensure its long-term success for community activities. Part of the building serves as Council and Parish offices, and part provides Village Hall facilities. Fairford Community Centre Ltd., a registered charity, manages the lettable space in the building for community activities with special regard to the needs of the young, the elderly, the disadvantaged and the disabled. A Management Committee has been appointed to supervise maintenance of the fabric of the building and allocate costs between users and includes Town Council and Church representatives. However, the building is Grade 2 listed and it is important that the Council remains prepared for exceptional maintenance costs.

## PALMER HALL

6.11. Fairford has a second community hall, the Palmer Hall, which includes a small stage for theatrical productions, and is run by a committee. It is an old building and requires regular upkeep and improvement. Fairford Town Council, as Custodian Trustees, has contributed to the recent refurbishment of the Palmer Hall, and will continue to provide grants for appropriate projects

## FAIRFORD LIBRARY

6.12. This has a well-stocked library containing physical and audio, books and study space. Free public computers are available with internet access and computer buddies to help people who may need assistance. The library provides free public Wi Fi and houses a Library Growth Hub giving digital access to information to support businesses and entrepreneurs. The library provides a good range of activities, e.g., Story Time, Baby Bounce and Rhyme, Bookstart, Home Library Service and Library Club.

## COMMUNITY SPORTS FACILITIES

6.13. Fairford is well served by community sports facilities, all of which play an integral part in retaining the viability of the town as an attractive place to live and work.

6.14. Fairford Town Football Club: The club consists of a clubhouse and 2 pitches off Cinder Lane to the East of Fairford town. The Clubhouse comprises: two bars (main bar and tea-bar), function hall including stage and skittle alley, home and away changing rooms, match and female officials' room, boardroom. The club provides social activities as well as football.

6.15. Bowling Club at East End. Formed in 1914 Fairford Bowling Club has a six-rink outdoor green, two rink indoor surface, licensed bar with dance floor and large indoor viewing area that can be adapted into a large dining/function hall.

6.16. Fairford Cricket Club: The site consists of a pavilion and one cricket pitch. The club was formed in 1889 and is known to be one of the oldest in the county. There are two Saturday league sides: one playing in Division Four of the Gloucestershire County Cricket League (GCCL); the other competing in Division Three of the Cotswold District Cricket Association

(CDCA) Cricket League. They also have a Friendly Xl playing on Sunday afternoons. The Cricket Club ground is also used for community activities e.g. Fairford Festival.

6.17. Fairford Rugby Club: The Fairford Rugby Club shares the clubhouse of Fairford Cricket Club. The Senior Rugby team play on the Coln House School pitches and the junior teams now have their own pitches off Leafield Road on Ernest Cook Trust land. This pitch was new in 2015.

6.18. Fairford Town Youth Football Club. The club was founded in 1976 and its purpose is to provide and promote the playing of football for young people aged between 6-18, and girls under 13 of Fairford and the surrounding towns and villages. Efforts to improve the facilities, equipment and quality of coaching are ongoing. All coaches are qualified to a minimum of FA coaching level 1, are first aid trained, qualified in the safeguarding of children and all managers and coaches have an enhanced DBS check. The club is a FA Charter Standard Development Club.

6.19. Fairford Tennis Club: The site consists of two outdoor floodlit hard tennis courts and a small wooden clubhouse. There is no onsite parking provided. The club is open to players of all ages and abilities and has around 100 members. There is a varied offer of activities including social tennis, coaching, competitive league team tennis and a summer tournament.

6.20. Farmor's Sports Centre: The school site includes a facility, formerly owned on behalf of the community, incorporating indoor sports and gym facilities. This was run as a shared use facility until the end August 2019, by a subsidiary company of the Farmor's School Academy Trust. Community use of the facility is now very limited, and the gym is no longer available for community use.

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# FNP4 MANAGING FLOOD RISK

FNP4.1. All sources of flood risk[5] must be considered at both the site selection and application stages, and the sequential test used to divert development to areas with lower probability of flooding, in accordance with NPPF guidance. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

FNP4.2. In addition to meeting national and strategic planning policy requirements, proposals for development on land identified by the Environment Agency as lying within either Flood Zone 2 or 3, or in areas of Flood Zone 1 where there is evidence of flood risk from sources other than fluvial, will require a site-specific Flood Risk Assessment (FRA), using appropriate calculations based on the highest expected groundwater levels for the area (200 year maximum), at the first application stage. Proposals will only be supported where it can be demonstrated in the Assessment that:

a) They include appropriate site-specific measures to address effectively all the identified surface and ground water issues.

b) Any residual flood risks can be managed on the site and will not increase flood risk beyond the site.

FNP4.3. Where this is not demonstrated satisfactorily permission will be refused.

FNP4.4. Land identified by the Environment Agency as lying within Flood Zone 1 but that is subject to high groundwater levels such that adequate and effective[6] SuDS drainage systems cannot be provided should be preserved as green space to provide for flood water storage/attenuation.

[5] "Flood risk" means risk from all sources of flooding - including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources, as stated in NPPF guidance.

[6] In accordance with EA and CIRIA guidance, and National Standards for sustainable drainage (DEFRA, 2015)

6.21. The natural floodplains of river valleys and minor watercourses are important features in terms of flood risk management. Future development sites should be guided away from these areas, using the Sequential Test, and should be preserved for flood water storage. Development in these areas would have detrimental effect on flood risk in the immediate vicinity and downstream, by displacing groundwater, and/or causing surface water to run-off onto neighbouring properties instead of soaking into the ground. Identifying areas suitable for water storage and safeguarding them from development, and harnessing the ability of wetlands to store water, are vital to surface water management.

6.22. Fairford, within the Cotswold Water Park (CWP), is subject to a number of particular issues with regard to flood risk:

a) Fairford lies at the lower end of the River Coln catchment and has experienced significant fluvial, surface water and sewage flooding in the past. Lower lying areas could be at risk from more extreme events in the future due to climate change.

b) There are some 'ordinary' (minor) watercourses which have sufficient catchment to give rise to flooding which is essentially 'fluvial' in character at some locations – specifically the ditch (historic 'drain') on the western side of the town, feeding into the Horcott Lakes and thence via Totterdown Lane and the Air base to the Dudgrove Brook; the ditch starting at the top end of Lovers Walk and running down Hatherop Lane and thence along London Road ultimately to join the Court Brook at the eastern end of Lakes by Yoo; and the Court Brook itself downstream of Fairford where it is subject to flooding from the River Coln.

c) The hydro-geology, which is locally variable, results in a high water table at some locations, particularly in wet seasons, and exceptionally variable confined groundwater levels, which has implications for deeper groundworks.

d) There are groundwater flows in a generally south-easterly direction under and in the vicinity of the town. Development which affects these has the potential to increase surface and/or groundwater risks in areas 'upstream' or adjacent to the site.

e) There are some areas of the town where infiltration type SuDS drainage may not be feasible to the extent that it may be impossible to avoid runoff and increased flood risk elsewhere in some wet seasons. The feasibility or otherwise of other types of SuDS in such situations needs to be considered on a site-specific basis, depending on the levels and space available.

f) The sewerage system in the town suffers from significant amounts of surface water ingress, due to unavoidable historical connections, so that the capacity of the sewerage system is exceeded on occasions and this has resulted in sewage flooding in some locations as well as pollution of the river from 'storm' discharges.

g) Fairford has experienced problems caused by increased surface water run-off during the construction phase of developments – something that has also been reported elsewhere in the district.

This is corroborated by evidence from the GCC studies, (especially the GIA (Atkins, April 2015) the CDC SFRAs (Halcrow, 2008) (JBA, 2014), as well as the WRA report (WRA, 2018).

6.23. This policy is designed to address these issues, to the extent that they are not adequately covered by CDLP policy EN14 and National policy and guidance (NPPF/PPG). The key points are:

- For all proposed developments (other than 'minor development') in the affected area as shown in the WRA report, developers must provide a site specific FRA at the first (full or outline) application stage, backed by appropriate on-site investigation of ground conditions and infiltration tests.
- For these affected areas, the design of drainage systems should take account of the ground water level found by infiltration tests, adjusted to a 200 year maximum level based on correlation with data from suitable boreholes in the vicinity for which both a concurrent measurement and long-term data is available.
- All types of flooding (including fluvial, surface water, ground water or sewage) should be taken into account. Evidence of incidence of these and the locations affected is included in the following specific sources:
    - CDC – Review and Response to the Summer 2007 Floods in Cotswold District, Second Phase Report (Hyder, July 2008)
    - Gov.uk – Long term flood risk information (for flood risk from sea or rivers or surface water)
- EA and WRA/Fairford Town Council borehole records should be consulted for information on ground water level variations in the area.
- Fairford Town Council and the relevant authorities (GCC, CDC and Thames Water) should be contacted when preparing the FRA to obtain any more specific or up-to-date information that may exist.
- In respect of all development within the Fairford Parish area, the guidance in section 6 of the CDC SFRA (JBA, 2014) should be followed, where it does not conflict with this policy and supporting guidance.
- Where a proposed development site is identified as being subject to a risk of any type of flooding and/or a drainage issue, the applicant must demonstrate by means of appropriate calculations at the initial application stage the feasibility of an effective mitigation solution that provides an acceptable risk of flooding for the development itself and avoids increasing flood risk anywhere else.
- The guidance in the Gloucestershire SUDS Design and Maintenance Guide (SDMG) (Dec 2015) should be followed for the design of SuDS and their associated management arrangements.
- Site specific FRAs and planning conditions should address potential issues that may arise temporarily during the construction phase of developments due to increased

surface water run-off, to avoid increasing flood risk from this source to areas outside the site.

6.24. Additional supporting documentation and evidence base for this policy is included in the "FNP4 Supporting Evidence" document in the evidence base.

# FNP5 INVESTING IN UTILITIES' INFRASTRUCTURE IMPROVEMENTS

FNP5.1. Planning permission will only be granted to a development intending to connect to the sewer network if the sewer network can accommodate the additional demand for sewage disposal either in its existing form or through planned improvements to the system in advance of the construction of the development, to ensure that the environment and the amenity of local residents are not adversely affected.

FNP5.2. Where a need for new or improved off-site utility infrastructure has been identified in order to support new development, any resulting proposals will only be supported where the proposed utility infrastructure will be delivered in line with an agreed phased timescale.

FNP5.3. Development proposals will be required to make either satisfactory arrangements for the direct implementation of the off-site infrastructure, and/or an agreed financial contribution towards its provision by another party within the agreed timescale.

FNP5.4. Planning permission for a development intending to connect to the sewer network must include conditions that require that new homes must not be occupied until it is demonstrated that the sewerage system has adequate capacity to accommodate the additional flow generated by the development. The condition may allow that the physical connection of new homes to the sewage treatment works may be delayed until enough homes are occupied to achieve sufficient flow through the sewerage system to avoid issues of septicity, during which time approved environmentally acceptable alternative arrangements (e.g., tankering) may be used, subject to Local Planning Authority agreement.

FNP5.5. All new development must have sufficient infrastructure to provide electric vehicle charging points to meet future demand.

6.25. By "Utilities Infrastructure" this policy means not only sewerage and water supply (as set out in INF1 and INF8 of the CDC Local Plan) but also broadband. Flood protection is covered in FNP4.

6.26. Such "planned improvements to the system" may take the form of reduced surface and ground water inflow into the sewers, increased pumping station capacity or increased sewage treatment works capacity. This plan does not stipulate which, but the effect must be to accommodate fully the additional demand.

6.27. This policy is intended to complement and strengthen Local Plan policies INF 1 and INF 8, particularly 11.8.8, 11.8.9 and 11.8.10, and ensure that developers work with Thames Water to plan for the necessary wastewater management infrastructure to accommodate growth in Fairford, taking account of the specific local circumstances. Fairford Town Council has been concerned for several years that further development would lead to overloading of existing sewerage infrastructure, since the population has increased dramatically in recent years. Ground and surface water ingress into the foul sewers adds to the problem, leading to sewage overspill in storm conditions and flooding of properties following prolonged and heavy rainfall.

## RESIDENTS' FEEDBACK

6.28. In the Neighbourhood Survey, 88% of local people were concerned about the risk of flooding and 91% of respondents were concerned about overloaded sewers. There is therefore a strong expectation that the Neighbourhood Plan will require future development proposals to ensure that adequate sewerage infrastructure is delivered ahead of development.

## LOCAL PLANNING AUTHORITY (LPA)

6.29. As LPA for Fairford, Cotswold District Council (CDC), in its Local Plan policy INF8 indicates that development should be phased to allow infrastructure improvements to be implemented in time. INF8 requires any mitigation measures to be implemented in full before occupation of the development.

6.30. This policy refines Policy INF8 of the Cotswold District Local Plan (CDLP), which requires the impact of development on the capacity of existing off-site water and wastewater infrastructure to be considered and satisfactory provision for improvement to be made where a need is identified. It is expected that infrastructure upgrades will be required to serve the planned growth in Fairford. Because of this, the CDLP indicates that it would be prudent to phase sites allocated for housing development in Fairford to the latter part of the Plan period.

6.31. INF8 (1a) states "In addition, proposals should not result in a deterioration in water quality. Where a need for improvement or a risk of deterioration in water quality is identified, the Council will require satisfactory improvement or mitigation measures to be implemented in full prior to occupation of the development." CDC should ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve new developments. Developers must demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. The Water Cycle Study carried out for the Cotswold District (JBA, 2015) predicts that the Sewage Treatment Works (STW) at Fairford will require some

infrastructure upgrade to accommodate higher flows and/or to prevent water quality deterioration. The study further concluded that Fairford STW has limited spare capacity without the need for an upgrade. Development of sites greater than 15 units is identified as likely to require local network improvements, and sites larger than 40 may require catchment improvements downstream. Further proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW.

6.32. The CDC SFRA (JBA, 2014) states that developers "must liaise with sewerage undertaker at an early stage to prevent an increase in sewer flooding".

6.33. The CDC SFRA (JBA, 2014) also states (6.5) that "Major developments and those upstream of areas where sewer flooding is known to be a problem must carry out wastewater capacity checks and should liaise with the sewerage undertaker at an early stage to prevent an increase in sewer flooding and/or spills from combined sewer overflows (CSOs) further down the wastewater system as a result of the development. The impact of an increased volume of foul water discharge on watercourses should also be considered for large sites, or where several sites are likely to be developed in the same STW catchment, particularly where the receiving STW discharges into the same watercourse as the surface water runoff from the site."

6.34. The detailed implementation of this policy will be secured through the development management system either by way of planning conditions or through planning obligations. Fairford Town Council look to Cotswold District Council, as custodians of the development management system, to ensure that planning conditions are enforced, and planning obligations are met.

## THAMES WATER (TW)

6.35. The provider, Thames Water, has acknowledged the problems of sewer and surface water flooding and is working on a drainage strategy for Fairford. Their publication "Fairford Drainage Strategy" (Thames Water, 2019)states (p8) that "Our sewers have become overloaded at times for a number of reasons, unfortunately leaving some of our customers with drainage issues such as sewer flooding, sewer blockages and restricted use of their toilets and bathrooms"

6.36. TW Fairford Drainage Strategy 2019 (p9) identifies these causes of drainage problems:

- More periods of prolonged and heavy rainfall
- Growing numbers of people, houses and businesses entering the area
- Loss of green spaces that previously provided natural drainage for rainwater as new paths, extensions and houses are built
- Blockages in the sewer network,
- Misconnected pipework that allows untreated wastewater to enter local rivers and streams
- River water and groundwater entering our sewers.

6.37. In Thames Water's current Business Plan period 2020-2025 it is delivering a sewer rehabilitation scheme to tackle the groundwater infiltration issues affecting its foul water sewer capacity. The proposed works include relining approximately 244 metres of foul sewers in Courtbrook, the Croft and West End Gardens area.

6.38. To avoid sewage flooding, the Fairford sewage treatment works operates a fully compliant permanent storm overflow system which permits discharge of highly diluted sewage into local watercourses during storm events. To meet changing performance requirements and regulatory measures the works has undergone upgrades over the years. Thames Water has stated that "the capacity of the sewage treatment works is being reviewed due to the amount of new development now proposed within the catchment. Assessments will be undertaken to understand the phasing of the proposed future development and growth, and the operational implications for the existing sewage works."

6.39. Thames water state that the scale of development in this plan is likely to require upgrades of the water supply network infrastructure. It is recommended that developers liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.

## WATER INTEGRATED WITH LOCAL DELIVERY

6.40. The Water Integrated with Local Delivery (WILD) group, a partnership project in the Cotswold Water Park working to improve the water environment, has reported (WILD, May 2016) that the water quality of the River Coln has deteriorated through 'moderate' to 'poor' in recent years. The water quality of the two SSSI lakes to the SE of Fairford is also reported as deteriorating.

6.41. This policy has been designed to address these matters and to ensure a close and effective relationship between future development in the town, CDC and the investment programmes of T.W. Developers must work with T.W. to plan for the necessary wastewater management infrastructure to accommodate growth in Fairford, to avoid unacceptable deterioration of water quality in the River Coln and quality of life for residents.

# FNP6 MANAGING TRAFFIC IN THE TOWN

FNP6.1. Proposals for a residential scheme of 10 or more homes or for a commercial scheme of more than 1,000 sq. m. gross internal area must identify and quantify in their transport assessments the effects of traffic generated by the scheme on its own, and in combination with other consented and allocated schemes, on the Fairford Conservation Area and on other heritage assets in the Town Centre. Where the potential for harm has been identified then the proposals must make provision for the necessary mitigation measures to avoid contributing to the harm caused to those assets.

FNP6.2. Transport Assessments must demonstrate that adequate electric vehicle charging points will be provided.

6.42. This policy is intended to draw specific attention to the increasing levels of traffic passing through the town centre, both from the growth of the town itself and from development either side of the town. The A417 is especially narrow as it passes through the town centre and, aside from the Conservation Area, there are many historic buildings, the fabric of which may be undermined by any further, significant traffic using the road.

6.43. Due to their relatively soft limestone constructions historic buildings in the town experience damage due to vibrations and pollution effects from passing heavy vehicles.

6.44. Historic buildings in the town have also experienced damage from collisions with large vehicles using the main road through the town, notably at the narrow section at the bottom of the Market Place. Ensuring that collision risks are not increased is important for the preservation of those historic buildings that are adjacent to key traffic intersections.

6.45. Government strategy intends for the abolition of fossil fuel powered vehicles (The Road to Zero) (HMG, 2018) by 2040 at the latest and is currently consulting on the bringing forward of that target to 2035 or even earlier. The major migration away from fossil fuelled vehicles will therefore be well underway during the period of this plan.

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# FNP7 IMPROVING ACCESS TO VISITOR ATTRACTIONS

FNP7.1. Proposals within the Plan area to improve pedestrian and cycle access between Fairford and attractions within the Cotswold Water Park, Lechlade, the Thames and Severn Canal route and the Thames Path will be supported.

6.46. This policy encourages proposals to improve pedestrian and cycle access from the town to nearby visitor attractions. There are opportunities to develop the old railway line between Fairford and Lechlade (north of the A417) as a walking and cycle path and to upgrade existing walks and the introduction of new walks between Fairford, Cotswold Water Park lakes, Lechlade (southern route – south of the A417 through the Water Park) and surrounding villages. Fairford is a Walkers-are-Welcome town and maps and routes are available online and in leaflets. It is also possible to extend and create new walks to link Fairford with the Thames and Severn Canal route and the Thames Path near Lechlade.

6.47. Fairford has an existing number of walks by the river and lakes and into the surrounding countryside. There is an ongoing programme of rehabilitation and improvement with better signage, and the 'Access to the Countryside' scheme has provided a wheelchair-accessible riverside walk especially for disabled users and for visitors. The development of the old railway line as a foot/cycle path will also create an Eastern link with Lechlade, the Thames and the marina for use by locals, schoolchildren and visitors. This is included in the Cotswold District Local Plan.

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# FNP8 PROTECTING LOCAL GREEN SPACES

FNP8.1. The Neighbourhood Plan designates the following land as Local Green Spaces, as shown on the Policies Map:

c) The Walnut Tree Field;

d) Upper Green;

e) Coln House Playing Field.

FNP8.2. Development proposals that lie within a Local Green Space will only be permitted in very special circumstances

6.48. This policy proposes three important green spaces in and on the edge of the town are designated as Local Green Spaces in accordance with §101 and §102 of the NPPF. In each case, the green spaces play an integral part in the enjoyment of the town and are therefore special to the local community. A full description of each site, and the justification for its designation, is provided in the Landscape & Local Green Space Study in the Evidence Base. The NPPF requires that the Green Belt equivalent national policy provisions will apply to any proposals, whereby 'very special circumstances' must be demonstrated by development proposals unless there are exempted by NPPF §149 or §150.

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# FNP9 PROTECTING THE FAIRFORD-HORCOTT LOCAL GAP

FNP9.1. The Neighbourhood Plan defines the Fairford to Horcott Local Gap on the Policies Map.

FNP9.2. Development proposals within the Local Gap will only be supported if they do not harm, individually or cumulatively, its open character.

6.49. This policy identifies the open land between the main settlement of Fairford and its smaller neighbour, Horcott, as a local gap preventing the visual coalescence of the two distinct components (Fairford and Horcott). The defined land is considered to be essential to the integrity of the gap and, although much of it also lies within Flood Zone 2, proposals that may otherwise be acceptable outside a Development Boundary defined in Policy FNP1 will not be supported if they do not maintain its open character. A full justification is provided in the Landscape & Local Green Space Study (Section 3) and in the Character and Design Assessment (p.1.2.18 and Section 6) both in the evidence base.

6.50. The Fairford-Horcott Local Gap includes Old Piggery Paddock; two fields south of Old Piggery Paddock; the Mere fields of Carters Ground and The Short Piece; Coln House School Playing Field (also proposed as a distinctive Local Green Space); Fairford Youth Football Club ground; and other land on either side of the River Coln to the south and east of the town centre.

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# FNP10 RIVER COLN VALUED LANDSCAPE

FNP10.1. The FNP identifies land between the River Coln and Fieldway, as shown on the Policies Map, as a valued landscape.

FNP10.2. Development proposals in the River Coln Valued Landscape, that may otherwise be suited to a countryside location, will only be supported if they will maintain the essential open character of the land.

6.51. This policy defines an area of land around the River Coln and eastern edges of Fairford as a 'valued landscape' that is out of the ordinary in local landscape terms by way of its open, riparian character and the purpose this serves in helping define the significance of the Conservation Area and the setting of the ancient 'Fieldway' when viewed from the south east.

6.52. The policy aims to manage development proposals that are appropriate to the countryside but risk undermining the special character of the landscape. The network of rights of way in this area demonstrates its recreational value to residents and visitors and the on-going work carried out by volunteers aims to improve the wildlife value of the land and thus its value as a wildlife corridor.

6.53. This is a local designation and complements the growth strategy provided for by other policies of the Neighbourhood Plan and other policy designations. A full description of the land, and the justification for its designation, is provided in the Landscape & Local Green Space Study in the Evidence Base.

6.54. The designation complements the proposed Local Gap to its west and together they are intended to maintain the special landscape character and visual integrity of the land to the south of the town.

6.55. These 2 policy designations (FNP9 and FNP10) are intended to link up to create an effective insect and wildlife corridor/haven along the River Coln at Fairford. This constraint will not prevent the longer-term growth of the town, as explained in Policy FNP1.

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# FNP11 VALUING HEDGEROWS AND TREES

FNP11.1. Development proposals that require the removal of trees should make provision for their replacement with trees of (wherever possible) native species within the site boundary. Where appropriate each tree removed should be replaced with at least two new trees.

FNP11.2. Development proposals that require the removal of all or part of a hedgerow should make provision in the landscape scheme:

a) either for its replacement within the site of hedgerow of a similar length, height and form, and of similar or greater density of native species to match existing or nearby hedging;

b) or to deliver biodiversity value of the equivalent to that lost with additional hedgerow or other shrub or tree planting elsewhere within the site;

c) or to deliver a replacement boundary treatment of a different type which is more appropriate to the site and its surroundings and which respects and complements the wider development proposal.

FNP11.3. Proposals for new planting should link, where appropriate, existing landscape features such as patches of woodland to watercourses or ponds. Hedgerows should be integrated into the development boundary features or be part of the open space provision to ensure their long-term management and retention.

6.56. This policy provides some detailed design guidance for managing the effects of development proposals on the trees and hedgerows of the Parish in support of the CDLP Policy EN7. Where practical, there will be an expectation that any tree lost will be replaced by two new trees. The size of the replacement trees should be based on the nature of the site and the ability of the new stock to become established and grow in a way which will ensure the effectiveness of the policy and which accords with CDLP Policy EN2 10.2.08: to provide a 'sense of transition between the open countryside and an existing settlement's historic core and character'. It is proposed that replanted trees and hedgerows should include significant numbers of blossom trees and plants in order to address the national crisis in pollinator numbers.

6.57. Over the past few decades, the landscape, watercourses, and biodiversity of this countryside has suffered serious damage through disease, development, neglect, and simple carelessness. This policy aims not only to maintain the status quo but to enhance the value of the landscape. The value of trees as a carbon sink is recognised in the minimum replacement ratio of 2:1. It should be noted that this complements the aims of the Cotswolds Conservation Board (Cotswold and Vale Ash Dieback Forum) and is in accord with moves to increase tree planting elsewhere (North Lincolnshire is proposing a 20:1 replacement ratio). In recent months ash dieback has arrived in Fairford and felling has begun. Re-planting the tree cover has suddenly become significantly more urgent.

6.58. Fairford is unusual in that most of the green planting throughout the town is within the curtilage of private properties, with Cotswold stone walls being the boundary of choice. The effort to plant trees in public places is longstanding and on-going but is limited by highways issues. Thus, new planting and renovation of hedgerows wherever possible is particularly valuable but not only as a means of enhancing existing landscapes. Hedgerows can also prevent soil erosion, capture pollutants such as fertilisers and pesticides running off fields, store carbon to help combat climate change, and provide homes for predators of many pest species. They also provide vital links across the countryside for wildlife, helping it to move about freely and keeping populations healthy.

6.59. The character of a place is found in the distinctive qualities of its landscape, cultures and built environment. A key environment issue in the Fairford Healthcheck (FTC, 2005) (EN3 p.61) was to 'keep Fairford green'. The recent rapid expansion along the A417 has meant that the remaining green spaces which are so characteristic of the town, have come under particularly severe pressure.

6.60. Any tree planting/replanting should be of trees labelled UKSG (UK Sourced and Grown Assurance Scheme)

6.61. Fairford has been identified by Buglife[7] as being on a "B-Line" route for pollinators running through the Cotswolds West to East and along the Coln river valley. This emphasises the importance of the area for insect populations and raises the importance of appropriate planting and management of species to support wildlife. The Buglife work builds upon The National Pollinator Strategy (DEFRA, November 2014).

[7] https://www.buglife.org.uk/our-work/b-lines/

# FNP12 ACHIEVING HIGH STANDARDS OF DESIGN

FNP12.1. Proposals for new development, including extensions to existing buildings, should be of the highest design standards, in accordance with the Cotswold Design Code and should have regard to the guidance of the Fairford Character & Design Assessment and to the following key design principles:

a) There are key views listed in Appendix 3 which should not be obstructed, nor should their contribution to defining the character of the town and its relationship with the surrounding landscape be harmed

b) More generally, development layouts and building orientation should not obstruct the occasional glimpse views of the surrounding landscape from within the town

c) Short runs of low-level buildings in groups (1, 1.5 or 2 storey) should be placed at the edges of any development with higher (max. 2.5 storey) buildings kept to the centre for developments outside the town centre boundary

d) The Cotswold stone of Fairford is the light, white/cream-coloured stone (not the yellow stone of the northern Cotswolds) with a light-coloured pointing. These are dominant and defining characteristics of the town and should therefore be the default material unless the nature and location of the proposal allow for the use of non-vernacular materials

e) All solid fencing/walling should contain a 13cm square hole to enable the passage of hedgehogs and small mammals. If the barrier is particularly long e.g. in a boundary wall, then several holes should be included at regular intervals (ideally every 5m, with attention paid to

the needs of small animals as recommended in www.hedgehogstreet.org/development

*Figure 10: Hedgehog friendly commercial fencing panel*

*Figure 9Figure 9: Hedgehog access in Cotswold Stone wall*

f) Frontages and boundaries, where they are to be defined, should be demarcated with Cotswold stone walls, iron railings or hedging with practical maintenance arrangements in place if a hedge is to be planted

g) Close-board timber fences should not be used to define boundaries to the frontage/roadside of new buildings

h) Bin storage should be incorporated into new housing and commercial proposals in a manner which is sympathetic and does not detract from their character and appearance.

i) Where 1960s imitation or reconstituted stone is to be replaced/covered, use natural and/or heritage materials, including rough cast render, rather than reproduction.

j) Provision should be made for thoroughfares for pedestrians and cyclists providing quick and safe access to main arterial routes (alleyways and through routes are a typical feature of the town). Where linking alleyways are incorporated into new design they should be at least 2m wide.

k) Development layouts formed of cul-de-sacs and crescents are not typical of old Fairford.

l) Overhead services generally detract from the special character and appearance of the street scene and landscape and the opportunity should be taken as part of suitable development proposals to re-site them underground as part of that scheme.

FNP12.2. Development should also take account of any Fairford Design Code and/or any Fairford Conservation Area Appraisal and Management Plan.

6.62. This policy complements the design policies of the CDLP (Policy EN2) and the application of the Cotswold Design Code (Appendix D of the CDLP) by requiring proposals to have regard to the Fairford Character and Design Assessment, prepared to evidence the FNP, and by identifying a number of specific characteristics and features of Fairford and Horcott. It has been formulated to have regard to the NPPF's approach to design whilst providing distinctiveness to the Plan area.

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# FNP13 CONSERVING NON-DESIGNATED HERITAGE ASSETS

FNP13.1. The FNP identifies the buildings and structures, as listed in Appendix 2: List of Non-Designated Heritage Assets and shown on the Policies Map, as Local Heritage Assets by way of their local architectural or historic interest. Proposals that will result in harm to, or unnecessary loss of, a Local Heritage Asset will be resisted, unless it can be demonstrated that there is a public benefit that outweighs the harm or loss.

FNP13.2. Non-householder development on previously undeveloped land must allow for the evaluation of archaeological remains and the protection or investigation of other non-designated heritage assets of archaeological importance that may not be listed in Appendix 2: List of Non-Designated Heritage Assets.

6.63. This policy identifies several buildings, structures and other features that have local, social, historical and/or architectural interest in order that their significance is understood and taken into account in development proposals. They are therefore specifically regarded as 'non-designated heritage assets' in respect of para. 197 of the NPPF.

6.64. CDLP Policy EN12 provides the basis on which proposals will be judged in seeking to avoid unnecessary loss of, or damage to, its local heritage value. Each asset has been assessed against the criteria provided in that policy for buildings, structures and historic parks and gardens as set out in the Evidence Base (FNP13 Conserving Non-Designated Heritage Assets). This document includes photographs and maps showing the location of each of the assets.

6.65. In addition, as mentioned in the 'Brief History of Fairford,' Section 2.16-2.23, there is abundant evidence of prehistoric, Roman, Saxon and medieval settlement within and around the town. The policy therefore draws specific attention to the likelihood of below ground archaeological remains so that development proposals make the necessary provision for investigations.

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# FNP14 A NEW LOW CARBON COMMUNITY IN FAIRFORD

FNP14.1. The Neighbourhood Plan allocates land between Leafield Road and Hatherop Road (north of John Tame Close and St. Mary's Drive, as shown on the Policies Map) for a low, or zero, carbon residential development.

FNP14.2. Proposals for housing development of around 80 homes will be supported, subject to delivery of a comprehensive proposal satisfying the following criteria:

a) Development is not commenced until the necessary upgrade and improvements to the local utilities infrastructure are as provided for by Policy FNP5 Investing in Utilities' Infrastructure Improvements;

b) Development conforms with the requirements of FNP15 to deliver appropriate housing type and mix;

c) Development conforms with the requirements of FNP16 to deliver sustainable housing;

d) The layout and landscape scheme incorporate appropriate measures, including tree planting, to mitigate the visual effects of the development on the countryside to the west, north and east of the site, with provision for this to be maintained in perpetuity;

e) Development satisfies, as a minimum, the standards required for the "Building with Nature[8] – Design" level. Developments that meet the higher levels ("Good", "Excellent") of the standard would be strongly supported.

f) The design and landscaping have regard for the setting of the Fairford Conservation Area;

[8] https://www.buildingwithnature.org.uk/how-it-works

g) Provision is made in the layout for the future provision of a link road giving access between the schools and the A417 to the east of the town;

h) A dropping-off point away from the school is provided, with a safe walking route to the schools;

i) The scheme provides one or more areas of publicly accessible open space, including a children's play area (Local Equipment Area for Play "LEAP") and a community garden or allotments;

j) Provision is made for the delivery of self or custom build plots in line with CDLP policy H1;

k) The scheme keeps housing away from areas prone to surface or ground water flooding and incorporates measures to contain and attenuate surface water either in low lying areas within the site boundary or on other land within the control of the landowner in accordance with FNP4; and

l) Provision is to be made for affordable housing in accordance with CDLP policy H2.

FNP14.3. The development of this site will be required to mitigate its impact on the Special Area of Conservation (SAC) at North Meadow near Cricklade.

6.66. This policy proposes developable land between Leafield Road and Hatherop Road for a housing scheme to meet a share of the district's housing needs once essential utilities works have been completed in the local area.

6.67. This policy proposes that the new development should only be delivered using low and zero carbon housing in order that local policy may begin the practical steps needed to implement the climate emergencies declared by the planning authorities (CDC, GCC) in the locality.

6.68. This policy proposes that the new development should meet with the FNP15 requirement to deliver homes to the "Lifetime Homes" standard in order that people will be able to stay in their own homes for longer, reducing the need for future adaptation and providing greater choice to those who cannot achieve independent living due to lack of suitable housing. While these standards apply to residents of all ages, the demographic trend in the Cotswolds towards a much older population make the implementation of such housing in our area a higher priority.

6.69. With the expansion of the schools there has been increasing pressure on Leafield Road for parking/access and a number of junctions around the centre of the town, including those of Park Street/Leafield Road and Lower Croft/A417. The FNP's Helix Transport report (Helix Transport Consultants, February 2016) identified a number of issues associated with these junctions and associated roads (e.g. the bend at the eastern end of The Croft).

6.70. This policy makes provision for a link road to give access to the schools and Air base from the east of the town, which would relieve congestion in the historic town centre, in accordance with Gloucestershire Local Transport Plan[9] (in preparation).

6.71. At the junction of Hatherop Road with Hatherop Lane, visibility and footpath improvements may be needed to ensure safe crossing between Lovers Walk and Hatherop Lane, which is part of the route to school from other housing developments at the east end of Fairford. The precise configuration and details for all these aspects, and funding arrangements, would need to be agreed with GCC Highways as part of the master planning process.

6.72. In the interest of community cohesion and convenience for families, plus environmental considerations such as reducing car journeys, as well as taking account of the options considered for the schools' expansion, it is considered most suitable to provide for both the additional facilities and additional housing on this site.

6.73. This site is proposed as an alternative to land at Milton Farm and Betterton's Close (F_35B)., as in policy S5 of the CDLP, for the following reasons:

a. The F_35B is not being put forward by the landowner for development and is not considered to be deliverable in the lifetime of the CDLP;

b. Proximity to the schools and relatively easy and safe access to these, the town centre and community facilities, relative to sites to the south of the A417;

c. Ability to include provision of significant public open space, links to other footpaths;

d. Ability to provide a drop-off/pick-up facility away from the schools but within easy walking distance, helping to relieve traffic on Lower Croft and Leafield Road in particular;

e. Ability to include provision for a link road to the east of the town, which would improve connectivity to the East and help relieve congestion;

f. The concentration of the allocation on a single site, rather than spread over several smaller sites, makes the provision of affordable housing, self-build houses and community facilities (playgrounds, landscaping, e-charging points etc) more viable. Also if the allocation is spread over several sites, there will be a number of different constraints to overcome for the different sites.

[9] https://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/draft-ltp/

g. The NPPF requires Local Planning to steer development away from areas with higher flood risk towards areas with a lower probability of flooding. This site has enough land of low flood risk to accommodate the housing requirement;

h. The site is not in any water supply Source Protection Zone (SPZ).

6.74. The utilities works are not currently committed but awaiting decisions by Thames Water. This means that the scheme is unlikely to contribute to meeting the District's five-year supply of housing until later in the plan period. The town is at the end of a significant new building programme of around 450 homes, so the scheme is not necessary to meet local needs within the next few years, but it is expected to be delivered before the end of the plan period.

6.75. Although the land comprises green fields on the edge of the town, the land is only considered to be of medium sensitivity to development (Site Assessments Report) and it is considered a more sustainable way for the town to grow; locating new homes closer to the schools, away from sensitive landscapes and in areas of lower flood risk.

6.76. To provide a 'soft' edge to the town, the form of development would need to be relatively low density, and incorporate significant tree planting, particularly towards the north and west of the site, in order to replicate the parkland character of the Special Landscape Area to the east, with fields separated by belts of trees and over-grown hedgerows. This would help to screen the development from the wider landscape to the north (including the AONB) and the east – a landscape of which the White report (White Associates, June 2000) says "The deterioration of tree cover, hedges and walls would make this area bleak".

6.77. The WRA Hydrology Report (WRA, 2018) indicates that the southern parts of both F_51B and F_51C, as well as an area around the ditch between these, are subject to high ground water levels and surface water flooding at times. This means that housing should be kept away from these. The zone along the southern part of these sites may be particularly suitable for attenuation ponds, which would help to manage the flow into the watercourse running down adjacent to Lovers Walk and then down Hatherop Lane to the A417 and thence eastwards, also helping to mitigate existing flood risk there. Because of the risk of construction works temporarily adding to surface water run-off, it is suggested that these attenuation ponds should be completed at the start of development.

6.78. Any development of this site should take account of the Cotswold Water Park SSSI IRZ and should consult Natural England at an early stage.

6.79. Any development of this site should incentivise a shift away from petrol/diesel vehicles by ensuring that integrated electric vehicle charging points are installed.

# FNP15 HOUSING TYPE AND MIX

FNP15.1. Proposals for housing development should provide a mix of housing types that have an emphasis on two and three-bedroom houses.

FNP15.2. Proposals for new housing that go beyond the requirements of Building Regulations and implement the design criteria set out in "The Lifetime Homes Design Guide" will be supported.

FNP15.3. In residential developments all garage and off-street parking must include provision for the safe charging of electrical vehicles. Schemes including communal parking areas must include a scheme for communal charging points.

6.80. This policy is intended to guide the mix of development standards, housing types and tenures of the schemes provided for by the Neighbourhood Plan and by windfall schemes that are consistent with Policy FNP1 over the course of the plan period.

6.81. The mix of requirements will inevitably change as the economy and demographics of the town evolve. In which case, such changes will be reflected in future reviews of the Neighbourhood Plan. Although the onus is on developers to assess local needs for different types of home at the time they propose a development, this policy provides a useful guide to ensure local housing supply maintains a wide variety of stock in the town.

6.82. The analysis of 'intentions to move' in the community questionnaire suggested a net over-supply of 2, 3 and 4 bed terraced/semi-detached houses, but this might simply reflect aspirations to move to a larger house. It showed an under-supply of bungalows (particularly 3 bed) and retirement home places; also an under-supply of 3 bed detached homes (possibly up and down-movers) but an over-supply of 4 bed+ properties (potential downsizers). However, it is recognised that this records only people wishing to move within Fairford and does not represent total supply and demand.

6.83. The 2011 Census showed 1462 houses in Fairford. Of these, 182 were affordable dwellings, representing 12% of the total housing stock. By September 2015 there were 254 affordable homes representing approximately 16% of the total housing stock of 1,586 (according to CDC Housing as at 30th September 2015). In 2016, 116 households registered on Gloucestershire Homeseeker put Fairford, or one of the adjoining parishes of Lechlade, Kempsford, Quenington, Meysey Hampton and Hatherop, as their preferred location to live. However, expressing a preference does not necessarily imply that applicants have a 'local connection' to Fairford (GRCC, September 2018).

6.84. Between 2011/12 and 2017/18 a total of 400 new dwellings were built in Fairford:

| Banding | A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|
| Additional dwellings | 0 | 34 | 104 | 71 | 111 | 55 | 0 | 0 |

*Table 2: Additional dwellings build in Fairford (March 2011 – August 2018) by Council Tax Band*

6.85. By August 2018, the total housing stock in Fairford had risen to 1838 and the Council Tax Banding was:

| Banding | A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|
| Number of dwellings | 102 | 352 | 580 | 214 | 268 | 234 | 82 | 6 |

*Table 3: Total Housing stock in Fairford (August 2018)*

6.86. The percentages of dwellings overall in Fairford in the lower Council Tax bands A and B reduced considerably between Census 2011 and August 2018, as developers preferred to build larger and more expensive houses.

6.87. A conclusion of the housing stock report (GRCC, September 2018) was that affordability is an issue for people looking to buy or rent privately in Fairford, where house purchase prices and rents are higher than average in England and incomes are lower.

6.88. The total affordability ratio (the ratio between the total house price and annual earnings) for the lowest quartile (affordable) house prices in the Fairford/Lechlade area is almost double the national average (OSCI, 2017).

6.89. The Cotswold District has the highest proportion (25.2%) of people aged 65+ in Gloucestershire (GCC, 2019)[10] . That figure compares to a figure of 18% for England as a whole.

6.90. While aging populations are a national challenge, within Fairford and Cotswold District, the population is aging more rapidly than the average for England. The 65+ population in Cotswold rose by 29.5% in the 10 years between 2007 and 2017.

6.91. The Cotswold District, of which Fairford is a part, is expected to experience an increase in the over 65 population of 55.8% from 2016-2041.

6.92. Lifetime housing standards seek to address the needs of all users but have a particular role to play in ensuring that the housing we build today remains suitable for the needs of an aging population.

[10] https://www.gloucestershire.gov.uk/media/12777/equality-profile-2019-final.pdf

6.93. A detailed comparison of Building Regulations requirements versus Lifetime Homes Design Criteria are provided by Habinteg (Habinteg Housing Association, 2015)[11].

6.94. The major migration away from fossil fuelled vehicles will therefore be well underway during the period of this plan. The plan therefore ensures that provision is made for suitable electric vehicle charging infrastructure.

[11] https://www.habinteg.org.uk/reports-and-briefings/accessible-housing-standards-2015-824

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# FNP16 ZERO CARBON BUILDINGS

FNP16.1. Subject to the development being found to be acceptable when judged against other policies in the FNP, innovative approaches to the construction of low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported. Examples would include, but would not be limited to earth sheltered, rammed earth, or straw bale construction, construction to Passivhaus standards, conversion to EnerPHit standards.

FNP16.2. The sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings will be encouraged, including the retrofitting of listed buildings, buildings of solid wall or traditional construction and buildings within conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future.

FNP16.3. All new non-residential buildings should achieve the BREEAM Excellent standard.

6.95. Planning authorities in the Fairford planning area have declared Climate Emergencies. Cotswold District has a stated intention to revise its local plan to address this emergency, however that process may take several years to complete, and this policy ensures that a policy response to climate change is enacted in a timeframe consistent with an emergency.

6.96. Despite the relative affluence of the Cotswold District it still has a fuel poverty rate of approximately 10.2%[12] (2019 report from 2017 data) (UK Government, 2019). This rate is higher than in the rural districts that surround the Cotswolds. Improved energy efficiency standards significantly reduce running costs for households and reduce the likelihood of that household falling into fuel poverty.

6.97. The major migration away from fossil fuelled vehicles will therefore be well underway during the period of this plan. The plan therefore ensures that provision is made for suitable electric vehicle charging infrastructure.

6.98. Planning authorities covering the Fairford planning area have declared Climate Emergencies. Non-residential development must also respond to the need for energy efficient, low carbon development and the BREEAM standard provides a benchmark for such development.

[12] https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-2019

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# FNP17 GROWING OUR LOCAL ECONOMY

FNP17.1. Insofar as planning permission is required proposals to intensify an existing business use on the Whelford Lane Industrial Estate, as shown on the Policies Map, will be supported, provided that use lies within either Class E(g), Class B2 or Class B8 and that the proposal is accessed from the highway using the existing access to the A417 via Whelford Road. Proposals for new buildings on vacant land in the Estate for any other use falling within Class E will not be supported.

6.99. This policy complements policies EC2 and EC3 of the CDLP by supporting proposals to intensify the use of land at the Whelford Lane Industrial Estate.

6.100. With the town seeing around 450 new homes built in recent years, the local community is keen to see the number of quality local jobs increase to provide local employment opportunities as an alternative to commuting to nearby towns. The two existing industrial estates are already successful locations and can deliver new jobs by extending their site areas or intensifying their use without any significant environmental or amenity harm.

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# FNP18 SUSTAINING A SUCCESSFUL TOWN CENTRE

FNP18.1. The Neighbourhood Plan identifies the Town Centre, as shown on the Policies Map, for the purpose of applying other development plan policies relating to retail development.

FNP18.2. Insofar as planning permission is required proposals for the conversion of Class E business premises in the town centre to residential use will not be supported. The loss of main town centre uses on the ground floor within the Town Centre boundary identified on the Policies Map will only be supported if the development does not harm the vitality and viability of the Town Centre and evidence has been submitted to demonstrate that the property has been continually, actively and effectively marketed for at least 12 months and that the use is no longer of commercial interest.

FNP18.3. Proposals for conversion to residential use will be supported on the upper floors of business premises in the Town Centre, provided that the conversion would not adversely affect the viability of the premises for commercial use.

FNP18.4. Proposals to improve the Market Place to create a more attractive environment for shoppers and visitors, including expanding the pedestrian area in front of the Bull Hotel, will be supported, provided any loss of existing car parking spaces is compensated for by new spaces within or on the edge of the Town Centre.

6.101. This policy defines the town centre and frontages for the operation of development plan policies managing retail and non-retail space and development.

6.102. As a country market town Fairford needs to adapt to meet the needs of an increased population (largely on the fringes of the town), an ageing existing population with decreasing mobility, requiring the town to be more self-sufficient in provision of services, and competition from other centres including out of town retail developments. Discussions with the town's retailers and through the Plan consultation days, has identified the need for the town centre to be more attractive and pedestrian friendly, with improved parking and walking/cycling links from the new developments. This policy and policy FNP7 together are designed to achieve this goal.

6.103. In order to protect the vitality and viability of the centre it is important that marketing is effective both in terms of visibility to potential local business users and commercial terms being realistic in relation to the size of the centre.

6.104. Because several premises now only have reduced ground floor business space, they may be dependent on storage, office or other facilities to maintain their viability as a business unit. This needs to be taken into account when considering applications for change of use on upper floors.

# FNP19 NEW VISITOR ACCOMMODATION

FNP1.1. Proposals for the development of new visitor accommodation or for a change of use to such accommodation will be supported, provided they are located either within the defined Fairford Development Boundary or comprise the appropriate and sustainable reuse of a redundant agricultural building in the countryside.

6.105. Proposals for camping facilities outside the defined Fairford Development Boundary will be supported provided there are no harmful effects on landscape and wildlife.

6.106. This policy encourages proposals to create new visitor accommodation in and around the town to stimulate greater economic activity from tourism. There is currently limited provision of publicly advertised visitor accommodation.

6.107. There is a range of cottages and rooms to rent privately through online websites, but the current provision is not affordable to low income individuals and families.

6.108. Due to the lack of affordable accommodation, priority will be given to the development of new visitor accommodation that demonstrates a commitment to providing affordable short-term accommodation.

6.109. Providing more flexibility for the provision of additional visitor accommodation, particularly within the expanded Town Centre boundary, will help to increase the market for daytime and evening services in the town centre and retain visitors in the town for longer, and hence improve its vitality and viability.

6.110. Offering a range of accommodation from budget to premium, will ensure a broad mix of visitors, including walkers, cyclists and larger families. Providing child and dog-friendly accommodation will also attract a wider tourist base.

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# 7 IMPLEMENTATION AND MONITORING

Neighbourhood plans provide local communities, like Fairford, with the chance to shape the future development of their areas. Once approved at a referendum, and endorsed by the Cotswold District Council, it will become a statutory part of the development plan for the Cotswold District and its policies will carry significant weight in how planning applications are decided, alongside other policies that apply across the District. The plan will direct future development at Fairford to meet the changing needs of the community over the next fifteen or so years. It indicates where and when that development should take place and what additional infrastructural and community facilities should be put in place to meet the needs of the town. The Neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (NPPF par.13) It should contain policies for the development and use of land. Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF also states (§12) that where a planning application conflicts with an up-to-date neighbourhood plan (as part of the development plan), permission should not usually be granted.

Most of the policies contained in the Neighbourhood Plan will be delivered by landowners and developers. In preparing the Plan, care has been taken to ensure, as far as possible, that the policies are achievable. Whilst the District Council will be responsible for determining applications, the Town Council will use the Plan to frame its representations on submitted planning applications. It will also work with the District Council to monitor the progress of sites coming forward for development

Once a neighbourhood plan has secured the consent of local people in a referendum, they will benefit from 25% of the revenues from the Community Infrastructure Levy arising from the development that takes place in their area. Allocating sites and producing housing policies demonstrates that the neighbourhood plan is planning positively for new homes, and provides greater certainty for developers, infrastructure providers and the community. In turn this also contributes to the local authorities' housing land supply, ensuring that the right homes are delivered in the right places.

The Town Council will guide investment of any future Community Infrastructure Levy passed on to it by the District Council into projects identified as needed/wanted by the local community.

## COMMUNITY INFRASTRUCTURE PROJECTS

The Town Council, in consultation with residents, has committed to prioritising the following community infrastructure projects in the town:

- Fairford to Lechlade multi-use circular path
- Victory Villas verge improvements and reinstatement of pavement

- Skate Park upgrade and improvements
- Coln House Community Sports Building
- Transport Plan incorporating reduction in speed limits, electric car charging points, improvements to the marketplace, improvements to footpaths and increased accessibility and road safety measures.
- New Burial Ground

The Town Council will endeavour to negotiate S106 agreements on future developments that are directly related to one or more of these project proposals to secure financial contributions. It will also use the list to guide its investment of any future Community Infrastructure Levy that is charged by the District Council within the Parish and is passed on to it (a minimum of 25% of the Levy once the Neighbourhood Plan is made).

## MONITORING & REVIEW POLICY

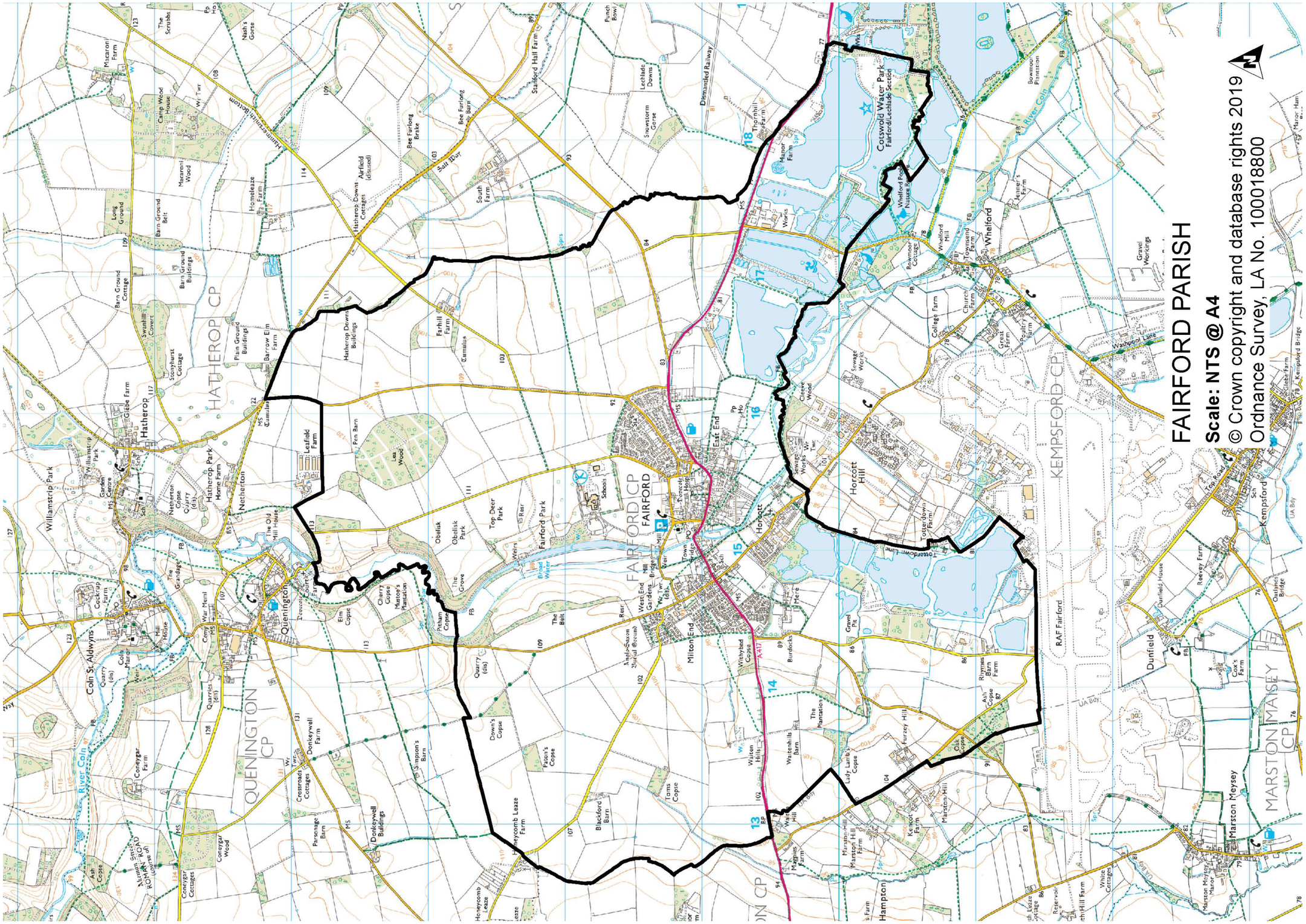
The Neighbourhood Plan will be monitored by the District Council and the Town Council using data collected in planning monitoring reports. The objectives will form the core of the monitoring activity, but other data collected and reported at the town scale that is relevant to the Plan may also be included. It is expected that the Fairford Neighbourhood Plan will be formally reviewed every five years, or more frequently if circumstances change, in order to meet the changing needs of the community over time.

# A1. APPENDIX 1: MAPS

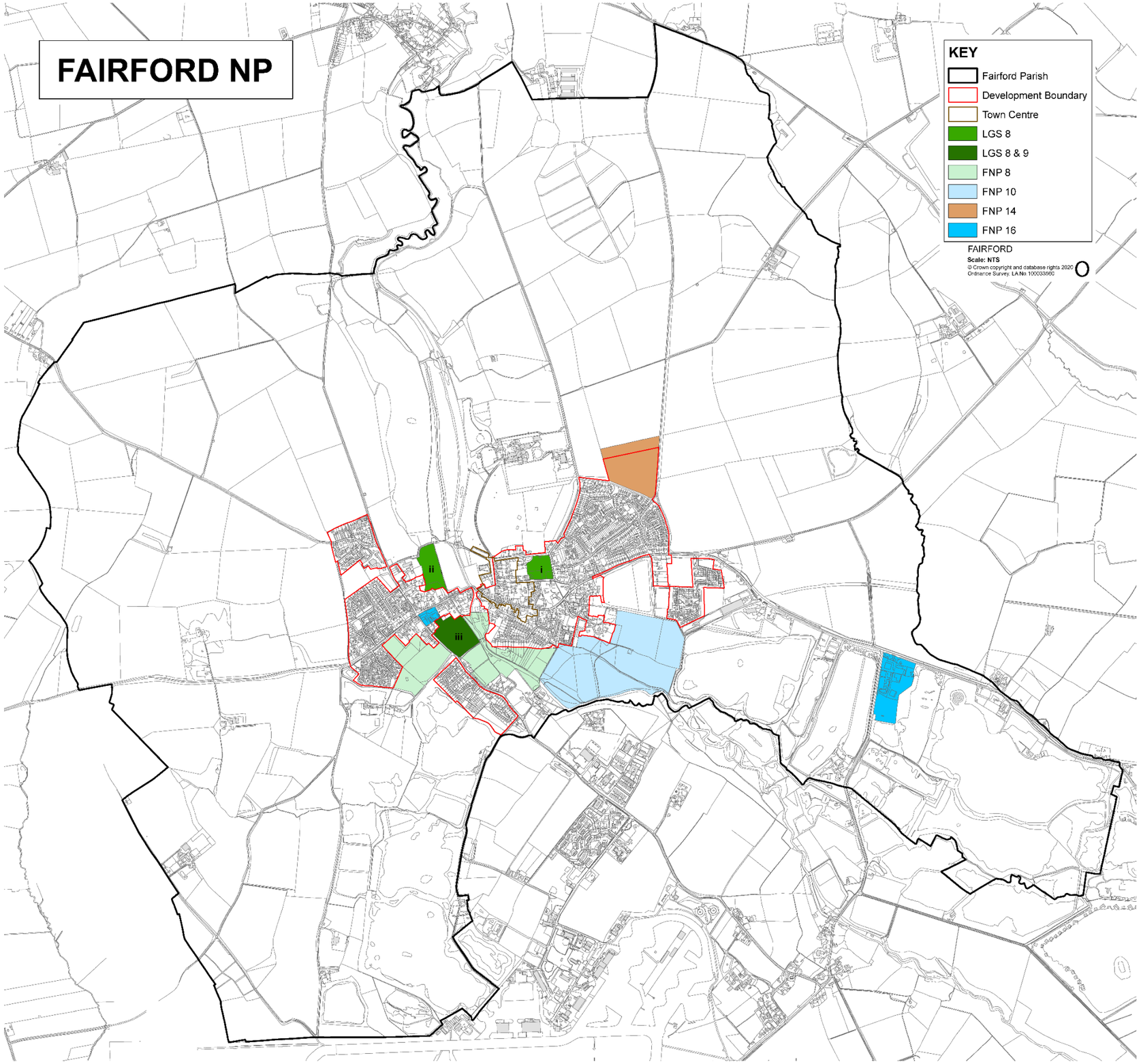
Maps included are:

- Map A: Fairford Parish Map
- Map B: Fairford Policies Map
- Map B1: Fairford Policies Map (Central Area)
- Map B2: Fairford Policies Map (Development Boundary Area)
- Map C: Heritage Assets
- Map D: Community Facilities
- Map E: Historical Environment and Landscape Designations

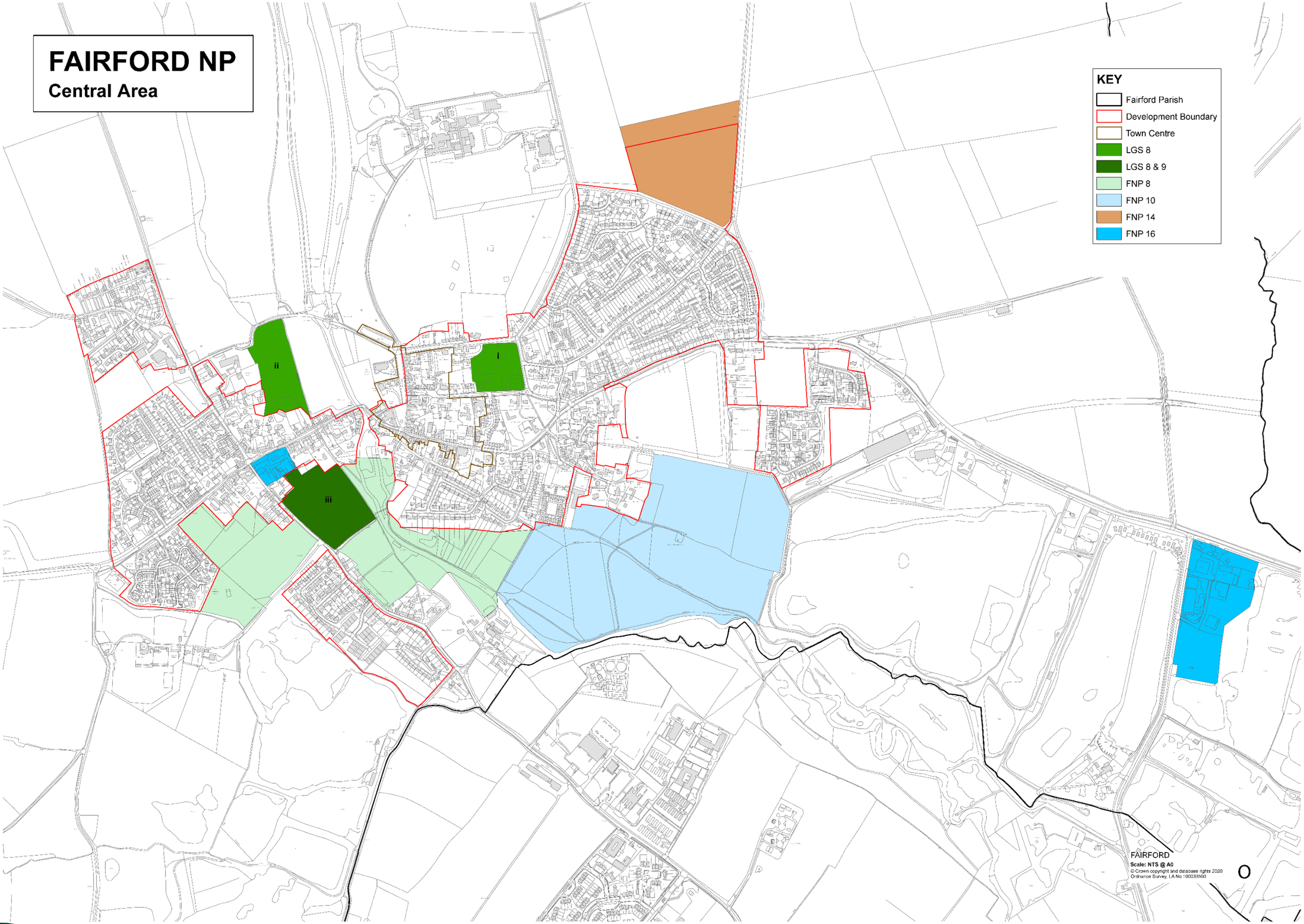
# MAP A: FAIRFORD PARISH



# MAP B: FAIRFORD POLICIES MAP



# MAP B1: FAIRFORD POLICIES MAP (CENTRAL AREA)



# FAIRFORD NP

## Development Boundary Area

FAIRFORD

**Scale: NTS @ A0**

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**KEY**

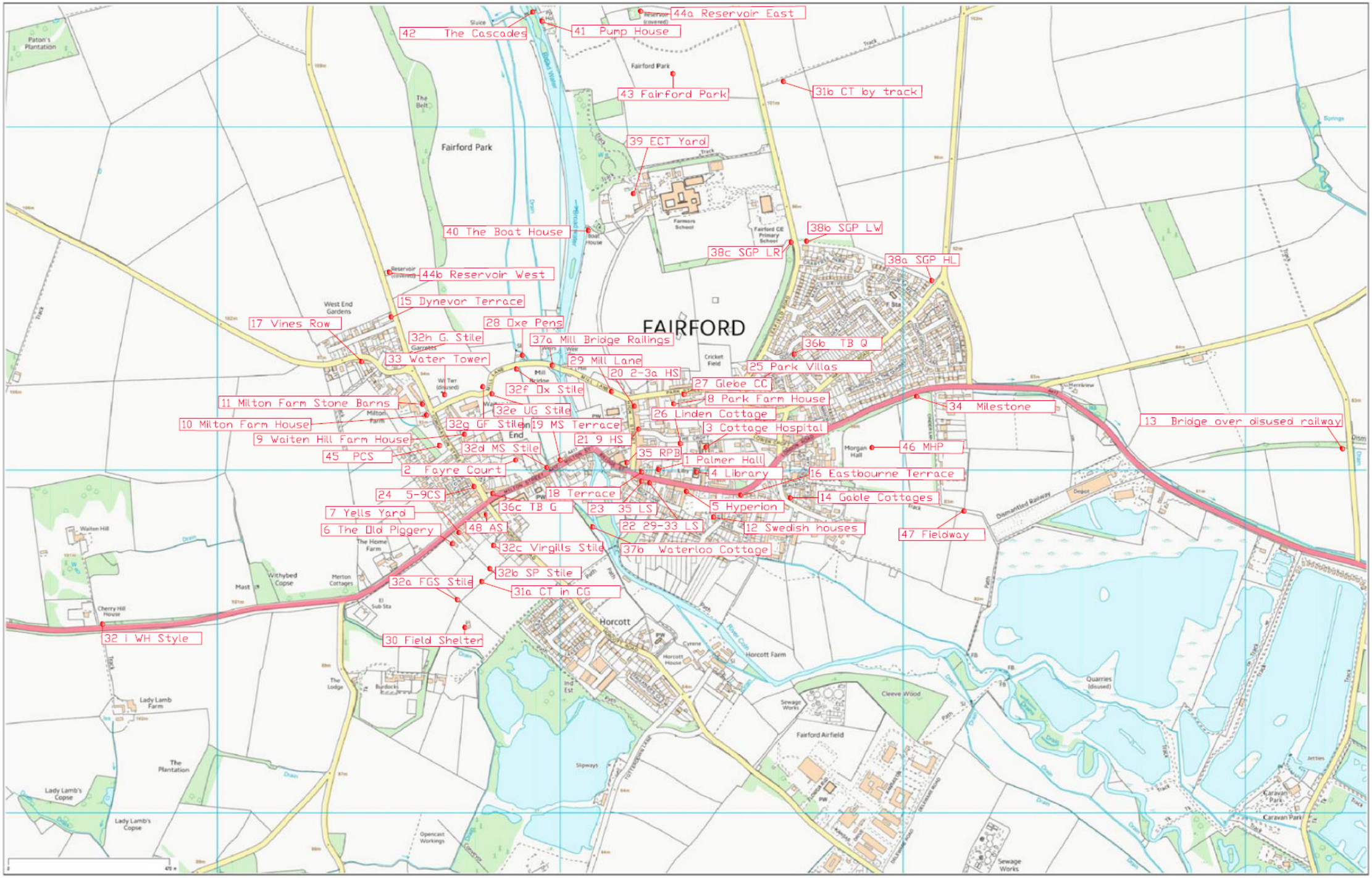
- Fairford Parish
- Development Boundary
- Town Centre
- LGS 8
- LGS 8 & 9
- FNP 8
- FNP 10
- FNP 14
- FNP 16

i

ii

iii

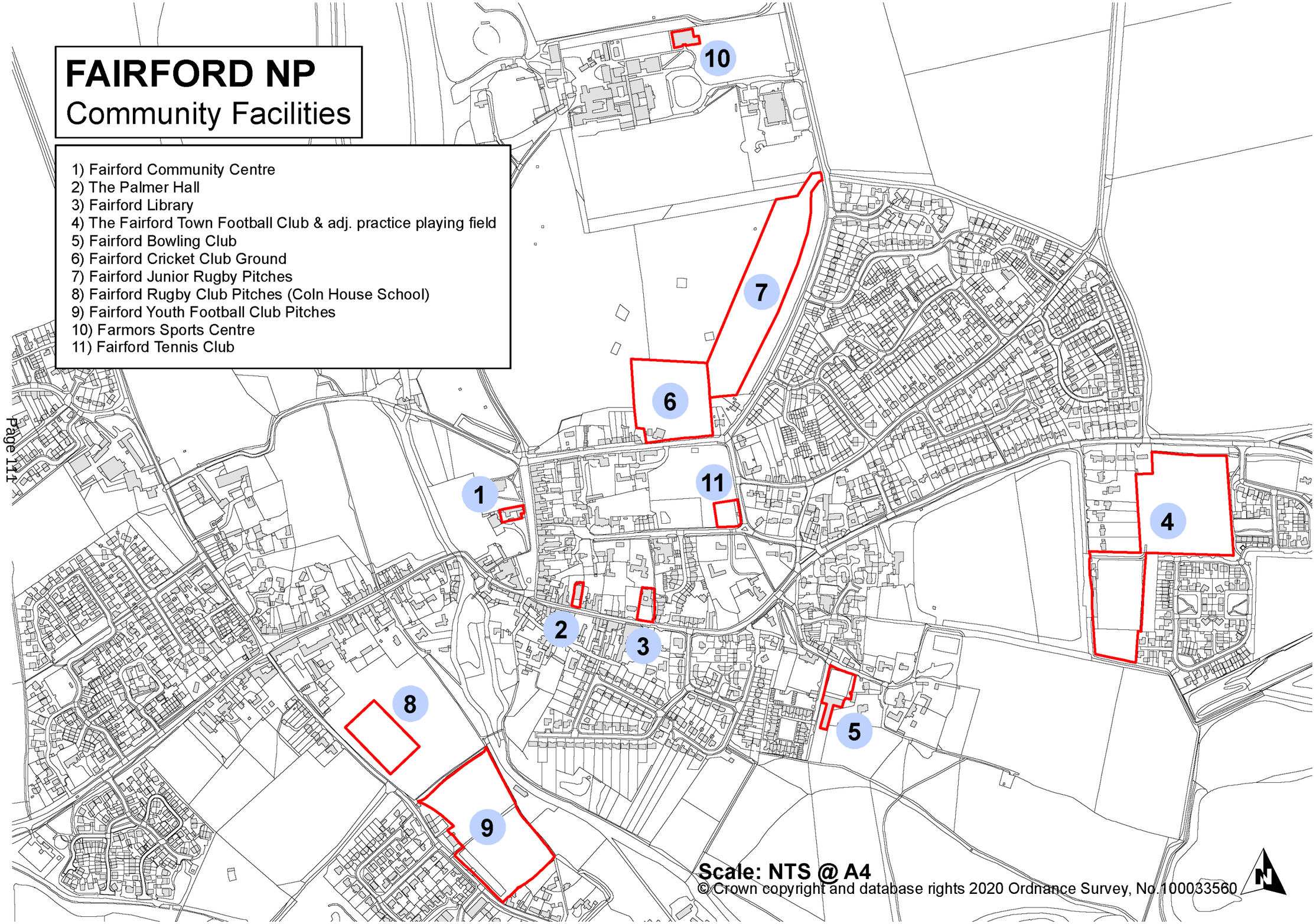
# MAP C: HERITAGE ASSETS




Date Created: 25-12-2016 | Map Centre (Easting/Northing): 415367 / 201088 | Scale: 1:10000 | © Crown copyright and database right. All rights reserved (00009999) 2016

# FAIRFORD NP
## Community Facilities

1) Fairford Community Centre
2) The Palmer Hall
3) Fairford Library
4) The Fairford Town Football Club & adj. practice playing field
5) Fairford Bowling Club
6) Fairford Cricket Club Ground
7) Fairford Junior Rugby Pitches
8) Fairford Rugby Club Pitches (Coln House School)
9) Fairford Youth Football Club Pitches
10) Farmors Sports Centre
11) Fairford Tennis Club




**Scale: NTS @ A4**

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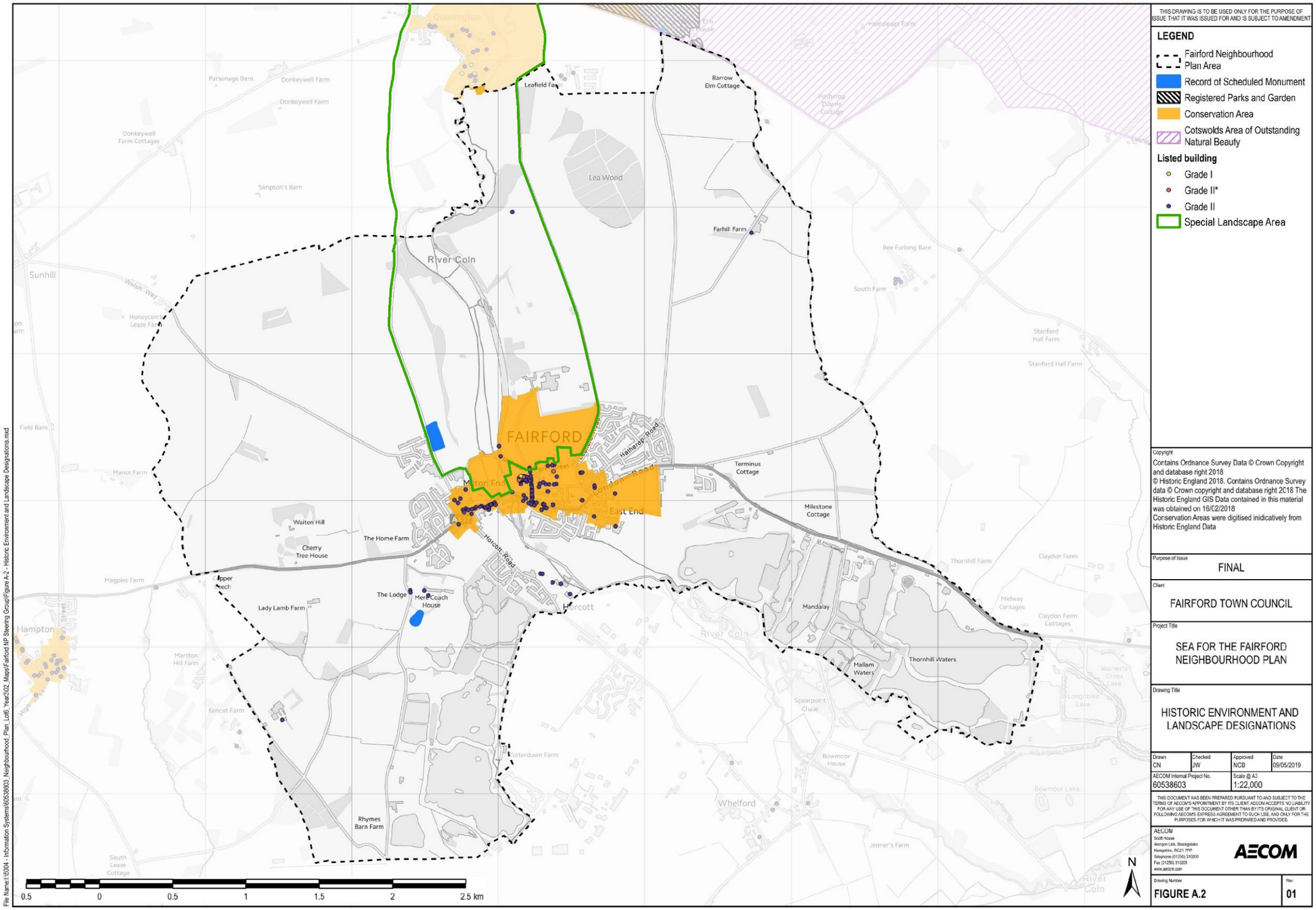
# MAP E: HISTORICAL ENVIRONMENT AND LANDSCAPE DESIGNATIONS



# A2. APPENDIX 2: LIST OF NON-DESIGNATED HERITAGE ASSETS

The Fairford Neighbourhood Plan identifies the following as Non-Designated Heritage Assets,

1. Palmer Hall
2. Fayre Court
3. Fairford Cottage Hospital
4. Library / Old School
5. Hyperion House
6. The Old Piggery
7. Yells Yard
8. Park Farm House
9. Waiten Hill Farm House
10. Milton Farm House
11. Milton Farm Stone Barns
12. The Swedish Houses in The Plies
13. Bridge over disused railway
14. Gable Cottages
15. Dynevor Terrace
16. Eastbourne Terrace
17. Vines Row
18. Terrace of Houses between Mr Ernest in the Market Place and The Plough, London Street: 7A, Tynedale, The Plough Inn
19. Terrace of Cottages on Milton Street backing onto Lower and Upper Green
20. 2, 3, 3a High Street
21. 9 High Street
22. 29, 30, 33 London Street
23. 35 London Street
24. 5-9 Coronation Street
25. Park Villas

26. Linden Cottage
27. Glebe Court canopy
28. The Oxpens
29. Mill Lane
30. Cotswold Stone Field Shelter
31a. Cattle Trough in Carters Ground
31b. Cattle Trough by Track in Field East of Polish Camp Site
32a. Fairford Gate South Stile
32b. The Short Piece Stile
32c. Virgills Stile
32d. Milton Street Stile
32e. Upper Green Stile
32f. Oxpens Stile
32g. Gassons Field Stile
32h. Garretts Stile
32i. Waiten Hill Stile
33. Gassons Field Water Tower
34. Milestone
35. Red Pillar Box, Market Place
36b. Telephone Box: Queensfield
36c. Telephone Box: The Green, Coronation Street
37a. Iron Railings on Mill Bridge
37b. Iron Gates to Waterloo Cottage
38a. Stone Gate Pillar – Hatherop Lane
38b. Stone Gate Pillar – Lovers Walk
38c. Stone Gate Pillar – Leafield Road
39. Entrance arch and Ernest Cook Estate Yard
40. The Boathouse
41. Pump House by The Cascades
42. The Cascades
43. Fairford Park

44a. Reservoir – East

44b. Reservoir - West

45. Paddock on Coronation Street

46. Morgan Hall Park including Jones' Field

47. Fieldway

48. Applestone Court

This is not an exhaustive list and further NDHAs may be identified in the future that meet the criteria provided in the Cotswold District Local Plan 2011-2031.

# A3. APPENDIX 3: FNP12 ACHIEVING HIGH STANDARDS OF DESIGN

## KEY VIEWS

Key views are identified in 'Character and Design Assessment', the main supporting document for this policy.

1. From Betterton's Close footpath across Milking Path Park to Waiten Hill
2. From Common Lane across to Waiten Hill
3. Across Gassons Field to the Mill and St Mary!s Church tower, over to Horcott Hill and Cleeve Wood (south) and into the Special Landscape Area (north)
4. The Mill, Upper and Lower Green, and the view over towards St Mary!s Church and vice versa (the views from St Mary!s Churchyard back across the River Coln)
5. Views from Pitham Brook Path
6. Westward from Leafield Road
7. Into Fairford Park from High Street + Walnut Tree Field
8. Up and downstream of the River Coln from Town Bridge and Mill Bridge.
9. Any views within/into Fairford Park, especially those across the River Coln, towards the Obelisk and from the gateway at the top end of Lovers Lane
10. Along the line of Lovers' Walk (from both directions)
11. Along Park Street and over to Walnut Tree Field including views to St Mary's Church
12. St Mary's Church from the High Street
13. Market Place and High Street including White Hart Court
14. From The Croft back towards the High Street as well as along the length of the Croft
15. Over Coln House playing fields from Horcott Road towards St Mary's Church
16. Southwest from Horcott Road across The Short Piece towards the Conservation Area
17. Along London Street from Back Lane junction; also along London Road towards the junction with the Market Place
18. Across the fields and along the River Coln
19. South from the end of the track off Moor Lane to the meadows and Snake Lane, across to Horcott Hill and Cleeve Wood
20. South from the track to the south from Moor Farm
21. Along Fieldway and across the meadows

22. Around and across Lake 104
23. From Horcott Road looking towards Horcott House paddocks, Horcott Farm and Horcott Hill
24. Across the Horcott Lakes at all points including views from the permissive paths
25. Back from Horcott Lakes (causeway seating area) to Horcott Hill
26. From Horcott Farm and the river PROW north and east across the river
27. Along London Road (both directions) particularly towards Keble House from Railway Inn
28. From green by Eight Bells towards East End House
29. North & south along river from River Walk passing gardens at the rear of Courtbrook and Moor Lane
30. Southeast from Cirencester Road west of The Old Piggery and along Cirencester Road in both directions
31. South from footpath south of The Burdocks
32. Westward from gateway halfway down Totterdown Lane across Horcott Lakes
33. Along Milton Street, both directions
34. From Gassons Field to Milton Farm agricultural buildings and on towards Waiten Hill

# Fairford Neighbourhood Plan

Site Assessment Report

Fairford Town Council

February 2019

## Quality information

| Prepared by | Checked by | Verified by | Approved by |
|---|---|---|---|
| Rosie Cox<br>Environmental Planner | Alastair Peattie<br>Associate Director | Una McGaughrin<br>Associate Director | Una McGaughrin<br>Associate Director |

## Revision History

| Revision | Revision date | Details | Name | Position |
|---|---|---|---|---|
| V1 | 21/08/18 | Internal draft for review | Rosie Cox | Environmental Planner |
| V2 | 06/09/18 | Draft for approval | Alastair Peattie | Associate Director |
| V3 | 07/11/18 | Final draft for locality review | Rosie Cox | Environmental Planner |
| V4 | 16/11/18 | Updated final draft for locality review | Rosie Cox | Environmental Planner |
| V5 | 27/11/18 | Draft for client comment | Rosie Cox | Environmental Planner |
| V6 | 29/01/19 | Final draft for Locality review | Rosie Cox | Environmental Planner |
| V7 | 31/01/19 | Final version | Rosie Cox | Environmental Planner |
| V8 | 26/02/19 | Updated final version | Rosie Cox | Environmental Planner |

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# Executive summary

AECOM has been commissioned to undertake an independent site assessment for the Fairford Neighbourhood Plan (FNP) on behalf of Fairford Town Council (FTC). The Town Council has made good progress in undertaking the initial stages of preparation for the Neighbourhood Plan, and it is now looking to ensure that key aspects of its proposals will be robust and defensible. In this context, FTC has been awarded technical support from AECOM through the MHCLG Neighbourhood Planning programme to undertake an independent and objective assessment of the sites that are available for housing for inclusion in the Neighbourhood Plan.

The Local Planning Authority for the Neighbourhood Plan area is Cotswold District Council (CDC). The Cotswold District Local Plan (adopted 08 August 2018) is the key planning policy document for the District and is the framework for decisions on the use and development of land.

The Local Plan designates Fairford as a 'Principal Settlement. Principal Settlements have been identified as the most appropriate locations to deliver future growth in the District, selected on the basis of their social and economic sustainability, including accessibility to services and facilities.

Policy S5 (Fairford) of the Local Plan allocates the following two sites to deliver a total of 61 new dwellings for Fairford:

- F_35B Land behind Milton Farm and Betterton's Close (49 dwellings); and
- F_44 Land to rear of Faulkner's Close, Horcott (12 dwellings).

Policy S5 also identifies the following existing employment sites which will be protected:

- Horcott Industrial Estate (EES26);
- London Road (EES27);
- Whelford Land Industrial Estate (EES28); and
- New Chapel Electronics (EES29).

FTC are keen to take a proactive approach to development in the Neighbourhood Plan area in order to secure additional community infrastructure, protect and enhance the natural environment and open spaces, and ultimately support the vitality of the town.

To help deliver these aspirations, FTC applied for technical support to consider potential sites within the FNP area which have been offered up by landowners as appropriate for development. This includes all promoted and available sites, including the two sites allocated through Policy S5 of the Local Plan, to ensure that an objective and comprehensive assessment has been carried out.

FTC submitted a first iteration of the FNP (Regulation 15)in 2017. This version of the FNP sought to deliver at least as much housing development as the emerging Local Plan, however proposed quite a different approach. This progressed to examination stage and was not recommended to go forward to referendum on the basis that it does not meet the necessary legal requirements. One of the issues that the Examiner had with the first iteration of the Neighbourhood Plan was that he was not satisfied with the level of detail in the Site Assessment report, and the key environmental matters had not been appropriately addressed. FTC are therefore now looking to ensure that this evidence is provided.

The Cotswold District Local Plan has since evolved, being adopted in August 2018. FTC are therefore now expected, in line with National Planning Policy Framework (NPPF) (2018) (Para. 16) to "develop a plan that support the strategic development needs set out in Local Plans, including policies for housing and economic development." To not do so would result in the Neighbourhood Plan not meeting the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. FTC can nonetheless use the Neighbourhood Plan to plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.

In this context, FTC are keen to take a proactive approach to development in the Neighbourhood Plan area to secure additional community infrastructure, protect and enhance the natural environment and open spaces, and ultimately support the vitality of the town. FTC are now in the process of carrying out further work to re-submit a Neighbourhood Plan in 2019.

# Sites considered through the appraisal

Eleven sites have been considered through the site assessment, which were reviewed through a combination of desktop assessment and site visits. The location of the sites is presented in Figure 1.2.

Seven of the eleven sites are assessed as potentially suitable, and could be taken forward for the purposes of the Neighbourhood Plan if constraints identified in Chapter 4 can be overcome:

- Site 1: Land behind Milton Farm and Betterton's Close (SHELAA Ref F_35B);
- Site 3: Land to rear of Faulkner's Close, Horcott (SHELAA Ref F_44);
- The southern half of site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C)
- Site 7: Jones' Field (SHELAA Ref F_15);
- Site 8: Land east of Beaumoor Place (SHELAA Ref F_38);
- Site 10: F_39C Field south east of granted planning permission at London Road; and
- Site 11: Land west of Terminus Cottage and Station (F_52).

These sites are considered potentially suitable for development on account of:

- The location and accessibility and of the sites
- The environmental constraints present.

As discussed above, these constraints would need to be addressed through further investigation, as well as mitigation, including appropriate design and layout of development. The sites may then be suitable for allocation though the Neighbourhood Plan.

It should be noted that two of the seven potentially suitable sites identified are allocations within the adopted Cotswold District Local Plan (Policy S5 (Fairford)).

# Overcoming constraints

It is recognised that the Site Assessment process has not been able to be conclusive in relation to the seven potentially suitable sites. Further investigation is needed into whether these sites could be suitable with appropriate mitigation, or whether they would be found unsuitable. Section 5.8 of this Report therefore includes suggestive mitigation to address the constraints identified.

# Next steps

It is now for FTC to decide which of the potential sites is most appropriate to allocate to meet the identified needs of the Neighbourhood Plan area.

It is advised that FTC discuss the proposed sites for allocation and emerging policies with CDC to ensure that the identified sites and policies would be supported by CDC as the Local Planning Authority.

Sites to be taken forward for the purpose of the Neighbourhood Plan will be considered and chosen by FTC on the basis of:

- The findings of this site assessment;
- Responses received during consultation on proposed sites;
- The scope for the sites to meet identified infrastructure needs of the community;

- Viability studies; and
- The extent to which the sites support the vision and objectives for the Neighbourhood Plan.

If sites identified as potentially suitable are included in the Fairford Neighbourhood Plan, it is recommended that the policy approaches proposed by the Neighbourhood Plan should seek to address the potential constraints highlighted in this report and through the Strategic Environmental Assessment process soon to be undertaken for the plan. This can include targeted site-specific Neighbourhood Plan policies to address the elements raised relating to environmental constraints and accessibility.

It is recommended that the findings of this report and the steps above are incorporated within the next stages of development for the Neighbourhood Plan in conjunction with engagement with landowners, CDC and other stakeholders.

# 1. Introduction

## Background

1.1 AECOM has been commissioned to undertake an independent site appraisal for the Fairford Neighbourhood Plan (FNP) on behalf of Fairford Town Council (FTC).

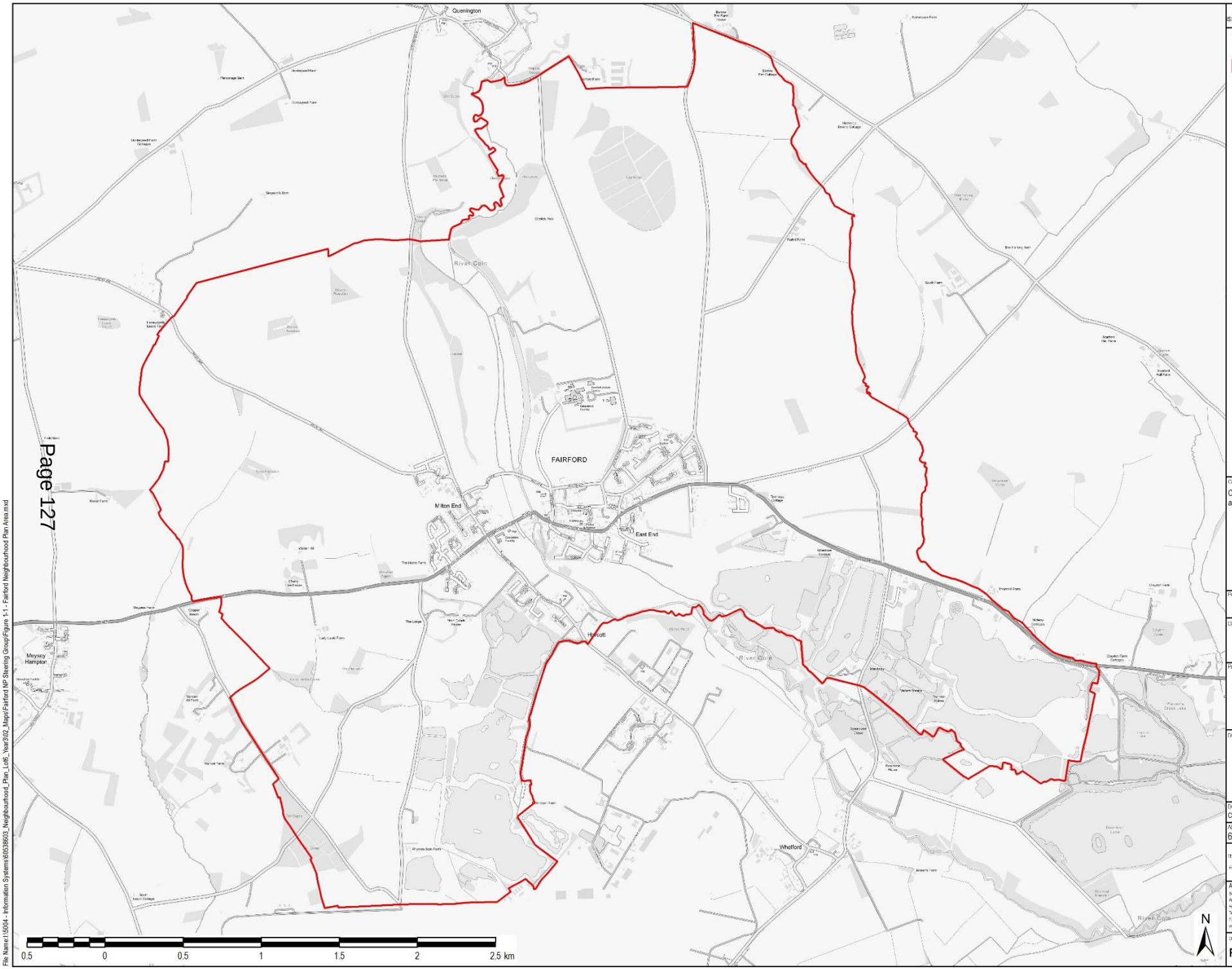
1.2 FTC submitted a first iteration of the FNP (Regulation 15) in 2017. This progressed to examination stage and was not recommended to go forward to referendum on the basis that it does not meet the necessary legal requirements (2017).[1]

1.3 FTC have previously undertaken their own site assessment work. However, one of the issues that the Examiner raised with the evidence base was that he was not satisfied that the level of detail in the Sustainability Appraisal and the Site Assessment Report was appropriate for the Plan area. FTC are therefore now seeking to ensure that the evidence base is robust and defensible. To this end, FTC have sought technical support from AECOM to undertake an independent and objective assessment of the sites available for housing for potential inclusion in the Neighbourhood Plan.

1.4 The purpose of this site appraisal is therefore to produce a clear, independent assessment as to whether the identified sites are suitable, available and viable for housing development. In this context it is anticipated that the site selection process will then be robust and able to meet the Basic Conditions considered by the Independent Examiner, as well as any potential legal challenges by developers and other interested parties.

1.5 The Neighbourhood Plan, which will cover the parish area of Fairford (see Figure 1.1 below), is being prepared in the context of the Cotswold District Local Plan (adopted 08 August 2018).

[1] Andrew Ashcroft (2017) Fairford Neighbourhood Plan – Examiners Report






File Name:I:\5004 - Information Systems\60538603_Neighbourhood_Plan_Lot6_Year3\02_Maps\Fairford NP Steering Group\Figure 1-1 - Fairford Neighbourhood Plan Area.mxd

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**LEGEND**

Fairford Neighbourhood Plan Area

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Purpose of Issue
FINAL

Client
FAIRFORD NEIGHBOURHOOD PLAN STEERING GROUP

Project Title
SITE ASSESSMENT FOR THE FAIRFORD NEIGHBOURHOOD PLAN

Drawing Title
FAIRFORD NEIGHBOURHOOD PLAN AREA

| Drawn | Checked | Approved | Date |
|---|---|---|---|
| CN | JW | RP | 31/01/2019 |

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| FIGURE 1.1 | 01 |

# Local Plan context for the Neighbourhood Plan

1.6 The Neighbourhood Plan is being prepared in the context of the Cotswold District Local Plan (adopted 08 August 2018). The Local Plan, which covers the period up to 2031, is the key planning policy document for the District and guides decisions on the use and development of land.[2]

1.7 The Local Plan designates Fairford as a 'Principal Settlement' within Policy DS1 (Development Strategy). Principal Settlements are identified as the most appropriate locations to deliver future growth in the District, selected on the basis of their social and economic sustainability, including accessibility to services and facilities.

1.8 Policy S5 (Fairford) of the Local Plan allocates the following two sites to deliver a total of 61 new dwellings for Fairford:

- F_35B Land behind Milton Farm and Betterton's Close (49 dwellings); and
- F_44 Land to rear of Faulkner's Close, Horcott (12 dwellings).

1.9 Policy S5 also identifies the following existing employment sites which will be protected:

- Horcott Industrial Estate (EES26);
- London Road (EES27);
- Whelford Land Industrial Estate (EES28); and
- New Chapel Electronics (EES29).

1.10 FTC previously submitted Fairford Neighbourhood Plan to CDC in 2017. The Regulation 15 submission version of the Fairford Neighbourhood Plan sought to deliver at least as much housing development as the adopted Local Plan, however proposed quite a different approach.

1.11 The examination of the FNP concluded that the FNP did not meet the basic conditions test, and as such FTC are now in the process of carrying out further work to submit a revised Neighbourhood Plan and evidence later in 2019.

1.12 The Cotswold District Local Plan has since evolved, being adopted in August 2018. FTC are therefore now expected, in line with National Planning Policy Framework (NPPF) (2018) (Para. 16) to "*develop a plan that support the strategic development needs set out in Local Plans, including policies for housing and economic development.*" To not do so would result in the Neighbourhood Plan not meeting the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. FTC can nonetheless use the Neighbourhood Plan to plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.

# Sites considered through the site appraisal

1.13 The site assessment work carried out by CDC through the Strategic Housing and Economic Land Availability Assessment[3] (SHELAA) (2017) formed the basis for the identification of sites for further consideration through this report. Sites identified within the SHELAA as being included in error, withdrawn or duplicated; where development has been completed and/ or construction has started and that fall outside the Neighbourhood Plan area have not been carried forward for consideration through the site assessment process.

[2] Cotswold District Council Local Plan 2011-2031 Examination Documents [online] available to access via: <http://www.cotswold.gov.uk/residents/planning-building/planning-policy/emerging-local-plan/local-plan-examination/local-plan-examination-documents/ >

[3] Wiltshire Council (2012) Strategic Housing and Land Availability Assessment [online] available at: http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/draftwhsap?tab=files

1.14 Appendix A lists the remaining sites identified through the SHELAA along with any additional sites proposed and provides justification for why they have been progressed for further detailed assessment and consideration through plan-making.

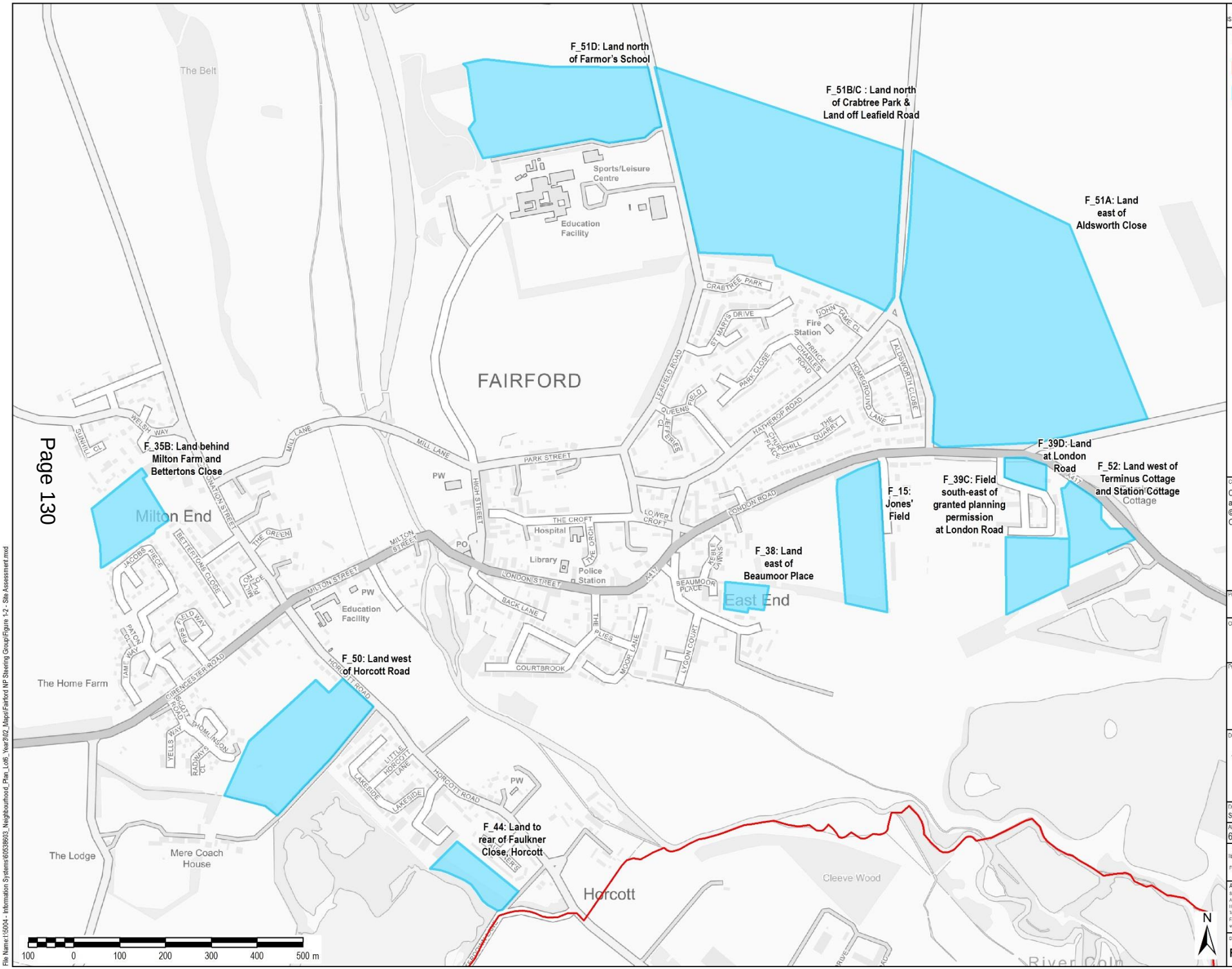
1.15 FTC are keen to take a proactive approach to development in the Neighbourhood Plan area in order to secure additional community infrastructure, protect and enhance the natural environment and open spaces, and ultimately support the vitality of the town. This reflects the outcomes of consultation initiated during earlier stages of development of the FNP, including feedback from working groups, paper/online questionnaire responses, and opinions gathered during public consultation open days.

1.16 To help deliver these aspirations, FTC applied for technical support to consider potential sites within the FNP area which have been offered up by landowners as appropriate for development. This includes all promoted and available sites, including the two sites allocated through Policy S5 of the Local Plan, to ensure that an objective and comprehensive assessment has been carried out.

1.17 The evidence available and consultation carried out by FTC (Appendix A) has resulted in eleven sites being taken forward for the purposes of the site appraisal process for the Neighbourhood Plan. These sites are listed in Table 1.1 below, with their location within the Neighbourhood Plan area shown in Figure 1.2 on the next page.

**Table 1.1 Sites identified for assessment**

| Name | Size (ha) |
|---|---|
| Site 1: Land to rear of Faulkner's Close, Horcott (SHELAA Ref F_44) | 1.14 |
| Site 2: Land west of Horcott Road (SHELAA Ref F_50) | 4.53 |
| Site 3: Land Behind Milton Farm and Bettertons Close (SHELAA F_35B) | 1.97 |
| Site 4: Land north of Farmor's School (F_51D) | 7.30 |
| Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C) | 17.40 |
| Site 6: Land east of Aldsworth Close (SHELAA Ref F_51A) | 22.88 |
| Site 7: Site 7: Jones' Field (SHELAA Ref F_15) | 2.31 |
| Site 8: Land east of Beaumoor Place (SHELAA Ref F_38) | 0.48 |
| Site 9: Land at London Road (SHELAA Ref F_39D) | 0.49 |
| Site 10: Field south east of granted planning permission at London Road (SHELAA Ref F_39C) | 1.31 |
| Site 11: Land west of Terminus Cottage and Station (SHELAA Ref F_52) | 1.40 |




Page 130

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**LEGEND**

- Fairford Neighbourhood Plan Area
- Site Option

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Purpose of Issue: FINAL

Client: FAIRFORD NEIGHBOURHOOD PLAN STEERING GROUP

Project Title: SITE ASSESSMENT FOR THE FAIRFORD NEIGHBOURHOOD PLAN

Drawing Title: SITES CONSIDERED THROUGH THE SITE ASSESSMENT FOR THE FAIRFORD NEIGHBOURHOOD PLAN AREA

| Drawn | Checked | Approved | Date |
|---|---|---|---|
| SM | CN | RP | 09/01/2019 |

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Rev: 01

# 2. Methodology for the site appraisal

## Introduction

2.1 Site selection and allocations is one of the most contentious aspects of planning, raising strong feelings amongst local people, landowners, builders and businesses. It is important that any selection process carried out is transparent, fair, robust and defensible and that the same criteria and thought process is applied to each potential site. Equally important is the way in which the work is recorded and communicated to interested parties, so the approach is transparent and defensible.

2.2 The approach to the site assessment is based primarily on the Government's National Planning Practice Guidance. The relevant sections are Housing and economic land availability assessment (March 2015)[4] and Neighbourhood Planning (updated Feb 2018)[5]. Supplementary guidance includes the Locality Neighbourhood Planning Site Assessment Toolkit[6]. These all encompass an approach to assessing whether a site is appropriate for allocation in a Development Plan based on whether it is suitable, available and achievable (or viable).

2.3 In this context, the methodology for carrying out the site appraisal is presented below.

## Task 1: Development of site assessment pro-forma

2.4 Prior to carrying out the appraisal, site appraisal proformas were developed. The purpose of the pro-forma is to enable a consistent evaluation of each site through the consideration of an established set of parameters against which each site can then be appraised.

2.5 The pro-forma utilised for the assessment enables a range of information to be recorded, including the following:

- Background details on the site;
- Existing land uses;
- Surrounding land uses;
- Site characteristics;
- Site planning history;
- Suitability;
- Accessibility;
- Environmental considerations;
- Community facilities and services;
- Heritage considerations;
- Flood risk;
- Existing infrastructure;
- Land ownership; and
- Site availability.

2.6 For environmental constraints/ features, distances have been measured approximately from the farthest point of the site to the centre of the constraint/feature. Distances from facilities have been measured from the farthest point of the site to the facility using Google Maps walking routes.

[4] https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment
[5] https://www.gov.uk/guidance/neighbourhood-planning--2
[6] https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/

# Task 2: Initial desk study

2.7 The second task involved conducting a desk study for each of the sites, obtaining the preliminary information needed to complete the proformas and highlighting areas which should be examined in more detail during the subsequent site visit (Task 3). Sources of information used include Defra – 'Magic' Map Application, Environment Agency – Flood Map for Planning and Historic England – Historic Environment Records (HER).

# Task 3: Site visit

2.8 After the completion of the initial desk study, a site visit to the Neighbourhood Plan area was undertaken by two members of the AECOM Neighbourhood Planning team on 02nd July 2018. The purpose of the site visit was to evaluate the sites 'on the ground' to support the site appraisal, in addition to gaining a better understanding of the context and nature of the Neighbourhood Plan area.

# Task 4: Consolidation of results

2.9 Following the site visit, further desk-based research was carried out to validate the findings of the visit and to enable the results of the site appraisal to be consolidated. Reports consulted at this stage included the Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) and the Cotswold District Council Strategic Flood Risk Assessment (SRFA) (2014).

2.10 Chapter 4 of this report presents a summary of the site appraisals for each of the eleven sites in the Neighbourhood Plan Area, with the completed pro-forma for each site provided in Appendix B.

# 3. Indicative housing capacity

3.1 The indicative housing capacity for each of the sites has been calculated using the methodology outlined below. Where sites have been assessed through the SHELAA the capacity figure identified has been provided for comparison. An assumption has been made as to the percentage of developable area of land that is available for development once non-housing land use has been accounted for, e.g. open space, parking and community facilities (Table 3.1). A housing density of 30 dwellings per hectare has then been applied to the resulting net development area.

**Table 3.1: Net Housing Density**

| Area | Percentage of site assumed developable | Net Housing Density |
|---|---|---|
| Up to 0.4 ha | 90% | 30 |
| 0.4 ha to 2 ha | 80% | 30 |
| 2 ha to 10 ha | 75% | 30 |
| Over 10 ha | 50% | 30 |

The assumed housing density is indicative only and should be refined further before sites are proposed for allocation, in consultation with CDC and the site owner/promoter.

**Table 3.2: Indicative number of dwellings for each site within the Neighbourhood Plan area**

| Name | Size (ha) | AECOM Indicative dwelling number | SHELAA indicative dwelling number |
|---|---|---|---|
| Site 1: Site 4: Land to rear of Faulkner's Close, Horcott (SHELAA Ref F_44) | 1.14 | 27 | 12 |
| Site 2: Land west of Horcott Road (SHELAA Ref F_50) | 4.53 | 102 | - |
| Site 3: Land Behind Milton Farm and Bettertons Close (SHELAA F_35B) | 1.97 | 47 | 49 |
| Site 4: Land north of Farmor's School (SHELAA Ref F_51D) | 7.30 | 164 | - |
| Site 5: Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C) | 17.40 | 261 | - |
| Site 6: Land east of Aldsworth Close (SHELAA Ref F_51A) | 22.88 | 343 | - |
| Site 7: Jones' Field (SHELAA Ref F_15) | 2.31 | 52 | - |
| Site 8: Land east of Beaumoor Place (SHELAA Ref F_38) | 0.48 | 12 | - |
| Site 9: Land at London Road (SHELAA Ref F_39D) | 0.49 | 12 | - |
| Site 10: F_39C Field south east of granted planning permission at London Road | 1.31 | 31 | 32 |
| Site 11: Land west of Terminus Cottage and Station (F_52) | 1.40 | 34 | 17 |

# 4. Summary of site appraisals: Fairford

## Site 1: Land to rear of Faulkner's Close, Horcott (SHELAA Ref F_44)

## SHELAA findings

4.1 SHELAA concludes site is available, suitable and achievable, however a number of potential issues were identified. See Appendix A for further details.

## Site assessment findings

### *Site development potential*

4.2 Land to rear of Faulkner's Close is approximately 1.14 ha in size and based on this area has the potential to deliver around 27 dwellings. Currently, the site is unused greenfield scrubland and is located within the settlement boundary, to the south of the town. Topographically, the site is relatively flat, with some gentle sloping.

4.3 At this stage, the proposed access to the site is uncertain. The site is currently accessed by a narrow gravel track which is an extension of Totterdown Lane. Totterdown Lane is private, providing access only for the existing residential dwellings. Access may be sought via the removal of a bungalow on Faulkner's Close; however, it is not currently clear if this is achievable. There may also be potential access via the south-west corner of the site; however, it is again not clear if this is achievable.

4.4 It is recognised that the site is allocated within the adopted Cotswold Local Plan for 12 residential dwellings.

### *Key constraints*

4.5 The site is notably constrained in terms of access to services and facilities. Of particular concern to local residents is that access to Fairford's local schools would involve crossing the A417 which is not seen to be desirable, with many roads lacking in pavements. It is likely that new residents would rely on the car for access to education, which would lead to knock-on effects relating to safety, parking, traffic, congestion and air quality.

4.6 Development of the site has the potential to lead to minor adverse effects on the landscape through localised visual impact and impact on local character and setting. The site is neighboured by low density single-storey housing to the north-east, Horcott Industrial Estate to the north-west, one of Horcott Lakes to the south-west (a former gravel pit and Key Wildlife Site (KWS) and open countryside to the south-east. New development may impact upon local views from the adjacent bungalows on Faulkner's Close and the footpath adjoining the southern border of the site.

4.7 These views currently include a natural area and the adjacent wooded Horcott Lake and may distract from its rural nature. However adverse effects are likely to be limited to the adjacent properties and are not expected to be significant considering the existing residential development and industrial estate present. Vegetation surrounding the site also provides a level of screening which may mitigate against adverse effects.

4.8 Although it may be argued that the site would be in keeping with the existing built form (bound by bungalows to the north and to the west by a fence/carpark for the Horcott Business Park) the setting of the site with the Horcott Lakes to the south and open countryside to the east is an integral part of the character of the area. Development has the potential to adversely impact upon the special characteristics (and views) of the lake which are integral to the character of the Neighbourhood Plan area.

4.9 The site is therefore also of community value. There are well-used paths running through the site, and four or five houses on adjoining land have access gates onto this plot. There is also a permissive footpath between the south of the site and the northern Horcott Lake. Views of the lake are highly valued by the local community; with access having a positive effect on residents' quality of life and overall neighbourhood satisfaction.

4.10 The site has numerous biodiversity constraints. The site is located within 1.4km of the Cotswold Water Park Site of Special Scientific Interest (SSSI) and subsequently is located within a SSSI Impact Risk Zone (IRZ) for 10+ residential units. IRZ zones have been developed by Natural England, and define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.[7] Given the site has an indicative capacity of 27 residential units, it is thought that development has the potential to lead to adverse effects on the SSSI. However it is noted that CDC reduced the proposed number of dwellings to twelve predominately on ecological grounds. In this context, given the size of the site, the low level of development proposed, and the distance of the site from the SSSI, it is unlikely that any impact on the SSSI would be significant.

4.11 As discussed above, there is a Key Wildlife Site (KWS) located adjacent to the south-western site boundary, which coincides with Horcott Lakes, and is rich in biodiversity. This richness extends within the site; including a thick tree belt, grassland and scrubland, which includes BAP Priority Habitat (Deciduous Woodland) and National Forest (Broadleaved Woodland). These habitats are likely to host many different species, some of which may also be BAP protected. Additionally, there are likely to be numerous aquatic habitats and species present in close proximity to the site, given the nearby lake. This may include otters, which have been identified by FTC as potentially present given prevention measures being undertaken at the site (fishing club requesting permission to install fencing). If protected species were to be identified at the site then the impact of development would require further investigation and potential mitigation.

4.12 The extensive biodiversity present within and adjacent to the site (including within the KWS) is also likely to support connectivity.

4.13 The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) states that *"F_44 is low-lying and vulnerable to groundwater flooding"* and that *"No area can be considered suitable at this location."* The site is therefore of high risk of groundwater flooding. With the high ground water level and related run-off issues, development here would increase flood risk

[7] Natural England (2018) Natural England's Impact Risk Zones for Sites of Special Scientific Interest: User Guidance [online] available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf

downstream with likely adverse impacts on the sensitive drainage system of the Fairford Air Base.

4.14 The site is located within flood zone 1 which is of low risk of fluvial flooding.

4.15 In terms of water quality, the Water Cycle Study carried out for the District (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a Water Framework Directive (WFD) deterioration.

4.16 The Study further concluded that Fairford Sewerage Treatment Works (STW) has limited spare capacity without the need for an upgrade. Development of sites greater than 15 units are identified as likely to require local network improvements. Given the indicative capacity for the site is 27 units it is thought that improvements would be necessary. Additionally, local knowledge indicates Faulkner's Close has recently documented issues of sewerage flooding. In December 2013 and for several weeks in January 2014 some houses in Faulkner's Close suffered from restricted toilet use and/or sewage flooding.

4.17 It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015).

4.18 The site is also within Groundwater Source Protection Zone (SPZ) 1. This zone has a minimum radius of 50m where groundwater supplies are at risk from potentially polluting activities and accidental releases of pollutants. The Environment Agency's groundwater protection policy sets the tightest controls on human activity in this zone.

## Recommendations

4.19 While the site holds a number of potential issues including access, landscape, community value, biodiversity, sewerage, groundwater flood risk, and access to education; none are considered sufficient to rule the site out for development. It is recognised that the Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes *"no area can be considered suitable at this location",* however it is not considered that mitigation measures have yet been explored.

4.20 The site is therefore potentially suitable, if the above issues can be resolved. If it can be demonstrated that the site's serious groundwater flooding issues cannot be mitigated, it would not be appropriate to allocate in the Neighbourhood Plan.

4.21 If protected species were identified at the site then the impact of development would require further investigation and potential mitigation. Mitigation is further discussed within Section 5.8 of this Report.

# Site 2: Land west of Horcott Road (SHELAA Ref F_50)

## SHELAA findings

4.23 SHELAA concludes site is unsuitable:

- The site prevents the coalescence of Horcott and Fairford and provides a green space that forms the setting of the Conservation Area and its relationship with the countryside, which would be removed by the site's development.
- There is also non-designated heritage assets within the western part of the site, which is a historic stone field shelter and enclosure. These structures and their field setting would be severely compromised by development, even if retained.
- There are also highways concerns at Horcott Road's junction with London Road.

4.24 See Appendix A for further details.

## Site assessment findings

### *Site development potential*

4.25 Land west of Horcott Road is approximately 4.53 ha in size and based on this area has the potential to deliver 102 dwellings. Currently, the site is in agricultural use (improved pasture) and is located adjacent to the settlement boundary, to the south of the town. Topographically, the site slopes from north to south.

4.26 There are concerns regarding the suitability of providing access via Horcott Road. Horcott Road is relatively narrow with an 18T weight limit from Totterdown Lane to the junction with the A417. There is restricted visibility on a section just north of the site and particularly at the A417 cross-roads junction, which could be a safety issue. This junction is already highly utilised and experiences traffic at peak times due to the access it provides to schools and amenities in the town. Additionally, it is noted that the former Coln House School building at the junction with the A417 is listed and therefore junction improvements (i.e. widening) would be unlikely to be achievable.

4.27 It is recognised that the site is being promoted for 92 dwellings and associated ancillary works.

## Key constraints

4.28 The historic environment is a key constraint for the site. The site is surrounded by heritage, with the following being located within 250m of the site:

- Fairford Conservation Area adjacent to site
- Grade II listed building 150m northwest of the site;
- Grade II listed Burdocks 250m southwest of the site;
- Grade II listed Pavilion to the south east of Burdocks 250m southwest of the site; and
- Historic stone field shelter and enclosure non-designated heritage asset within the western part of the site.

4.29 These heritage assets and their settings would likely be adversely impacted by development, despite existing vegetation providing some level of screening. Notably, the site is an important part of the rural setting of this end of the Fairford Conservation Area. The Study of Surrounding Key Settlements in Cotswold District Update (2015) describes the edges of Fairford as recessive and indented with an incremental mix of traditional buildings to the north within the Conservation Area, linear development further south, and a small hedged field to the rear of properties.

4.30 In this context, it is noted that the "Character and appearance of the area and the setting of Fairford Conservation Area" was the main issue identified by the Inspector and agreed by the Secretary of State, dismissing the appeal and refusing planning permission at the site (2016).

4.31 To the north of the site is the edge of the settlement and a low stone wall with other low field boundaries allowing glimpsed and filtered views through maturing trees from the A417. A public footpath also runs along the northern edge of the site linking the settlement to the countryside to the south west, which may have views impacted by new development. Horcott Road to the north east is fenced with occasional trees within the site, and here there is also relatively clear views. The Study of Surrounding Key Settlements in Cotswold District Update (2015) states that when combined with the playing fields along the River Coln, the site provides a green gap between Fairford and Horcott. The Study concludes that the site is of high/medium landscape sensitivity.

4.32 In this context, development of the site may remove contact between the Conservation Area and the wider countryside on this side of the settlement which would be undesirable. New development would enclose fields to the north of the site that provide the setting to the western end of the Conservation Area, which features recessive but attractive traditional buildings which form a positive introduction to the old settlement. This would adversely impact the local character of the town which is highly valued by residents.

4.33 It is also noted that development would result in coalescence of the town with Horcott. Development would close the gap between Horcott and Fairford and effectively create a continuous belt of housing from Totterdown Lane to the A417. The site therefore functions as an important green gap between Horcott and Fairford.

4.34 It is recognised that there are pockets of development with planning permission in close proximity to the site, which may impact upon the existing character of the area. Development of the site in conjunction with recent development would further alter the existing settlement pattern, effectively creating ribbon development northwest-southeast along Horcott Road. Development of the site may also set precedent for supplementary development to the south of the A417 which would further encroach upon Horcott and significantly increase the built form of Fairford.

4.35 In terms of biodiversity designations, the site is located within 2km of Cotswold Water Park SSSI and is within a SSSI IRZ for 10 residential units. However, given the size of the site and the distance of the site from the SSSI, it is unlikely that any impact on the SSSI would be significant. There is a KWS located adjacent to the site to the south east which coincides with Horcott Lakes. This includes BAP Priority Habitat Inventory Deciduous Woodland and National Forest Inventory Broadleaved Woodland. These habitats are likely to host many different

species, some of which may also be BAP protected. Development has the potential to lead to minor adverse effects on the KWS through disturbance and indirectly through pollution.

4.36 Development may also lead to adverse effects on protected bat species present in an old barn on the site and could also affect migration routes of other wildlife between town/river and countryside to the west. In terms of habitat connectivity, trees and hedgerow extend across the site in a linear formation, which may provide a corridor for connectivity with the wider countryside. Further to this, there are trees and hedgerows lining the site to the east and south which may also provide habitats for species and aid connectivity.

4.37 A significant part of the site is classed as best and most versatile agricultural land. Development of best and most and versatile land is seen as a key issue for the site due to the loss of natural resources.

4.38 The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"part of the site along the southern boundary and south-west boundary will experience high groundwater levels, where the area lies along the boundary with the valley of the Dudgrove Brook."* This part of the site is therefore of high risk of groundwater flooding. The site is located within flood zone 1 which is of low risk of fluvial flooding, although the southern end of the site has been subject to significant surface water flooding in wet winters (as indicated on the Environment Agency surface water flood risk map).[8]

4.39 In terms of water quality, the Water Cycle Study carried out for the District (JBA, 2015) predicts that the waste water treatment works for Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity. Proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW. Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.

4.40 Given the indicative capacity for the site is 102 units it is expected that infrastructure upgrades will be required to serve the planned growth of the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). Further modelling is also needed to determine water supply upgrades required.

4.41 The site is also notably constrained in terms of access to services and facilities. Of particular concern to local residents is that the site is outside the primary school catchment.

## Recommendations

4.42 The site is available; however, it is not considered suitable due to several significant constraints. These include landscape, rural character, risk of groundwater flooding, the setting of Fairford Conservation Area and the town itself, loss of agricultural land, and access via Horcott Road.

[8] Gov.uk (2019) Flood Warning Information Service [online] available at: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=415421.06&northing=201058.522> last accessed 25/02/19

# Site 3: Land Behind Milton Farm and Bettertons Close (SHELAA F_35B)

## SHELAA findings

4.43 SHELAA concludes site is available, suitable and achievable, however a number of potential issues were identified. See Appendix A for further details.

## Site assessment findings

### *Site development potential*

4.44 Land behind Milton Farm and Bettertons Close is approximately 1.97 ha in size and based on this area has the potential to deliver around 47 dwellings. Currently, the site is in agricultural use (pasture/grazing as part of Milton Farm) and is located within the settlement boundary, to the west of the town. Topographically, the site slopes gently from north to south.

4.45 It is considered that the proposed access to this site may be via the retained link from the new housing development to the south, although there is understood to be a ransom strip which is not currently within the control of the landowner of this site. This could be overcome through an agreement with the landowner.

4.46 It is noted that the site currently provides a link between Milton Farm and its central operational base. Local knowledge suggests a fully operational service road across the site to link the farm buildings to the land to the west would most likely be required if the farm remained in operation. The continued operation of the farm (with its associated farm traffic) may impact on the sale value of any new housing. The impact of increased traffic on approach roads would also need to be considered, although an access link has been retained from the new housing development to the south.

4.47 It is recognised that the site is allocated in the adopted Cotswold District Local Plan for 49 residential units. While the landowner has stated that the site is currently not available, the Local Plan Inspector's Report (June 2018) states that "The site is in a suitable location for development, and it is quite possible that the landowner's intentions could change again over the next ten years or so. I therefore consider there to be a reasonable prospect of 49 dwellings being built on the site by 2031."

## Key constraints

4.48 Development at the site may lead to minor impacts on the landscape due to visual impact and impact on setting. The site forms an integral part of the character of Milton Farm, which is a working farm with land to the west of the site, and currently provides a link between the farm and its central operational base. Local knowledge suggests a fully operational service road across the site to link the farm buildings to the land to the west would most likely be required if the farm remained in operation. It is noted that farms in and around the town form part of Fairford's uniqueness and contribute considerably to the local character, being valued highly by local residents. The site, together with the connected paddock on Coronation Street, currently forms part of a green corridor separating the area of development around Welsh Way from the rest of the housing at the western end of Fairford and linking the Conservation Area to the wider countryside to the west. However, given the site is sandwiched between two sizeable new residential development schemes it could be considered that additional residential development would be in keeping with surrounding built form.

4.49 The site is 140m west of a Special Landscape Area (SLA) (White Consultants, 2015) and provides a visual, rural and green space corridor between the new developments to the north and south of the site and views from the PRoW to the west. Local knowledge suggests there are doubts of the viability of Milton Farm if housing development were to take place at this location, and that the loss of farm buildings would lead to adverse effects on the views from the SLA. This area with the Mill, Oxpens, river and Pitham brook path with the church in the background is identified by residents as the most highly valued landscape in Fairford; notably the importance of Milton Farm providing the backdrop to the SLA and shielding the views of the recently developed housing estates.

4.50 In terms of the historic landscape, development may have a minor impact on the setting of Fairford Conservation Area, located to the south-east of the site. While not within the Conservation Area, the site does have a connection with the heritage of the Conservation Area and holds important views. However, as discussed above, the site is located between two new large residential development schemes. It is therefore considered that further additional residential development at this location would not lead to significant adverse effects on the Conservation Area or the wider historic landscape.

4.51 The site is also 270m southwest of Fairford Saxon Cemetery Scheduled Monument. However, existing built form screens the site from the Scheduled Monument and therefore any adverse effects on the setting of the Scheduled Monument are expected to be minor and possibly avoided if existing screening is maintained and enhanced.

4.52 The Water Cycle Study (JBA, 2015) carried out for the District predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity. Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.

4.53 It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015).

4.54 The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that the site *"should have reasonable freeboard during times of high groundwater"* (freeboard is the distance from the water level to the ground level). The site is therefore considered to be of low risk of groundwater flooding. The site is located within flood zone 1 which is of low risk of fluvial flooding.

4.55 The site is within Groundwater SPZ 1. This zone has a minimum radius of 50m where groundwater supplies are at risk from potentially polluting activities and accidental releases of pollutants. The Environment Agency's groundwater protection policy sets the tightest controls on human activity in this zone.

4.56 The site has medium biodiversity value; mature hedgerows surround the site and there is evidence of bird and mammal presence. Mature hedgerows are also expected to provide connectivity. The site is within SSSI IRZ for 50 residential units; however, it is noted that the indicative capacity for the site is 47 units which is marginally below the 50-dwelling threshold. Nonetheless potential adverse effects on the SSSI should be considered. In this context, it is recognised that there is a potential impact on SSSIs downstream due to a sewage system capacity issue.

4.57 The site is located on Grade 3 agricultural land. At this stage it is unknown if this is Grade 3a (best and most versatile) or 3b. Development of best and most versatile agricultural land would be a key issue for the site due to the loss of natural resources.

4.58 The site has poor accessibility to services and facilities, being located 1km from shops and the town centre. It is considered that dependent on site access secured, distance to the town centre may exceed this distance. Access to the town centre would likely be via a discontinuous footway and narrow carriageway along Mill Lane.

## *Recommendations*

4.59 A number of potential issues have been identified for this site including access, loss of agricultural land, WwTW, landscape, character of the settlement, and heritage. The site could be suitable for development if these issues are resolved/ appropriately addressed.

# Site 4: Land north of Farmor's School (Ref 51_D)

## SHELAA findings

4.60 Site has not been assessed through the SHELAA process.

## Site assessment findings

## Site development potential

4.61 Land north of Farmor's School is approximately 6.30 ha in size and based on this area has the potential to deliver around 164 dwellings. Currently, the site is in agricultural use (pasture) and is located adjacent to the settlement boundary, to the north of the town. Topographically, the site is relatively flat with some gentle sloping.

4.62 The proposed access to this site is expected to be via Leafield Road. The site is located adjacent to Farmor's School, and as such parking and safety is an issue along Leafield Road at peak times (i.e. at the beginning and end of the school day). It is noted that Gloucestershire Highways had a scheme in place for road improvements at this location however this has been suspended. This has been addressed in a different way by the approved Fairford Primary School expansion scheme.

4.63 It is recognised that the site is being promoted for community space and some small-scale retirement/sheltered housing.

## Key constraints

4.64 Development of the site would lead to significant landscape (and historic landscape) impacts. The site is located to the north of the settlement in the open countryside and holds characteristic long-distance views. The site also falls wholly within the SLA (White Consultants, 2015). While it is recognised that there are trees and woodland lining field boundaries, limiting characteristic views to some extent, it is nonetheless considered that development would adversely impact upon the features of the SLA, which give the area a sense of unity with the Cotswolds to the north.

4.65 The site is located adjacent to Farmor School and would extend the build form to the north if development were to take place, encroaching upon the open landscape/SLA. This may set precedent for further development to the north, which may impact upon the setting of the

Cotswold AONB. However it is noted that the landscape to the north of the site is afforded a level of protection provided by Local Plan Policy EN6 (Special Landscape Area).

4.66 Being along the northern boundary, the site contributes to the historic setting of Fairford, which is valued highly by residents. Residents utilise the Pitham Brook permissive path located to the north of the site, which is valued as a community asset. The Pitham Brook Path is not a public footpath in the legal sense, but the public are able to use it when it is open. The path is closed every Tuesday.

4.67 The site also holds views of the Grade II Listed obelisk in Fairford Park (Votive Column Monument). The obelisk is a landscaping feature built in the 1750s, left from the original Fairford Park estate.

4.68 The site is in close proximity to the River Coln, which can be seen from the site itself. Again, the impact on views of this natural feature is a concern for development of the site. There is part of the site, in the triangle formed by the woods to the west and the line of conifers along the northern boundary of Farmor's School, which is effectively screened from view of the river. Additionally, an avenue of trees extends along the site which are characteristic of the area and an important feature of the landscaped Fairford Park. The main function of this avenue of trees is to provide a line of view from the old Fairford Park stables courtyard to the Grade II listed obelisk. These trees provide some minor screening for the site. However, allowing for retention of the avenue of trees referred to would leave relatively little space potentially suitable for development.

4.69 In terms of biodiversity, the site is approximately 2.1km northwest of Cotswold Water Park SSSI and is within a SSSI IRZ for 50 residential units. The River Coln is designated a KWS, which is 500m west of the site. Development has the potential to adversely impact upon the biodiversity value of the sites through disturbance and indirectly through pollution.

4.70 In terms of the biodiversity value of the site itself, the site is entirely Woodpasture and Parkland BAP Priority Habitat, and there is an avenue of trees and hedgerows which extends along the field boundary. These biodiversity features have the potential to support numerous species (notably birds) and provide connectivity to the wider countryside.

4.71 The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that the site *"is at a higher elevation and should achieve the required freeboard"* (freeboard is the distance from the water level to the ground level). The site is therefore considered to be of low risk of groundwater flooding. The site is located within flood zone 1 which is of low risk of fluvial flooding.

4.72 The Water Cycle Study carried out for the District (JBA, 2015) predicts that the WwTW at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity. Proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW. While the indicative capacity of the site is 164 it is thought that this site would not be allocated for residential development. Nonetheless, without increased capacity, new built development may still result in increased sewage pollution of the River Coln and areas downstream.

4.73 It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015).

4.74 The site is not connected with the existing settlement of Fairford, being over 1km from the town centre and shops, restricting accessibility for residents and increasing reliance on the car for access to day-to-day services. The site would therefore would not relate well to the settlement and would constitute isolated development and therefore would be contrary to NPPF (2018).

## Recommendations

4.75 This site is available however has major constraints in terms of location, landscape and historic environment. While landscape and historic environment constraints may be mitigated, the location of the site is not suitable for housing development. The site is not connected with and would not relate well to the existing settlement and would be contrary to NPPF policies (2018).

# Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C)

## SHELAA findings

4.76 SHELAA concludes site is available and achievable but not suitable for development:

- The site is part of a field used for arable farming, which is generally flat and has long views.
- The site has no defined northern boundary.
- The site is adjacent to the Special Landscape Area to the west and the Conservation Area to the south-west.
- The site's development would be an intrusion into the open countryside, the scale of which would be too large in the context of the town. It would also compromise views of the town from Public Rights of Way.
- There are also concerns about how the site would be accessed and that the amount of development would require strategic level infrastructure upgrades.

4.77 See Appendix A for further details.

# Site assessment findings

## Site development potential

4.78 Land north of Crabtree Park & Land off Leafield Road is approximately 17.40 ha in size and based on this area has the potential to deliver around 261 dwellings. Currently, the site is in agricultural use (arable) and is located adjacent to the settlement boundary, to the north of the town. Topographically, the site slopes gently from north to south.

4.79 The proposed access to this site is expected to be partly via Hatherop Road, with the eastern part of the site likely to be accessed from Leafield Road. Local knowledge suggests that there would be various pedestrian/cycle access points, including to Lovers Walk and the estates to the south. However, access should nonetheless take into consideration infrastructure improvements given the scale of development proposed. For example, improvements to the junction at the end of Hatherop Road would ensure access to the school is maintained (i.e. road does not become significantly congested).

4.80 It is recognised that the site was being proposed in the SHELAA for up to 400 dwellings in combination with Site 6: Land east of Aldsworth Close (SHELAA Ref F_51A), but is currently only being promoted for about 130 in conjunction with landscaping and infrastructure benefits.

4.81 The site owner, The Ernest Cook Trust (ECT), has proposed a scheme on this site for a limited number of houses adjoining the existing town boundary with parkland, green spaces and tree screening which would mitigate effects on the landscape, and maintain the open setting.

## Key constraints

4.82 Significant landscape constraints exist for this site. Located on the northern extent of the town, development of the site would act as an urban extension, extending the existing built form into the open countryside. The site has no definitive northern boundary and is adjacent to the Special Landscape Area (SLA) to the west. The scale of development proposed would be particularly large in the context of the town and may also set precedent for further development to the north. However it is noted that the landscape to the northwest of the site is afforded a level of protection by Local Plan Policy EN6 (Special Landscape Area).

4.83 However, the site slopes slightly to the south towards the town, limiting long distance views in to and out of the site to the wider landscape. From the south (along Lovers Walk) the site is screened entirely by dense vegetation which includes three groups of individual Tree Preservation Orders (TPOs). From other directions, mature trees and hedgerows restrict views into the site, for example from the PRoW along the southern boundary of the site.

4.84 In terms of the historic landscape, the site is adjacent to a corner of Fairford Conservation Area to the south-west. Development may impact upon the open setting of this heritage asset. The site is screened almost entirely from this by the primary school and adjacent belt of trees which may limit adverse effect on the setting of the Conservation Area. However development would still change the character of the rural area immediately to the east of the primary school.

4.85 Minor biodiversity constraints exist, given the arable field, trees and hedgerows extending along the sites boundaries and through the centre of the site. These habitats have the potential to support species and provide connectivity to the wider countryside.

4.86 The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"the low-lying parts of this area do not achieve the desired freeboard; and would be subject to groundwater flooding."* (freeboard is the distance from the water level to the ground level). Part of the site is therefore of high risk of groundwater flooding. The site is located within flood zone 1 which is of low risk of fluvial flooding.

4.87 The Water Cycle Study carried out for the District (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing

capacity. Proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW. The indicative capacity for this site is 261, significantly exceeding the 50-100-unit threshold. Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.

4.88 It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015).

4.89 It is considered that while the south of the site is well connected to the settlement, as the site extends further to the north there is a level of disconnect from the settlement, with the northern extent of the site being particularly distant from the town (over 1km from the centre and shops). Therefore the further development extends north, the further walking distance to local services and facilities. This may restrict accessibility for some residents and could increase reliance on the car for access to day-to-day services.

## Recommendations

4.90 The key issues for development at this site are landscape, risk of groundwater flooding, location in terms of distance to the settlement, and infrastructure capacity given the size and scale of the site in relation to the town. This site is therefore not suitable for development at the scale envisaged in the SHELAA.

4.91 However taking the above constraints into consideration, it is recognised that the southern half of the site could be taken forward for the purposes of the Neighbourhood Plan. The development of the south of the site in isolation coincides with the scheme proposed by Ernest Cook Trust (ECT). This includes the area south of the hedgerow running east-west through the site – see photos above.

4.92 As identified in Section 4.78, the ECT outline scheme is expected to include significant public open space and tree planting (potentially including a community orchard) providing screening from the wider landscape. However, it is noted that southern parts of the site close to ditches and Lovers Walk are subject to groundwater flooding risk. Development of the site would therefore need to take this into consideration, avoiding areas of flood risk where possible, and consider options for mitigation. Mitigation is further discussed within Section 5.7 of this Report.

4.93 Given the size and capacity of the site, and therefore depending on the scale of development proposed, wider infrastructure provision would also need to be planned for before the site was allocated to ensure the town has capacity for new development. This is of particular importance considering the high level of development recently seen in Fairford.

# Site 6: Land east of Aldsworth Close (SHELAA Ref F_51A)

## SHELAA findings

4.94 SHELAA concludes site is available and achievable but not suitable for development:

- The site is part of a field used for arable farming, which is generally flat and has long views.
- The site has no defined northern boundary.
- The site's development would be an intrusion into the open countryside, the scale of which would be too large in the context of the town. It would also compromise views of the town from Public Rights of Way.
- There are also concerns about how the site would be accessed and that the amount of development would require strategic level infrastructure upgrades.

4.95 See Appendix A for further details.

## Site assessment findings

### *Site development potential*

4.96 Land west of Aldsworth Close is approximately 22.88 ha in size and based on this area has the potential to deliver around 343 dwellings. Currently, the site is in agricultural use (arable) and is located adjacent to the settlement boundary, to the east of the town. Topographically, the site is relatively flat, rising slightly to the north.

4.97 The proposed access to this site may be via Hatherop Road or Hatherop Lane. Given the scale of development proposed infrastructure improvements will be required. For example, improvements to the junction at the end of Hatherop Road would ensure access to the school is maintained (i.e. road does not become significantly congested), and local knowledge suggests improvements to the junction of Hatherop Lane with the A1417 should also be considered

4.98 It is recognised that the site is being promoted for up to 400 dwellings in combination with Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C).

## Key constraints

4.99 In terms of landscape, development of the site would likely be an intrusion into the open countryside, the scale which would be particularly large in the context of the town leading to adverse effects on the landscape character and wider landscape setting. This may also set precedent for further development to the east into the open landscape.

4.100 It is however noted that the site is screened to some extent by vegetation surrounding the site, limiting adverse effects on views from the PRoW to the north of the site.

4.101 The site has minor biodiversity constraints. Arable field, trees/hedgerows extend along the field boundary particularly to the south of the site. These biodiversity assets have the potential to support protected species and provide connectivity to the wider countryside.

4.102 The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"the low-lying parts of this area do not achieve the desired freeboard; and would be subject to groundwater flooding"* (freeboard is the distance from the water level to the ground level). Part of the site is therefore at high risk of groundwater flooding. The site is located within flood zone 1 which is of low risk of fluvial flooding.

4.103 The Water Cycle Study carried out for the District (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity. Proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW. The indicative capacity for this site is 343, significantly exceeding the 50-100-unit threshold. Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.

4.104 It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015).

## Recommendations

4.105 The site is unsuitable for allocation in the Neighbourhood Plan as it has a number of major constraints including landscape (long distance views, intrusion into the open countryside, scale of the site in the context of the town), partial risk of groundwater flooding, and infrastructure capacity (particularly considering the high level of development recently seen in Fairford).

# Site 7: Jones' Field (SHELAA Ref F_15)

## SHELAA findings

4.106 Concludes site is available but is not achievable. Suitability is uncertain:

- Site forms part of Fairford's historic landscape and is an important green space within the Conservation Area, contributing to the town's setting, character and its well defined historic edge.
- Development of the site would have a detrimental impact employment and housing) on the setting of Morgan Hall (a Listed Building) and on the setting of Fairford Conservation Area.
- The site contains several mature trees, which form part of an area protected by Fairford's Conservation Area and is a Wood-pasture and Parkland Biodiversity Action Plan Priority Habitat.

4.107 See Appendix A for further details.

## Site assessment findings

### *Site development potential*

4.108 Jones' Field is approximately 2.31 ha in size and based on this area has the potential to deliver around 52 dwellings. Currently, the site is in agricultural use and is located adjacent to the settlement boundary, to the southeast of the town. Topographically, the site is relatively flat.

4.109 The proposed access to this site is expected to be via the London Road (A417). However local knowledge suggests that the existing gate is not sufficiently wide and is on the inside of a bend near the entrance to Cinder Lane, with restricted visibility (particularly to the east). Creating a new access or widening the existing one would likely require demolition of part of a Cotswold stone wall (in the Conservation Area) and may also adversely impact upon another feature of the historic curtilage of Morgan Hall (the ha-ha). This is discussed further below.

4.110 It is recognised that the site is being promoted for 20 lifetime home houses, public realm improvements, and a social hub pavilion.

## Key constraints

4.111 The site holds minor landscape constraints, being in a rural grassed field enclosed by a Cotswold stone wall to the north and mature trees and hedges to the east and south. Mature trees are protected by a blanket TPO and contribute towards the screening of the site. This vegetation screening is likely to limit adverse effects on views in and out of the site, including from the PRoW (Cinder Lane) which runs north to south along the east of the site, and the Fieldway ancient pathway to the south of the site. To the west the site adjoins onto the land behind Morgan Hall, which again is screened significantly by the dense vegetation and mature trees lining the site.

4.112 The site is located within Fairford Conservation Area, and the Grade II listed Morgan Hall is located 200m west. The site adjoins the grounds of Morgan Hall and contains part of the historic ha-ha which was part of Morgan Hall. Development has potential to impact on the setting of Morgan Hall, and of the Conservation Area. However, it is noted that the site is well screened by vegetation and mature trees, limiting adverse effects on setting and character.

4.113 In terms of biodiversity, the site is Woodpasture and Parkland BAP Priority Habitat. A number of mature trees (discussed above) form part of and are protected by Fairford's Conservation Area. The trees, and other vegetation present are likely to provide valuable habitats for species, and act as a wildlife corridor, providing connectivity with the wider area.

4.114 Looking at designated sites, the site is located 1km north-west of Cotswold Water Park SSSI. Potential impact on SSSIs downstream due to sewage system capacity issue. However, it is noted that the proposed Scheme Location Sketch Document (undated) states that *"a sewage treatment plant will be installed to prevent any pressure on the local drainage network."* The details of which have not been confirmed.

4.115 The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"data suggests that [the site] satisfies requirements and the development area could be larger."* The site is therefore considered to be of low risk of groundwater flooding. The site is located within flood zone 1 which is of low risk of fluvial flooding.

4.116 The Water Cycle Study carried out for the District (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration.

4.117 Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity. Proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW. The indicative capacity for this site is 52, which falls within the 50-100-unit threshold. However, it is noted that the site is promoted for only 20 specialist housing units. Nonetheless, without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.

4.118 It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015).

4.119 The site is located within best and most versatile agricultural land. Development of best and most and versatile land is seen as a key issue for the site due to the loss of natural resources.

4.120 Access to services and facilities in the town centre is poor and would involve crossing the A417. It is noted that local knowledge suggests that access (onto the A417) is not straightforward. The existing gate, which is considered to not be sufficiently wide, is on the inside of a bend near the entrance to Cinder Lane, with restricted visibility particularly to the east. Creating a new access or widening the existing one would likely require demolition of part of a Cotswold stone wall (which is located within the Conservation Area).

## Recommendations

4.121 There are a number of potential issues identified for this site including being located within Fairford Conservation Area, within the original grounds of Grade II listed Morgan Hall, including

a part of that listed building's historic curtilage (the ha and boundary wall), potential impacts on several TPOs and views from the PRoW (also ancient pathway), and loss of best and most versatile agricultural land. Access is also currently an issue for the site, and should be confirmed on to the A417; taking into consideration road safety and the protection of heritage assets present.

4.122 Providing these constraints can be effectively mitigated, the site is considered to be potentially suitable to take forward for the purposes of the Neighbourhood Plan. Mitigation is further discussed within Section 5.7 of this Report.

4.123 It is recognised that national planning guidance requires that the benefits of high quality agricultural land are taken into account in planning decision-making and that soils are protected and enhanced where possible. Careful planning and soil management can reduce soil degradation.[9]

[9] Natural England (2015) Natural England Access to Evidence Information Note EIN009 Summary of Evidence: Land Use [online] available at: publications.naturalengland.org.uk/file/5874576670064640

# Site 8: Land east of Beaumoor Place (SHELAA Ref F_38)

## SHELAA findings

4.124 Concludes site is not suitable:

- It is considered that the site's development would have unacceptable impact on setting of Morgan Hall and the Conservation Area.
- The site is also currently landlocked and has access issues, although it has been proposed that this would be overcome by the demolition of a dwelling (derelict mobile home) that is in the ownership of the landowner (this still needs to be confirmed with the landowner). CDC conclude that the demolition of a dwelling within the Conservation Area would require further consideration.

4.125 Availability and achievability of the site is unknown. See Appendix A for further details.

## Site assessment findings

### *Site development potential*

4.126 Land east of Beaumoor Place is approximately 0.48 ha in size and based on this area has the potential to deliver around 12 dwellings. Currently, the site is in agricultural use (fallow) and is located adjacent to the settlement boundary, to the south of the town. Topographically, the site is relatively flat.

4.127 Access to the site would involve demolishing a present dwelling (derelict mobile home) that is in the ownership of the landowner, which is situated close to the bowling club on East End Road. The landowner engaged developers to put forward an application using this access route, and it is noted that the dwelling was never a permanent fixture. The Examiner of the previous Fairford Neighbourhood Plan (2017) indicated that the removal of the dwelling would improve Fairford Conservation Area.

4.128 It is recognised that a proposal for the area is being developed to include parking for staff at the nearby doctors' surgery and a limited number of low level retirement bungalows.

4.129 Beaumoor Place to East end is a narrow, quiet road which may not have capacity for a significant increase in vehicle use. However, it is thought that the increased use may not be detrimental to the road given the surgery car park would be for staff (therefore only busy at the beginning and end of the day), and only a small number of specialist housing is proposed.

## Key constraints

4.130 The site holds minor landscape issues, being located in a rural grassed field, relatively enclosed by a Cotswold stone wall to the north, hedgerows to the east, hedgerows backing onto three bungalows on the South, and Beaumoor retirement home to the west. Development would impact views from the bungalows on the south side of the site and Beaumoor Place retirement homes adjacent to the west side of the site, as well as from the PRoW through the north of the site. Some screening is provided by existing vegetation lining the site.

4.131 The site is located within Fairford Conservation Area. Development therefore has the potential to impact upon the integrity of the Conservation Area, and/ or its setting. Further heritage assets potentially affected by new development at this site include the Grade II listed Moor Farmhouse located 100m south of the site and the Grade II listed Morgan Hall, located 120m north of the site. Development of the site may impact upon the historic setting of these buildings; however, some on-site screening is provided by vegetation which limits adverse effects.

4.132 The Groundwater Monitoring and Review of Flood Risk at Fairford (2018) concludes that the site is close to a *"monitoring well at Riverdale which showed a risk of groundwater flooding in T200 conditions"* (T200 identifies 200-yr max groundwater level). This would suggest that raising the ground level would be required, which may increase the visual impact of the site, and therefore may further impact on the setting of Morgan Hall.

4.133 The site is located within flood zone 1 which is of low risk of flooding, however there are small areas of low risk of surface water flooding within the site.

4.134 A small section of the site is located within best and most versatile agricultural land; the development of which would lead to the loss of natural resources.

4.135 The site holds some community value, being regularly used by dog and other walkers, and has a PROW footpath running through it, connecting East End to the Cinder Track and the Horcott Lakes. However, potential use of the site as a surgery car park would benefit the local community by providing staff with alternative car parking space and avoiding on street parking in Keble Lawns which is detrimental to local access.

4.136 In terms of biodiversity, the area is bordered on the south and east by thick hedgerows and trees, which provide a natural habitat for nesting birds, insects, rabbits and other wildlife. These habitats may also provide connectivity with the wider area.

4.137 Looking at biodiversity designations, the site is located 1km north-west of the Cotswold Water Park SSSI and may impact the SSSI downstream due to sewage system capacity issues. Adjacent residential properties have historically experienced sewage issues.

4.138 The Water Cycle Study (JBA, 2015) carried out for the District predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Fairford STW has limited capacity without the need for an upgrade. Development sites greater than 15 units are likely to require local network improvements. The indicative capacity of the site is 12 residential units, and the proposal for the site will likely be for 8 specialist houses. However, it is noted that Beaumoor Place is historically recognised for having sewage capacity/flooding issues. Local knowledge indicates that adjacent residential properties have recently experienced sewage issues.

4.139 Modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015).

4.140 A minor issue for the site is the poor access to the town centre. While the site is within 800m of the town centre, access would involve crossing the A417.

## Recommendations

4.141 This site is available with a number of constraints; the most significant relating to, groundwater flooding, access and heritage. There is also the potential for loss of an area of best and most versatile agricultural land. Access is likely to be achievable once the demolition of the derelict dwelling is confirmed, and the impacts of increased vehicular use of East End are considered. However, this is not yet confirmed.

4.142 Providing the constraints identified can be effectively mitigated, the site is considered to be potentially suitable to take forward for the purposes of the Neighbourhood Plan. Mitigation is further discussed within Section 5.7 of this Report.

4.143 However, if it can be demonstrated that the groundwater flooding issue would entirely preclude development on the site, it would not be appropriate to allocate in the Neighbourhood Plan.

4.144 It is recognised that national planning guidance requires that the benefits of high quality agricultural land are taken into account in planning decision-making and that soils are protected and enhanced where possible. Careful planning and soil management can reduce soil degradation.

4.145 A proposal for the area to be developed to include parking for doctors/staff at the nearby surgery and limited numbers of low level retirement bungalows would be most suitable for the site given its constraints.

# Site 9: Land at London Road (SHELAA Ref F_39D)

## SHELAA findings

4.146 Site not assessed through the SHELAA for housing as the site has extant planning permission (Ref: 13/03793/OUT). Permission has now been granted for eight dwellings on this site (Application ref 18/02389/FUL).

## Site assessment findings

### *Site development potential*

4.147 Land at London Road is approximately 0.49 ha in size and based on this area has the potential to deliver around 12 dwellings. Currently, the site is vacant land and is located within the settlement boundary, to the south of the town. Topographically, the site is relatively flat.

4.148 The proposed access to this site is expected to be directly from 'June Lewis Way' located on the southern boundary of the site, and from a private highway constructed from 'Morecombe Way'. It should be noted that 'Morecombe Way' and 'June Lewis Way' were constructed recently as part of the Bovis development 'Keble Fields' located to the south of the site.

4.149 Permission has now been granted for eight dwellings on this site (Application ref 18/02389/FUL).

### *Key constraints*

4.150 The site has minor landscape constraints. The site is bounded to the north by trees and an existing watercourse, to the south and west by existing roads, and to the east by an existing property and hedgerows. The site is screened from the A417 to the north by dense vegetation. The adjacent road to the south coincides with the new residential development named Keble Fields on land at London Road to the south and west. Keble Fields will comprise around 120 dwellings and is currently being constructed. It is therefore considered that the principle of residential development near the site is well established. As such, development of the site is expected to be in keeping with the surrounding residential development.

4.151 Vegetation along the site's boundaries will reduce effects on views into and out of the site, including views of the existing watercourse. Additionally, the landscape proposals provided for the proposed new development include detailed landscaping i.e. maintaining and enhancing tree cover and providing buffering.

4.152 Biodiversity constraints include the Cotswold Water Park KWS located 300m south-east of the site, and the Cotswold Water Park SSSI within 1km. Development has the potential to adversely impact upon these designated sites through habitat fragmentation/loss, and possible pollution during construction. However, given the scale of the development proposed and the current construction taking place at Keble Fields, any adverse effects are not expected to be significant.

4.153 On the site itself, there are several semi-mature/mature trees located along the northern/eastern boundaries of the site which are considered through the Ecology Survey carried out for the site (2018) to have moderate-low potential to support roosting bats. The site itself is also considered to provide moderate suitability for foraging and commuting bats due to boundary features comprising shrubs and trees. The site is also valuable for bird species and mammals such as hedgehogs and foxes. In addition to supporting species, these biodiversity features have the potential to aid connectivity with the wider area.

4.154 Flood risk drainage issues have been highlighted through the flood risk and drainage statement produced for the site (Calibro, 2018). This states that a small tributary watercourse is located close to the northern boundary of the site. The small tributary watercourse is part of the land drainage network that forms part of the River Thames catchment area. It is noted that Thornhill lakes are located approximately 350m to the south west of the site.

4.155 The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"data suggests that [the site] satisfies requirements and the development area could be larger."* The site is therefore considered to be of low risk of groundwater flooding.

4.156 The site is located within flood zone 1 which is of low risk of fluvial flooding. In terms of surface water flooding, while the site itself is not at risk from surface water flooding, immediately adjacent to the site is an area of high surface water flood risk, along the sites northern boundary.

4.157 The site is located on best and most versatile land (Grade 2), although it is now a small isolated land parcel. The loss of this would have a negative effect on the areas natural resources.

4.158 A minor issue for the site is the limited access to the town centre. Residents would likely be reliant on the car for access.

4.159 A Water Cycle Study (JBA, 2015) carried out for the District predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Development sites greater than 15 units are likely to require local network improvements. The indicative capacity of the site is 12 residential units, and the proposal for the site will likely be for less than this, at 8 residential units. It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015).

## Recommendations

4.160 It is considered that with mitigation against loss of best and most versatile land, this site is suitable for development (as it is available and there are no further significant constraints). It is however noted that permission has now been granted at the site for eight dwellings (Application ref 18/02389/FUL).

# Site 10: Field south east of granted planning permission at London Road (SHELAA Ref F_39C)[10]

## SHELAA findings

4.161 Concludes site is developable, suitable and achievable (note for either limited housing (32 dwellings) or potentially employment development). See Appendix A for further details.

## Site assessment findings

### *Site development potential*

4.162 Field south east of granted planning permission at London Road is approximately 1.31 ha in size and based on this area has the potential to deliver around 31 dwellings. Currently, the site is in agricultural use (fallow field formally used for crop production), and is located adjacent to the settlement boundary, to the south east of the town. Topographically, the site is relatively flat.

4.163 The proposed access to the site is currently undetermined. Access may be possible through the employment estate/depot, but this is restricted due to present industrial activity and the road width. This would also need to be negotiated and is not in the landowners' control. There are concerns from the local community about intensification of access to the north. Another possible option for access would be via the adjacent Bovis home development.

4.164 It is recognised that the site is being promoted for residential or employment use.

### *Key constraints*

4.165 Development of the site may lead to minor adverse effects on landscape due to visual impact and impact on setting, particularly from surrounding residential dwellings. However, the site is adjacent to an industrial area with no views in or out.

4.166 The site is located on best and most versatile agricultural land. The loss of this would have a negative effect on the areas natural resources.

4.167 In terms of the heritage value of the site, Cotswold District Council (CDC) indicate that an archaeological investigation would be needed at the site.

4.168 The site holds moderate biodiversity value, being surrounded by mature hedgerows and trees, and adjacent to the old railway embankment. This likely to be rich in biodiversity, including hedgerow birds, rabbits and insects. The railway embankment may also act as a habitat corridor, providing connectivity for wildlife throughout the area.

4.169 The site is also located 800m north of Cotswold Water Park SSSI, and 60m north of a KWS. Development has the potential to adversely impact upon these designated sites through habitat fragmentation and/or loss, and possible pollution during construction. However, considering the existing development surrounding the site it is thought that any adverse effects would not be significant.

4.170 Development of the site has the potential to impact on Cotswold Water Park SSSI downstream due to sewage system capacity issues, and water run off from the industrial site.

*4.171* The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"part of the site is likely not to have sufficient freeboard"* (Freeboard is the distance from the water level to the ground level. Negative freeboard indicates water level above ground level). Part of the site is therefore at high risk of groundwater flooding. The site is located within flood

[10] Photographs of this site not included as site was not accessible during site visit.

zone 1 which is of low risk of fluvial flooding. There are small areas of low risk of surface water flooding within the site (WRA, 2018).

4.172 The Water Cycle Study (JBA, 2015) carried out for the District predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Fairford STW has limited spare capacity without the need for an upgrade. Development sites greater than 15 units are likely to require local network improvements. The indicative capacity of this site is 32 units, exceeding the 15-unit threshold. Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.

4.173 It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015).

## *Recommendations*

4.174 The main constraint for development is access. Also of concern is that part of the site is at high risk of groundwater flooding and is also subject to surface water flooding, and development may lead to loss of best and most versatile agricultural land.

4.175 Providing these constraints can be effectively mitigated, the site is considered to be potentially suitable to take forward for the purposes of the Neighbourhood Plan. Mitigation is further discussed within Section 5.7 of this Report.

4.176 However if it can be demonstrated that the groundwater flooding issue would entirely preclude development on the site, it would not be appropriate to allocate in the Neighbourhood Plan

# Site 11: Land west of Terminus Cottage (SHELAA Ref F_52)

## SHELAA findings

4.177 Concludes site is developable, suitable and achievable. See Appendix A for further details.

## Site assessment findings

### *Site development potential*

4.178 Land west of Terminus Cottage is approximately 1.40 ha in size and based on this area has the potential to deliver around 34 dwellings. Currently, the site is in use as a horse paddock with some rough pasture and several outbuildings. The site is located adjacent to the settlement boundary, to the south east of the town.

4.179 The proposed access to the site would be directly from the A417, although there are concerns from the local community about intensification of access from the new housing development on London Road. This would particularly affect safety of pedestrian/cycle access. Alternative access would be from the employment estate, although this requires negotiation.

4.180 It is recognised that the site is being promoted for 65 residential units.

### *Key constraints*

4.181 The site is neighboured by an employment estate to the south, new housing to the west and open countryside to the north and south-west. In terms of landscape, given the presence of new housing and the existing industrial estate, it is considered that the landscape is of low sensitivity to development. The site is well screened by vegetation with no views in or out; and would be in keeping with the built form to the south and west. However, the site currently acts as a green buffer between the A417 and the new housing. The 'green' approach to the town from the east is considered important to local residents, not least to limit the perception of ribbon development. Loss of this buffer has the potential to lead to minor adverse effects on the landscape to the east of the town.

4.182 The site is located on best and most versatile agricultural land. The loss of this would have a negative effect on the areas natural resources.

4.183 In terms of biodiversity designations, the site is 900m north of Cotswold Water Park SSSI and there is a KWS located 200m south of the site. Development has the potential to lead to minor adverse effects on these designated sites through disturbance and pollution.

4.184 There is rough pasture present on the site itself, and trees and hedgerows extend along the field boundaries particularly to the north, east, and west of the site. These biodiversity features have the potential to support species and provide connectivity to the wider countryside. Agricultural buildings may also have the potential to support protected species such as bats, however this is uncertain and may require further ecological survey work.

4.185 The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"part of the site is likely not to have sufficient freeboard"* (Freeboard is the distance from the water level to the ground level). Negative freeboard indicates water level above ground level). Part of the site is therefore at high risk of groundwater flooding. The site is located within flood zone 1 which is of low risk of fluvial flooding. There is an area of medium surface water flood risk to the north of the site.

4.186 The Water Cycle Study carried out for the District (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Development sites greater than 15 units are likely to require local network improvements. The indicative capacity for the site is 34 residential units, exceeding this threshold. As such, without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.

4.187 It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015).

4.188 A significant issue for the site is the limited access, both on to the A417 and to the town centre. Notably, planning permission was recently refused for an additional dwelling at Station Cottage (17/03757/OUT) on grounds of inadequate visibility splays and access issues are similar, if not arguably greater at this location. Local knowledge suggests the developer at Station Cottage has been advised to discuss this issue with the highway authority and consider alternative access via the industrial estate or Site 10 (Field south east of granted planning permission at London Road) (which would need to be negotiated)).

## Recommendations

4.189 The main constraint for development is access. Also of concern is that part of the site is at high risk of groundwater flooding and is also subject to surface water flooding, and development may lead to loss of best and most versatile agricultural land.

4.190 Providing these constraints can be effectively mitigated, the site is considered to be potentially suitable to take forward for the purposes of the Neighbourhood Plan. Mitigation is further discussed within Section 5.7 of this Report.

4.191 However if it can be demonstrated that the groundwater flooding issue would entirely preclude development on the site, it would not be appropriate to allocate in the Neighbourhood Plan.

# 5. Conclusions

## Introduction

5.1 This site assessment has considered eleven potential sites for development within the Fairford Neighbourhood Plan area, listed below in Table 5.1. These have been evaluated utilising the consistent criteria presented in the pro-forma developed by AECOM.

## Conclusions and recommendations

5.2 Eleven sites have been considered through the site assessment, which were reviewed through a combination of desktop assessment and site visits. The location of the sites is presented in Figure 1.2.

5.3 Seven of the eleven sites are assessed as potentially suitable, and could be taken forward for the purposes of the Neighbourhood Plan if constraints identified in Table 5.1 below can be overcome:

- Site 1: Land to rear of Faulkner's Close, Horcott (SHELAA Ref F_44);
- Site 3: Land behind Milton Farm and Betterton's Close (SHELAA Ref F_35B);
- Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C)
- Site 7: Jones' Field (SHELAA Ref F_15);
- Site 8: Land east of Beaumoor Place (SHELAA Ref F_38);
- Site 10: F_39C Field south east of granted planning permission at London Road; and
- Site 11: Land west of Terminus Cottage and Station (F_52).

5.4 These sites are considered potentially suitable for development on account of:

- The location and accessibility and of the sites; and
- The environmental constraints present.

5.5 As discussed above, these constraints would need to be addressed through further investigation, as well as mitigation, including appropriate design and layout of development. The sites may then be suitable for allocation though the Neighbourhood Plan.

5.6 It should be noted that two of the seven potentially suitable sites identified are allocations within the adopted Cotswold District Local Plan (Policy S5 (Fairford))[11].

[11] Cotswold District Council (2018) Cotswold District Local Plan (2011 – 2031) [online] available at: https://www.cotswold.gov.uk/residents/planning-building/planning-policy/local-plan-2011-2031/

**Table 5.1 Suitability of sites for the purposes of the Fairford Neighbourhood Plan**

| Name | Size (ha) | Capacity (dwelling no.)[12] | SHELAA (2017) conclusion | AECOM Site Assessment conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? ) |
|---|---|---|---|---|
| Site 1: Land to rear of Faulkner's Close, Horcott (SHELAA Ref F_44) | 1.14 | 27 | Site is available, suitable and achievable. | **Potentially** - the site could be suitable for development if numerous issues resolved. The site has serious ground water flooding issues which could rule development out if the risk cannot be mitigated. Other issues include access, surface water flooding, heritage and landscape. |
| Site 2: Land west of Horcott Road (SHELAA Ref F_50) | 4.53 | 102 | Site is unsuitable:<br>• The site prevents the coalescence of Horcott and Fairford and provides a green space that forms the setting of the Conservation Area and its relationship with the countryside, which would be removed by the site's development.<br>• There are also non-designated heritage assets within the western part of the site, which is a historic stone field shelter and enclosure. These structures and their field setting would be severely compromised by development, even if retained.<br>• There are also highways concerns at Horcott Road's junction with London Road. | **No** - the site is not considered a suitable development location due to several significant constraints including landscape, historic environment and access. |
| Site 3: Land Behind Milton Farm and Bettertons Close (SHELAA Ref F_35B) | 1.97 | 47 | Site is available, suitable and achievable. | **Potentially** - the site could be suitable for development if concerns regarding access, agricultural land, WwTW, and impact on landscape, settlement character and heritage are addressed. It is noted that the landowner has stated site is currently not available however the Local Plan Inspector's Report (June 2018) states that "*T=the site is in a suitable location for development, and it is quite possible that the landowner's intentions could change again over the next ten years or so. I* |

[12] Indicative capacity calculated using AECOM's standard method; see Chapter 3 for further detail.

| Name | Size (ha) | Capacity (dwelling no.)[12] | SHELAA (2017) conclusion | AECOM Site Assessment conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? ) |
|---|---|---|---|---|
| | | | | *therefore consider there to be a reasonable prospect of 49 dwellings being built on the site by 2031.*" |
| Site 4: Land north of Farmor's School | 7.30 | 47 | N/A | **No** - the site is not considered a suitable development location due to several significant constraints including landscape, historic environment and location. |
| Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C) | 17.40 | 261 | Site is available and achievable but not suitable for development:<br>• The site is part of a field used for arable farming, which is generally flat and has long views.<br>• The site has no defined northern boundary.<br>• The site is adjacent to the Special Landscape Area to the west and the Conservation Area to the south-west.<br>• The site's development would be an intrusion into the open countryside, the scale of which would be too large in the context of the town. It would also compromise views of the town from Public Rights of Way.<br>• There are also concerns about how the site would be accessed and that the amount of development would require strategic level infrastructure upgrades. | **Potentially** - the southern half of the site is potentially suitable with no significant constraints (coinciding with the scheme proposed by ECT). |
| Site 6: Land east of Aldsworth Close (SHELAA Ref F_51A) | 22.88 | 343 | Site is available and achievable but not suitable for development:<br>• The site is part of a field used for arable farming, which is generally flat and has long views.<br>• The site has no defined northern boundary.<br>• The site's development would be an intrusion into the open countryside, the scale which would be too large in the context of the town. It would also compromise views of the town from Public Right of Ways. | **No** - the site is not considered a suitable development location at this time due to several significant constraints including landscape, groundwater flood risk and infrastructure capacity. |

| Name | Size (ha) | Capacity (dwelling no.)[12] | SHELAA (2017) conclusion | AECOM Site Assessment conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? ) |
|---|---|---|---|---|
| | | | • There are also concerns about how the site would be accessed and that amount of development would require strategic level infrastructure upgrades. | |
| Site 7: Jones' Field (SHELAA Ref F_15) | 2.31 | 52 | Site is available but is not achievable. Suitability is uncertain:<br>• Site forms part of Fairford's historic landscape and is an important green space within the Conservation Area, contributing to the town's setting, character and its well defined historic edge.<br>• Development of the site would have a detrimental impact on the setting of Morgan Hall (a Listed Building) and the Conservation Area.<br>• The site contains several mature trees, which form part of an area protected by Fairford's Conservation Area and is a Wood-pasture and Parkland Biodiversity Action Plan Priority Habitat. | **Potentially** - the site could be a suitable development location if the issues relating to access, heritage, and loss of best and most versatile agricultural land are resolved. |
| Site 8: Land east of Beaumoor Place (SHELAA Ref F_38) | 0.48 | 12 | Site is not suitable:<br>• It is considered that the site's development would have unacceptable impact on setting of Morgan Hall and the Conservation Area.<br>• The site is also currently landlocked and has access issues, although it has been suggested that this could be overcome by the demolition of a dwelling (derelict mobile home) that is in the ownership of the landowner (this still needs to be confirmed with the landowner). CDC conclude that the demolition of a dwelling within the Conservation Area would require further consideration. | **Potentially** - the site could be a suitable development location if numerous issues resolved; predominately access, heritage, amenity, ground water flood risk, and loss of best and most versatile agricultural land. |
| Site 9: Land at London Road (SHELAA Ref F_39D) | 0.49 | 12 | N/A | **No** - the site has planning permission and therefore it has been established that the site is suitable and available for development and does not need to be allocated. |

| Name | Size (ha) | Capacity (dwelling no.)[12] | SHELAA (2017) conclusion | AECOM Site Assessment conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? ) |
|---|---|---|---|---|
| Site 10: F_39C Field south east of granted planning permission at London Road | 1.31 | 31 | Site is developable, suitable and achievable (note for either limited housing (32 dwellings) or potentially employment development). | **Potentially** - the site could be a suitable development location if the access and ground and surface water flooding issues are resolved. |
| Site 11: Land west of Terminus Cottage and Station (F_52) | 1.40 | 34 | Site is available, suitable and achievable. | **Potentially** - the site could be a suitable development location if the access and ground and surface water flooding issues are resolved. |

# Overcoming constraints

5.7 It is recognised that the Site Assessment process has not been able to be conclusive in relation to the seven potentially suitable sites. Further investigation is needed into whether these sites could be suitable with appropriate mitigation, or whether they would be found unsuitable.

5.8 The following mitigation is suggested to address the constraints identified throughout Chapter 4 of this report:

- **Access:** Deliver measures designed to achieve access. This may include new vehicular access, alterations, or widening of existing access roads. Where safety is a concern, new developments could be required to provide on-site footways and pedestrian safety measures to facilitate pedestrian access to the town centre and community facilities (i.e. schools).
- **Flood risk:** The NPPF (2018)(para 155) states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- Sites in Flood Zone 2 and 3 would require sequential testing to demonstrate there are no suitable sites outside of high flood risk areas. Sites with surface water or ground water flooding issues would need further investigation to understand whether there are measures that could reduce the risk of flooding to allow them to be acceptable for development.
- Specific flood risk mitigation includes providing detailed designs for sites including water management measures. Sustainable Drainage Systems (SuDS) are often used to manage surface water drainage, being incorporated into open space and parking areas, in addition to green roofs and attenuation tanks in constrained areas. Government policies and the Water Framework Directive (WFD) provide further requirements related to surface water management and the impact housing development has on surface water drainage and water quality of local environments.[13]
- Specific mitigation measures need to take account of the revised Cotswold District SFRA (2016) and the guidance it contains, particularly in relation to surface water, groundwater and flooding from sewers.
- **Historic Environment:** The NPPF (2018) (Para 190) requires that the significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) should be identified and assessed, taking account of the available evidence and any necessary expertise. This should be taken into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- Early appraisals, a conservation plan or targeted specialist investigation can help to identify constraints and opportunities arising from the asset at an early stage. Such studies can reveal alternative development options, for example more sensitive designs or different orientations, that will deliver public benefits in a more sustainable and appropriate way.
- A design and access statement may be used to demonstrate how the proposed design has responded to the historic environment through including the necessary heritage assessment.[14] Planning Practice Guidance (PPG) (2014) and the NPPF (2018) recognise that securing high quality design is an integral part of sustainable development.
- In terms of specific mitigation measures, particular attention should be paid to the approaches to heritage assets and views from heritage assets. Screening measures should be in place in these areas to ensure any visual harm is reduced. Screening may be visual or acoustic, and is often provided through planting. Note that screening requires careful consideration with regards to the impact of the screening on the heritage asset.

[13] The EU Water Framework Directive (updated 2016) [online] available at: http://ec.europa.eu/environment/water/water-framework/index_en.html

[14] Planning Portal (2019) What is a Design and Access Statement? [online] available at:https://www.planningportal.co.uk/faqs/faq/51/what_is_a_design_and_access_statement

Screening may have as intrusive an effect on the setting as the development it seeks to mitigate, so where it is necessary, it too merits careful design.

- For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence or noisiness of a development. In other cases, good design may reduce or remove the harm, or provide enhancement. The design quality may be an important consideration in determining the balance of harm and benefit. Further guidance is provided by Historic England (2015) The Setting of Heritage Assets.[15]
- All development in and adjacent to a Conservation Area should be carried out in conjunction with the Conservation Area Appraisal and Management Plan prepared for the Conservation Area. However, an appraisal has not be carried out for Fairford Conservation Area. It is recommended that this is further investigated by FTC, and is supported by CDC and Historic England. This will provide an appropriate basis for the protection and enhancement of the Conservation Area, and provide guidance for proposed development. An example is the locally prepared Kemble Conservation Area Appraisal and Management Guidance (2014).[16]
- **Landscape:** The NPPF (2018) (para. 127) requires that development be sympathetic to local character, including the surrounding built environment and landscape setting. As discussed for the Historic Environment above, mitigation of adverse effects will be proposed through design and layout, requiring development to take account of important views through screening and landscaping.
- The rural character and setting of the town could be protected by incorporating vegetated landscape buffers (of an appropriate depth) to take account of the topography of a site and/or its location within the town to include local native trees and hedging, around the outer edge where development meets and connects with the rural landscape.
- Landscaping may also include the retention of substantial connected networks of green space in urban, urban fringe and adjacent countryside areas. Connected networks of green space will contribute towards maintaining adequate open landscape space, avoiding coalescence and ensuring the perception and experience of the settlement is separate, distinct and rural. Developer contributions may also be utilised in this respect to facilitate improvements to the quality and robustness of green space.
- **Biodiversity:** mitigation may include requiring a commitment to 'biodiversity net gain'. This seeks to enhance the biodiversity value of a site through incorporating enhancements to habitats and ecological networks through new development.
- Development proposals should maintain and enhance existing on-site biodiversity assets, delivering 'net gain' in line with Policy 8 (Biodiversity and Geodiversity: Features, Habitats and Species) of the Cotswold Local Plan, and provide for wildlife needs on site, where possible. On-site biodiversity enhancements include new roosting features for bats or nesting features for birds, and should be incorporated into the fabric of the development. For small sites, a contribution to biodiversity enhancement elsewhere in the parish may be made.
- **BMV agricultural land**: It is recognised that national planning guidance requires that the benefits of high quality agricultural land are taken into account in planning decision-making and that soils are protected and enhanced where possible. Careful planning and soil management can reduce soil degradation.[17]

[15] Historic England (2015) The Setting of Heritage Assets [online] available at: https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets.pdf/

[16] Montagu Evans (2016) Kemble Conservation Area Appraisal and Management Guidance [online] available at: https://www.cotswold.gov.uk/residents/planning-building/historic-buildings-conservation-areas/conservation-area-maps-and-appraisals/

[17] Natural England (2015) Natural England Access to Evidence Information Note EIN009 Summary of Evidence: Land Use [online] available at: publications.naturalengland.org.uk/file/5874576670064640

# Next steps

5.9 It is now for FTC to decide which of the potential sites is most appropriate to allocate to meet the identified needs of the Neighbourhood Plan area.

5.10 It is advised that FTC discuss the proposed sites for allocation and emerging policies with CDC to ensure that the identified sites and policies would be supported by CDC as the Local Planning Authority.

5.11 Sites to be taken forward for the purpose of the Neighbourhood Plan will be considered and chosen by FTC on the basis of:

- The findings of this site assessment;
- Responses received during consultation on proposed sites;
- The scope for the sites to meet identified infrastructure needs of the community;
- Viability studies; and
- The extent to which the sites support the vision and objectives for the Neighbourhood Plan.

5.12 If sites identified as uncertain are included in the Fairford Neighbourhood Plan, it is recommended that the policy approaches proposed by the Neighbourhood Plan should seek to address the potential constraints highlighted in this report and through the Strategic Environmental Assessment process soon to be undertaken for the plan. This can include targeted site-specific Neighbourhood Plan policies to address the elements raised relating to environmental constraints and accessibility.

5.13 It is recommended that the findings of this report and the steps above are incorporated within the next stages of development for the Neighbourhood Plan in conjunction with engagement with landowners, CDC and other stakeholders.

# Appendix A Identification of sites for assessment

## Table A.1 Identification of sites for assessment

| SHELAA Ref | Site Name | SHELAA comment | SHELAA deliverability | Fairford Town Council comment | Detailed assessment? |
|---|---|---|---|---|---|
| F_1 | Telephone exchange, London Road | Below 5 dwelling threshold | Discounted | Site falls within the development boundary of Fairford but could only deliver small scale (less than 5 dwellings) residential development and offers no opportunity to deliver any social infrastructure in line the vision and objectives for the Neighbourhood Plan. | No |
| F_2 | East Glos. Engineering Co., Lower Croft | Below 5 dwelling threshold | Discounted | Site falls within the development boundary of Fairford but could only deliver small scale (less than 5 dwellings) residential development and offers no opportunity to deliver any social infrastructure in line the vision and objectives for the Neighbourhood Plan. | No |
| F_3 | 3 Cinder Lane | Below 5 dwelling threshold | Discounted | Site falls within the development boundary of Fairford but could only deliver small scale (less than 5 dwellings) residential development and offers no opportunity to deliver any social infrastructure in line the vision and objectives for the Neighbourhood Plan. | No |
| F_5 | Applestone House | Unavailable - landowner confirms that the site is not available for residential or economic development. The site may be realised in future, although there is no reasonable prospect or certainty that new residential units or economic development will be delivered within the plan period. However, if the site were to become available in future, it may be suitable for a residential and / or office (Class B1) conversion, subject to a full investigation of constraints. | Not currently developable | Site falls within the development boundary of Fairford. Site is not currently available for residential or economic development. If circumstances change then it may be a suitable site in the future. | No |
| F_8 | Coln House School | Unavailable - landowner confirms that the site is not available for residential or economic development. However, if the site | Not currently developable | Site falls within the development boundary of Fairford. Site is not currently available for | No |

| SHELAA Ref | Site Name | SHELAA comment | SHELAA deliverability | Fairford Town Council comment | Detailed assessment? |
|---|---|---|---|---|---|
| | | were to become available in future, it may be suitable for a residential and / or office (Class B1) conversion, subject to a full investigation of constraints. | | residential or economic development. If circumstances change then it may be a suitable site in the future. | |
| F_14 | Former Arc Concrete Works | Site at Whelford Road (part of protected existing employment site EES28). Not within or adjacent to Fairford's Development Boundary in the emerging Cotswold District Local Plan. | Discounted | Site does not fall within the development boundary of Fairford. Remote from the town. | No |
| F_15/ FDD_E2 | Jones' Field, London Road | Unsuitable - site forms part of Fairford's historic landscape and is an important green space within the Conservation Area, contributing to the town's setting, character and its well defined historic edge. Its development would also have a detrimental impact employment and housing) on the setting of Morgan Hall (a Listed Building) and the Conservation Area. The site also contains several mature trees, which form part of an area protected by Fairford's Conservation Area and is a Wood-pasture and Parkland Biodiversity Action Plan Priority Habitat. | Not currently developable | Site is adjacent to the development boundary of Fairford. The site falls within the Conservation Area and provides important local open/green space. Development is likely to have a significant adverse effect on the setting on the Conservation Area as well as Listed Buildings. | No |
| F_20A/ FFD_E3 | Land south-east of Fairford | Unsuitable - site is currently 'land locked' with access being a major issue preventing development. Detailed survey shows site is predominantly Grade 3a agricultural land. Development would also break away from existing settlement pattern into open countryside. CDC landscape assessment on the recent East End application would seem to have a significant bearing on F_20A (as well as F_45 and F_38).<br>This field has been identified as a major flow route into lake 104 and should be reserved for "safeguarding land from development that is required for current and future flood management". | Not currently developable | Site is adjacent to the development boundary of Fairford. The site is land locked. CDC landscape assessment states "This field has been identified as a major flow route into lake 104 and should be reserved for "safeguarding land from development that is required for current and future flood management"." | No |
| F_20B | Land south-east of Fairford | Not within or adjacent to Fairford's Development Boundary in the emerging Cotswold District Local Plan. The site is also mostly in Flood Zone 3a (SFRA Level 2) and its development would be unsuitable. | Discounted | Site does not fall within the development boundary of Fairford. The majority of the site is within Flood Zone 3 and there are a sufficient number of alternative sites in areas of lower flood risk. | No |
| F_21 | Moor Lane | Flood Zone 3b (SFRA Level 2) | Discounted | Site partially falls within the development boundary of Fairford. The site falls within Flood Zone 3 and there are a sufficient number of alternative sites in areas of lower flood risk. | No |
| F_24 | Former Fairford Railway Station | Unavailable - site comprises the former railway station, which has been demolished and now partly contains some naturally | Not currently developable | Site is adjacent to the development boundary of Fairford. The site is part of an Established | No |

| SHELAA Ref | Site Name | SHELAA comment | SHELAA deliverability | Fairford Town Council comment | Detailed assessment? |
|---|---|---|---|---|---|
| | | reoccurring scrubland and the hardstanding of the adjacent employment units. The site is part of an 'Established Employment Site' in the emerging Local Plan and is therefore unsuitable for residential use. The linear shape would have design implications for any further employment development. The site is remote from the main settlement and the scrubland may have ecological value, which would require further investigation and potential mitigation. There may be potential for an extension of the existing employment facilities, although the site has not been confirmed as being available for further development. | | Employment Site (EES27) in Policy S5 of the emerging Local Plan. | |
| F_26 | Rear of Hatherop Road | Unsuitable and unachievable - backland site comprising 14 gardens in multiple ownership. Former Urban Capacity Study site with no expression of developer interest. The site is 'land locked' and access is unachievable. | Not currently developable | Site falls within the development boundary of Fairford. Site is land locked, under multiple ownership and there is no expression of developer interest. | No |
| F_29 | The Tan House, Back Lane | Part of site has planning for a residential unit, which is now complete. The remaining site area is within Flood Zone 3b (SFRA Level 2). | Discounted | Site falls within the development boundary of Fairford. The site falls within Flood Zone 3 and there are a sufficient number of alternative sites in areas of lower flood risk. | No |
| F_32 | Highgate, West End Gardens | Extant planning permission (Ref: 14/04847/REM) | Extant planning permission | Site falls within the development boundary of Fairford. The site has now been built out. | No |
| F_34 | Bloor 2 | Extant planning permission for 120 dwellings (Ref: 15/02707/REM) | Extant planning permission | Site falls within the development boundary of Fairford. The site has now been built out. | No |
| F_35B | Land Behind Milton Farm and Bettertons Close | The site is a field in agricultural use forming part of Milton Farm. Milton Farm is tenanted but the site has potential to deliver a residential development within 15 years. The site currently provides a link between Milton Farm and its central operational base. A fully operational service road across the site to link the farm buildings to the land to the west would most likely be required if the farm remained in operation. The continued operation of the farm (with its associated farm traffic) may impact on the sale value of any new housing. The impact of increased traffic on approach roads would also need to be considered, although an access link has retained from the new housing development to the south.<br>The site has few development constraints and is suitable for further residential development. However, given the amount of | 49 dwellings in 11-15 years | Site falls within the development boundary of Fairford. Site is included as an allocation within Policy S5 of the emerging Local Plan. This site is near to the Special Landscape Area to the east and the Conservation Area to the south-east. Development of this site in conjunction with redevelopment of Milton Farm could have an impact on the setting of this, as referred to in the October 2014 update of the Study of land surrounding Key Settlements in Cotswold District (p64). | Yes |

| SHELAA Ref | Site Name | SHELAA comment | SHELAA deliverability | Fairford Town Council comment | Detailed assessment? |
|---|---|---|---|---|---|
| | | development that has occurred in Fairford in recent years, the town's infrastructure may need time expand before further development occurs. This is likely to prevent the site from being developed straight away. Archaeological investigation would also be needed if the site were to come forward. | | Also the agricultural buildings must be retained to prevent adverse visual impact from the Mill and Oxpens. | |
| F_36B | Land south of Cirencester Road | Unsuitable - the site is a field used for arable farming located on the south-western edge of Fairford. The site is visible from the A417 and there are long views out to the west. A planning application for 92 dwellings was refused on part of the site (Ref:16/01766/OUT). Refusal reasons included the encroachment into the countryside that would have infilled the important rural buffer between Fairford and Horcott. The site was said to be a valued landscape with a number of landscape and visual qualities that contribute to Fairford's attractive rural setting that could be appreciated from a number of local visual receptors. The site's development was also said to be harmful to the setting of Fairford's Conservation Area, its settlement character as a small rural market town, and the strongly rural character of this particular area. Appeal decision awaiting. | Not currently developable | This site overlaps with F_50 and is subject to the same constraints. The site is adjacent to the development boundary of Fairford. The site is important as a rural buffer between Fairford and Horcott and there is no developer interest. Appeal refused. | No |
| F_38 | Land east of Beaumoor Place | Unsuitable - although the site is considered to be suitable for a development of up to 10 dwellings in the pre-submission Fairford Neighbourhood Plan (2016-31), it is considered that the site's development would have unacceptable impact on setting of Morgan Hall and the Conservation Area.<br>The site is also currently landlocked and has access issues, although it has been suggested that this could be overcome by the demolition of a dwelling (derelict mobile home) that is in the ownership of the landowner (this still needs to be confirmed with the landowner). However, the landowner engaged developers to put forward an application using the access route proposed, and it is noted that the dwelling was never a permanent fixture. The dwelling only had temporary consent and the Examiner of the previous FNP indicated that its removal would improve the Conservation area. Nonetheless, CDC conclude that the demolition of a dwelling within the Conservation Area would require further consideration. | Not currently developable | The site is adjacent to the development boundary of Fairford. Development at this site could provide community infrastructure, in the form of additional parking for the adjacent Doctor surgery. It was felt by FTC that community benefit outweighed possible impact on the setting of Morgan Hall if mitigated by small number of low rise houses and green space adjacent to PRoW.<br>Given this, it is considered appropriate to take this site forward for more detailed consideration. | Yes |

| SHELAA Ref | Site Name | SHELAA comment | SHELAA deliverability | Fairford Town Council comment | Detailed assessment? |
|---|---|---|---|---|---|
| F_39A/ FFD_E1 A | Field north-west of granted planning permission at London Road (13/03793/OUT) | Unsuitable - site comprises a sports pitch, which is an important local facility that should be retained. There are concerns about how a safe access could be achieved. A number of hedges and trees within the site have ecological value and there is some species rich grassland, much of which would also need to be retained. There are also indications that an old badger set may be located close by. | Not currently developable | The site is adjacent to the development boundary of Fairford. The sports pitch is an important local recreational facility. | No |
| F_39B/ FFD_E1 A | Fairford Town Football Club | Unsuitable - site occupied by Fairford Town Football Club. Concerns about how the relocation of the football club to a suitable alternative site in the town can be achieved. There are also concerns about the suitability of access to the site from Cinder Lane or London Road. The site also has important trees and hedge on its southern edge. | Not currently developable | The site is adjacent to the development boundary of Fairford. The site is occupied by Fairford Town Football Club and there are currently no suitable alternatives for relocation. | No |
| F_39C/ FFD_E1 B | Field south-east of granted planning permission at London Road (13/03793/OUT) | The site is a fallow field formally used for crop production, which is Grade 3a best and most versatile land. It is a proposed 'business' allocation in the pre-submission Fairford Neighbourhood Plan (2016-31). The site is adjacent to a new residential development to the north and west and an employment estate to the south-east. Access may be possible through the employment estate, although this would need to be negotiated and is not in the landowners' control. There are concerns from the local community about intensification of access to the north. The noise impact from adjacent employment uses may also constrain development and there are concerns about the distance to Fairford's services and facilities. Any hedges and trees buffers surrounding the site, which are likely to have biodiversity value, should be retained. However, the site is considered suitable for a residential or potentially an employment development, subject to achieving an acceptable access and overcoming the groundwater flood risk issue. Given the amount of development that has occurred in Fairford in recent years, the town's infrastructure may need time expand before further development occurs. This is likely to prevent the site from being developed straight away. Archaeological investigation would also be needed. | 32 dwellings or some B Class employment development in 11-15 years | The site is adjacent to the development boundary of Fairford. The site is identified through the CDC's SHELAA process as being available, suitable and achievable so has therefore been carried forward for detailed assessment. | Yes |
| F_39D | Land at London Road (community facilities area) | Extant planning permission (Ref: 13/03793/OUT). Remaining part of the outline permission that will be used for community / healthcare facility. | Extant planning permission | Site falls within the development boundary of Fairford. The site has extant planning permission. | Yes |

| SHELAA Ref | Site Name | SHELAA comment | SHELAA deliverability | Fairford Town Council comment | Detailed assessment? |
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| | | | | There is however now developer interest for a few houses on this site. | |
| F_40 | Land east of Lygon Court | Unsuitable - the site is a field in active agricultural use that has flat topography and is bound by mature trees and hedges. The site is neighboured by housing to the north, the bowling club to the west and fields to the south and east. The site experiences high flood risk with Flood Zone 3a and 2 (SFRA Level 2) across whole site. The site is also Grade 3a best and most versatile land and its development would lose productive agricultural land. The site's development would urbanise the southern approach to the town, particularly from the footpath that runs across the site, and would comprise an intrusion into open countryside. It also forms an important green space in the setting of the Conservation Area. A local network electricity line is located to the south of the site. Access may also be an issue as the road approaching the site appears to be in private ownership. There is also a Strategic Nature Area adjacent to southern boundary. | Not currently developable | The site is adjacent to the development boundary of Fairford. Entire site falls within Flood Zone 3 and there are a sufficient number of alternative sites in areas of lower flood risk. | No |
| F_41 | Land east of Morgan Hall | Unsuitable - site contributes an important part in the heritage landscape and the town's setting. Development would have an adverse impact on the Conservation Area and the setting of Morgan Hall, a Listed Building. The site is also Wood-pasture and Parkland Biodiversity Action Plan Priority Habitat. | Not currently developable | The site is adjacent to the development boundary of Fairford. The site falls within the Conservation Area and provides important open/green space. Development would have a significant adverse effect on the setting on the Conservation Area as well as Listed Buildings. | No |
| F_42 | Land known as Fairford Ground, adjacent to Horcott | Below 5 dwelling threshold - the development of five or more dwellings would not be suitable on this particular site | Discounted | The site is adjacent to the development boundary of Fairford. Site could only deliver small scale (less than 5 dwellings) residential development and offers no opportunity to deliver any social infrastructure in line the vision and objectives for the Neighbourhood Plan. | No |
| F_44 | Land to rear of Faulkner's Close, Horcott | The site is currently scrubland with a belt of trees along the south-west boundary, which may have been planted to screen the original minerals workings to the south. It is neighboured by low density single-storey housing to the north-east (whose character should be respected in any new development), Horcott Industrial Estate to the north-west, a lake to the south-west (a former gravel pit and KWS) and open countryside to the | 12 dwellings in 11-15 years | Site falls within the development boundary of Fairford. Site is included as an allocation within Policy S5 of the emerging Local Plan. | Yes |

| SHELAA Ref | Site Name | SHELAA comment | SHELAA deliverability | Fairford Town Council comment | Detailed assessment? |
|---|---|---|---|---|---|
| | | south-east. The site is proposed as a new visitor facility and parking area in the pre-submission Fairford Neighbourhood Plan (2016-31), although it is submitted for consideration for residential use in the SHELAA. The site is accessed by a narrow gravel track and a suitable access may be difficult to achieve, although access may be possible from the south-west corner. The distance to the town's services and facilities is a concern. There are also power lines / pylons, a thick tree belt and a footpath along the southern boundary. There is potential for currently unknown heritage assets due to the density of known sites in the near vicinity and the lack of previous archaeological investigation of this site. The site has some ecological value and is adjacent to a lake and the impact of development would require further investigation and potential mitigation. The trees along the south would need to be retained, although there may be potential for a limited single storey development within the north of the site, subject to overcoming the access and landscape issues. Given the amount of development that has occurred in Fairford in recent years, the town's infrastructure is likely to need time expand before further development occurs. This may prevent the site from being developed straight away | | | |
| F_45 | Land to rear of the Bull Pens | Unsuitable - site is a green space sandwiched between two Listed Buildings (Morgan hall and Moor farm). Development would have an adverse impact on the setting of Morgan Hall and the Conservation Area adjacent. The site is also currently 'landlocked' with access issues. | Not currently developable | The site is adjacent to the development boundary of Fairford. Development would have a significant adverse effect on the setting on the Conservation Area as well as the setting of Listed Buildings. Site also landlocked, with access issues. | No |
| F_46 | Land south-west of Saxon Way, West End | Extant planning permission (Ref: 14/04847/REM) | Extant planning permission | Site falls within the development boundary of Fairford. The site has now been built out. | No |
| F_49 | Land at Waiten Hill Farm | Extant planning permission (Ref: 15/02817/FUL) | Extant planning permission | The site falls within the development boundary for Fairford. The site has extant planning permission. | No |
| F_50 | Land west of Horcott Road | Unsuitable - the site prevents the coalescence of Horcott and Fairford and provides a green space that forms the setting of the Conservation Area and its relationship with the countryside, which would be removed by the site's development. There are also non-designated heritage assets within the western part of | Not currently developable | The site is adjacent to the development boundary of Fairford. Despite the importance of the site as a rural buffer between Fairford and Horcott, given developer interest it is considered appropriate to | Yes |

| SHELAA Ref | Site Name | SHELAA comment | SHELAA deliverability | Fairford Town Council comment | Detailed assessment? |
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| | | the site, which are a historic stone field shelter and enclosure. These structures and their field setting would be severely compromised by development, even if retained. There are also highways concerns at Horcott Road's junction with London Road. A planning application for 92 dwellings was refused on the site (Ref: 16/01766/OUT). Appeal decision awaited. | | carry this site forward for further detailed consideration. | |
| F_51A | Land east of Aldsworth Close | Unsuitable - the site is part of a field used for arable farming, which is generally flat and has long views. The site has no defined northern boundary. The site's development would be an intrusion into the open countryside, the scale which would be too large in the context of the town. It would also compromise views of the town from Public Rights of Way. There are also concerns about how the site would be accessed and that the amount of development would require strategic level infrastructure upgrades. | Not currently developable | The site is adjacent to the development boundary of Fairford. While development at this site has no defined northern boundary, and would be an intrusion into the open countryside, the SA for the emerging Local Plan (Submission SA Report, Appendix II) identified the area to the North East of Fairford as being the least constrained for development.<br><br>The landowner has requested that this site be considered further as part of the plan-making process. As a result, it is considered appropriate to carry this site forward for further detailed consideration. | Yes |
| F_51B | Land north of Crabtree Park | Unsuitable - see comments for F_51A - same comments apply, although the site is also adjacent to the Special Landscape Area adjacent to the western boundary. | Not currently developable | The site is adjacent to the development boundary of Fairford. While development at this site has no defined northern boundary, and would be an intrusion into the open countryside, the SA for the emerging Local Plan (Submission SA Report, Appendix II) identified the area to the North East of Fairford as being the least constrained for development.<br><br>The landowner has requested that this site be considered further as part of the plan-making process and together with F_51C as a larger single site. As a result, it is considered appropriate to carry this site forward in-combination with F_51C for further detailed consideration. | Yes |

| SHELAA Ref | Site Name | SHELAA comment | SHELAA deliverability | Fairford Town Council comment | Detailed assessment? |
|---|---|---|---|---|---|
| F_51C | Land off Leafield Road | Unsuitable - the site is part of a field used for arable farming, which is generally flat and has long views. The site has no defined northern boundary. The site is adjacent to the Special Landscape Area to the west and the Conservation Area to the south-west. The site is neighboured by housing to the south and Farmor's School to the west. Open countryside extends in all other directions. However, there are concerns that the site's development would be an intrusion into open countryside and that an 80-dwelling development would be inappropriate in this location. There are also concerns about how a suitable access could be achieved. Please note, the pre-submission Fairford Neighbourhood Plan (2016-31) proposes a housing development of up to 80 homes and other uses in conjunction with the school on F_51C. | Not currently developable | The site is adjacent to the development boundary of Fairford. While this site is adjacent to the Special Landscape Area and would result in an extension to the development boundary of Fairford, there is an opportunity for development to enable the release of sufficient land within the site on its frontage to assist with the long-term expansion of the adjacent school. This is a particular issue given all the recently completed and extant planning permissions.<br>The landowner has requested that this site be considered further as part of the plan-making process and together with F_51B as a larger single site. As a result, it is considered appropriate to carry this site forward in-combination with F_51B for further detailed consideration. | Yes |
| F_52 | Land west of Terminus Cottage and Station Cottage | The site is a horse paddock with some rough pasture and several outbuildings. It is neighboured by an employment estate to the south, new housing to the west and open countryside to the north and south-west. The site currently acts as a green buffer between the A417 and the new housing development to the west. Access directly from the A417 would be difficult to achieve and would be unpreferable. There are also concerns from the local community about intensification of access from the new housing development on F_39 / FFD_E1B. A more suitable access is from the employment estate, although this requires negotiation. The site has limited accessibility to the town centre. Notwithstanding this, a low-density development that respects the site's character at the entrance to the town may be possible, subject to achieving a suitable access and retaining the green infrastructure and boundary treatments. Given the amount of development that has occurred in Fairford in recent years, the town's infrastructure needs time expand before further development occurs. This is likely to prevent the site from being developed straight away. | 17 dwellings in 11-15 years | The site is adjacent to the development boundary of Fairford. The site is identified through the CDC's SHELAA process as being available, suitable and achievable so has therefore been carried forward for detailed assessment. | Yes |
| F_54 | Land at Horcott Lakes | The site is part of a series of former sand and gravel extraction pits that are now lakes with associated maturing landscaping on | Discounted | Site does not fall within the development boundary for Fairford. The site is not considered suitable for | No |

| SHELAA Ref | Site Name | SHELAA comment | SHELAA deliverability | Fairford Town Council comment | Detailed assessment? |
|---|---|---|---|---|---|
| | | the margins of the lakes. It is a proposed mixed allocation (including renewable energy, flood risk management, residential, community and leisure uses) in the pre-submission Fairford Neighbourhood Plan (2016-31). However, the site is not within or adjacent to the Development Boundary of a Principal Settlement identified within the emerging Cotswold District Local Plan and is therefore a location that would not be allocated in the Cotswold District Local Plan. | | residential uses given its separation from Fairford Town. | |
| New site | Land north of Farmor's school | Not considered through the SHELAA | N/A | Site does not fall within the development boundary for Fairford. Landowner recently proposed the site as being available for development and could deliver employment and educational opportunities with links to Farmor's School and the Primary School. There may also be the opportunity for community space and some small-scale retirement/sheltered housing. While the site falls within the Special Landscape Area given the landowner interest and potential to deliver community infrastructure the site carried forward for further detailed consideration. | Yes |

# Appendix B Completed site appraisal proformas

## Site 1: Land to rear of Faulkner's Close, Horcott (SHELAA Ref F_44)

Site F_44: Land to rear of Faulkner Close, Horcott

| *General information* | |
|---|---|
| **Site Reference / name** | Land to rear of Faulkner's Close, Horcott (SHELAA Ref F_44) |
| **Site Address (or brief description of broad location)** | Behind Faulkner's Close, Horcott |
| **Current use** | Greenfield scrubland and BAP Woodland. |
| **Proposed use (in Neighbourhood Plan)** | The draft Fairford Neighbourhood Plan identified the site for a potential new visitor facility and parking area. Possibility for some residential dwellings subject to constraints (site assessed in SHELAA for 12 net). |
| **Gross area (Ha)**<br>Total area of the site in hectares | 1.14 |
| **SHLAA site reference (if applicable)** | F_44 |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | SHELAA |

| | |
|---|---|
| **Is the site being actively promoted for development by a landowner/developer/agent? If so, provide details here (land use/amount)** | Yes. Site being promoted by Hanson for residential dwellings. Assessed in SHELAA for 12 residential dwellings. |

*Context*

| | | | | |
|---|---|---|---|---|
| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield**<br>☑ | **Brownfield**<br>☐ | **Mixture**<br>☐ | **Unknown**<br>☐ |
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | N/A | | | |

## 1.0. Suitability

*Suitability*

| | | | | |
|---|---|---|---|---|
| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within**<br>☐ | **Adjacent**<br>☑ | **Outside**<br>☐ | **Unknown**<br>☐ |
| **Does the site have suitable access, or could a suitable access be provided? (Yes/No)**<br>(provide details of any constraints) | **No**<br><br>The site is accessed by a narrow gravel track and a suitable access may be difficult to achieve, possibly involving the removal of a bungalow on Faulkner's Close. The SHELAA (2017) identifies potential access to the south-west corner of the site. It is noted that Totterdown lane is private, with private access for existing residential dwellings only. | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No)**<br>(provide details) | **Yes**<br><br>Site is included as an allocation for 12 net dwellings within Policy S5 of the adopted Local Plan. | | | |

*Environmental Considerations*

| Questions | Assessment guidelines | Observations and comments |
|---|---|---|
| **Is the site within or adjacent to the following policy or environmental designations:** | **Within** | **Adjacent/nearby**<br>The site is approx. 4.2km from the Cotswold AONB. |

| | | |
|---|---|---|
| • **Green Belt**<br>• **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)**<br>• **SSSI Impact Risk Zone**<br>• **Key Wildlife Site**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage**<br>• **Water quality/ supply** | | The site is approx. 1.3km west of the Cotswold Water Park SSSI, and 1.7km west of Whelford Meadow SSSI.<br>The site is within IRZ for 10 residential units – indicative capacity of the site 27.<br>Potential impact on SSSIs downstream due to sewage system capacity issue.<br><br>Site located approx. 80m from Horcott Lakes KWS – adjacent to the south-west boundary. Development has the potential to adversely impact upon the biodiversity value of nationally and locally designated sites through disturbance and indirectly through pollution.<br><br>Site within Flood Zone 1. There is an area of medium surface water flood risk in the south-east of the site.<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that the site "would be vulnerable to groundwater emergence from the alluvial deposits." The site is therefore of high risk of groundwater flooding. The report (para 6-1-3) states that "F_44 is low-lying and vulnerable to groundwater flooding" and that "No area can be considered suitable at this location."<br>Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration.<br>Fairford STW limited spare capacity without the need for an upgrade. Development sites greater than 15 units are likely to require local network improvements. While the indicative capacity of site is 27 units it is recognised that the site is proposed for 12 units. |

| | | |
|---|---|---|
| | | It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |
| **Landscape and townscape**<br><br>**Is the site low, medium or high sensitivity in terms of landscape character?**<br><br>Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | **Low sensitivity to development**<br>**Medium sensitivity to development**<br>**High sensitivity to development** | **Medium sensitivity to development**<br><br>The site is neighboured by low density single-storey housing to the north-east, Horcott Industrial Estate to the north-west, one of Horcott Lakes to the south-west (a former gravel pit and KWS) and open countryside to the south-east. New development would directly impact on the views from the bungalows on Faulkner's Close. Views currently include a natural area and the adjacent wooded Horcott Lake area. While vegetation does provide some screening, it is likely that any development would directly impact on the rural nature of the Horcott Lakes and views from the footpath adjoining the southern border of the site.<br><br>Although the site is bordered to the north by bungalows and to the west by a fence/carpark for the Horcott Business Park, the local setting (with the Horcott Lakes to the south and countryside to the east) is an integral part of the character of the area. Development has the potential to lead to minor adverse effects on the landscape character/setting. |
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **No loss** |

***Heritage considerations***

| Question | Assessment guidelines | Comments |
|---|---|---|

| | | |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br><br>• **Conservation area**<br>• **Scheduled monument**<br>• **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible**<br>**Limited or no impact or no requirement for mitigation** | **Some impact, and/or mitigation possible**<br><br>There is potential for the presence of currently unknown heritage assets due to the density of known sites of in the near vicinity and the lack of previous archaeological investigation of this site. |

***Community facilities and services***

| **What is the distance to the following facilities (measured from the edge of the site)** | **Distance (metres)** | **Observations and comments** |
|---|---|---|
| **Town / local centre / shop** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Bus Stop** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |
| **Primary School** | **<400m**<br>**400-800m**<br>**>800m** | **>800m**<br><br>School route would not be practical, would require crossing the A417. |
| **Secondary School** | **<1600m**<br>**1600-3900m**<br>**>3900m** | **1600-3900m**<br><br>School route would not be practical, would require crossing the A417. |
| **Open Space / recreation facilities** | **<400m**<br>**400-800m**<br>**>800m** | **400-800m**<br><br>Fairford Town Youth Football Club pitches and Coln House School playing fields (not currently public) are within 800m. |
| **GP / Hospital / Pharmacy** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Cycle route** | **<400m**<br>**400-800m**<br>**>800m** | **>800m**<br><br>There are no National Cycle network routes within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area. |
| **Footpath** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |

| | | |
|---|---|---|
| | | There is a public access footpath between the south of the site and the Northern Horcott lake. |
| **Key employment site** | **<400m**<br>**400-800m**<br>**>800m** | **400-800m**<br><br>400-800mm from Horcott Industrial Estate. |

| *Other key considerations* | | | |
|---|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | **Several**<br>**Few**<br>**None**<br>**Unknown** | **None** | |
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies?** | **High/Medium/Low/ Unknown** | **Medium**<br><br>The site includes a thick tree belt, grassland and scrubland, which includes BAP Priority Habitat Inventory Deciduous Woodland and National Forest Inventory Broadleaved Woodland. These habitats are likely to host many different species, some of which may also be BAP protected.<br>The SHELAA (2017) highlights that the site is located adjacent to a lake and therefore development could impact upon aquatic habitats and species. This may include otters, which have been identified by FTC as potentially present given prevention measures being undertaken at the site (fishing club requesting permission to install fencing). If protected species were evidenced at the site the assessment may be updated to “high” risk of loss of key biodiversity. The impact of development would require further investigation and potential mitigation. | |
| **Public Right of Way** | **Yes/No** | **No**<br><br>None within the site but clear and well-used paths running through the site. Four or five houses on adjoining land have access gates onto this plot. Whilst not a PRoW land clearing has been allowed. There is a permissive footpath between the south of the site and the lake. | |
| **Existing social or community value (provide details)** | **Yes/No** | **Yes**<br><br>There are clear and well used footpaths through the site from the Bungalows to the north and Horcott Lakes to the south. Views of the lakes are also valued by the community. The Town Council also leases a footpath around the Horcott lakes for public use. | |
| ***Is the site likely to be affected by any of the following?*** | ***Yes*** | ***No*** | ***Comments*** |

| | | | |
|---|---|---|---|
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or near hazardous installations** | ✓ | ☐ | There are power lines / pylons running across the site. |

***Characteristics***

| **Characteristics which may affect development on the site:** | **Comments** |
|---|---|
| **Topography:** Flat/ plateau/ steep gradient | Site slopes in part. |
| **Coalescence Development would contribute in neighbouring settlements merging into one another (Yes/No)** | **No** |
| **Scale and nature of development would be large enough to significantly change size and character of settlement (Yes/No)** | **No** |
| **Other** (provide details) | |

## 3.0. Availability

***Availability***

| | **Yes** | **No** | **Comments** |
|---|---|---|---|
| **Is the site available for sale or development (if known)? Please provide supporting evidence.** | ✓ | ☐ | |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?** | ✓ | ☐ | Hanson have informed FTC that they only have right of vehicular access to Totterdown Lane (and the temporary spur road just to the south of it) for the purpose of quarrying, and road access for residential development on the site would need to be negotiated. |

| | | | |
|---|---|---|---|
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | ✓ | | The site is essentially available now, subject to resolving access and other infrastructure constraints. |
| **Any other comments?** | | | |

## 4.0. Summary

***Conclusions***

Please tick a box

| | |
|---|---|
| **The site is suitable and available for development ('accept')** | ✓ |
| **This site has minor constraints** | ✓ |
| **The site has significant constraints** | ✓ |
| **The site is unsuitable for development / no evidence of availability ('reject')** | |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | 27 (AECOM indicative capacity – however it is recognised through the SHELAA that only part of the site may be developable). |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | The site is available for development however has several constraints which would need to be resolved prior to development. These include:<br>• The site has serious ground water flood issues which could rule development out if the risk cannot be mitigated.<br>• Uncertainty regarding access. Access may be difficult to achieve, possibly involving the removal of a bungalow on Faulkner's Close, if access cannot be established to the south-west of the site.<br>• Poor access to local schools.<br>• Potential landscape visual impact from the bungalows on Faulkner's Close. Likely impact on the rural character of the Horcott Lakes and views of the lake.<br>• Potential impact on the Cotswold Water Park SSSI and the KWS located located adjacent to the south-western site boundary. Also, potential impact on the ecological value of Horcott Lakes, including potential protected species present).<br>• Site is located within a Source Protection Zone and there is evidence of sewerage flooding at existing properties on Faulkner's Close.<br>• Site holds community value as there are well-used paths running through the site, and there is also a PRoW footpath between the south of the site and the northern Horcott lake. Also, four or five houses on adjoining land have access gates onto this plot. Views of the lake are highly valued by the local community. |

| | |
|---|---|
| | The site is therefore potentially suitable, if the above issues can be resolved. If it can be demonstrated that the site's serious groundwater flooding issues cannot be mitigated, it would not be appropriate to allocate in the Neighbourhood Plan.<br>Additional mitigation against the above constraints may include delivering measures designed to achieve access, high quality design and layout including landscaping and screening, maintaining and enhancing existing on site biodiversity assets, and providing for wildlife needs on site, and the delivery of SuDS. |

## Site 2: Land west of Horcott Road (SHELAA Ref F_50)

Site F_50: Land west of Horcott Road

### *General information*

| | |
|---|---|
| **Site Reference / name** | Land west of Horcott Road (SHELAA Ref F_50) |
| **Site Address (or brief description of broad location)** | Land west of Horcott Road |
| **Current use** | Agricultural use. |
| **Proposed use (in Neighbourhood Plan)** | Local green gap |
| **Gross area (Ha)**<br>Total area of the site in hectares | 4.53 |
| **SHLAA site reference (if applicable)** | F_50 |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | SHELAA |
| **Is the site being actively promoted for development by a landowner/developer/agent? If so, provide details here (land use/amount)** | Not at present. See site planning history below. |

### *Context*

| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield**<br>☑ | **Brownfield**<br>☐ | **Mixture**<br>☐ | **Unknown**<br>☐ |
|---|---|---|---|---|
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | Application by Gladman Developments (ref: 16/01766/OUT) for 92 dwellings (including up to 50% affordable housing), landscaping, public open space and children's play area, surface water attenuation, vehicular access from Horcott Road and associated ancillary works (April 2016).<br><br>Application was refused (August 2016) but appealed.<br><br>The appeal was recovered by the Secretary of State, who supported the Inspector's recommendation to dismiss the appeal. (Sept 2017) | | | |

## 1.0. Suitability

***Suitability***

| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within**<br>☐ | **Adjacent**<br>☑ | **Outside**<br>☐ | **Unknown**<br>☐ |
|---|---|---|---|---|
| **Does the site have suitable access, or could a suitable access be provided? (Yes/No)**<br>(provide details of any constraints) | **No**<br><br>Access to the site would be from Horcott Road. Horcott Road is relatively narrow with an 18T weight limit from Totterdown Lane to the junction with the A417. There is restricted visibility on a section just north of the site and particularly at the A417 cross-roads junction, which means that a significant increase in traffic is highly undesirable. This junction is already highly used and experiences traffic at peak times, due to the access provided to the schools and amenities in the town. Additionally, it is noted that buildings at the junction, including the Coln House School building immediately adjacent, are listed and therefore junction improvements (i.e. widening) would not be achievable. | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No)**<br>(provide details) | **No** | | | |

***Environmental Considerations***

| Questions | Assessment guidelines | Observations and comments |
|---|---|---|
| **Is the site within or adjacent to the following policy or environmental designations:**<br><br>• **Green Belt**<br>• **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)**<br>• **SSSI Impact Risk Zone**<br>• **Key Wildlife Site**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage**<br>• **Water quality/ supply** | **Within**<br><br>**Adjacent/nearby**<br><br>**No** | **Within**<br><br>The site is approx. 4km from the Cotswolds AONB.<br><br>The site is approx. 1.8km west of Cotswold Water Park SSSI, and within an IRZ for 10 residential units – indicative capacity 102. Potential impact on SSSI downstream due to sewage system capacity issue.<br><br>KWS located adjacent to the site to the south east.<br><br>Development has the potential to adversely impact upon the biodiversity value of nationally and locally designated sites through disturbance and indirectly through pollution.<br><br>The site is within Flood Zone 1. Area of medium/ high surface water flood risk in the south-east of the site. This is of a semi-fluvial nature, related to the adjacent ordinary watercourse (the ditch which feeds into the Horcott lakes and ultimately the Dudgrove brook).<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (2018) concludes that "part of the site along the southern boundary and south-west boundary will experience high groundwater levels, where the area lies along the boundary with the valley of the Dudgrove Brook." This part of the site is therefore of high risk of groundwater flooding.<br><br>The Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. |

| | | |
|---|---|---|
| | | Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity. Proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW – site indicative capacity 102. Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.<br><br>It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |
| **Landscape and townscape**<br><br>**Is the site low, medium or high sensitivity in terms of landscape character?**<br><br>Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | **Low sensitivity to development**<br>**Medium sensitivity to development**<br>**High sensitivity to development** | **Medium sensitivity to development**<br><br>The site lies on the south-western edge of Fairford. It is in an area of open old fields which previously extended into open countryside to the west and is now screened by trees from a group of houses at The Mere.<br><br>Development would severely impact views to the west from this part of Horcott Road, the adjacent playing fields and footpath on the western side of the River Coln; also views to the South and West from the PRoW running to the north of the site, the Old Piggery, other houses in the Conservation Area, Cirencester Road and properties in Lakeside.<br><br>The Study of Surrounding Key Settlements in Cotswold District Update (2015) concludes that the site is of high/medium landscape sensitivity. The updated Study states that when |

| | | |
|---|---|---|
| | | combined with the playing fields along the River Coln, the site provides a green gap between Fairford and Horcott. In this context, the Study also concludes that development of the site would remove contact between the Conservation Area and the wider countryside on this side of the settlement which would be undesirable.<br><br>The Study of Surrounding Key Settlements in Cotswold District Update (2015) further states that development would enclose fields to the north of the site which provide the setting to the western end of the Conservation Area which features recessive but attractive traditional buildings which form a positive introduction to the old settlement. This would adversely impact the local character of the town which is highly valued by residents. It is also recognised that there are pockets of development with planning permission in this location, which may impact upon the existing character of the area. |
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **Some loss**<br><br>A significant part of the site is classed as best and most versatile agricultural land. |

***Heritage considerations***

| Question | Assessment guidelines | Comments |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br><br>• **Conservation area**<br>• **Scheduled monument**<br>• **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible**<br>**Limited or no impact or no requirement for mitigation** | **Directly impact and/or mitigation not possible**<br><br>Site is located adjacent to Fairford Conservation Area, to the east of the site. The site is an important part of the rural setting of this end of the Fairford Conservation Area. This has been discussed in the Study of Surrounding Key Settlements in Cotswold District |

| | | |
|---|---|---|
| | | Update (2015) which concluded that the site is of high/medium landscape sensitivity. The Update states that new development of the site would remove contact between the Conservation Area and the wider countryside on this side of the settlement which would be undesirable.<br><br>There is a Grade II listed building 150m north west of the site (built form between the site and the listed building so development unlikely to cause adverse effect).<br><br>There is the Grade II listed Burdocks, and Pavilion to south east of Burdocks 250m to the southwest of the site. May impact upon the setting of the Burdocks, however existing vegetation provides some level of screening.<br><br>There is also a non-designated heritage asset within the western part of the site, which is a historic stone field shelter and enclosure. These structures and their field setting would be severely compromised by development, even if retained. |

***Community facilities and services***

| **What is the distance to the following facilities (measured from the edge of the site)** | **Distance (metres)** | **Observations and comments** |
|---|---|---|
| **Town / local centre / shop** | **<400m**<br>**400-800m**<br>**>800m** | **>800m**<br><br>Average walking distance to the town centre, via footpaths crossing the river (unlit), is just over 800m. |
| **Bus Stop** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |
| **Primary School** | **<400m**<br>**400-800m**<br>**>800m** | **>800m**<br><br>The site is remote from the town's Primary and Secondary Schools, to which cycle access would require crossing the A417. |
| **Secondary School** | **<1600m**<br>**1600-3900m**<br>**>3900m** | **1600-3900m** |

| | | |
|---|---|---|
| | | The site is remote from the town's Primary and Secondary Schools, to which cycle access would require crossing of the A417. |
| **Open Space / recreation facilities** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>The site itself provides a green space that forms the setting of the Conservation Area and its relationship with the countryside. However, local knowledge indicates that there is no public access at present. Playing fields at Coln House and Fairford Town Youth Football Club (FTYFC) are in close proximity to the site but access is currently restricted (lease to clubs) [although public access is being sought] |
| **GP / Hospital / Pharmacy** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Cycle route** | **<400m**<br>**400-800m**<br>**>800m** | **>800m**<br><br>There are no National Cycle network routes within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area. |
| **Footpath** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>Footpath located along north-eastern boundary of the site. |
| **Key employment site** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>0-400m from Horcott Industrial Estate. |

***Other key considerations***

| | | |
|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | **Several**<br>**Few**<br>**None**<br>**Unknown** | **Few**<br><br>There are individual TPOs along Horcott Road. |
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies?** | **High/medium/Low/ Unknown** | **High**<br><br>Potential impact on protected bat species in old barn and migration routes of other wildlife between town/river and countryside to the west.<br><br>Trees/hedgerow extend across the site in a linear formation, which may provide connectivity for biodiversity. There are also trees/hedgerows lining the site to the east and south which may provide habitats for species and aid connectivity. |

| | | |
|---|---|---|
| **Public Right of Way** | **Yes/No** | **Yes**<br><br>PRoW along north-eastern boundary of the site. |
| **Existing social or community value (provide details)** | **Yes/No** | **Yes**<br><br>The main social/community value of this site is visual – from the PRoW to the north and as a connection between the Conservation Area and the wider countryside. |

| *Is the site likely to be affected by any of the following?* | *Yes* | *No* | *Comments* |
|---|---|---|---|
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or in close proximity to hazardous installations** | ☑ | ☐ | Power lines cross the site. |

| *Characteristics* | |
|---|---|
| **Characteristics which may affect development on the site:** | **Comments** |
| **Topography:**<br>Flat/ plateau/ steep gradient | Site is gently sloping. |
| **Coalescence**<br>**Development would contribute in neighbouring settlements merging into one another (Yes/No).** | **Yes**<br><br>Development would close the gap between Horcott and Fairford and effectively create a continuous belt of housing from Totterdown Lane to the A417. Site functions as an important green gap between Horcott and Fairford. |
| **Scale and nature of development would be large enough to significantly change size and character of settlement (Yes/No).** | **Yes**<br><br>Development of the site would alter the existing settlement pattern, losing the ribbon development currently seen along the A417. Development of the site may also set precedent for further development to the south of the A417 which would further encroach upon Horcott. |
| **Other** (provide details) | |

## 3.0. Availability

*Availability*

| | Yes | No | Comments |
|---|---|---|---|
| **Is the site available for sale or development (if known)? Please provide supporting evidence.** | ✓ | | Subject of appeal on refused application. |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?** | | ✓ | |
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | | ✓ | |
| **Any other comments?** | | | |

## 4.0. Summary

*Conclusions*

| | Please tick a box |
|---|---|
| **The site is suitable and available for development ('accept')** | |
| **This site has minor constraints** | |
| **The site has significant constraints** | ✓ |
| **The site is unsuitable for development / no evidence of availability ('reject')** | ✓ |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | 102 |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | The site is available however is not considered suitable due to several significant constraints. These include:<br>• Landscape and rural character, notably the coalescence of the town with Horcott and impacts on the setting of Fairford Conservation Area. It is noted that the "Character and appearance of the area and the setting of Fairford Conservation Area" was the main issue identified by the Inspector and agreed by the Secretary of State, dismissing the appeal and refusing planning permission at the site (2016). |

| | |
|---|---|
| | • Impact upon other heritage assets within close proximity of the site.<br>• Access via Horcott Road given restricted visibility and safety concerns.<br>• Impact on the Cotswold Water Park SSSI and the KWS located adjacent to the site to the south east. Possible presence of protected species at the site.<br>• Loss of best and most and versatile land.<br>• Groundwater/surface water flood risks<br>• Poor access to facilities and services. |

## Site 3: Land behind Milton Farm and Bettertons Close (SHELAA Ref F_35B)

Site F_35B: Land behind Milton Farm and Bettertons Close

### *General information*

| | |
|---|---|
| **Site Reference / name** | Land behind Milton Farm and Bettertons Close (SHELAA Ref F_35B) |
| **Site Address (or brief description of broad location)** | Field located behind Milton Farm (however forms part of Milton Farm) and is also behind Bettertons Close. |
| **Current use** | Agricultural use – pasture/grazing as part of Milton Farm. |
| **Proposed use (in Neighbourhood Plan)** | Approx. 49 dwellings |
| **Gross area (Ha)**<br>Total area of the site in hectares | 1.97 |
| **SHLAA site reference (if applicable)** | F_35B |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | SHELAA – Site is included as an allocation within Policy S5 of the adopted Cotswold Local Plan. |
| **Is the site being actively promoted for development by a landowner/developer/agent? If so, provide details here (land use/amount)** | Site not currently promoted for development. |

| *Context* | | | | |
|---|---|---|---|---|
| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield**<br>☑ | **Brownfield**<br>☐ | **Mixture**<br>☐ | **Unknown**<br>☐ |
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | N/A | | | |

## 1.0. Suitability

| *Suitability* | | | | |
|---|---|---|---|---|
| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within**<br>☐ | **Adjacent**<br>☑ | **Outside**<br>☐ | **Unknown**<br>☐ |
| **Does the site have suitable access, or could a suitable access be provided? ((Yes/No)**<br>(provide details of any constraints) | **Yes**<br><br>It is possible that an access link could be retained from the new housing development to the south. This may be confirmed through an agreement with ECT, however this is not certain at present.<br>It is noted that the site currently provides a link between Milton Farm and its central operational base. A fully operational service road across the site to link the farm buildings to the land to the west would most likely be required if the farm remained in operation. The continued operation of the farm (with its associated farm traffic) may impact on the sale value of any new housing. The impact of increased traffic on approach roads would also need to be considered, although an access link has been retained from the new housing development to the south. | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No)**<br>(provide details) | **Yes**<br><br>Site is included as an allocation within Policy S5 of the Cotswold Local Plan for 49 dwellings. | | | |

| *Environmental Considerations* | | |
|---|---|---|
| **Questions** | **Assessment guidelines** | **Observations and comments** |
| **Is the site within or adjacent to the following policy or environmental designations:** | **Within** | **Adjacent/nearby** |

| | | |
|---|---|---|
| • **Green Belt**<br>• **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)**<br>• **SSSI Impact Risk Zone**<br>• **Key Wildlife Sites**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage**<br>• **Water quality/ supply** | **Adjacent/nearby**<br><br>**No** | The site is approx. 3.4km south of the Cotswold AONB<br><br>The site is almost adjacent to Fairford Conservation Area to the south-east.<br><br>The site is located approx. 2.2km from Cotswold Water Park SSSI, and within SSSI IRZ for 50 residential units – indicative capacity for the site is 47 units. Potential impact on SSSIs downstream due to sewage system capacity issue.<br><br>The site is located within Flood Zone 1.<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that the site *"should have reasonable freeboard during times of high groundwater".* The site is therefore not considered to be at high risk of groundwater flooding.<br><br>Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration.<br>Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity. Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.<br><br>It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |

| | | |
|---|---|---|
| **Landscape and townscape**<br><br>**Is the site low, medium or high sensitivity in terms of landscape character?**<br><br>Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | **Low sensitivity to development**<br>**Medium sensitivity to development**<br>**High sensitivity to development** | **Medium sensitivity to development**<br><br>The site is relatively enclosed, with established hedgerows to the north, west & south, with hedgerow/farm buildings/garden to the east. The site forms an integral part of the character of Milton Farm, which is a working farm with land to the west of the site, and currently provides a link between the farm and its central operational base. The site is 140m west of a Special Landscape Area (SLA) (White Consultants, 2015) and provides a visual, rural and green space corridor between the new developments to the north and south of the site and views from the PRoW to the west. Local knowledge suggests there are doubts of the viability of Milton Farm if housing development were to take place at this location, and that the loss of farm buildings would lead to adverse effects on the views from the SLA. |
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **Some loss**<br><br>Site within Grade 3 agricultural land (best and most versatile if found to be Grade 3a). Potentially some loss. |

***Heritage considerations***

| Question | Assessment guidelines | Comments |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br><br>• **Conservation area**<br>• **Scheduled monument**<br>• **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible**<br>**Limited or no impact or no requirement for mitigation** | **Some impact, and/or mitigation possible**<br><br>Site is 270m southwest of Fairford Saxon Cemetery Scheduled Monument. Existing built form screens the site from the Scheduled Monument and therefore significant adverse effects on the setting of the Scheduled Monument are not predicted. |

| | | |
|---|---|---|
| | | While not within the Fairford Conservation Area, the site does have a connection with the heritage of the Conservation Area and holds important views.<br><br>Archaeological investigation would be needed if the site were to come forward (SHELAA 2017). |

*Community facilities and services*

| What is the distance to the following facilities (measured from the edge of the site) | Distance (metres) | Observations and comments |
|---|---|---|
| **Town / local centre / shop** | <400m<br>400-800m<br>>800m | >800m<br><br>Distance to the shops and town centre may be significantly greater than if access were to be via the housing development to the south. |
| **Bus Stop** | <400m<br>400-800m<br>>800m | <400m |
| **Primary School** | <400m<br>400-800m<br>>800m | >800m |
| **Secondary School** | <1600m<br>1600-3900m<br>>3900m | 1600-3900m |
| **Open Space / recreation facilities** | <400m<br>400-800m<br>>800m | 400-800m<br><br>Coln House playing field within 800m. |
| **GP / Hospital / Pharmacy** | <400m<br>400-800m<br>>800m | >800m |
| **Cycle route** | <400m<br>400-800m<br>>800m | <400m<br><br>There are no National Cycle network routes within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area, to the northeast of the site. |
| **Footpath** | <400m<br>400-800m<br>>800m | <400m<br><br>Footpath runs along the western boundary of the site. |

| | | |
|---|---|---|
| **Key employment site** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |

| *Other key considerations* | | | |
|---|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | **Several**<br>**Few**<br>**None**<br>**Unknown** | **None** | |
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies?** | **High/Medium/Low/ Unknown** | **Medium**<br>Mature hedgerows surround the site and connect to surrounding countryside with clear evidence of birds and mammals e.g. rabbits.<br>Potential impact on SSSIs downstream due to sewage system capacity issue. | |
| **Public Right of Way** | **Yes/No** | **Yes**<br>PRoW runs along the western boundary of the site. | |
| **Existing social or community value (provide details)** | **Yes/No** | **No** | |
| ***Is the site likely to be affected by any of the following?*** | ***Yes*** | ***No*** | ***Comments*** |
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or in close proximity to hazardous installations** | ☐ | ☑ | |

| *Characteristics* | |
|---|---|
| **Characteristics which may affect development on the site:** | **Comments** |
| **Topography:**<br>Flat/ plateau/ steep gradient | Site slopes north to south. |
| **Coalescence**<br>**Development would contribute in neighbouring settlements merging into one another (Yes/No).** | **No** |
| **Scale and nature of development would be large enough to** | **No** |

| | |
|---|---|
| **significantly change size and character of settlement (Yes/No).** | |
| **Other** (provide details) | |

## 3.0. Availability

***Availability***

| | Yes | No | Comments |
|---|---|---|---|
| **Is the site available for sale or development (if known)? Please provide supporting evidence.** | ☐ | ✓ | Landowner has stated site is currently not available however the Local Plan Inspector's Report (June 2018) states that "The site is in a suitable location for development, and it is quite possible that the landowner's intentions could change again over the next ten years or so. I therefore consider there to be a reasonable prospect of 49 dwellings being built on the site by 2031." |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?** | ✓ | ☐ | Planning application 12/02133/FUL Erection of 124 dwellings (72 market & 52 Affordable Housing units) and new vehicular access, public and private open space and car parking, with landscaping and associated servicing on Land Parcel West of Pips Field, Cirencester Road is adjacent to the site boundary. Local knowledge suggests there is a potential ownership issue regarding strip of land bordering both sites. It is presumed that there is a ransom strip, which is usual is such cases. The Design and Access statement shown the relevant piece of land as public open space/private driveways. |
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | ✓ | ☐ | 11-15 years |
| **Any other comments?** | Site is included as an allocation within Policy S5 of the adopted Cotswold Local Plan. | | |

## 4.0. Summary

***Conclusions***

Please tick a box

| | |
|---|---|
| **The site is suitable and available for development ('accept')** | ✓ |
| **This site has minor constraints** | ✓ |
| **The site has significant constraints** | ✓ |
| **The site is unsuitable for development / no evidence of availability ('reject')** | |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | 47 |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | The site is available and has predominately minor constraints which are thought to be overcome through appropriate mitigation. Access is the significant constraint the site. This needs to be confirmed, alongside assurance that Milton Farm (access to and the setting of) is considered.<br>Other constraints include:<br>• Landscape visual impacts, particularly to the east and from the existing PRoW.<br>• Impact on the setting of Fairford Conservation Area located to the south-east of the site.<br>• Potential impact on the Cotswold Water Park SSSI.<br>• The site is located on Grade 3 agricultural land. At this stage it is unknown if this is Grade 3a (best and most versatile) or 3b.<br>• Limited access to shops and the town centre.<br>The site is therefore potentially suitable. Mitigation against the above constraints may include delivering measures designed to achieve access, high quality design and layout including landscaping and screening, delivering biodiversity net gain, and ensuring planning decision making considers the benefits of high quality agricultural land. |

## Site 4: Land north of Farmor's School

Site F_51D: Land north of Farmor's School

| *General information* | |
|---|---|
| **Site Reference / name** | Land north of Farmor's School |
| **Site Address (or brief description of broad location)** | Land north of Farmor's School and east of Leafield Road. |
| **Current use** | Agriculture – pasture |
| **Proposed use (in Neighbourhood Plan)** | Community infrastructure |
| **Gross area (Ha)**<br>Total area of the site in hectares | 7.30 |
| **SHLAA site reference (if applicable)** | N/A |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | ECT contacted the Neighbourhood Plan group. |
| **Is the site being actively promoted for development by a landowner/developer/agent? If so, provide details here (land use/amount)** | Yes. Landowner proposed the site as being available for development and could deliver employment and educational opportunities with links to Farmor's School and the Primary School. There may also be the opportunity for community space and some small-scale retirement/sheltered housing. |

| *Context* | | | | |
|---|---|---|---|---|
| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield**<br>☑ | **Brownfield**<br>☐ | **Mixture**<br>☐ | **Unknown**<br>☐ |
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | N/A | | | |

## 1.0. Suitability

| *Suitability* | | | | |
|---|---|---|---|---|
| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within**<br>☐ | **Adjacent**<br>☐ | **Outside**<br>☑ | **Unknown**<br>☐ |
| **Does the site have suitable access, or could a suitable access be provided? (Yes/No)**<br>(provide details of any constraints) | **Yes**<br><br>Access via Leafield Road. It is noted that parking and safety is an issue along Leafield Road at peak times (i.e. at the beginning and end of the school day). | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No)**<br>(provide details) | **No** | | | |

| *Environmental Considerations* | | |
|---|---|---|
| **Questions** | **Assessment guidelines** | **Observations and comments** |
| **Is the site within or adjacent to the following policy or environmental designations:**<br><br>• **Green Belt**<br>• **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)**<br>• **SSSI Impact Risk Zone**<br>• **Key Wildlife Site**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage** | **Within**<br><br>**Adjacent/nearby**<br><br>**No** | **Adjacent/nearby**<br><br>Site is approx. 2.5km from Cotswold AONB.<br><br>Site is approx. 2.1km north-west of Cotswold Water Park SSSI. Site within a SSSI IRZ for 50 residential units – indicative capacity 164.<br><br>The River Coln is designated a Key Wildlife Site (KWS), which is 200m east of the site. |

| | | |
|---|---|---|
| • **Water quality/ supply** | | Development has the potential to adversely impact upon the biodiversity value of nationally and locally designated sites through disturbance and indirectly through pollution.<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that the site *"is at a higher elevation and should achieve the required freeboard."* The site is therefore not considered to be at high risk of groundwater flooding.<br><br>Site is within Flood Zone 1.<br><br>Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration.<br>Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity.<br>Proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW – site indicative capacity 164.<br>Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.<br><br>It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |
| **Landscape and townscape**<br><br>**Is the site low, medium or high sensitivity in terms of landscape character?** | **Low sensitivity to development**<br>**Medium sensitivity to development** | **High sensitivity to development** |

| | | |
|---|---|---|
| Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | **High sensitivity to development** | The site is located to the north of the settlement in the open countryside and holds characteristic long-distance views. However, it is noted that these views are limited to an extent by lines of trees and woodlands around field boundaries.<br>The site falls wholly within the Special Landscape Area (SLA) (White Consultants, 2015). Development would therefore adversely impact upon the characteristics of the SLA, which give the area a sense of unity with the Cotswolds to the north.<br>The site contributes to the historic setting of Fairford, along the town's northern boundary, and is valued highly by residents. Residents utilise the Pitham Brook permissive path located to the north of the site and there is concern that the special character of the path will be lost.<br><br>The site holds views of the Grade II listed obelisk in Fairford Park. The obelisk is a landscaping feature built in the 1750s, left from the original Fairford Park estate.<br><br>The site is located adjacent to Farmor School and would extend the build form to the north if development were to take place, encroaching upon the open landscape. This may set precedent for further development to the north, which may impact upon the setting of the Cotswold AONB. However it is noted that the landscape to the north of the site is afforded a level of protection by the Local Plan Policy EN6 (Special Landscape Area).<br>The site is in close proximity to the River Coln which the site currently holds open views of. An avenue of trees extends along the site which are also characteristic of the area. These trees also provide |

| | | |
|---|---|---|
| | | some minor screening of the site. The main function of this avenue of trees is to provide a line of view from the old Fairford Park stables courtyard to the Grade II listed obelisk. |
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **No loss** |

*Heritage considerations*

| Question | Assessment guidelines | Comments |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br>• **Conservation area**<br>• **Scheduled monument**<br>• **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible**<br>**Limited or no impact or no requirement for mitigation** | **Some impact, and/or mitigation possible**<br><br>The site contributes significantly to the historic setting of Fairford, notably the setting of the Grade II Listed Obelisk(discussed above under landscape). |

*Community facilities and services*

| What is the distance to the following facilities (measured from the edge of the site) | Distance (metres) | Observations and comments |
|---|---|---|
| **Town / local centre / shop** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Bus Stop** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>This distance relates to the school bus(es). The nearest other bus stop is in Park Street, which is 400-800m away. |
| **Primary School** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |
| **Secondary School** | **<1600m**<br>**1600-3900m**<br>**>3900m** | **<1600m**<br><br>Site located adjacent to Farmor's School, to the south. |
| **Open Space / recreation facilities** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>Site adjacent to Farmor's sports centre. |

| | | |
|---|---|---|
| **GP / Hospital / Pharmacy** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Cycle route** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>There are no National Cycle network routes within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area, along the eastern boundary of the site. |
| **Footpath** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |
| **Key employment site** | **<400m**<br>**400-800m**<br>**>800m** | **>800m**<br><br>It is noted that the schools (located adjacent to the site) are also a major employer in the town, although not an 'employment site' as such. |

| *Other key considerations* | | | |
|---|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | **Several**<br>**Few**<br>**None**<br>**Unknown** | **None** | |
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies?** | **High/Medium/Low/ Unknown** | **High**<br><br>The site is entirely Woodpasture and Parkland BAP Priority Habitat, and there is an avenue of trees and hedgerows which extends along the field boundary Potential to support numerous species (notably birds) and provide connectivity to the wider countryside. | |
| **Public Right of Way** | **Yes/No** | **No**<br><br>Pitham Brook permissive path located to the west on the far side of the river. | |
| **Existing social or community value (provide details)** | **Yes/No** | **Yes**<br><br>The site contributes to the historic setting of Fairford, along the town's northern boundary. Residents utilise the Pitham Brook permissive path located adjacent to the site and there is concern that the special character of the path will be lost. | |
| ***Is the site likely to be affected by any of the following?*** | ***Yes*** | ***No*** | ***Comments*** |

| | | | |
|---|---|---|---|
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or in close proximity to hazardous installations** | ☐ | ☑ | |

***Characteristics***

| **Characteristics which may affect development on the site:** | **Comments** |
|---|---|
| **Topography:** Flat/ plateau/ steep gradient | Site predominately flat with some gentle sloping. |
| **Coalescence Development would contribute in neighbouring settlements merging into one another (Yes/No).** | **No** |
| **Scale and nature of development would be large enough to significantly change size and character of settlement (Yes/No).** | **No** |
| **Other** (provide details) | |

## 3.0. Availability

***Availability***

| | **Yes** | **No** | **Comments** |
|---|---|---|---|
| **Is the site available for sale or development (if known)? Please provide supporting evidence.** | ☑ | ☐ | Landowner recently proposed the site as being available for development and could deliver employment and educational opportunities with links to Farmor's School and the Primary School. There may also be the opportunity for community space and some small-scale retirement/sheltered housing. |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?** | ☐ | ☑ | |

| | | | |
|---|---|---|---|
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | ☐ | ✓ | |
| **Any other comments?** | | | |

## 4.0. Summary

***Conclusions***

| | Please tick a box |
|---|---|
| **The site is suitable and available for development ('accept')** | ☐ |
| **This site has minor constraints** | ☐ |
| **The site has significant constraints** | ✓ |
| **The site is unsuitable for development / no evidence of availability ('reject')** | ✓ |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | 164. |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | Site is available but has significant constraints and is therefore unsuitable for development. Significant constraints include:<br>• The site is not well connected with the settlement and would constitute isolated development.<br>• Potential adverse effects on the landscape as the site is located within the SLA, and on the northern extent of the town in the open countryside.<br>• The site contributes to the historic setting of Fairford.<br>Site is therefore unsuitable for development. |

## Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C)

Site F_51B/C : Land north of Crabtree Park & Land off Leafield Road

### *General information*

| | |
|---|---|
| **Site Reference / name** | Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C) |
| **Site Address (or brief description of broad location)** | Land north of Crabtree Park & Land off Leafield Road |
| **Current use** | Agricultural – arable farming |
| **Proposed use (in Neighbourhood Plan)** | The pre-submission Fairford Neighbourhood Plan (2016-31) proposes a housing development of up to 80 homes and other uses in conjunction with the school on F_51C. |
| **Gross area (Ha)**<br>Total area of the site in hectares | 17.40 |
| **SHLAA site reference (if applicable)** | F_51B and F_51C |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | SHELAA |
| **Is the site being actively promoted for development by a landowner/developer/agent? If so, provide details here (land use/amount)** | The landowner has requested that this site be considered further as part of the plan-making process. Proposal submitted for up to 400 dwellings in combination with F_51A. Scheme proposed includes only the southern half of the site, south of the thick hedgerow which runs through the middle of the site. |

| *Context* | | | | |
|---|---|---|---|---|
| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield**<br>☑ | **Brownfield**<br>☐ | **Mixture**<br>☐ | **Unknown**<br>☐ |
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | N/A | | | |

## 1.0. Suitability

| *Suitability* | | | | |
|---|---|---|---|---|
| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within**<br>☐ | **Adjacent**<br>☑ | **Outside**<br>☑ | **Unknown**<br>☐ |
| **Does the site have suitable access, or could a suitable access be provided? (Yes/No)**<br>(provide details of any constraints) | **Yes**<br><br>The site could be accessed along Hatherop Road and/or Leafield Road. Infrastructure improvements should be considered given the scale of development proposed. For example, improvements to the junctions at both ends of Hatherop Lane would facilitate easy access to the schools is maintained (i.e. avoid congestion). | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No)**<br>(provide details) | **No** | | | |

| *Environmental Considerations* | | |
|---|---|---|
| **Questions** | **Assessment guidelines** | **Observations and comments** |
| **Is the site within or adjacent to the following policy or environmental designations:**<br><br>• **Green Belt**<br>• **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)**<br>• **SSSI Impact Risk Zone** | **Within**<br><br>**Adjacent/nearby**<br><br>**No** | **Adjacent/nearby**<br><br>The site is approx. 2.3km from the Cotswold AONB (to the north).<br><br>The site is approx. 1.8km north-west of Cotswold Water Park SSSI and is within a SSSI IRZ for 50 residential |

| | | |
|---|---|---|
| • **Key Wildlife Site**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage**<br>• **Water quality/ supply** | | units – indicative capacity 261.<br><br>Development has the potential to adversely impact upon the biodiversity value of the SSSI through disturbance and indirectly through pollution.<br><br>The site located within Flood Zone 1. Site contains areas of medium/high surface water flood risk along the southern site boundary and around the ditch running north-south through the site.<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"at this site, groundwater levels are artesian and close to the surface during winter at several locations. The low-lying parts of this area do not achieve the desired freeboard; and would be subject to groundwater flooding."* Part of the site is therefore at high risk of groundwater flooding.<br><br>Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration.<br>Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity.<br>Proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW – site indicative capacity 261.<br>Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.<br><br>It is expected that infrastructure upgrades will be required to serve the planned |

| | | |
|---|---|---|
| | | growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |
| **Landscape and townscape**<br><br>**Is the site low, medium or high sensitivity in terms of landscape character?**<br><br>Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | **Low sensitivity to development**<br>**Medium sensitivity to development**<br>**High sensitivity to development** | **Medium sensitivity to development**<br><br>The site is on the northern extent of the town, and would act as an urban extension, extending the built form into the open countryside. The site is adjacent to the Special Landscape Area (SLA) to the west. Development of the site would arguably be too large in the context of the town and may also set precedent for further development to the north.<br><br>The site's development would be an intrusion into the open countryside, impacting upon the SLA to the west. The scale of development would be particularly large in the context of the town leading to adverse effects on the landscape character and wider landscape setting. However, the site slopes slightly to the south towards the town, limiting long distance views in to and out of the site to the wider landscape. The site is screened by dense vegetation/ trees/ hedgerows, which restricts views into the site, for example from the PRoW along the southern boundary of the site. |
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **No loss** |

***Heritage considerations***

| Question | Assessment guidelines | Comments |
|---|---|---|

| | | |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br><br>• **Conservation area**<br>• **Scheduled monument**<br>• **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible**<br>**Limited or no impact or no requirement for mitigation** | **Some impact, and/or mitigation possible**<br><br>The site is adjacent to Fairford Conservation Area to the south-west. Development would likely have minor impact upon the setting of this heritage asset. The site is screened almost entirely from this by dense belts of trees which may limit adverse impact on setting. |

*Community facilities and services*

| **What is the distance to the following facilities (measured from the edge of the site)** | **Distance (metres)** | **Observations and comments** |
|---|---|---|
| **Town / local centre / shop** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Bus Stop** | **<400m**<br>**400-800m**<br>**>800m** | **400-800m** |
| **Primary School** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |
| **Secondary School** | **<1600m**<br>**1600-3900m**<br>**>3900m** | **<1600m**<br><br>Site located adjacent to Farmor's School, to the west. |
| **Open Space / recreation facilities** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>Farmor's sports centre is located to the west of the site. |
| **GP / Hospital / Pharmacy** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Cycle route** | **<400m**<br>**400-800m**<br>**>800m** | **400-800m**<br><br>There are no National Cycle network routes within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area. |
| **Footpath** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>Footpath along the site's southern boundary. |

| | | |
|---|---|---|
| **Key employment site** | **<400m**<br>**400-800m**<br>**>800m** | **>800m**<br><br>It is noted that the schools (located adjacent to the site) are also a major employer in the town, although not an 'employment site' as such. |

| *Other key considerations* | | | |
|---|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | **Several**<br>**Few**<br>**None**<br>**Unknown** | **Several**<br><br>There are three groups of individual TPOs along the southern site boundary (Lovers Walk). | |
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies?** | **High/Medium/Low/ Unknown** | **Medium**<br><br>Arable field, trees/hedgerows extend along the field boundary particularly to the south of the site. There is also a linear corridor of hedgerows/scrub running through the centre of the site dividing the fields. These biodiversity features have the potential to support species and provide connectivity to the wider countryside. | |
| **Public Right of Way** | **Yes/No** | **Yes**<br><br>PRoW adjacent to the site's southern boundary. | |
| **Existing social or community value (provide details)** | **Yes/No** | **No** | |
| ***Is the site likely to be affected by any of the following?*** | ***Yes*** | ***No*** | ***Comments*** |
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or in close proximity to hazardous installations** | ☐ | ☑ | Power line running along the boundary of the site. |

| *Characteristics* | |
|---|---|
| **Characteristics which may affect development on the site:** | **Comments** |
| **Topography:**<br>Flat/ plateau/ steep gradient | Site is generally flat with some gentle sloping from east to west. |
| **Coalescence**<br>**Development would contribute in neighbouring settlements** | **No** |

| | |
|---|---|
| **merging into one another(Yes/No).** | |

| | |
|---|---|
| **Scale and nature of development would be large enough to significantly change size and character of settlement(Yes/No).** | **Yes**<br><br>The site has no defined northern boundary on the ground, and its development would be an intrusion into the open countryside to the north of the town. The ECT/Gleesons proposal map shows the boundary is defined by the power line crossing the fields, and that in practice this would be defined by new trees and hedge planting. If fully developed, the scale would be significantly large in the context of the town, substantially increasing the size of the town. However it is recognised that there is a level of development currently proposed on the western side of the town. |
| **Other** (provide details) | |

## 3.0. Availability

***Availability***

| | Yes | No | Comments |
|---|---|---|---|
| **Is the site available for sale or development (if known)? Please provide supporting evidence.** | ✓ | | |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?** | | ✓ | |
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | ✓ | | |
| **Any other comments?** | Fairford Town Council recognise that there is an opportunity for development to enable the release of sufficient land within the site on its frontage to plan for the long-term expansion of the adjacent school. This is a particular issue given all the recently completed and extant planning permissions. | | |

## 4.0. Summary

***Conclusions***

| | Please tick a box |
|---|---|
| **The site is suitable and available for development ('accept')** | ✓ |

| | |
|---|---|
| **This site has minor constraints** | ☐ |
| **The site has significant constraints** | ✓ |
| **The site is unsuitable for development / no evidence of availability ('reject')** | ☐ |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | 261 (based on AECOM indicative capacity – however it is noted that the landowner has stated that the proposal is for about half this number (130), although the feasibility of this would depend on the constraints.) |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | The site is available for development however has several potentially significant constraints given its size and scale in relation to the town. Constraints include:<br>• Impact on landscape character and wider landscape setting.<br>• Minor impact upon the setting of Fairford Conservation Area.<br>• Adverse effect on/loss of biodiversity (loss of fields).<br>• Part of the site is at high risk of groundwater flooding.<br>• The northern extent of the site is not well connected with the settlement which may restrict accessibility for some residents.<br>• Need for infrastructure delivery (this could provide positive effects in the long-term).<br>Taking the above constraints into consideration the site is considered potentially suitable for development. It is recommended that the southern half of the site is taken forward for consideration through the Neighbourhood Plan, coinciding with the scheme proposed by ECT.<br><br>Mitigation against the above constraints may include delivering measures designed to improve access, high quality design and layout including landscaping and screening, delivering SuDS, delivering biodiversity net gain, maintaining and enhancing existing on site biodiversity assets, and providing for wildlife needs on site. |

## Site 6: Land east of Aldsworth Close (SHELAA Ref F_51A)

Site F_51A: Land west of Aldsworth Close

### *General information*

| | |
|---|---|
| **Site Reference / name** | Land east of Aldsworth Close (SHELAA Ref F_51A) |
| **Site Address (or brief description of broad location)** | Land east of Aldsworth Close |
| **Current use** | Agricultural – arable farming |
| **Proposed use (in Neighbourhood Plan)** | 343 residential dwellings |
| **Gross area (Ha)**<br>Total area of the site in hectares | 22.88 |
| **SHLAA site reference (if applicable)** | F_51A |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | SHELAA |
| **Is the site being actively promoted for development by a landowner/developer/agent? If so, provide details here (land use/amount)** | Yes. Proposal submitted for up to 400 dwellings in combination with F_51B and F_51C. |

### *Context*

| | | | | |
|---|---|---|---|---|
| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield**<br>☑ | **Brownfield**<br>☐ | **Mixture**<br>☐ | **Unknown**<br>☐ |
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | N/A | | | |

## 1.0. Suitability

***Suitability***

| | | | | |
|---|---|---|---|---|
| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within**<br>☐ | **Adjacent**<br>☑ | **Outside**<br>☐ | **Unknown**<br>☐ |
| **Does the site have suitable access, or could a suitable access be provided? (Yes/No)**<br>(provide details of any constraints) | **Yes**<br><br>The site would be accessed along Hatherop Lane. Infrastructure improvements should be considered given the scale of development proposed. | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No)**<br>(provide details) | **No** | | | |

***Environmental Considerations***

| Questions | Assessment guidelines | Observations and comments |
|---|---|---|
| **Is the site within or adjacent to the following policy or environmental designations:**<br><br>• **Green Belt**<br>• **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)**<br>• **SSSI Impact Risk Zone**<br>• **Key Wildlife Site**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage**<br>• **Water quality/supply** | **Within**<br><br>**Adjacent/nearby**<br><br>**No** | **Adjacent/nearby**<br><br>Site is approx. 2.5km from the Cotswolds AONB.<br><br>Site is approx. 1.6km north-west of Cotswold Water Park SSSI. Site within SSSI IRZ for 50 residential units – indicative capacity 343.<br><br>Development has the potential to adversely impact upon the biodiversity value of the SSSI |

| | | |
|---|---|---|
| | | through disturbance and indirectly through pollution.<br><br>Site within Flood Zone 1. Site contains areas of medium/high surface water flood risk along the site boundary (south/eastern/western).<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"the low-lying parts of this area do not achieve the desired freeboard; and would be subject to groundwater flooding."* Part of the site is therefore at high risk of groundwater flooding. The site is located within flood zone 1 which is of low risk of fluvial flooding.<br><br>Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration.<br>Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity.<br>Proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW – site indicative capacity 343.<br>Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.<br><br>It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |
| **Landscape and townscape** | **Low sensitivity to development** | **High sensitivity to development** |

| | | |
|---|---|---|
| **Is the site low, medium or high sensitivity in terms of landscape character?**<br><br>Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | **Medium sensitivity to development**<br>**High sensitivity to development** | The site is on the eastern extent of the town, and would act as an urban extension, extending the built form into the open countryside. The site itself is part of a field used for arable farming, which slopes slightly. The site has no defined northern boundary on the ground.<br>The site's development would be an intrusion into the open countryside, the scale which would be particularly large in the context of the town and may also set precedent for further development to the east of the town.<br><br>The site is screened to some extent by vegetation surrounding the site, limiting adverse effects on views from the PRoW to the north of the site. The site slopes in part towards the housing development to the west. |
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **No loss** |

***Heritage considerations***

| Question | Assessment guidelines | Comments |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br><br>• **Conservation area**<br>• **Scheduled monument**<br>• **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible**<br>**Limited or no impact or no requirement for mitigation** | **Limited or no impact or no requirement for mitigation** |

***Community facilities and services***

| What is the distance to the following facilities (measured from the edge of the site) | Distance (metres) | Observations and comments |
|---|---|---|
| **Town / local centre / shop** | **<400m** | **>800m** |

| | | |
|---|---|---|
| | 400-800m<br>>800m | |
| **Bus Stop** | <400m<br>400-800m<br>>800m | 400-800m |
| **Primary School** | <400m<br>400-800m<br>>800m | >800m |
| **Secondary School** | <1600m<br>1600-3900m<br>>3900m | <1600m |
| **Open Space / recreation facilities** | <400m<br>400-800m<br>>800m | >800m |
| **GP / Hospital / Pharmacy** | <400m<br>400-800m<br>>800m | >800m |
| **Cycle route** | <400m<br>400-800m<br>>800m | <400m<br><br>There are no National Cycle network routes within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area, along the London Road to the south of the site. |
| **Footpath** | <400m<br>400-800m<br>>800m | <400m |
| **Key employment site** | <400m<br>400-800m<br>>800m | >800m |

***Other key considerations***

| | | |
|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | Several<br>Few<br>None<br>Unknown | None |
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees,** | High/Medium/Low/<br>Unknown | Low<br><br>Arable field, trees/hedgerows extend along the field boundary particularly to the south of the site. |

| | | | |
|---|---|---|---|
| **woodland, hedgerows and waterbodies?** | | Potential to support species and provide connectivity to the wider countryside. | |
| **Public Right of Way** | **Yes/No** | **Yes** | |
| **Existing social or community value (provide details)** | **Yes/No** | **No** | |
| ***Is the site likely to be affected by any of the following?*** | ***Yes*** | ***No*** | ***Comments*** |
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or in close proximity to hazardous installations** | ☐ | ☑ | |

***Characteristics***

| **Characteristics which may affect development on the site:** | **Comments** |
|---|---|
| **Topography:** Flat/ plateau/ steep gradient | Site is relatively flat, rising slightly to the north. |
| **Coalescence Development would contribute in neighbouring settlements merging into one another (Yes/No).** | **No** |
| **Scale and nature of development would be large enough to significantly change size and character of settlement (Yes/No).** | **Yes**<br><br>The site has no defined northern boundary, and its development would be an intrusion into the open countryside to the north of the town. The scale which would be significantly large in the context of the town, substantially increasing the size of the town and altering the characteristic settlement pattern. |
| **Other** (provide details) | |

## 3.0. Availability

***Availability***

| | **Yes** | **No** | **Comments** |
|---|---|---|---|
| **Is the site available for sale or development (if known)?** | ☑ | ☐ | |

| | | | |
|---|---|---|---|
| **Please provide supporting evidence.** | | | |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?** | ☐ | ☑ | |
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | ☑ | ☐ | |
| **Any other comments?** | | | |

## 4.0. Summary

***Conclusions***

Please tick a box

| | |
|---|---|
| **The site is suitable and available for development ('accept')** | ☐ |
| **This site has minor constraints** | ☐ |
| **The site has significant constraints** | ☑ |
| **The site is unsuitable for development / no evidence of availability ('reject')** | ☑ |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | 343 |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | The site is available but has a number of significant constraints. Site is therefore not considered suitable for development.<br>• Groundwater flood risk<br>• Landscape given its size and scale in relation to the town. The site would extend the built form into the open countryside and adversely impacting long distance views.<br>• There is an identified infrastructure requirement for the site to serve the planned growth within the settlement. |

## Site 7: Jones' Field (SHELAA Ref F_15)

Site F_15: Jones' Field

### *General information*

| | |
|---|---|
| **Site Reference / name** | Jones' Field (SHELAA Ref F_15) |
| **Site Address (or brief description of broad location)** | Jones' Field, south of London Road |
| **Current use** | Agricultural |
| **Proposed use (in Neighbourhood Plan)** | Residential dwellings – possibly specialist housing |
| **Gross area (Ha)**<br>Total area of the site in hectares | 2.31 |
| **SHLAA site reference (if applicable)** | F_15 |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | SHELAA |
| **Is the site being actively promoted for development by a landowner/developer/agent? If so, provide details here (land use/amount)** | Site being actively promoted for 20 lifetime home houses, public realm improvements, a social hub pavilion (serving as a gym and a hall for classes and social events) |

### *Context*

| | | | | |
|---|---|---|---|---|
| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield**<br>☑ | **Brownfield**<br>☐ | **Mixture**<br>☐ | **Unknown**<br>☐ |
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | N/A | | | |

## 1.0. Suitability

***Suitability***

| | | | | |
|---|---|---|---|---|
| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within**<br>☐ | **Adjacent**<br>☑ | **Outside**<br>☐ | **Unknown**<br>☐ |
| **Does the site have suitable access, or could a suitable access be provided? (Yes/No)**<br>(provide details of any constraints) | **Yes**<br><br>The proposed access to this site is expected to be via the London Road (A417). However local knowledge suggests that the existing gate is not sufficiently wide and is on the inside of a bend near the entrance to Cinder Lane, with restricted visibility (particularly to the east). Creating a new access or widening the existing one would likely require demolition of part of a Cotswold stone wall (in the Conservation Area) and may also adversely impact upon the historic ha-ha (discussed further below). | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No)**<br>(provide details) | **No** | | | |

***Environmental Considerations***

| Questions | Assessment guidelines | Observations and comments |
|---|---|---|
| **Is the site within or adjacent to the following policy or environmental designations:**<br><br>• **Green Belt**<br>• **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)** | **Within**<br><br>**Adjacent/nearby**<br><br>**No** | **Yes**<br><br>The site is approx. 3.3m south of the Cotswold AONB.<br><br>Site is located approx. 900m north-west of Cotswold Water Park SSSI, and 1.4km north |

| | | |
|---|---|---|
| • **SSSI Impact Risk Zone**<br>• **Key Wildlife Site**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage**<br>• **Water quality/ supply** | | west of Whelford Meadow SSSI.<br>Site is within SSSI IRZ for 50 residential units – indicative capacity for the site is 52 units. Note site being promoted for 20 specialist houses.<br><br>Development has the potential to adversely impact upon the biodiversity value of the SSSI through disturbance and indirectly through pollution.<br><br>Potential impact on SSSIs downstream due to sewage system capacity issue.<br><br>Site located within Flood Zone 1. The southern extent of the site is at low-medium risk of ground water flooding and is below the level of surrounding land, making sustainable drainage difficult – high water table makes drainage difficult.<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"data suggests that [the site] satisfies requirements and the development area could be larger."* The site is therefore considered to be of low risk of groundwater flooding.<br><br>Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration.<br>Sites larger than 40 units may require catchment improvements downstream towards the pumping stations as they are nearing capacity. Proposed development (in the region of 50-100 units) may trigger the need for larger upgrades at the STW – site indicative capacity 52. Without increased capacity, development may result in |

| | | |
|---|---|---|
| | | increased sewage pollution of the River Coln and areas downstream. Note site promoted for only 20 specialist housing units.<br><br>It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |
| **Landscape and townscape**<br><br>**Is the site low, medium or high sensitivity in terms of landscape character?**<br><br>Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | **Low sensitivity to development**<br>**Medium sensitivity to development**<br>**High sensitivity to development** | **High sensitivity to development**<br><br>The site is in a rural grassed field enclosed by a Cotswold stone wall to the north and mature trees and hedges to the east and south. This vegetation screening is likely to limit adverse effects on views in and out of the site, including from the PRoW (Cinder Lane) which runs north to south along the east of the site, and the Fieldway ancient pathway to the south of the site. To the west the site adjoins onto the land behind Morgan Hall, which again is screened significantly by the dense vegetation and mature trees lining the site. |
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **Some loss**<br><br>Site is located within best and most versatile agricultural land. |

***Heritage considerations***

| Question | Assessment guidelines | Comments |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br><br>• **Conservation area**<br>• **Scheduled monument** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible** | **Some impact, and/or mitigation possible**<br><br>The site is located within Fairford Conservation Area, and the line of trees along London Road is specifically |

| | | |
|---|---|---|
| • **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Limited or no impact or no requirement for mitigation** | referred to in the 1971 CA policy statement. The Grade II listed Morgan Hall is located 200m west of the site. The site adjoins the grounds of Morgan Hall and contains part of the historic ha-ha which was part of Morgan Hall. Development has potential to impact on the setting of Morgan Hall, however vegetation screening at the site is likely to limit any adverse effects. |

***Community facilities and services***

| **What is the distance to the following facilities (measured from the edge of the site)** | **Distance (metres)** | **Observations and comments** |
|---|---|---|
| **Town / local centre / shop** | **<400m**<br>**400-800m**<br>**>800m** | **>800m**<br><br>Involves crossing the A417 |
| **Bus Stop** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |
| **Primary School** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Secondary School** | **<1600m**<br>**1600-3900m**<br>**>3900m** | **<1600m** |
| **Open Space / recreation facilities** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>0-400m from Fairford Football Club on Cinder Lane. |
| **GP / Hospital / Pharmacy** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |
| **Cycle route** | **<400m**<br>**400-800m**<br>**>800m** | **400-800m**<br><br>There are no National Cycle network routes. within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area. |
| **Footpath** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>PRoW exists along the east and south of the site. |

| | | |
|---|---|---|
| **Key employment site** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |

| *Other key considerations* | | | |
|---|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | **Several**<br>**Few**<br>**None**<br>**Unknown** | **Several**<br><br>There is a group TPO – Areas Groups Woodlands – affecting the whole of Morgan Hall and Jones' Field. | |
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies?** | **High/Medium/Low/ Unknown** | **Medium**<br><br>The site includes Woodpasture and Parkland BAP Priority Habitat. The site boundaries are defined by a low park wall and a belt of mature nineteenth century trees, planted on a raised bank above the road.<br><br>A number of mature trees within the site are protected by a blanket TPO and those along London Road are specifically identified as a feature of Fairford's Conservation Area. The site also contains overgrown hedgerow and shrub species. There is a dense belt of tree planting with mature trees along the southern and eastern site boundary. These belts of vegetation are likely to provide habitat for a range of species, and also act as a wildlife corridor providing connectivity between the site and the wider area. There are also mature trees to the west of the site – which again may provide valuable habitats for species. | |
| **Public Right of Way** | **Yes/No** | **Yes**<br><br>PRoW exists along the east and south of the site. | |
| **Existing social or community value (provide details)** | **Yes/No** | **No** | |
| ***Is the site likely to be affected by any of the following?*** | ***Yes*** | ***No*** | ***Comments*** |
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or in close proximity to hazardous installations** | ☐ | ☑ | |

| *Characteristics* |
|---|

| Characteristics which may affect development on the site: | Comments |
|---|---|
| **Topography:** Flat/ plateau/ steep gradient | Site is relatively flat. |
| **Coalescence Development would contribute in neighbouring settlements merging into one another(Yes/No)** | **No** |
| **Scale and nature of development would be large enough to significantly change size and character of settlement(Yes/No)** | **No** |
| **Other** (provide details) | |

## 3.0. Availability

***Availability***

| | Yes | No | Comments |
|---|---|---|---|
| **Is the site available for sale or development (if known)? Please provide supporting evidence.** | ✓ | | |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?** | | ✓ | |
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | ✓ | | Site potentially available now subject to infrastructure constraints. |
| **Any other comments?** | | | |

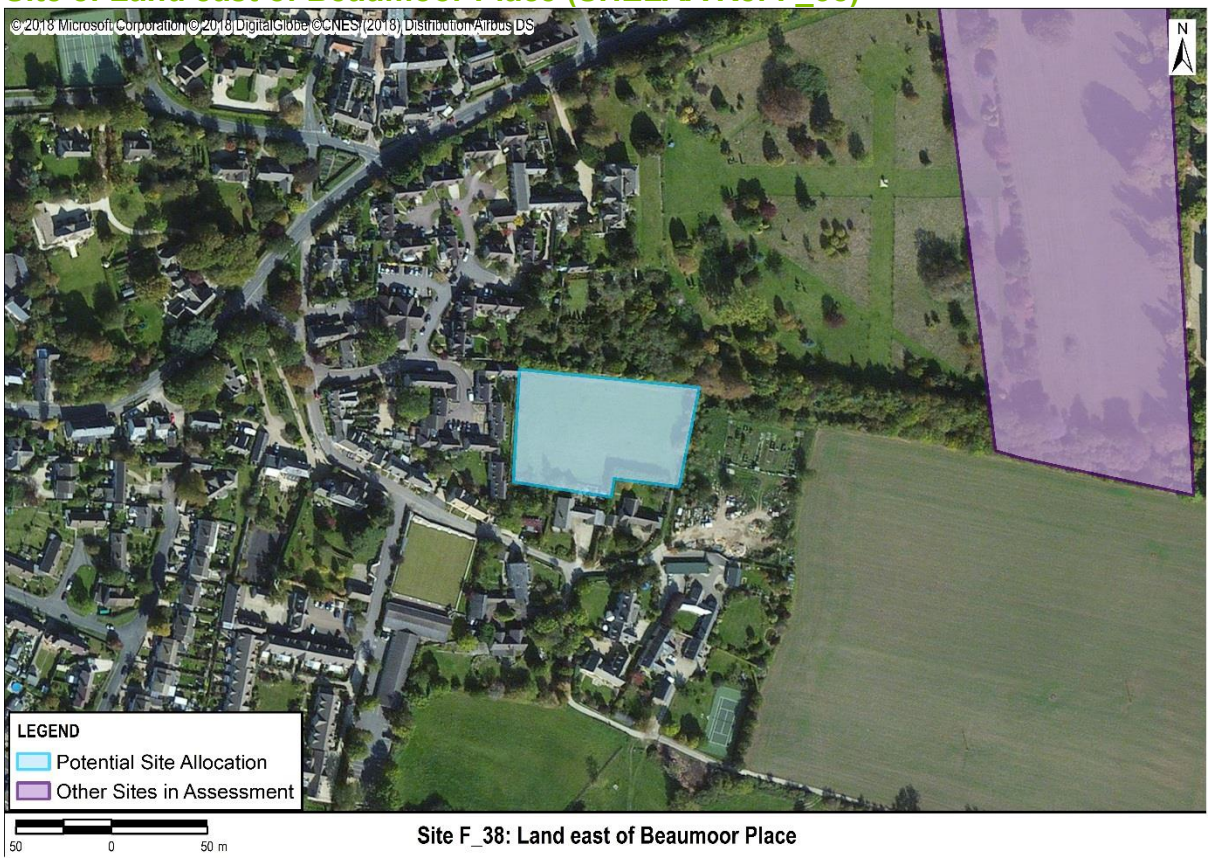
## 4.0. Summary

***Conclusions***

| | Please tick a box |
|---|---|
| **The site is suitable and available for development ('accept')** | ✓ |
| **This site has minor constraints** | ✓ |
| **The site has significant constraints** | |
| **The site is unsuitable for development / no evidence of availability ('reject')** | |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | 52 |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | This site is available with the following constraints:<br>• The site is located within Fairford Conservation Area, and the Grade II listed Morgan Hall is located 200m west of the site. Potential impact on the town's historic landscape and/or townscape character. Possible impact on the setting of, and views of/from, Morgan Hall, and PRoW.<br>• The site contains a number of mature trees which are protected by a blanket TPO and form part of and are protected by Fairford's Conservation Area.<br>• Potential adverse effect on Cotswold Water Park SSSI.<br>• Potential impact on the landscape and/or townscape character. Possible impact on the setting of, and views of/from, Morgan Hall and Cinder Lane PRoW.<br>• Possible loss of best and most versatile agricultural land.<br>• Access onto the A417 is an issue, owing to cars currently parking on the verge around the suggested entrance, and the road configuration (There is potential for the development to help provide a solution to this problem, which would also improve the look of this part of the Conservation Area)<br>• Access to the town centre is less than adequate, involving crossing the A417.<br><br>Providing these constraints can be effectively mitigated, the site is considered to be potentially suitable to take forward for the purposes of the Neighbourhood Plan. Mitigation measures may include delivering measures designed to achieve better access, high quality design and layout including landscaping and screening, delivering biodiversity net gain, and ensuring planning decision making considers the benefits of high quality agricultural land. |

## Site 8: Land east of Beaumoor Place (SHELAA Ref F_38)




Site F_38: Land east of Beaumoor Place

### *General information*

| | |
|---|---|
| **Site Reference / name** | Land east of Beaumoor Place (SHELAA Ref F_38) |
| **Site Address (or brief description of broad location)** | Land east of Beaumoor Place, East End |
| **Current use** | Fallow |
| **Proposed use (in Neighbourhood Plan)** | Parking for doctors' surgery and a limited number of specialist housing. |
| **Gross area (Ha)**<br>Total area of the site in hectares | 0.48 |
| **SHLAA site reference (if applicable)** | F_38 |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | SHELAA |
| **Is the site being actively promoted for development by a landowner/developer/agent? If so, provide details here (land use/amount)** | Owner willing to work with Fairford Town Council. A proposal for the area is to be developed to include parking for doctors/staff at the nearby surgery and limited numbers of low level retirement bungalows could be considered and has been included in the pre-submission Fairford Neighbourhood Plan FNP 2016-2031, if the sites issues could be resolved. |

| *Context* | | | | |
|---|---|---|---|---|
| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield**<br>☑ | **Brownfield**<br>☐ | **Mixture**<br>☐ | **Unknown**<br>☐ |
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | Blue Cedar Homes submitted an application (17/05185/FUL) December 2017 for the demolition of 1 no. dwelling and the erection of 9 no. dwellings (Use Class C3) and a car park for use by the Doctor's Surgery, together with access, landscaping and associated infrastructure. Application withdrawn April 2018 (Reason not stated). | | | |

## 1.0. Suitability

| *Suitability* | | | | |
|---|---|---|---|---|
| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within**<br>☐ | **Adjacent**<br>☑ | **Outside**<br>☐ | **Unknown**<br>☐ |
| **Does the site have suitable access, or could a suitable access be provided? (Yes/No)**<br>(provide details of any constraints) | **Yes**<br><br>Access to the site would involve demolishing a present dwelling (derelict mobile home) that is in the ownership of the landowner, which is situated close to the bowling club on East End road.<br><br>The landowner engaged developers to put forward an application using this access route, and it is noted that the dwelling was never a permanent fixture. The Examiner of the previous FNP indicated that its removal would improve Fairford Conservation Area.<br><br>It is noted that Beaumoor Place to East End is a narrow, quiet road which may not have capacity for a significant increase in vehicle use. However, it is thought that the increased use may not be detrimental to the road given the surgery car park would be for staff (therefore only busy at the beginning and end of the day), and only a small number of specialist housing is proposed. | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No)**<br>(provide details) | **No** | | | |

*Environmental Considerations*

| Questions | Assessment guidelines | Observations and comments |
|---|---|---|
| **Is the site within or adjacent to the following policy or environmental designations:**<br><br>• **Green Belt**<br>• **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)**<br>• **SSSI Impact Risk Zone**<br>• **Key Wildlife Sites**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage**<br>• **Water quality/ supply** | **Within**<br><br>**Adjacent/nearby**<br><br>**No** | **Yes**<br><br>The site is approx. 3.4km south of the Cotswold AONB.<br><br>The site is located approx. 1km north-west of Cotswold Water Park SSSI, and 1.4km north west of Whelford Meadow SSSI.<br>Site is within SSSI IRZ for 50 residential units –indicative capacity for the site is 12 units and therefore is not expected to lead to adverse effects on the designated site.<br><br>Development has the potential to adversely impact upon the SSSI's through disturbance and indirectly through pollution.<br><br>Potential impact on SSSIs downstream due to sewage system capacity issue. Adjacent residential properties have historically experienced sewage issues.<br><br>The site located within Flood Zone 1. There are small areas of low risk of surface water flooding within the site.<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that the site is close to a *"monitoring well at Riverdale which showed a risk of groundwater flooding in T200 conditions"* (T200 identifies 200-yr max groundwater level). The site is therefore considered to be of risk of groundwater flooding. It is suggested that raising the ground level would be required, which would inevitably increase the visual impact and therefore the impact on the setting of Morgan Hall. |

| | | |
|---|---|---|
| | | Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Fairford STW limited spare capacity without the need for an upgrade. Development sites greater than 15 units are likely to require local network improvements – indicative capacity of site is 12 units therefore unlikely to cause significant effect on the STW.<br><br>It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |
| **Landscape and townscape**<br><br>**Is the site low, medium or high sensitivity in terms of landscape character?**<br><br>Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | **Low sensitivity to development**<br>**Medium sensitivity to development**<br>**High sensitivity to development** | **Medium sensitivity to development**<br><br>The site is in a rural grassed field, relatively enclosed by a Cotswold stone wall to the south, hedgerows to the east, hedgerows backing onto three bungalows on the South and Beaumoor retirement home to the west.<br><br>Development would impact views from the bungalows on the south side of the site and Beaumoor Place retirement homes adjacent to the west side of the site, as well as from the PRoW through the north of the site.<br><br>Potential impact on character/setting of Morgan Hall and it is noted that the site is within Fairford Conservation Area.<br><br>Some screening provided by vegetation. |

| | | |
|---|---|---|
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **Some loss**<br><br>Small section of the site is located within best and most versatile agricultural land (Grade 2) |

***Heritage considerations***

| Question | Assessment guidelines | Comments |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br><br>• **Conservation area**<br>• **Scheduled monument**<br>• **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible**<br>**Limited or no impact or no requirement for mitigation** | **Directly impact and/or mitigation not possible**<br><br>The site is located within Fairford Conservation Area and therefore new development may impact upon the integrity of the Conservation Area, and/or its setting.<br><br>The Grade II listed Moor Farmhouse is 100m south of the site and the Grade II listed Morgan Hall is 120m north of the site. Development of the site may impact upon the setting of these heritage assets. However, some screening is provided by vegetation which limits adverse effects. |

***Community facilities and services***

| What is the distance to the following facilities (measured from the edge of the site) | Distance (metres) | Observations and comments |
|---|---|---|
| **Town / local centre / shop** | **<400m**<br>**400-800m**<br>**>800m** | **400-800m** |
| **Bus Stop** | **<400m**<br>**400-800m**<br>**>800m** | **400-800m** |
| **Primary School** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Secondary School** | **<1600m**<br>**1600-3900m**<br>**>3900m** | **<1600m** |
| **Open Space / recreation facilities** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |

| | | |
|---|---|---|
| | | 0-400m from Fairford Bowling Club at East End and 400-800m (or less) from Fairford Football Club on Cinder Lane. |
| **GP / Hospital / Pharmacy** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |
| **Cycle route** | **<400m**<br>**400-800m**<br>**>800m** | **>800m**<br><br>There are no National Cycle network routes within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area. |
| **Footpath** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>PRoW running through the northern part of the site and adjacent to the eastern boundary of the site. |
| **Key employment site** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |

| *Other key considerations* | | | |
|---|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | **Several**<br>**Few**<br>**None**<br>**Unknown** | **None** | |
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies?** | **High/Medium/Low/ Unknown** | **Medium**<br><br>The area is bordered on the south and east by thick hedgerows and trees, which provide a natural habitat for nesting birds, insects, rabbits and other wildlife. These biodiversity features may also provide connectivity with the wider area. | |
| **Public Right of Way** | **Yes/No** | **Yes**<br><br>A PRoW exists through the north of the site. | |
| **Existing social or community value (provide details)** | **Yes/No** | **Yes**<br><br>The site is regularly used by dog and other walkers, connecting East End to Fieldway (eventually reaching the Horcott Lakes). | |
| ***Is the site likely to be affected by any of the following?*** | ***Yes*** | ***No*** | ***Comments*** |
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |

| | | | |
|---|---|---|---|
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or in close proximity to hazardous installations** | ☐ | ✓ | |

*Characteristics*

| **Characteristics which may affect development on the site:** | **Comments** |
|---|---|
| **Topography:** Flat/ plateau/ steep gradient | Relatively flat. |
| **Coalescence Development would contribute in neighbouring settlements merging into one another (Yes/No)** | **No** |
| **Scale and nature of development would be large enough to significantly change size and character of settlement (Yes/No)** | **No** |
| **Other** (provide details) | |

## 3.0. Availability

*Availability*

| | **Yes** | **No** | **Comments** |
|---|---|---|---|
| **Is the site available for sale or development (if known)? Please provide supporting evidence.** | ✓ | ☐ | Site owner willing to work with Fairford Town Council. |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?** | ☐ | ✓ | |
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | ☐ | ✓ | |
| **Any other comments?** | | | |

## 4.0. Summary

***Conclusions***

| | Please tick a box |
|---|---|
| **The site is suitable and available for development ('accept')** | ✓ |
| **This site has minor constraints** | ✓ |
| **The site has significant constraints** | ✓ |
| **The site is unsuitable for development / no evidence of availability ('reject')** | |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | 12 |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | This site is available and may be suitable for development. There are a number of minor-major constraints which need addressing. The most significant of these constraints relate to heritage and access.<br><br>Constraints include:<br>• Location of the site within Fairford Conservation Area and close to Grade II listed building (Morgan Hall).<br>• Potential impact on views from the bungalows on the south side of the site and Beaumoor Place retirement homes adjacent to the west side of the site, as well as from the PRoW through the north of the site.<br>• Access to the site would involve demolishing a present dwelling (derelict mobile home) that is in the ownership of the landowner, which is situated close to the bowling club on East End Road.<br>• Community value of the PRoW which provides community value (recreation/dog walking).<br>• The area is bordered by biodiversity features which may provide connectivity with the wider area.<br>• Small section of Grade 2 agricultural land present on site.<br>• Groundwater flooding risk.<br>• Potential impact on the Cotswold Water Park SSSI.<br>• There are small areas of low risk of surface water flooding within the site.<br>• Access to the town centre would involve crossing the A417.<br>Site potentially suitable. Mitigation against the above constraints may include delivering measures designed to achieve access, high quality design and layout including landscaping and screening, the delivery of SuDS, delivering biodiversity net gain, |

| | |
|---|---|
| | maintaining and enhancing existing on site biodiversity assets, and providing for wildlife needs on site, and ensuring planning decision making considers the benefits of the area of high quality agricultural land.<br><br>However, if it can be demonstrated that the groundwater flooding issue would entirely preclude development on the site, it would not be appropriate to allocate in the Neighbourhood Plan |

## Site 9: Land at London Road (SHELAA Ref F_39D)

Site F_39D: Land at London Road

### *General information*

| | |
|---|---|
| **Site Reference / name** | Land at London Road (SHELAA Ref F_39D) |
| **Site Address (or brief description of broad location)** | Land West of Eyscott Hall, London Road (A417) |
| **Current use** | None – vacant land. |
| **Proposed use (in Neighbourhood Plan)** | 8 residential dwellings |
| **Gross area (Ha)**<br>Total area of the site in hectares | 0.49 |
| **SHLAA site reference (if applicable)** | F_39D |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | SHELAA |
| **Is the site being actively promoted for development by a landowner/developer/agent? If so, provide details here (land use/amount)** | Yes. Promoted for development by Pegasus Group for the construction of 8 dwellings, means of access, landscaping and associated works. |

### *Context*

| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield**<br>☑ | **Brownfield**<br>☐ | **Mixture**<br>☐ | **Unknown**<br>☐ |
|---|---|---|---|---|
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | 18/02389/FUL – June 2018 – Construction of 8 dwellings, means of access, landscaping and associated works – permitted.<br><br>16/03785/FUL – November 2016 – Overflow car parking for up to 30 cars associated with adjoining rugby club – temporary. Planning Permission not implemented, and permission expired on 7th November 2017.<br><br>13/03793/O – July 2014 – Erection of up to 120 dwellings, community facilities and provision of public open space. Now known as 'Keble Fields'. Reserved Matters for residential element of development (not including the Application Site) approved in March 2016 (ref: 15/04461/REM).<br><br>Note - as part of planning application 13/03793/OUT the site was consented for healthcare/community use. In the preliminary discussions the developer made an offer to transfer this site to the Town Council for community use, however this failed to translate into a legal commitment.<br><br>The adopted Local Plan includes the site within the Development Boundary and the site has now received planning consent for 8 dwellings (application 18/02389/FUL)." | | | |

## 1.0. Suitability

***Suitability***

| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within**<br>☐ | **Adjacent**<br>☑ | **Outside**<br>☐ | **Unknown**<br>☐ |
|---|---|---|---|---|
| **Does the site have suitable access, or could a suitable access be provided? (Yes/No)**<br>(provide details of any constraints) | **Yes**<br><br>Access is to be provided directly from 'June Lewis Way' located on the southern boundary of the site, and from a private highway constructed from 'Morecombe Way'.<br>It should be noted that 'Morecombe Way' and 'June Lewis Way' were constructed recently as part of the Bovis development 'Keble Fields' located to the south of the site. | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No)**<br>(provide details) | **No** | | | |

*Environmental Considerations*

| Questions | Assessment guidelines | Observations and comments |
|---|---|---|
| **Is the site within or adjacent to the following policy or environmental designations:**<br><br>• **Green Belt**<br>• **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)**<br>• **SSSI Impact Risk Zone**<br>• **Key Wildlife Site**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage**<br>• **Water quality/supply** | **Within**<br><br>**Adjacent/nearby**<br><br>**No** | **Adjacent/nearby**<br><br>Site within 2.9km of Cotswold AONB.<br><br>Site 900m north of Cotswold Water Park SSSI and 1.3km north-west of Whelford Meadow SSSI. Site is within a SSSI IRZ for 50 residential units – however indicative capacity for the site is less than this at 12.<br><br>Cotswold Water Park KWS Site located 300m south-east of the site.<br><br>Development has the potential to adversely impact upon the biodiversity value of nationally and locally designated sites through disturbance and indirectly through pollution.<br><br>Calibro published a flood risk and drainage statement for the site (WRA, 2018). This states that a small tributary watercourse is located approximately on the northern boundary of the site. The small tributary watercourse is part of the land drainage network that forms part of the River Thames catchment area.<br>Thames Water sewer records identify a rising main located in London Road to the north of the site.<br><br>Site located within Flood Zone 1 and is of very low risk of surface water flooding. However, area of high surface water flood risk is located along the northern boundary of the site. Due to the good infiltration rates on site, the discharge of surface water run-off will be achieved by |

| | | |
|---|---|---|
| | | infiltration, utilising permeable paving and individual plot soakaways.<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (2018) concludes that *"data suggests that [the site] satisfies requirements and the development area could be larger."* The site is therefore considered to be of low risk of groundwater flooding.<br><br>Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration.<br>Development sites greater than 15 units are likely to require local network improvements. Site indicative capacity is less than this at 12. Site is being put forward for 8 residential units.<br>It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement.<br><br>Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |
| **Landscape and townscape**<br><br>**Is the site low, medium or high sensitivity in terms of landscape character?**<br><br>Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from | **Low sensitivity to development**<br>**Medium sensitivity to development**<br>**High sensitivity to development** | **Low sensitivity to development**<br><br>The site is bounded to the north by trees and an existing watercourse, to the south and west by existing roads, and to the east by an existing property and hedgerows. The site is screened from the A417 to the north by dense vegetation. The adjacent road to the south coincides with the new residential development named Keble Fields on land at London Road to the south and west. Keble Fields will comprise around 120 dwellings and is currently being |

| | | |
|---|---|---|
| local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | | constructed. It is therefore considered that the principle of residential development in the vicinity of the site is well established. As such, development of the site is expected to be in keeping with the surrounding residential development.<br><br>However, views of the existing watercourse, for example, may be adversely impacted. Vegetation along the site's boundaries may reduce these effects. Additionally, the landscape proposals provided for the proposed new development include detailed landscaping i.e. maintaining and enhancing tree cover and providing buffering. |
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **Some loss**<br><br>Site located in Grade 2 Agricultural Land. |

***Heritage considerations***

| Question | Assessment guidelines | Comments |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br><br>• **Conservation area**<br>• **Scheduled monument**<br>• **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible**<br>**Limited or no impact or no requirement for mitigation** | **Limited or no impact or no requirement for mitigation** |

***Community facilities and services***

| What is the distance to the following facilities (measured from the edge of the site) | Distance (metres) | Observations and comments |
|---|---|---|
| **Town / local centre / shop** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Bus Stop** | **<400m**<br>**400-800m** | **<400m** |

| | | |
|---|---|---|
| | >800m | |
| **Primary School** | <400m<br>400-800m<br>>800m | >800m |
| **Secondary School** | <1600m<br>1600-3900m<br>>3900m | <1600m |
| **Open Space / recreation facilities** | <400m<br>400-800m<br>>800m | 400-800m<br><br>400-800m from Fairford Football Club on Cinder Lane |
| **GP / Hospital / Pharmacy** | <400m<br>400-800m<br>>800m | >800m |
| **Cycle route** | <400m<br>400-800m<br>>800m | <400m<br><br>There are no National Cycle network routes within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area, adjacent to the north eastern boundary of the site. |
| **Footpath** | <400m<br>400-800m<br>>800m | <400m |
| **Key employment site** | <400m<br>400-800m<br>>800m | <400m<br><br>Site adjacent to London Road employment site and Newchapel Electronics. |

| *Other key considerations* | | |
|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | Several<br>Few<br>None<br>**Unknown** | Few<br><br>Barton Hyett Arboriculture Consultants carried out an arboriculture survey, impact assessment and protection plan for the site (2018). There is a large group of trees forming a shelter belt that runs between the site and London Road (A417), and between the site and neighbouring property of Eyscott Halt. This large group was surveyed by selecting the larger and more established trees within this group as individual trees, with the remainder comprising of a group of common ash and also the understorey trees. Of the sixteen individual trees surveyed six were<br>recorded as being of low quality because of an obvious decline in physiological condition due to disease, or due to obvious defects in their structural condition. The groups that were surveyed are |

| | | | |
|---|---|---|---|
| | | considered to be of low quality and with an estimated remaining life expectancy of at least ten years.<br>The significance of proposed tree removals in relation to the arboricultural resource of the site is considered very minimal.<br><br>The arboriculture survey, impact assessment and protection plan (2018) considers that the outline landscape proposals for the site will provide sufficient potential for considered tree planting to take place as part of detailed landscaping proposals. | |
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies?** | **High/Medium/Low/ Unknown** | **Medium**<br><br>In terms of biodiversity, the site contains species-poor semi-improved grassland, a tree and shrub belt along the eastern and northern site boundaries, and there is a small brook immediately north of the site.<br><br>There are several semi-mature/mature trees located along the northern/eastern boundaries of the site which are considered through the Ecology Survey (2018) to have moderate-low potential to support roosting bats. The site itself is also considered to provide moderate suitability for foraging and commuting bats due to boundary features comprising shrubs and trees. Note one bat record was identified within a 1km search area.<br><br>The site is valuable for a number of common bird species, including the song thrush which is currently a Red List bird of conservation concern.<br><br>There have also been hedgehogs, foxes, otters and water voles recorded within 1km of the site. These are expected to utilise the site. | |
| **Public Right of Way** | **Yes/No** | **No** | |
| **Existing social or community value (provide details)** | **Yes/No** | **No** | |
| ***Is the site likely to be affected by any of the following?*** | ***Yes*** | ***No*** | ***Comments*** |
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or in close proximity to hazardous installations** | ☐ | ☑ | |
| ***Characteristics*** | | | |

| Characteristics which may affect development on the site: | Comments |
|---|---|
| **Topography:** Flat/ plateau/ steep gradient | Site relatively flat. |
| **Coalescence Development would contribute in neighbouring settlements merging into one another (Yes/No)** | **No** |
| **Scale and nature of development would be large enough to significantly change size and character of settlement (Yes/No)** | **No** |
| **Other** (provide details) | |

## 3.0. Availability

***Availability***

| | Yes | No | Comments |
|---|---|---|---|
| **Is the site available for sale or development (if known)? Please provide supporting evidence.** | ✓ | | |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?** | | ✓ | |
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | ✓ | | 0-5 years |
| **Any other comments?** | | | |

## 4.0. Summary

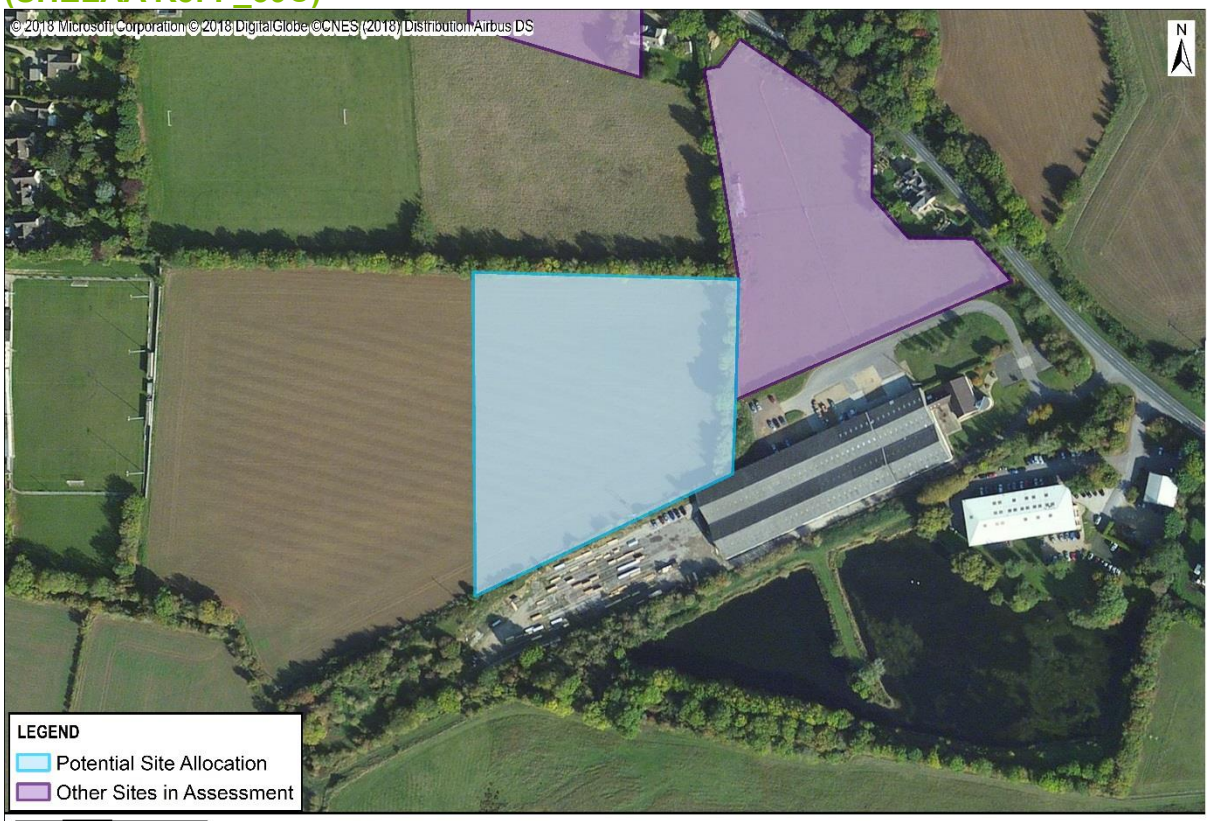
***Conclusions***

Please tick a box

| | |
|---|---|
| **The site is suitable and available for development ('accept')** | ☑ |
| **This site has minor constraints** | ☑ |
| **The site has significant constraints** | ☐ |
| **The site is unsuitable for development / no evidence of availability ('reject')** | ☐ |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | 12 |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | Site is available with only minor constraints, except for the potential loss of best and most versatile land. Mitigation in this respect should include ensuring planning decision making considers the benefits of the area of high quality agricultural land.<br><br>Other minor constraints for the site include:<br><br>• Impact on the Cotswold Water Park SSSI and the KWS 300m south-east of the site.<br>• Potential surface water flood risk issues.<br>• The site has limited accessibility to the town centre.<br>However site has planning permission so there is no need for allocation through the Neighbourhood Plan. |

## Site 10: Field south-east of granted planning permission at London Road (SHELAA Ref F_39C)




Site F_39C: Field south-east of granted planning permission at London Road

### *General information*

| | |
|---|---|
| **Site Reference / name** | Field south-east of granted planning permission at London Road (SHELAA Ref F_39C) |
| **Site Address (or brief description of broad location)** | Field south-east of Keble Field/ Bovis at London Road |
| **Current use** | Agricultural/fallow field formally used for crop production |
| **Proposed use (in Neighbourhood Plan)** | 32 dwellings or some B-class employment. Proposed 'business' allocation – expansion of London Road industrial estate in the pre-submission Fairford Neighbourhood Plan 2016-2031 |
| **Gross area (Ha)**<br>Total area of the site in hectares | 1.31 |
| **SHLAA site reference (if applicable)** | F_39C |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | SHELAA |
| **Is the site being actively promoted for development by a landowner/developer/agent? If so,** | No. |

| | |
|---|---|
| **provide details here (land use/amount)** | |

*Context*

| | | | | |
|---|---|---|---|---|
| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield**<br>☑ | **Brownfield**<br>☐ | **Mixture**<br>☐ | **Unknown**<br>☐ |
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | N/A | | | |

## 1.0. Suitability

*Suitability*

| | | | | |
|---|---|---|---|---|
| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within**<br>☐ | **Adjacent**<br>☑ | **Outside**<br>☐ | **Unknown**<br>☐ |
| **Does the site have suitable access, or could a suitable access be provided? (Yes/No)**<br>(provide details of any constraints) | **No**<br><br>Access currently undetermined. Access may be possible through the employment estate/depot, but this is restricted due to present industrial activity and the road width. This would also need to be negotiated and is not in the landowners' control.<br><br>Another option for access would be via the adjacent Keble Fields development, but there are concerns about intensification of access onto this stretch of the A417. | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No**<br>(provide details) | **No** | | | |

*Environmental Considerations*

| Questions | Assessment guidelines | Observations and comments |
|---|---|---|
| **Is the site within or adjacent to the following policy or environmental designations:**<br><br>• **Green Belt** | **Within**<br><br>**Adjacent/nearby** | **Within**<br><br>Site is approx. 2.7km from the Cotswolds AONB. |

| | | |
|---|---|---|
| • **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)**<br>• **SSSI Impact Risk Zone**<br>• **Key Wildlife Site**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage**<br>• **Water quality/ supply** | **No** | Site is located approx. 700m north of Cotswold Water Park SSSI, and 1.1km northwest of Whelford Meadow SSSI.<br>Site within IRZ for 50 residential units – indicative capacity for the site is 31 dwellings. However, there is also potential impact on SSSIs downstream due to sewage system capacity issue and water run off issues from an industrial site.<br><br>KWS 60m south of the site.<br><br>Development has the potential to adversely impact upon the biodiversity value of nationally and locally designated sites through disturbance and indirectly through pollution.<br><br>Site located within Flood Zone 1. There are small areas of low risk of surface water flooding within the site. Southern half of site located within ground water flood risk zone.<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"part of the site is likely not to have sufficient freeboard."* Part of the site is therefore at high risk of groundwater flooding.<br><br>Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration.<br>Fairford STW limited spare capacity without the need for an upgrade. Development sites greater than 15 units are likely to require local network improvements – indicative capacity of site is 32 units. Without increased capacity, development may result in increased sewage pollution of |

| | | |
|---|---|---|
| | | the River Coln and areas downstream.<br><br>It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |
| **Landscape and townscape**<br><br>**Is the site low, medium or high sensitivity in terms of landscape character?**<br><br>Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | **Low sensitivity to development**<br>**Medium sensitivity to development**<br>**High sensitivity to development** | **Low sensitivity to development**<br><br>The site is presently in a semi-rural setting (housing to the north and west and the embankment to the south) but is adjacent to the industrial area to the east. As such, development would likely have a minor impact on landscape, as the openness of the wider landscape has already been compromised by the industrial estate and adjacent housing development. Nonetheless, a localised visual impact is expected as views from the adjacent housing development would no longer be onto greenfield land. |
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **Some loss**<br><br>The site is Grade 3a best and most versatile agricultural land. Potential loss. |

***Heritage considerations***

| Question | Assessment guidelines | Comments |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br><br>• **Conservation area**<br>• **Scheduled monument**<br>• **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible**<br>**Limited or no impact or no requirement for mitigation** | **Limited or no impact or no requirement for mitigation**<br><br>Note CDC indicate that an archaeological investigation would be needed at the site. |

*Community facilities and services*

| What is the distance to the following facilities (measured from the edge of the site) | Distance (metres) | Observations and comments |
|---|---|---|
| **Town / local centre / shop** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Bus Stop** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |
| **Primary School** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Secondary School** | **<1600m**<br>**1600-3900m**<br>**>3900m** | **1600-3900m** |
| **Open Space / recreation facilities** | **<400m**<br>**400-800m**<br>**>800m** | **400-800m**<br><br>Site is 400-800m from Fairford Football Club on Cinder Lane, and 400-800m from Fairford Bowling Club at East End. |
| **GP / Hospital / Pharmacy** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Cycle route** | **<400m**<br>**400-800m**<br>**>800m** | **400-800m**<br><br>There are no National Cycle network routes within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area, to the north east of the site. |
| **Footpath** | **<400m**<br>**400-800m**<br>**>800m** | **<400m** |
| **Key employment site** | **<400m**<br>**400-800m**<br>**>800m** | **<400m**<br><br>Site is 0-400m of London Road employment site. |

*Other key considerations*

| | | |
|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | **Several**<br>**Few**<br>**None**<br>**Unknown** | **None** |

| | | |
|---|---|---|
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies?** | **High/Medium/Low/ Unknown** | **Medium**<br><br>The site is surrounded by mature hedgerows/trees and adjacent to the old railway embankment which is likely to be rich in biodiversity, including hedgerow birds, rabbits and insects. This may also act as a habitat corridor, providing connectivity for wildlife throughout the area. |
| **Public Right of Way** | **Yes/No** | **Yes**<br><br>Along the southern boundary of the site. |
| **Existing social or community value (provide details)** | **Yes/No** | **No**<br><br>Currently no public access to this site despite its open nature. |

| *Is the site likely to be affected by any of the following?* | *Yes* | *No* | *Comments* |
|---|---|---|---|
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or in close proximity to hazardous installations** | ☐ | ☑ | |

*Characteristics*

| **Characteristics which may affect development on the site:** | **Comments** |
|---|---|
| **Topography:**<br>Flat/ plateau/ steep gradient | Site is relatively flat. |
| **Coalescence**<br>**Development would contribute in neighbouring settlements merging into one another (Yes/No)** | **No** |
| **Scale and nature of development would be large enough to significantly change size and character of settlement (Yes/No)** | **No** |
| **Other** (provide details) | Local knowledge suggests a potential issue for the site is noise from the adjacent timber factory (This required acoustic screening from the adjacent housing development – Ref application 18/00692/COMPLY). |

## 3.0. Availability

***Availability***

| | Yes | No | Comments |
|---|---|---|---|
| **Is the site available for sale or development (if known)? Please provide supporting evidence.** | ✓ | | |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?** | | ✓ | |
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | ✓ | | 11-15 years. |
| **Any other comments?** | | | |

## 4.0. Summary

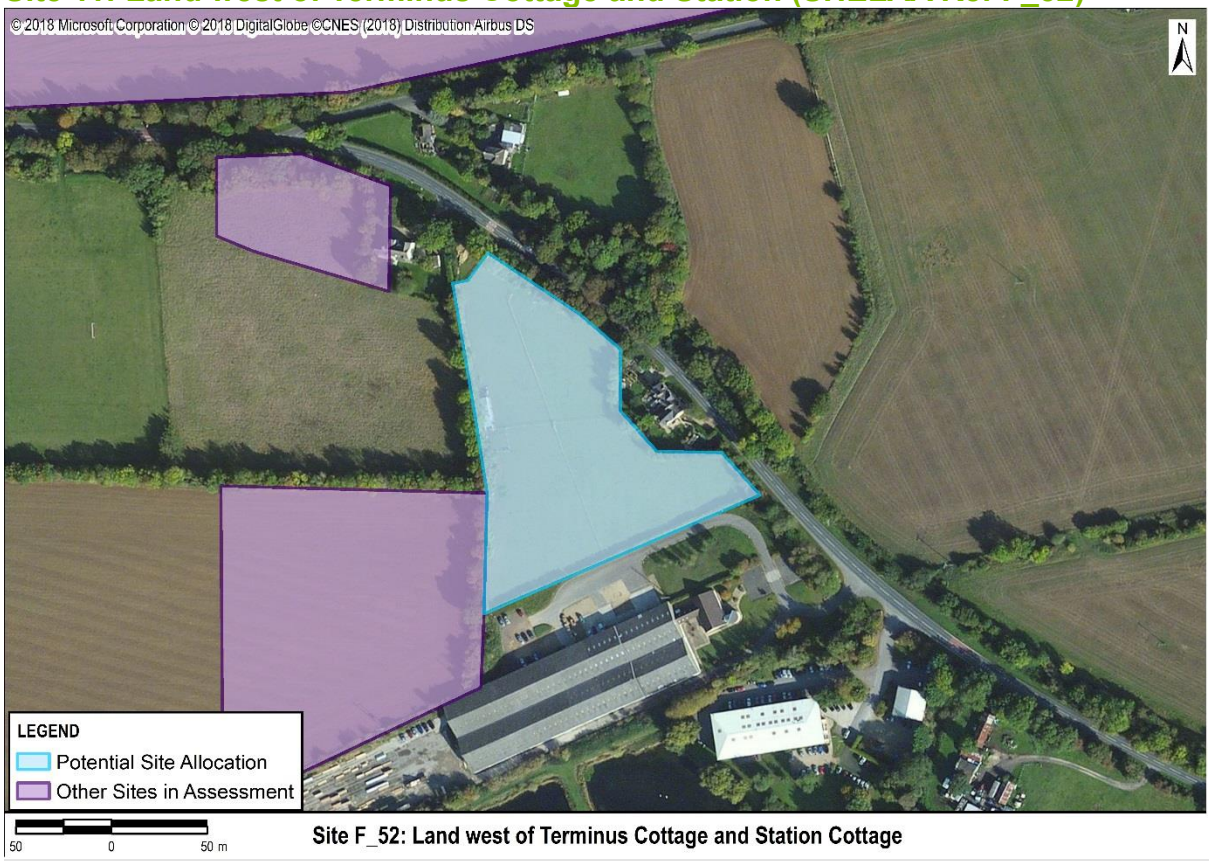
***Conclusions***

| | Please tick a box |
|---|---|
| **The site is suitable and available for development ('accept')** | ✓ |
| **This site has minor constraints** | |
| **The site has significant constraints** | ✓ |
| **The site is unsuitable for development / no evidence of availability ('reject')** | |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | This site is available however a key issue for the site is access which would need to be provided through the adjacent employment estate/depot or via the Bovis Homes development. This would need to be resolved prior to development.<br><br>Other minor constraints include: |

| | |
|---|---|
| | • Landscape visual impact and impact on setting, particularly from surrounding residential dwellings.<br>• Possible loss of best and most versatile agricultural land.<br>• Impact on the biodiverse old railway embankment and surrounding vegetation.<br>• Potential impact on the Cotswold Water Park SSSI, and KWS located 60m north of the site.<br>• Small areas of low risk of Surface Water flooding are located within the site.<br>• Part of the site is at high risk of groundwater flooding.<br>The site is therefore potentially suitable for development. Mitigation against the above constraints may include delivering high quality design and layout including landscaping and screening, delivering SuDS, delivering biodiversity net gain, maintaining and enhancing existing on site biodiversity assets, and providing for wildlife needs on site, and ensuring planning decision making considers the benefits of high quality agricultural land.<br><br>However if it can be demonstrated that the groundwater flooding issue would entirely preclude development on the site, it would not be appropriate to allocate in the Neighbourhood Plan. |

## Site 11: Land west of Terminus Cottage and Station (SHELAA Ref F_52)




Site F_52: Land west of Terminus Cottage and Station Cottage

### *General information*

| | |
|---|---|
| **Site Reference / name** | Land west of Terminus Cottage and Station (SHELAA Ref F_52) |
| **Site Address (or brief description of broad location)** | Land west of Terminus Cottage |
| **Current use** | Site in use as a horse paddock with some rough pasture and several outbuildings. |
| **Proposed use (in Neighbourhood Plan)** | Site assessed in the SHELAA 2017 as suitable for 17 dwellings.<br>Given its location, could also potentially be suitable for employment use. |
| **Gross area (Ha)**<br>Total area of the site in hectares | 1.40 |
| **SHLAA site reference (if applicable)** | F_52 |
| **Method of site identification (e.g. proposed by NP group/ SHLAA/Call for Sites etc)** | SHELAA |
| **Is the site being actively promoted for development by a landowner/developer/agent? If so, provide details here (land use/amount)** | Proposal submitted to the SHELAA call for sites for 65 dwellings.<br>No formal planning application yet. A new proposal may be for less. |

### *Context*

| | | | | |
|---|---|---|---|---|
| **Is the site:**<br>Greenfield: land (farmland, or open space) that has not previously been developed<br><br>Brownfield: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated infrastructure. | **Greenfield** ☐ | **Brownfield** ☐ | **Mixture** ☑ | **Unknown** ☐ |
| **Site planning history**<br>Have there been any previous applications for development on this land? What was the outcome? Does the site have an extant planning permission? | Proposal submitted for 65 dwellings. | | | |

## 1.0. Suitability

***Suitability***

| | | | | |
|---|---|---|---|---|
| **Is the site:**<br>- **Within the existing built up area**<br>- **Adjacent to and connected with the existing built up area**<br>- **Outside the existing built up area** | **Within** ☐ | **Adjacent** ☑ | **Outside** ☐ | **Unknown** ☐ |
| **Does the site have suitable access, or could a suitable access be provided? (Yes/No)**<br>(provide details of any constraints) | **Yes**<br><br>The proposed access is directly from the A417, although there are concerns from the local community about intensification of access from the new housing development on London Road, particularly the safety of pedestrian/cycle access. The SHELAA assessment states that "Access directly from the A417 would be difficult to achieve and would be unpreferable".<br>Alternative access would be from the employment estate or via site 10 (F_39C), although either would require negotiation. | | | |
| **Is the site allocated for a particular use (e.g. housing/employment/open space) in the adopted and/ or emerging Local Plan? (Yes/No)**<br>(provide details) | **No** | | | |

***Environmental Considerations***

| Questions | Assessment guidelines | Observations and comments |
|---|---|---|
| **Is the site within or adjacent to the following policy or environmental designations:**<br><br>• **Green Belt**<br>• **Area of Outstanding Natural Beauty (AONB)**<br>• **National Park**<br>• **European designated nature conservation site (i.e. Special Area of Conservation or Special Protection Area)**<br>• **SSSI Impact Risk Zone** | **Within**<br><br>**Adjacent/nearby**<br><br>**No** | **Adjacent/nearby**<br><br>Site approx. 2.5km from Cotswold AONB.<br><br>Site 800m north of Cotswold Water Park SSSI and 1.2km north-west of Whelford Meadow SSSI. Site is within a SSSI IRZ for 50 residential |

| | | |
|---|---|---|
| • **Key Wildlife Site**<br>• **Site of Geological Importance**<br>• **Flood Zones 2 or 3**<br>• **Drainage**<br>• **Water quality/ supply** | | units – however indicative capacity for the site is less than this at 34.<br>KWS located 200m south of the site.<br>Development has the potential to adversely impact upon the biodiversity value of nationally and locally designated sites through disturbance and indirectly through pollution.<br><br>Site located within Flood Zone 1. There is an area of medium surface water flood risk to the north of the site.<br><br>The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"part of the site is likely not to have sufficient freeboard."* Part of the site is therefore at high risk of groundwater flooding.<br><br>Water Cycle Study (JBA, 2015) predicts that the waste water treatment works (WwTW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent a WFD deterioration. Development sites greater than 15 units are likely to require local network improvements. Without increased capacity, development may result in increased sewage pollution of the River Coln and areas downstream.<br><br>It is expected that infrastructure upgrades will be required to serve the planned growth within the settlement. Further modelling will be required to determine the scale of the water supply infrastructure upgrades that may be needed (JBA, 2015). |
| **Landscape and townscape**<br><br>**Is the site low, medium or high sensitivity in terms of landscape character?** | **Low sensitivity to development**<br>**Medium sensitivity to development** | **Medium sensitivity to development** |

| | | |
|---|---|---|
| Low sensitivity: site not visible or less visible from surrounding locations, existing landscape or townscape character is poor quality, existing features could be retained.<br><br>Medium sensitivity: development of the site would lead to a moderate impact on landscape or townscape character due to visibility from surrounding locations and/or impacts on the character of the location.<br><br>High sensitivity: development would be within an area of high quality landscape or townscape character, and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness- without the possibility of mitigation. | **High sensitivity to development** | The site is neighboured by an employment estate to the south, new housing and (currently) an agricultural field to the west and a couple of isolated houses and open countryside to the north and east. However, the site currently acts as a green buffer between the A417 and the new housing and therefore loss of this buffer may alter the landscape character to the east of the town, and impact upon local views. This is considered important to local residents. However, site is screened to some extent by vegetation. |
| **Agricultural Land**<br>Land classified as the best and most versatile agricultural land (Grade 1,2 or 3a) | **No loss**<br>**Some loss** | **Some loss**<br><br>Site located within Grade 2 Agricultural Land. |

***Heritage considerations***

| Question | Assessment guidelines | Comments |
|---|---|---|
| **Is the site within or adjacent to one or more of the following heritage designations or assets?**<br><br>• **Conservation area**<br>• **Scheduled monument**<br>• **Registered Park and Garden**<br>• **Registered Battlefield**<br>• **Listed building**<br>• **Known archaeology**<br>• **Locally listed building** | **Directly impact and/or mitigation not possible**<br>**Some impact, and/or mitigation possible**<br>**Limited or no impact or no requirement for mitigation** | **Limited or no impact or no requirement for mitigation** |

***Community facilities and services***

| What is the distance to the following facilities (measured from the edge of the site) | Distance (metres) | Observations and comments |
|---|---|---|
| **Town / local centre / shop** | **<400m**<br>**400-800m**<br>**>800m** | **>800m** |
| **Bus Stop** | **<400m**<br>**400-800m**<br>**>800m** | **400-800m** |
| **Primary School** | **<400m** | **>800m** |

| | | |
|---|---|---|
| | 400-800m<br>>800m | |
| **Secondary School** | <1600m<br>1600-3900m<br>>3900m | 1600-3900m |
| **Open Space / recreation facilities** | <400m<br>400-800m<br>>800m | 400-800m<br><br>400-800m from Fairford Football Club on Cinder Lane. |
| **GP / Hospital / Pharmacy** | <400m<br>400-800m<br>>800m | >800m |
| **Cycle route** | <400m<br>400-800m<br>>800m | <400m<br><br>There are no National Cycle network routes within the Neighbourhood Plan area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford Neighbourhood Plan area, to the north of the site. |
| **Footpath** | <400m<br>400-800m<br>>800m | <400m |
| **Key employment site** | <400m<br>400-800m<br>>800m | <400m<br><br>Site adjacent to London Road employment site and Newchapel Electronics. |

*Other key considerations*

| | | |
|---|---|---|
| **Are there any known Tree Preservation Orders on the site?** | Several<br>Few<br>None<br>Unknown | None |
| **Would development lead to the loss of key biodiversity habitats with the potential to support protected species, such as, for example, mature trees, woodland, hedgerows and waterbodies?** | High/Medium/Low/<br>Unknown | Medium<br><br>Rough pasture present, and trees/hedgerows extend along the field boundaries particularly to the north/east/west of the site. Potential to support species and provide connectivity to the wider countryside.<br><br>Agricultural buildings may also have the potential to support protected species such as bats, however this is uncertain and may require further ecological survey work. |
| **Public Right of Way** | Yes/No | No |

| | | | |
|---|---|---|---|
| **Existing social or community value (provide details)** | **Yes/No** | **No** | |
| ***Is the site likely to be affected by any of the following?*** | ***Yes*** | ***No*** | ***Comments*** |
| **Ground Contamination (Y/N/Unknown)** | ☐ | ☐ | Unknown. |
| **Significant infrastructure crossing the site i.e. power lines/ pipe lines, or in close proximity to hazardous installations** | ☐ | ☑ | |

***Characteristics***

| **Characteristics which may affect development on the site:** | **Comments** |
|---|---|
| **Topography:** Flat/ plateau/ steep gradient | Site relatively flat. |
| **Coalescence Development would contribute in neighbouring settlements merging into one another (Yes/No).** | **No** |
| **Scale and nature of development would be large enough to significantly change size and character of settlement (Yes/No)** | **No** |
| **Other** (provide details) | |

## 3.0. Availability

***Availability***

| | **Yes** | **No** | **Comments** |
|---|---|---|---|
| **Is the site available for sale or development (if known)? Please provide supporting evidence.** | ☑ | ☐ | |
| **Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational** | ☑ | ☐ | Local knowledge suggests there may be issues with access option via the industrial estate or the Keble Fields estate. This needs to be confirmed. |

| | | | |
|---|---|---|---|
| **requirements of landowners?** | | | |
| **Is there a known time frame for availability? 0-5 /6-10 / 11-15 years.** | ✓ | | 11-15 years. |
| **Any other comments?** | | | |

## 4.0. Summary

***Conclusions***

Please tick a box

| | |
|---|---|
| **The site is suitable and available for development ('accept')** | ✓ |
| **This site has minor constraints** | ✓ |
| **The site has significant constraints** | ✓ |
| **The site is unsuitable for development / no evidence of availability ('reject')** | |

| | |
|---|---|
| **Potential housing development capacity (estimated as a development of 30 homes per Ha):** | 34 |
| **Key evidence (3-4 bullet points) to explain why site has been accepted or rejected as suitable/available or unsuitable/unavailable.** | Site is available and suitable for development, however there are significant concerns regarding safe access to the site and impact on the rural approach to the town from the east. These would need to be resolved prior to allocation of the site or development.<br>Other minor constraints include:<br>• Loss of best and most versatile land.<br>• Impact on the Cotswold Water Park SSSI and the KWS located 200m south of site.<br>• Area of medium surface water flood risk to the north of the site.<br>• Part of the site at high risk of groundwater flooding.<br>• The site has limited accessibility to the town centre.<br>• Potential infrastructure requirements.<br>The site is therefore potentially suitable for development. Mitigation against the above constraints may include delivering measures designed to improve access, delivering SuDS, high quality design and layout including landscaping and screening, delivering biodiversity net gain, and ensuring planning decision making considers the benefits of high quality agricultural land.<br>However if it can be demonstrated that the groundwater flooding issue would entirely preclude development on |

| | |
|---|---|
| | the site, or that access directly on to the A417 is unsuitable, it would not be appropriate to allocate in the Neighbourhood Plan. |

# Evidence Base
# Fairford Landscape & Local Green Space Study

**August 2020 (revised November 2021)**

# Fairford Landscape & Local Green Space Study

## Contents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## 1.0 Introduction & Purpose

1.1 This Landscape & Local Green Spaces Study has been undertaken by local residents of Fairford, with the professional support of RCOH Ltd, in the course of preparing a local Neighbourhood Plan. The aim of this study is to provide evidence for policy choices and wording in the Fairford Neighbourhood Development Plan (NDP), in particular Policies FNP8, FNP9 and FNP10.

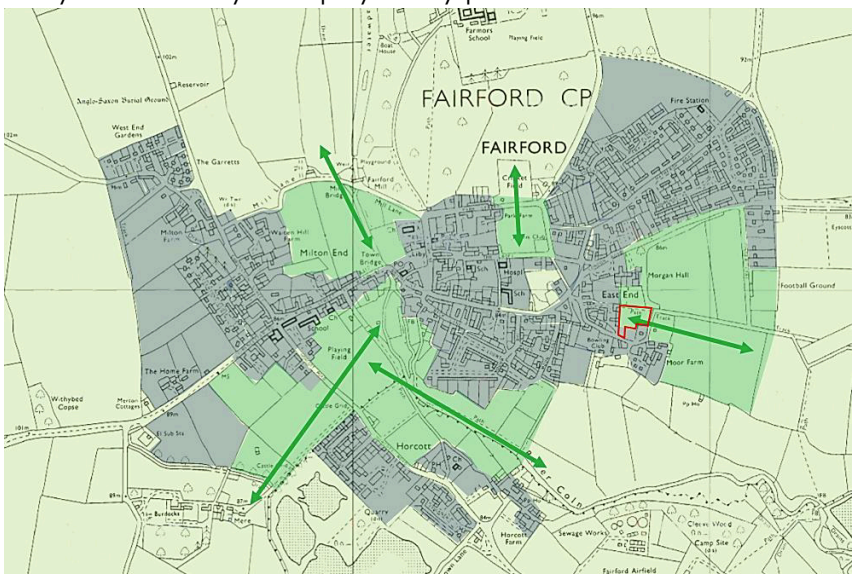
1.1.1 The designations proposed in this document for the NDP are a crucial component in support of that plan. They do not seek to rule out any form of development and other policies in the NDP have responded to the requirement for growth in the town.

1.1.2 An earlier NDP was rejected in 2017 by examiner Andrew Ashcroft and did not proceed to referendum.

## 1.2 Background

1.2.1 Fairford Town has all the characteristics of a small Cotswold market town in that the open spaces, both within and around the town, are a crucial component of the townscape. One of the distinctive, even unique, features of Fairford is the way in which the countryside comes right into the heart of the town, particularly at the top of the High Street and at the Greens. 'At the northern end of the High Street is Fairford Park. This close proximity of High Street and parkland is one of the town's most distinctive qualities.'[1]

1.2.2 'Between the town and Milton End to the west is an important rural valley corridor through which the Coln has been canalised as the 'Broadwater'. The finest views of the church are over this open area.'[2] The White Report recognises the unique pattern of settlement in Fairford: the edges of Fairford are one of the town's most distinctive features; they are 'visually and physically permeable between the town and the floodplain providing




1.2.3 1979-82, 1:10,000 O.S. map. 2018 Areas developed or under development (shaded grey) surviving green corridors (shaded green). Most of the development has been completed (2020). The large Keble Fields development to the east of the town is beyond the limits of this map.

[1] 'The White Report': Study of Land Surrounding Key Settlements in Cotswold District Council, June 2000, para. 10.2, p.30

[2] 'The White Report': Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.2, p. 62

good continuity between the town and its landscape context'[3]. This 'rural feel' was identified in the consultation questionnaire as a much-valued aspect of town life.

1.2.4 There are several constraints on development which need to be taken into account when deciding on new development sites. As an ancient ford for the River Coln, Fairford is sited on a floodplain and the old medieval town largely developed to the north of the river on higher ground. Horcott to the south, a quite distinct settlement[4], is bounded by the river, Horcott Hill, the airfield, and several lakes resulting from gravel extraction.

1.2.5 To the south west and south east of the town are gravel extraction lakes, (Horcott Lakes and the Lake 104 complex); to the south is RAF Fairford; to the north are the Ernest Cook Trust Estate and a protected Special Landscape Area. Squeezed between these areas are the river and the A417 – a District Link road running through the medieval centre of the town, closely bounded by listed buildings. In places the carriageway is less than 3.5m wide.

1.2.6 Recent housing developments have taken place along the A417 at the eastern and western edges of the town, creating a kind of dumbbell effect and seriously, negatively, affecting the main approaches to the town. At the moment the town is struggling to retain the rural and Cotswold character of the settlements; the open spaces listed here are a vital part of the plan to redress the balance. It should be noted that the NDP foresees a future of the town as including an increase in visitor numbers from tourism.

1.2.7 Fairford is also one of the very few towns in the Cotswolds to have no formally designated green spaces in the Cotswold District Council Local Plan 2011-2031 (CDLP) but it is clear that the existing spaces are widely valued; this is particularly true today since so many fields have recently been taken for housing. The lakeside and riverside walks have long been identified as important to the character of Fairford. The Fairford Health Check, published April 2005 after extensive local consultation, led to Fairford Town Council's (FTC) policy aim 'to perpetuate the distinct green character that makes Fairford special, and to designate Lake 104 and the riverside as an area that cannot be built upon or spoiled'.

1.2.8 Although Fairford Town and Horcott are two distinct settlements with quite different histories, the shorter name 'Fairford' is generally used here to cover the whole area under consideration.

1.2. 9 River Coln[5]

[3] 'Ibid, para. 12.8, p. 62

[4] See NDP Chapter 2. Fuller details can be found in NDP Evidence Base, Fairford Character and Design Assessment, paras. 1.2.18, 1.2.19 and Section 6)

[5] Photograph/map numbers are integrated into the paragraph number system

## 2.0 LOCAL GREEN SPACES (FNP8)

2.0.1 The NDP designates the following land as Local Green Spaces, as shown on the Policies Map:

i. The Walnut Tree Field;
ii. Upper Green;
iii. Coln House Playing Field.

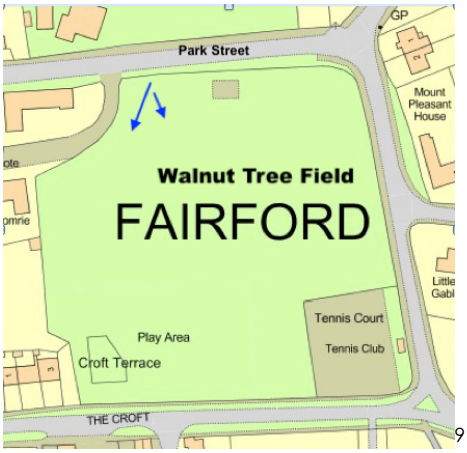
Development proposals that lie within a Local Green Space will only be permitted in very special circumstances.

2.0.2 These three sites are analysed according to the criteria set out in NPPF Paras. 101 & 102 'The Local Green Space designation … should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife;
- and where the green area concerned is local in character and is not an extensive tract of land.'

2.0.3 2017 NDP Examiner Andrew Ashcroft writes, 'Based on the findings of the Study and my own observations I am satisfied that the Walnut Tree Field, Upper Green and the Coln House Playing Field comfortably satisfy the three tests in paragraph 77 of the NPPF[6]. On this basis, they have regard to national policy.'[7]

### 2.1 The Walnut Tree Field (shown as 'I' on the Policies Map)[8]



[9]

2.1.1 Map showing the position and facilities of The Walnut Tree Field.

2.1.2 Questionnaire responses identified this as the most highly valued community green space and it is within the Conservation Area. The land contains the town's children's playground, exercise equipment, tennis courts, skateboard ramp and is much used for community events (eg. Fairford festival). It is owned by the Ernest Cook Trust.

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[6] Now NPPF para.100

[7] Andrew Ashcroft: 'A report to Cotswold District Council on the Fairford Neighbourhood Plan' 2017 para. 7.46

[8] All blue arrows in this document mark the position from which photographs were taken and the direction faced.

[9] Except where otherwise stated, all maps were created using Parish Online or the NDP Policies Map

2.1.3 Area: 1.47ha

2.1.4 Walnut Tree Field from Park Street looking towards Fairford Cottage Hospital

2.1.5 Walnut Tree Field from Park Street looking towards the Tennis Courts

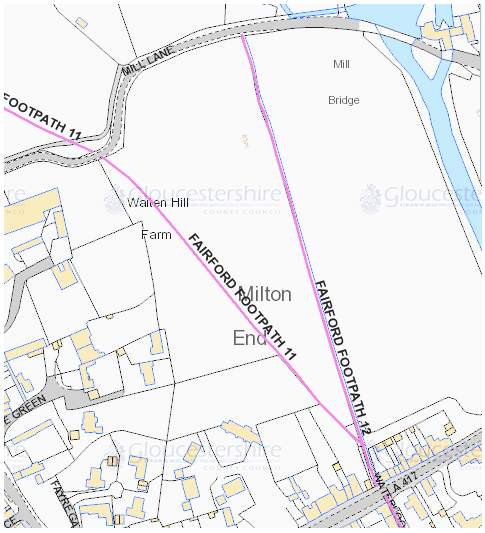
*2.1.6 NPPF: Is the green space in reasonably close proximity to the community it serves?*
This site is the 'green lung' of Fairford as it is right at the heart of the town, on the way home from school for many, and well supplied with play and exercise equipment.

*2.1.7 NPPF: Is the green space demonstrably special to a local community and holds a particular local significance?*
Consultation Day comments 2019 – 'Excellent facility.' 'Very good facility wonderful for the children.' 'An excellent community space.' Must be kept – wonderful space for youngsters of all ages.' 'Central, important to keep this empty community resource.' 'All green local spaces are important to the character of Fairford and the well being of its inhabitants.' 'It's a brilliant space. Would love to see a better skate park.' 'Essential green space.' 'Keep.'
Consultation Days comments September 2016 - 'It is a pleasure to go past the Walnut Tree Field on a nice day, often 40 or 50 people, grandparents, parents and young children using the facility.' 'Definitely need to preserve Walnut field – nice to see improvements there.' 'We very much value the Walnut field as a play space between the school and the main residential areas. It is extremely useful, well positioned and well used.' 'Questionnaire comments - 'Our grandchildren love going there.' 'For everyone young and old, large community space, it's great for community events and a meeting place.' 'Brilliant for parents and children alike.' '…park very important for children to play in safe area.' In total, 154 people said that they especially valued 'Walnut Tree Field' in response to the question, 'Are there any particular public open/green spaces you especially value and, if so, why?'

*2.1.8 NPPF: Is the green space local in character and not an extensive tract of land?*
This is a lovely space, overlooked by the historic, listed dovecote, in one of the most attractive areas of the town. It is bordered by old Cotswold stone walls and Fairford Preservation Society (now Fairford Community Voice) undertook significant tree planting in recent years. The site has a strong relationship with the Special Landscape Area (designated by CDLP Policy EN6, para.10.6.3), which extends as far south as Park Street. The open character of the space contributes to the setting of that much larger landscape. At 1.47ha, it is certainly not 'an extensive tract of land'.

## 2.2 Upper Green (shown as 'ii' on the Policies Map)

2.2.1
Map showing location of Upper Green




2.2.2
Map showing location of Upper Green PROWs. Detail from Gloucestershire C. Council: Highways Public Rights of Way Map

2.2.3 Questionnaire responses identified this as highly valued. It is in the centre of the town, within the Special Landscape Area, between the Town Bridge and Mill Bridge. It is one of the most photographed and visible green spaces in the town and forms an essential part of the Special Landscape Area (designated by the CDLP, Policy EN6) and of the Fairford Conservation Area. Community events are regularly held here, especially on celebratory occasions eg. the Jubilee Beacon. There are two PROWs (BFA11 and BFA12)[10] across the land and it is heavily used by walkers.

2.2.4 The area is divided into Upper and Lower Greens by a brook; Lower Green is within the floodplain and is an integral part of the recently constructed flood defences as a designated water attenuation area. Visually Lower Green is a part of the proposed Local Green Space setting, but its main function now is to protect the town from floods.

2.2.5 Upper Green is largely owned by the Ernest Cook Trust. The fenced area directly to the east of Fayre Court wall is within the boundary of Fayre Court. However, visually this land is an integral part of Upper Green. The recent development of Fayre Court land and subsequent sales included a clawback/coverage provision which would be triggered by the grant of a

[10] All PROW references and maps sourced from Gloucestershire County Council PROW online map at https://www.gloucestershire.gov.uk/highways/public-rights-of-way/rights-of-way-online-map/

residential planning consent for any further houses in that area. The section marked to the south of Upper Green in the map above, is the fenced area.

2.2.6 Area: 2.93ha

2.2.7 Upper Green - looking across towards Milton Street

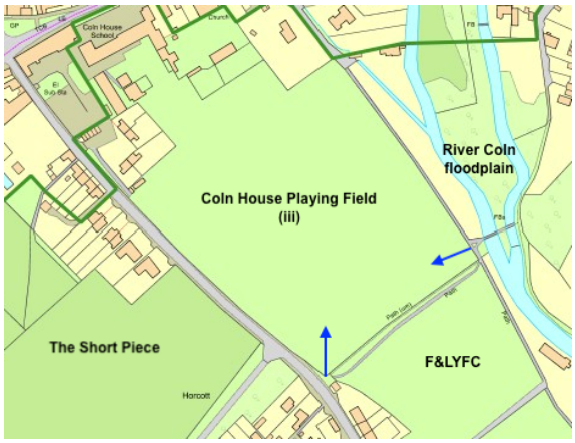
*2.2.8 NPPF: Is the green space in reasonably close proximity to the community it serves?*
Upper Green is close to both the Town Bridge and Mill Bridge. The Green is at the centre of the town.

*2.2.9 NPPF: Is the green space demonstrably special to a local community and holds a particular local significance?*
Consultation Day comments 2019 – 'Beautiful space.' 'This is essential for the character of Fairford.' 'Historic space and an asset to the town.' 'Keep.'
Consultation Days comments September 2016 – 'The Upper Green – have walked dogs across there for 12 years plus. Jubilee beacon.' 'Upper Green also of huge importance – historic views (+ probably my chosen best view) + one of the few relatively unchanged views/areas since C18th – characterises Fairford, part and parcel of 'famous views' of mill/church.'

*2.2.10 NPPF: Is the green space local in character and not an extensive tract of land?*
Upper Green has been used by the residents of Fairford for many, many centuries. It is, in large part, essentially, a 'working' field and cows often graze there, a green in the most ancient sense bringing the living countryside right into the town. Originally much larger it was 'part of the Milton End common [and] was probably used by the Welsh drovers to pasture their cattle when stopping at the town.'[11] Although a part of the Special Landscape Area, the space is distinct with defined boundaries that give it a local character. It is forms part of one of the most important 'postcard' views of Fairford, with Lower Green, the Mill and St Mary's Church'. At 2.93ha it is not an 'extensive tract of land' and is at the centre of the community it serves.

[11] Victoria County History vol. 7 p. 72.

## 2.3 Coln House Playing Field (shown as 'iii' on the Policies Map)




2.3.1 Map showing location of Coln House Playing Field

2.3.2 Coln House Playing Field from PROW by Dilly's Bridge

2.3.3 The area of the playing field at Coln House has had a long history in Fairford, from Anglo-Saxon settlement, to lunatic asylum to school. Coln House was a residential school in Gloucestershire for the education and care of pupils who had a primary diagnosis of social, emotional and mental health (SEMH) needs. In 2017 the local authority closed the school and permission has been granted for conversion to residential use. The land in question is the playing field at the back of the school, in a prominent position. It is tree-lined and surrounded by footpaths, so is a familiar and peaceful local landscape.

2.3.4 In the past plans to extend the school buildings onto this land had to be abandoned due to significant archaeological finds (the application was 1999 CT0056/J and it was withdrawn in 2000). 'The results of the evaluation suggest the presence of an extensive Anglo-Saxon settlement of late 5th to 9th century date. Any groundworks penetrating to more than 0.32m in depth would destroy significant archaeological deposits.'[12] The case for preserving the archaeological heritage of this area is made in paragraph 3.4.5 in The Short Piece analysis and is equally applicable to this playing field[13] which is of historical significance to the area. In 1999 the report on this field stated, 'The most important element in this assemblage is the Anglo-Saxon component. Evidence of Anglo-Saxon occupation is relatively rare and very piecemeal in Gloucestershire…'[14] and it is not unreasonable to suggest that this field, linked with The Short Piece finds, comprise two parts of the same settlement, bisected by the modern Horcott Road. A comment arising from the 2016 pre-submission consultation makes the point well: 'Fairford is an area that WAS rich in archaeology which unfortunately has been lost either by gravel extraction or by development … it could be a future asset to the town if investigated properly.'

2.3.5 On the 1841 Tithe Map, Coln House Field was described as 'Field for exercising lunatics'; however, it was very much more than a field as it also contained gardens which were worked

[12] An Archaeological Evaluation at Coln House School, Fairford, Gloucestershire for County Property Services, by Paul Nichols, 1999, p. 13)

[13] See para. 6.7.8 for a recent response of the Gloucestershire County Council Archaeologist to a query regarding this site

[14] Ibid p.12

by the residents as therapy; the asylum closed in 1944[15]. Since then, as a school facility (opened 1950), it has seen fetes, hog roasts, parties and various festival activities. It is bordered on two sides by heavily walked PROWs, both important routes into Fairford for Horcott residents. In particular, the children of Horcott use these paths as crucial parts of safe routes into school. The open ground of this playing field is a significant feature of these walks and the tranquility it provides is highly valued.

2.3.6 The playing field is now used by Fairford Rugby Club. When Fairford Youth Football Club (FYFC) was formed in 1976 (as Fairford & Lechlade Youth Football Club), they used this facility until they moved to their own ground next door – and it is still used by this club as an overspill facility due to the popularity of the FYFC.

2.3.7 Coln House Playing Field, directly opposite The Short Piece, also forms an important part of the Local Gap between Fairford and Horcott. The White Report of 2014 made specific mention of the importance of the 'Open land between Fairford and Horcott in order to maintain the separate identity of the settlements.'[16]

2.3.8 The view 'Over Coln House playing fields from Horcott Road towards St Mary's Church, the river and town centre beyond' has been identified as a key view in both NDP Appendix C: NDP12 Achieving High Standards of Design, and in the Evidence Base: 'Fairford Character and Design Assessment'.

2.3.9 Environment Agency Flood Map for Planning: flood zone 3 runs across the south-eastern corner of the site (see FYFC maps), confirmed in the Fairford Hydrological Study of 2018 (see map 2.3.12 below[17]).

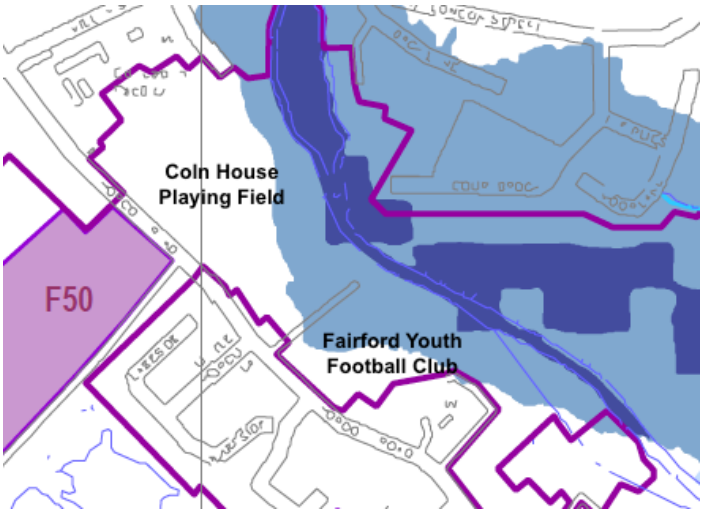
2.3.10 Area: 3.03 ha

2.3.11 Coln House Playing Field taken from Horcott Road, the tower of St Mary's Church in the distance.

[15] For a fuller history of Coln House see Evidence Base: Fairford Character and Design Assessment para. 2.7.2

[16] The White Report:' Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.12, p. 63

[17] Water Resource Associates: Groundwater Monitoring and Review of Flood Risk at Fairford, 2018 Fig. 5-1 p.19




2.3.12
Map from 2018 Hydrological Study, Figure 5-1 p.19[13]
Light blue = medium risk from river flooding
Dark blue = high risk from river flooding

*2.3.13 NPPF: Is the green space in reasonably close proximity to the community it serves?*
This site lies between the western half of the town and Horcott. Crucially, it links the open space of The Short Piece with the River Coln and ensures that the separation of settlements continues across the Horcott Road.

*2.3.14 NPPF: Is the green space demonstrably special to a local community and holds a particular local significance?*
The playing field is within the curtilage of a listed building which dates at least from 1806, and which has served a social function ever since 1816, well integrated into the local community. This, together with its considerable archaeological importance (2.3.4), means that the field is of historic significance. Consultation Day comments 2019 – 'Would be fabulous to protect this green space.' 'This would be good to keep as it is.' 'Potential for opportunity to be an asset facility for the town.' 'Should be maintained for the use of the community.' Keep for the community.' 'Public open space.' 'Keep.'

2.3.15 Fairford and Horcott have always been welcoming to those who might be considered 'different' or disadvantaged in some way. From the time of The Retreat, when 'lunatics' were housed here in open conditions, to more recent years when children who were less able or with special problems came here from far afield, all were welcomed by the local community. Even more, they were supported and encouraged. The annual Coln House fete was always well attended, local people bought produce from their gardens, and when out and about in town the children were always accepted. As such this area has a particularly special place in the life of local people and this field has become very much the focus of this feeling. It is understood that this is private land at the moment, but just as residents were protective of those who needed and used this space in the past, so they are of the space itself today. It is hoped that the land will remain available for Fairford Rugby Club

2.3.16 Quite apart from school events, the field is well used by local residents for sports and quiet contemplation, well attested to by 2016 pre-submission consultation comments. 'On Saturday and Sunday we watch men and juniors play their soccer and rugby there supported my friends and parents. This is a beautiful area with great views across to the old town and church.' 'I walk the dogs along the river bank daily and enjoy watching the birds in the Coln House field and the ducks sun bathing in the summer. My husband has fond memories of playing sport there when it was used as the sports field for the old Farmors school in the market place.' 'The field is used by local sports teams on a regular basis. I worked at Coln House for nine years some time ago and am very fond of the large open space it gives.' 'The Coln

House field has been there as long as I remember. I grew up in Fairford and played football there.' 'Due to its proximity to the river we often sit and watch the abundance of nature and wildlife, from ducks and moorhens to dragon flies and on one occasion we saw a kingfisher.' 'It provides a valuable space for recreational activity … with the majority of other sport facilities located on the North and East side of the town.'

2.3.17 Other comments made on the Informal Consultation Days in September 2016 include: 'Gap between Horcott/new development + Coln House also critical. Views of Fairford setting as you come down hill.' '[Green spaces] to be preserved + Coln House playing field especially.' 'Preserve as much as possible!'

*2.3.18 NPPF: Is the green space local in character and not an extensive tract of land?*
By reason of its long history, from Neolithic (HER 45955) to Anglo-Saxon times to the present day, this land is strongly local in character. It is a playing field and and cannot be considered to be 'an extensive tract of land'. In addition this space, together with The Short Piece, makes an important contribution to defining the character of Fairdord Conservation Area, by allowing the historic group character of buildings in the town centre to be enjoyed in views across the space, especially in winter.

## 3.0 THE FAIRFORD – HORCOTT LOCAL GAP (FNP9)

3.0.1 The NDP defines the Fairford to Horcott Local Gap on the Policies Map. It includes Coln House Playing Field (coloured dark green as it is also a proposed Local Green Space). Development proposals within the Local Gap will only be supported if they do not harm, individually or cumulatively, its open character.

3.0.2 The Fairford - Horcott Local Gap aims
a) to prevent the visual coalescence of the town's two constituent components, Horcott and Fairford;
b) to ensure that the character of Fairford and Horcott as essentially rural communities is maintained; and
c) to preserve a visual break between old and new, between Conservation Area and new estate.

3.0.3 As well as this, the Local Gap proposed will provide a valuable source of green infrastructure which will offer important recreational and landscape benefits to the local community as well as nature conservation value. The White Report recognizes the value of this gap, identifying it as unsuitable for development as it is, 'Open land between Fairford and Horcott [needed] in order to maintain the separate identity of the settlements.'[18] The open land here is also needed in order to maintain the essential rural character of both settlements which is so valued by both the White Report and local residents. The fields protect lovely views of the Conservation Area, the church tower and the river. Indeed, this green band, at root, settles both communities in their ancient landscape.

3.0.4 The open nature / sense of separation between these settlements cannot be retained by other policy designations and is essential to help preserve the distinctive settlement pattern. In addition, in this particular case, the proposed local gap is vital for the protection of the town from future flood events, from groundwater and surface water flooding, a problem which has

[18] The White Report:' Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.12, p. 63

been exacerbated in recent years by the construction of hundreds of houses uphill of the sites in question. The slope uphill is gentle but it is nonetheless significant, draining down over 200m from Withington at the head of the water catchment area.

3.0.5 NPPF Section 14 states: 'Plans should … [take] account of the impacts of climate change, by: … 'safeguarding land from development that is required, or likely to be required, for current and future flood management'[19]. Thames Water's 'Fairford Drainage Strategy' identifies 'loss of green space results in more strain on the sewerage network when it rains heavily'[20] as a cause of drainage problems. This is particularly relevant for the proposed Fairford-Horcott Local Gap as in recent years over 200 houses have been built directly to the north and east of the land in question.

3.0.6 Cotswold Water Park reports clearly identify Horcott as a settlement separate from Fairford: 'Other settlements in the area include Horcott, a small linear village located at the north-west base of Horcott Hill.'[21] It is not without significance that the Historic Environment Record lists all the Horcott HER references under 'Kempsford', the parish it was part of until 1987 (see para. 1.2.4). The 1834 map below, clearly shows the historical status of Horcott as a separate settlement in a separate parish. This has recently been acknowledged in a recent Cotswold Archaeology report, 'The …green spaces either side of Horcott Road act as a buffer between the town of Fairford and the modern extension to the historic hamlet of Horcott …'[22]

3.0.7
1834 map of Fairford parish.
Gloucestershire Archives
Reference P141MI71

3.0.8 It can be seen, therefore, that this local gap whilst clearly fulfilling the requirement of 'preventing the coalescence of settlements' has various other functions and is the reason why it is proposed that some of this area be designated 'Local Green Space' ie. Coln House Playing Field (iii)

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[19] National Planning Policy Framework, Section 14, 'Meeting the challenge of climate change, flooding and coastal change', p. 47, para. 161 b)

[20] Thames Water, Fairford Drainage Strategy: Stage 1 – Initialise and Prepare, p. 13

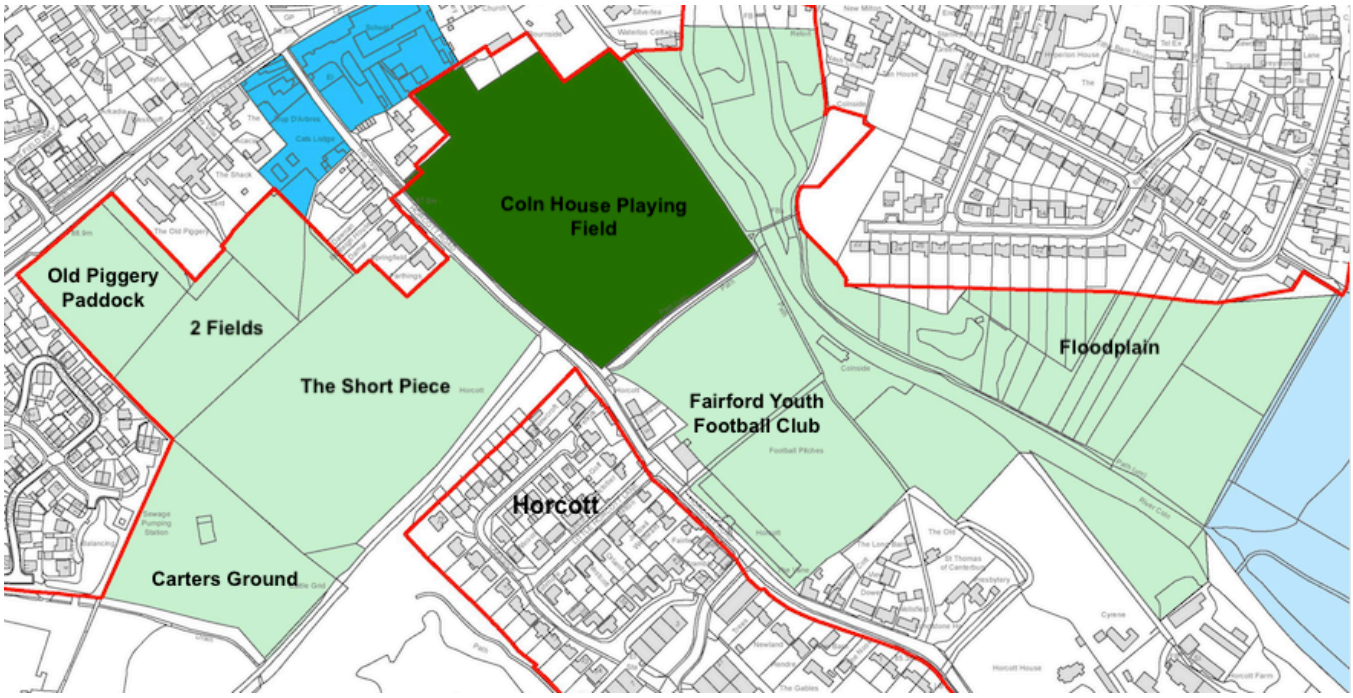
[21] Cotswold Water Park; Integrated Landscape Character Assessment: Final Report 2009 'Ecological Character' 6.0 Section 6.0 p. 81

[22] Cotswold Archaeology, Coln House, Fairford, Gloucestershire Heritage Statement, CA 18423, October 2020, p.34, para. 5.14

3.0.9 NDP 2017 Examiner Andrew Ashcroft writes: 'I am satisfied that the proposed Local Gap meets the basic conditions. There is a clear role and purpose for a Local Gap in this sensitive part of the neighbourhood area. There is a significant difference in the characters of Fairford and Horcott and the prevention of coalescence between the two will serve a clear planning function. I am also satisfied that in most cases its boundaries have been sensitively and appropriately defined. In particular the section between Horcott Road and the A417 (including The Short Piece) is particularly sensitive to built development. The gap in built development along Horcott Road (represented by The Short Piece to the south west and by Coln House School Playing Field to the north east) is particularly prominent in the local townscape. It represents a discernible gap between the two settlements.'[23]

3.0.10 The Fairford - Horcott Local Gap consists of:

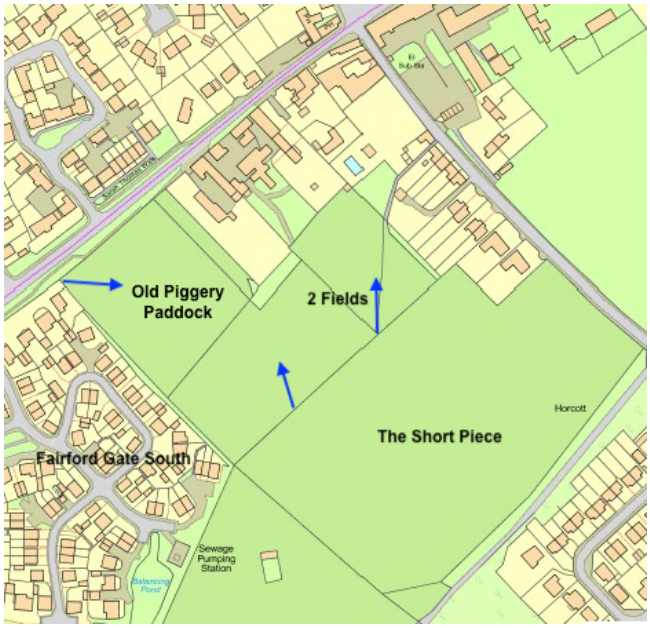
a) Old Piggery Paddock;
b) 2 Fields linking Old Piggery Paddock and The Short Piece;
c) Carters Ground;
d) The Short Piece;
e) Coln House Playing Field (also a proposed Local Green Space);
f) Fairford Youth Football Club (FYFC); and
g) Floodplain extending along the River Coln from Town Bridge to Snake Lane/Cutlers Ford.




3.0.11 Map showing location of Fairford – Horcott Local Gap

[23] Andrew Ashcroft, 'A report to Cotswold District Council on the Fairford Neighbourhood Plan' para.7.59. See paras. 7.53 -> 7.63 for the full argument.

### 3.1 Old Piggery Paddock




3.1.1 Map showing position of Old Piggery Paddock and 2 fields

3.1.2 This is a site that was the subject of some debate during the 2014 Appeal by Gladman Developments against the decision to refuse planning permission on what is now Fairford Gate South (see map above). This Appeal was won by Gladman Developments but the value of this particular site was recognised and was mentioned positively several times in the Section 'Effect of the development on the setting of the town of Fairford' [24]. Additionally, during the course of the appeal it was accepted that development of the appeal site should not make the Old Piggery Paddock more vulnerable to development as an 'infill' site.

3.1.3 An example of one of the comments made by the Appeal Inspector:
'I agree that, on this side of the road, there is an aesthetically pleasing transition from the Old Piggery to the countryside, via the adjoining paddock with its stone wall and the appeal site. … The relationship with the countryside still exists, and indeed the edge of the conservation area is very strongly rural in character. This reflects the historical role of Fairford as a market town set in the countryside landscape.'[25]

3.1.4 It is proposed that this paddock should be designated as the western start of the Fairford - Horcott Local Gap. This will also protect the setting of the buildings of the Conservation Area and maintain the rural character of the town (recognised as important by the planning inspectorate). It is the last remaining rural gap on this main entrance to Fairford.

3.1.5 Agricultural Land Classification: 2 Very Good
Area: 0.83 ha

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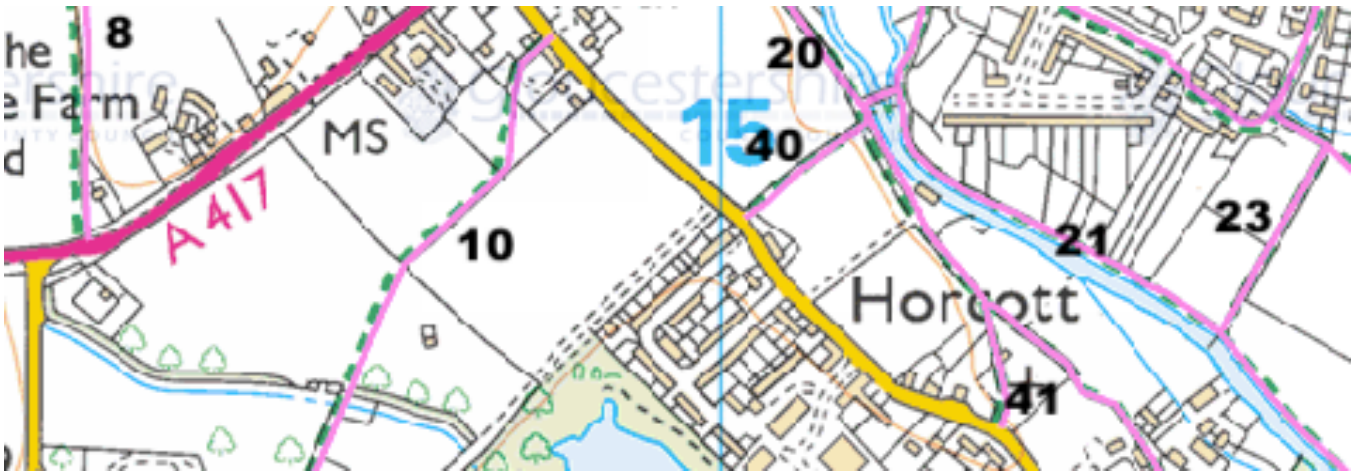
[24] 13/03097/OUT | Erection of up to 120 dwellings (all matters reserved other than means of access), Land Parcel South Of Home Farm Cirencester Road Fairford. para. 50 onwards

[25] Ibid, para 68.

3.1.6 The Old Piggery Paddock

### 3.2 Two Fields

3.2.1 These modest fields allow a 'through view' of the countryside from the A417 and from Horcott Road, and therefore are instrumental in emphasising the rural setting and clearly indicating the separation of the two settlements. A section of the smaller of the two fields is currently used to store caravans and was recently included in a planning application (refused)[26]. In addition, a PROW (BFA10) crosses these fields using a series of old stone stiles which have been proposed as Non-Designated Heritage Assets. The hedgerows should be restored and maintained. 'If a hedge ceases to be valued, then the land it is on is usually reclaimed …'[27]




[26] CDC Planning Reference: 20/00932/FUL Demolition of existing buildings and roadside wall with the retention, conversion and extension of the roadside building to form a single dwelling, together with the erection of 17 two and two and a half storey residential dwellings, creation of a new access off the Cirencester Road, and garaging, parking, public open space, landscaping and all enabling development | Yells Yard Cirencester Road Fairford Gloucestershire

[27] John Wright 'A Natural History of the Hedgerow' 2016 p.3

3.2.2 Map showing PROW numbers in this area, all with the prefix BFA. Detail from Gloucestershire County Council: Highways Public Rights of Way Map

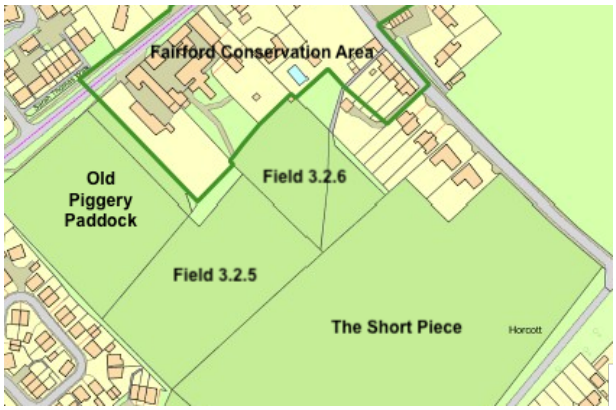
3.2.3 The Conservation Area boundary runs along the edges of these two fields (Map 3.2.7) and they are clearly important to the setting of the buildings in the Conservation Area. Their position is such that they naturally form a part of the gap which provides the open, rural setting for both Fairford and Horcott.

3.2.4 Agricultural Land Classification: 2 Very Good Total area: 1.27 ha

Photograph 3.2.5

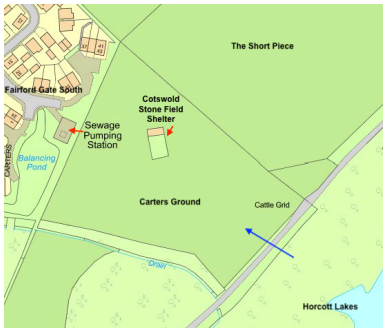
Photograph 3.2.6

2 fields between Old Piggery Paddock and The Short Piece




3.2.7 Map showing 2 fields position relative to Conservation area (green line = CA boundary)

## 3.3 Carters Ground




3.3.1 Map showing Carters Ground with The Short Piece to the NE, Fairford Gate South to the W, and Horcott Lakes to the SE

3.3.2 Carters Ground is an old field which contains a historic early C19th Cotswold stone field barn which is proposed as a Non-Designated Heritage Asset (NDP13) due to its archaeological significance. It is used by 7 species of bats[28]. The south east corner of the site is subject to surface water flooding – this is recognised on the Environment Agency Surface Water Flooding Map. The field is rich in wildlife.

3.3.3 Views across Carters Ground from Horcott Lakes permissive path 3.3.4

3.3.5 These photographs (above) were taken from the same position on the Horcott Lakes walk about a year apart – a valuable view showing the early C19th Cotswold stone field barn (zoom used on 3.3.4). An unfinished Bloor development (now completed Fairford Gate South) in the field beyond is clearly visible in 3.3.3 and is even more so in 3.3.4. The narrowness of the remaining Fairford – Horcott Local Gap is apparent.

3.3.6 Running alongside the southern boundary of this field is the ditch which takes run-off water from fields, springs and developments to the north of the A417 and from the development to the immediate west of the field. The ditch runs underneath the Mere driveway and into the Horcott Lakes site (see map 3.3.7 below[29]). Drainage runs via the Dudgrove Ditch from Horcott Lakes, across the runway of RAF Fairford (which has flooded in the past) to the nearby settlement of Whelford. This was one of the fields (together with The Short Piece) subject to a planning application which was called in by the Secretary of State who agreed with the Inspector that 'the proposed development would cause the separation between Fairford and Horcott settlements to be lost, and thus would be harmful to the character and appearance of the area'[30].

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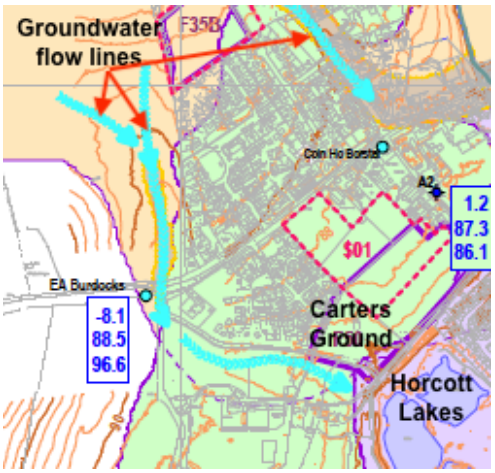
[28] fpcr: Ecological Appraisal for Gladman Developments Ltd. Land off Horcott Road, Fairford 2016, para. 4.41 p.38 (CDC Application No.16/01766/OUT)

[29] Water Resource Associates: Groundwater Monitoring and Review of Flood Risk at Fairford, 2018 Fig. 4.9 p.16

[30] Section 78 Appeal made by Gladman Developments Ltd, Land at West of Horcott Road, Fairford, GL7 4DA, Application Ref: 16/01766/OUT. P. 3, Para.20




3.3.7 Map detail showing groundwater flow lines, including a main line (blue/turquoise) running to the south of Carters Ground.

3.3.8 This site forms the western end of the Fairford – Horcott Local Gap and is therefore crucial for the demarcation of the two very distinct settlements of Horcott and Fairford at its narrowest point. As has been noted in The Short Piece analysis, consultants for Gladman Developments Limited accepted that the gap here is narrow, but it is, nonetheless, a gap, and its protection has become even more imperative. The developer's suggestion is that the fields south of The Old Piggery would maintain an 'additional green gap'[31] but this is to make a nonsense of the 'gap' concept since development here would eliminate any sense of there being two separate and distinct settlements. At this point (Carters Ground), any housing would extend, literally uninterrupted, from Horcott to the A417.

3.3.9 The Fairford - Horcott Local Gap has to be a coherent, interconnected partition which clearly separates Fairford from Horcott, allowing open views across the fields to the Conservation Area if coalescence of the two settlements is to be prevented. This is recognised by CDC: 'The flat lowland qualities and open pastoral character are typical of this landscape character type. I consider that these qualities along with attractive landscape features such as established hedgerows, low stone walls and mature roadside trees make an important and pleasing contribution to the rural setting of the village which should be preserved. This can be appreciated from a number of local viewpoints.'[32]

3.3.10 It is, perhaps, worth pointing out that until recently, this gap was clear and uninterrupted with views right across to the A417. Housing expansion is threatening the sense of open countryside, of two distinct agricultural settlements, as views close in. Communities face losing this sense altogether if this field and others in the proposed gap are not protected from development.

3.3.11 Consultation Day comments 2019 – 'Endorse local green gap proposals.' 'Support.' 'Do not allow any development.' 'Important to maintain space between Horcott and Fairford.'

3.3.12 Agricultural Land Classification: 2 Very Good
Area: 2.35ha

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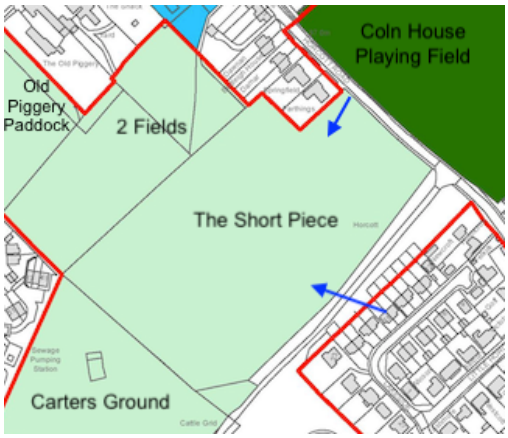
[31] CDC Planning Reference: 16/01766/OUT 'Outline with all matters reserved apart from access for up to 92 dwellings (including up to 50% affordable housing) public open space and children's play area and associated works.'

[32] CDC Planning Reference: CT.9172, 16/01/66/OUT: Development Services – Landscape Response, KS, p. 3

### 3.4 The Short Piece




3.4.1 Map of The Short Piece location

3.4.2 The Short Piece looking from Fairford towards Horcott from Horcott Road

3.4.3 The Short Piece is another old field and (together with Carters Ground and Coln House Playing Field) is a central site which maintains the separation of Fairford from Horcott and provides a real sense of openness.[33] Horcott's history is very different from that of Fairford since it only left the parish of Kempsford and joined the parish of Fairford in 1987; Dilly's Bridge, linking Horcott and Fairford was only installed in 1990.

3.4.4 It is proposed that this site should form a part of the Fairford-Horcott Local Gap as it is key to the demarcation of the two very distinct settlements of Horcott and Fairford. In addition, this is one of the very few remaining significant archaeological sites and is therefore of historical significance.

3.4.5 Fairford is an area rich in archaeological heritage, recognized by Gloucestershire County Council who write, 'Fairford parish is particularly rich in undesignated heritage assets of archaeological interest, some of which are of equivalent significance to designated assets (NPPF 139)'[34]. Over recent years, much of that heritage has been destroyed. Not only have contractors undertaken work without notification (HER 7215, 7216)[35], but whole sites have been lost: a Romano-British site with Iron Age ditch is now a gravel pit (HER 27768) as is a Romano-British farming settlement including two stone-lined wells (HER 2477); the source of a Neolithic polished flint axe is lost beneath a lake (HER 2490) as is the source of a late Bronze Age socketed spearhead (HER 3333). Much evidence points to an extensive Anglo-Saxon settlement west of the River Coln, from Horcott Lakes to the south, and Pip's Field (now Stoneleigh development) to the north. The serious damage to this part of the town began with the building of the runway for RAF Fairford, then the extensive quarrying at Horcott Lakes and finally with the construction of large housing estates. Very little remains, but one area which does is The Short Piece/Coln House Playing Field.

3.4.6 The archaeological report for The Short Piece (and Carters Ground) site states, 'In terms of artefacts, the period and quality of the Anglo-Saxon finds is such that this signifies a notable

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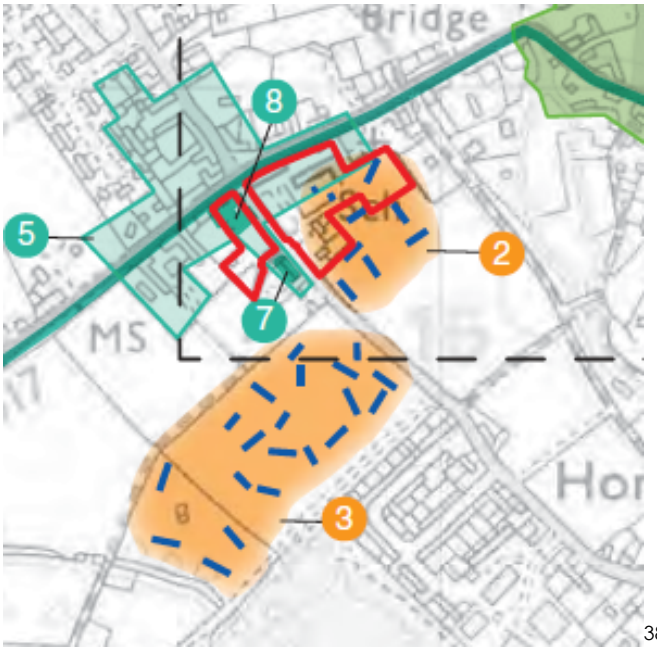
[33] See 'The Neighbourhood Area,'Section 2A of the Fairford Neighbourhood Plan, 'A Brief History', 2.22, 2.23 for the history of Horcott.

[34] Robert Niblett, Planning Officer for Gloucestershire County Council in email, response to Fairford Neighbourhood Plan Pre-Submission Consultations.

[35] All HER references are to the Historic Environment Record for Gloucestershire: http://www.heritagegateway.org.uk/Gateway

site, where the main activity took place … and so there is a high possibility of the finds assemblage being extensive and, therefore, informative. This site is liable to offer opportunities of closer scientific dating and so improve understanding of occupation sequence within a wider region much favoured for settlement in this period.'[36] 'Overall, it was apparent that the site contains a significant array of archaeological features that all offer good potential to contribute to a number of research priorities for the wider region.'[37] There is 'evidence for prehistoric activity in the form of possibly Neolithic pits and Anglo-Saxon occupation in the form of sunken feature buildings and post-built structures …The settlement, probably 5th to 7th or early 8th century in date, comprised up to fifteen possible sunken-featured buildings (SFBs) and a posthole arrangement thought to be the remains of a post built rectangular structure with the potential to be a hall-type building' (HER 45955, 48671).



[38]

3.4.7
Map detail showing evidence of Anglo-Saxon settlement
Orange = Anglo-Saxon
Blue lines = evaluation trenches
2 = Coln House
3 = The Short Piece and Carters Ground

3.4.8 The response of the Gloucestershire Archaeologist to the survey is disappointing in that whilst acknowledging that 'it is clear that the archaeological remains present on this site have the potential to make a very substantial contribution to our understanding of the archaeology of Gloucestershire, and indeed further afield' he nonetheless raised no objection to the development of the land subject to certain provisos. Development would certainly destroy whatever remains, and there would be no opportunity for future generations, with superior methodologies and equipment, to investigate the site. The Council for British Archaeology states, 'The CBA best practice guidelines show that as long as they remain safe then it is better to leave the evidence for future generations to investigate with better techniques and with better-informed questions to ask.'[39] These are the principles which should be followed here.

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[36] Archaeological Evaluation at land off Horcott Road, Fairford, Gloucestershire by Worcestershire Archaeology. 2016, p. 23

[37] Ibid, p.24

[38] Cotswold Archaeology, Coln House, Fairford, Gloucestershire Heritage Statement, CA 18423, October 2020, p.13. See also para. 3.1 for further detail.

[39] Council for British Archaeology: Archaeology Out There website http://new.archaeologyuk.org/best-practice

3.4.9 The 'Two Fields' PROW runs along the northern boundary (BFA10) of the site, separated only by a low wall, allowing clear, open views; a permissive path runs along the southern boundary (providing access to Horcott Lakes); and Horcott Road runs along the eastern boundary. The views across the fields are much appreciated and highly valued. The mature lime trees along Horcott Road, together with the mature avenue of mixed beech and copper beech along The Mere drive, are significant landscape features, a visual amenity which needs protecting for all. In the past local residents used what is now Mere drive to reach Horcott Lakes (the public footpath being impassable at the time), 'My brother-in-law clearly remembers regularly using this access with other residents, for many years prior to it being 'closed off' to the public' and 'The drive to Mere was one of our main accesses to Totterdown lakes before the new house was built and the path across the fields is a good short cut to the lane to Marston Meysey.' (Pre-submission consultation comments).

3.4.10 The report of RPS CgMs for Gladman Developments Limited, 21 July 2016 describes The Short Piece, accepting that 'The existing gap between Horcott and Fairford on the western side of Horcott Road is already extremely limited…The most southerly Fairford house on Horcott Road is only approximately 125m from the most northerly Horcott house.'[40] This makes the remaining gap even more significant and the need for protection even more urgent. This report explicitly acknowledges the fact that there is a clear 'Horcott' - 'Fairford' distinction.

3.4.11 It is also important to note that these fields (Carters Ground and The Short Piece) form 'an important part of the setting in which the Conservation Area (CA) is experienced and consequently it makes a positive contribution to the character and appearance of the CA'[41].

3.4.12 This field, together with Carters Ground, are, quite literally, the last fields on this side of Horcott Road, which separate the two settlements. This is acknowledged in The White Report evaluation of the site as lying 'on the south western edge Fairford on very gently sloping land separating it from Horcott to the south' and 'it provides a green gap between Fairford and Horcott when combined with playing fields along the River Coln corridor to the north east.'[42] Fewer than two years ago, this gap extended all the way through to the A417. However, unplanned development has eaten away at this and it is vital that this separation be maintained, not only for the present, but also for future generations of residents. 'The site has value in providing the setting to the western end of the Conservation Area which features recessive but attractive traditional buildings which form a positive introduction to the old settlement.'[43]

3.4.13 AECOM's Site Assessment Report for Fairford Town Council concludes: 'The site is available; however, it is not considered suitable due to several significant constraints. These include landscape, rural character, risk of groundwater flooding, the setting of Fairford Conservation Area and the town itself, loss of agricultural land, and access via Horcott Road.'[44] This, and the following assessment, refers to Carters Ground as well as The Short Piece.

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[40] CDC Planning Reference: 16/01766/OUT 'Outline with all matters reserved apart from access for up to 92 dwellings (including up to 50% affordable housing) public open space and children's play area and associated works.'

[41] Section 78 Appeal made by Gladman Developments Ltd, Land at West of Horcott Road, Fairford, GL7 4DA, Application Ref: 16/01766/OUT. P. 3, Para.21.

[42] The White Report for Cotswold District Council, 'Study of Land Surrounding Key Settlements' 2014, Section 8 p.23

[43] Ibid p.23

[44] AECOM: Site Assessment Report for Fairford Town Council, January 2019, p. 17, para.4.41

3.4.14 The SHELAA assessment of this site (The Short Piece and Carters Ground) considers it to be unsuitable: 'the site prevents the coalescence of Horcott and Fairford and provides a green space that forms the setting of the Conservation Area and its relationship with the countryside, which would be removed by the site's development. There are also non-designated heritage assets within the western part of the site, which include stiles and a historic stone field shelter and enclosure. These structures and their field setting would be severely compromised by development, even if retained. There are also highways concerns at Horcott Road's junction with London Road'[45].

3.4.15 Agricultural Land Classification: 2 Very Good Area: 3.20ha

3.4.16 Looking across The Short Piece from Horcott towards the Conservation Area

## 3.5 Coln House Playing Field

3.5.1 Coln House Playing Field photograph taken from Dilly's Bridge corner.

3.5.2 See Local Green Space discussion

3.5.3 An area between Coln House playing field and the river has been maintained as a community area/garden. There are plans to create a wildflower area in this riverside garden.

[45] CDLP Strategy: Strategic Housing and Economic Land Availability Assessment, para. 2.2.02. Site Assessments 4, p.53

### 3.6 Fairford Youth Football Club (FYFC)

3.6.1 Map showing location of FYFC

3.6.2 Environment Agency flood map for FYFC fields[46]

3.6.3 These two playing fields have long been a part of the lives of the children of Fairford. When the school was situated in what is now Fairford Community Centre, these fields were used as their sports ground. Crocodiles of children could regularly be seen wending their way down through the town to these fields. When the school transferred to The Park and what is now Farmor's School, the fields remained fallow until bought by FYFC (then, Fairford and Lechlade Youth Football Club). Now they are used regularly both by the children of Fairford and by children from other towns and villages who participate in junior tournaments and friendly matches. The club has links with Cheltenham Football Club which, in the summer school holidays, conducts well-attended training sessions for children here. It is also used for casual kickabouts and a caravan park during the International Air Tattoo. The club has invested in car parking and clubhouse facilities which enhance the value of the site to the town.

3.6.4 The fields both form part of the Fairford - Horcott Local Gap continuing the line from Coln House Playing Field, south and along the river. It is ideally placed between the two communities to serve them both with Horcott to the west and south, Fairford to the east and north.

3.6.5 Tarmacked, well-used PROWs run along 2 sides of this area, to the north and west (BFA40 and BFA50). These have become much more heavily used since the installation of Dilly's Bridge as there is now a quick route through to the centre of Fairford (and the schools) from Horcott.

3.6.6 The fields mark the start of the Coln River Valley floodplain at Fairford. The Environment Agency Flood Map for Planning: flood zone 3 extends some way across these fields (see 3.6.2). The White Report of 2000 has identified areas 'where development is not suitable' One is '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.'[47]

3.6.7 Consultation Day comments - 'We use the Horcott [Fairford] Youth Football pitches very regularly and having this safe, accessible space for children to learn new skills and take exercise is very valuable.' 'Football ground plus areas and footpath behind for walking.'

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[46] Environment Agency Flood Map for Planning: http://maps.environment-agency.gov.uk/wiyby/wiybyController

[47] 'The White Report:' Study of land surrounding Key Settlements in Cotswold District: June 2000, para.10.12, p. 31

3.6.8 The area is regularly walked by residents surrounded as it is by PROWs. Dog walkers, joggers, school children, people going shopping, regularly cross this land and the open space is highly valued. It is a critical aspect of the setting of Horcott.

3.6.9 Area: 2.43 h

3.6.10 Fairford Youth Football Club Ground, taken from Horcott / Fairford footpath

### 3.7 The Floodplain extending along the River Coln from Town Bridge to Snake Lane and Cutlers Ford

3.7.1 A sinuous line of green fields and gardens combines to create linked vistas throughout the whole length of the town. 'The flood plain to the south consists of a variety of smaller meadows and larger arable fields away from the river to the east. The meadows are enclosed by outgrown hedges with fences … The floodplain is an important element of the landscape setting to the town.'[48]

3.7.2 The riverside here is home to a population of water voles. The river bank is maintained to support and increase this population eg. planting and conserving reed plantations. Much of this work is carried out by a local volunteer group advised by Gloucestershire FWAG (Farming and Wildlife Advisory Group).

3.7.3 A new footpath surface has recently been built as part of the River Walk which means that this area is now much more accessible to all residents and visitors.

3.7.4 'The area is heavily used as a recreational resource e.g. dog walking.'[49] From the Fairford - Horcott Local Gap, to the fields which run along the River Coln and form the River Walk, all the way to Lake 104. This area is nearly all in the floodplain. Some of the views have been affected by development at both the west and east end of the town, which makes the remaining landscape so much more precious. 'The floodplain is an important element of the landscape setting to the town.'[50] It anchors the Fairford – Horcott Local Gap on the river, leading from Bull Island and Dilly's Bridge down to the fields opposite the working Horcott Farm; from one river crossing down to the next, Cutlers Ford, which permits the passage of farm vehicles, as well as children paddling in the summer heat.

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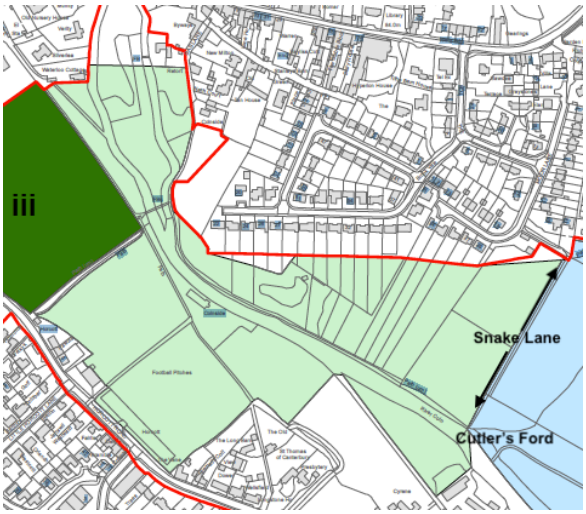
[48] The White Report:' Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.6, p. 62

[49] Ibid, p. 62

[50] Ibid, para 12.8, p. 62




3.7.5 Map showing the extent of the floodplain of the Fairford – Horcott Local Gap, illustrating the way in which the gap functions to separate the two communities but which also acts as a meeting place along the river path, providing recreation and leisure space as well as valuable water storage.

3.7.6 A Cotswold Water Park report on this area states, 'The broad riparian corridor and floodplain area will provide additional benefits through management of parts of this area for wildlife as well as for water control thereby ensuring more effective water storage in the Upper Thames as well as helping to protect settlements downstream.'[51] 'One of the key strands to this vision is that built development should not, and cannot be undertaken on the floodplain; this will protect settlements elsewhere in the Upper Thames, will prevent inappropriate developments and will also safeguard these areas for wildlife.'[52]

3.7.7 All these areas are unsuitable for development as they are either in the River Coln floodplain, or are at the highest risk of groundwater flooding according to the Gloucestershire Groundwater Management Plan[53]. The data provided includes Fairford observation wells and 'indicate many exceedances of the ground level recorded […] There is clear indication of an upward trend in groundwater level at …and Fairford'.[54] Appendix C. Groundwater Level Data chart p.52 for Fairford shows ground water levels between 1996 and 2010 with multiple exceedances above ground level.

3.7.8 The Examiner noted 'the boundary of the proposed Local Gap running artificially through the rear gardens of residential properties in Courtbrook and Moor Lane. Plainly this is not ideal for development management purposes. However, on balance I do not recommend any changes to its spatial extent. In any event it is unlikely that built development would be proposed or practical in these rear gardens.' An explanation for this boundary is that it roughly reflects the lines of hedges which formed original southern boundaries of these gardens, separating them from fields beside the river. The gardens were extended when plans for a by-pass were cancelled and the reserved fields were sold off to the residents, most of whom removed the hedgerows. The revised line here takes the Development Boundary line to define the floodplain edge.

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[51] Cotswold Water Park; Integrated Landscape Character Assessment: Final Report 2009 'Ecological Character' 6.0 Section 6.0 p.33

[52] Cotswold Water Park Biodiversity Action Plan 2007-2016, Section 31, p. 24

[53] Gloucestershire Groundwater Management Plan, Groundwater Immediate Assessment – South Gloucestershire District April 2015 Map p.35, Chart p. 52.

[54] Ibid, p. 12

## 4.0 RIVER COLN VALUED LANDSCAPE (FNP10)

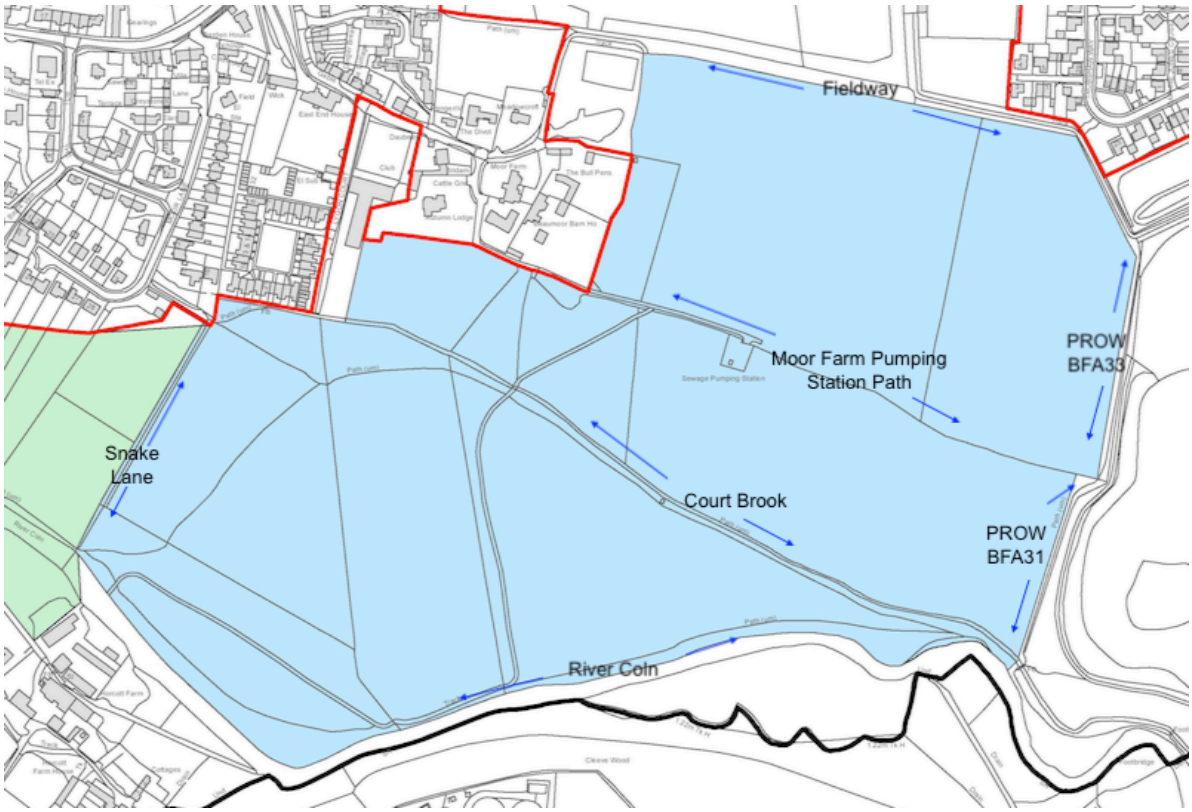
4.0.1 The FNP10 identifies land between the River Coln and Fieldway, as shown on the Policies Map, as a valued landscape**.**

4.0.2 The River Coln Valued Landscape Value (RCVL) aims:

a) to recognise, safeguard and enhance the riparian landscape;
b) to promote a sense of pride in the area and encourage a sense of place;
c) to acknowledge the quality and character of the landscape, its wildlife and its ecological value;
d) to encourage active water management activities
e) to enhance the role of this area in providing a wildlife corridor from the SSSI and Whelford Pools Nature Reserve to the east and the Fairford-Horcott Local Gap and SLA to the west[55]
f) to support the National Pollinator Strategy: for bees and other pollinators in England, Nov. 2014.

4.0.3 The River Coln Valued Landscape (RCVL) will consist of:

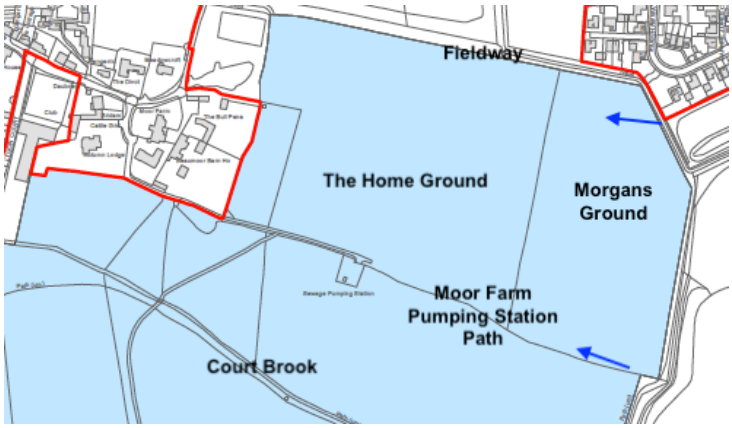
a) Fields running between Fieldway and the Moor Farm Pumping Station Path;
b) River Coln floodplain, from Snake Lane (west) to the Moor Farm Pumping Station Path (north) and the floodplain fields to hedge line of PROW BFA31 (east);




4.0.4 Policy map showing the full extent of the proposed River Coln Valued Landscape (in blue)

[55] In January 2021 Natural England designated the whole of the Cotswold Water Park as SSSI. As a consequence the proposed River Coln Valued Landscape Area now borders a SSSI (PROWs BFA33 and 31 mark the border with the new SSSI).

## 4.1 Fields between Fieldway and the Moor Farm Pumping Station Path (The Home Ground and Morgans Ground)




4.1.1 Map showing location of RCVL fields between Fieldway and Moor Farm Pumping Station Path

4.1.2 These fields (The Home Ground, with a fenced tree-planted area to its west, and Morgans Ground) lead out of the floodplain and are important as a visual amenity; they will also be needed if ever one of the NDP's desired projects (reinstatement of the water meadows) is to be completed. They form the first river terrace coming down from the old 'Fieldway' path. As can be seen from the map, they are the only remaining fields where such restoration is possible. The area concerned includes both Fieldway and the Pumping Station Path.

4.1.3 This site also has historic, as well as natural, value. A part of this site is mentioned in the Historic Environment Record 2480 DESCRIPTION: 'Cropmarks of a settlement site consisting of circles & irregular enclosures & ditches were seen from the air in 1942, south-west of Fairford railway station.' Elsewhere the record states, 'Two probable Prehistoric or Roman hut circles were seen as cropmarks and mapped from good quality air photographs. The hut circles are centred at SP 1601 0077 and SP 1600 0076 [Morgan's Ground] and are 11m and 12m in diameter. They are joined together by a double ditched linear feature 8m long which has been interpreted as a trackway.' Such archaeological finds should be preserved (see 3.4.8) – much of the archaeological record in this area has been lost to gravel pits and development).

4.1.4 In addition, the developments currently agreed (Lake 104, 103, 103a) and recently completed (Keble Fields) are likely to exacerbate existing surface water flooding problems. The area is part of the Cotswold Water Park where gravel extraction has created extensive areas of open water. The hydrogeological properties are such that there is likely to be a high ground water level in addition to the normal surface water run-off (see maps 4.1.7, 4.1.8 below[56]). This means that the usual SUDS mitigation systems will be inadequate and this land will therefore be needed to attenuate the excess surface water run-off resulting from the developments. Fairford is a very ancient settlement; green spaces which have never been built on in the past were left for the good reason that they store water and flood in wet seasons.

4.1.5 These are sites at the highest risk of groundwater flooding according to the Gloucestershire Groundwater Management Plan, Groundwater Immediate Assessment – South Gloucestershire District April 2015 Map p.35, Chart p. 52. WILD Project Rivers Management Plan

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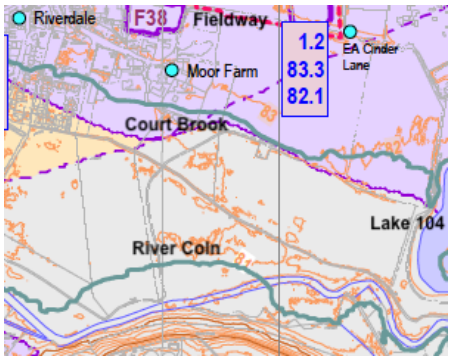
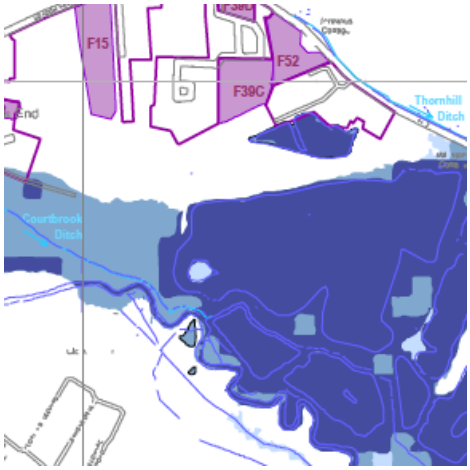
[56] Water Resource Associates: Groundwater Monitoring and Review of Flood Risk at Fairford, 2018 Fig. 4.9 p.16. Maps 4.1.7 and 4.1.8 are both taken from this document.

for Fairford Parish May 2016, p.7, states, '…future management practices should aim to create more flood winter storage capacity for storm events.'

4.1.6 One of the comments made on the 2016 Consultation Days was, 'I have twice walked the area even in 'dry-ish' weather and have stuck a garden fork into the soil south and east of Fairford Town Football Ground or north of the river and found the tines wet.'



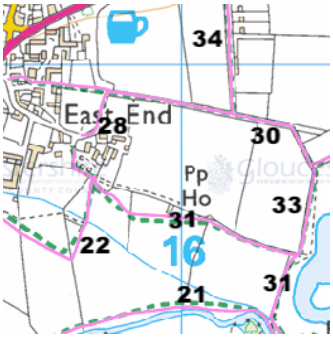

4.1.7 Map showing the dividing line (line of dashes) between Cornbrash Limestone (north west) and Kellaway Clay (south); detail from Fig. 4.9 p.16 of Fairford Hydrological Survey. The area to the south and east of this line (most of this area) has serious groundwater issues. The area to the north and west is drier.




4.1.8 Map showing the extent of flood risk from rivers in RCVL. Detail from Fig 5-1 p.19 of Fairford Hydrological Survey

4.1.9 It is proposed that these fields should form the northern boundary of the RCVL, between the floodplain and the Conservation Area. This will also maintain the rural setting of several listed buildings as well as that of an ancient lane which was an important link in the field (and drove road) system, which is still visible, still widely used by the community and such a distinctive part of the town: Fieldway. These fields were, at the time of the enclosures, divided into multiple small land holdings ('allotted' land) and therefore the site would be suitable for more allotments (there are already private allotments on field F-45).

4.1.10 PROWs run along 3 sides of this area, to the north (Fieldway) BFA30, to the south BFA31 and to the east (on the far side of the hedge line) BFA33.




4.1.11
Map showing PROW numbers in this area, all with the prefix BFA. Detail from Gloucestershire County Council: Highways Public Rights of Way Map

4.1.12 Consultation Day comments 2019 – 'Homeground and Morgans Ground needs to be protected as green space – its such an area of local beauty used by my children as a perfect place to enjoy and play.' 'Problem of balance – gaps needed and preservation of countryside – not spilling into surroundings.' 'Good.' 'Need to protect.' 'Asset to the town.'

4.1.13 2016 Pre-submission consultation comments indicate the importance of this area of land to the local community. 'Wildflowers, Wild Animals, Birdlife. I walk north, south & east of this land and have personally encountered and watched; roe deer, 30 different bird species, several types of orchids.' 'This area is crucial to keep wildlife in the town by providing a natural habitat. Also a great space for exercising dogs.' 'Recreational value – encourages walking. Richness of its wildlife. Natural environment essential to wellbeing'. 'Every spring on the eastern edge of Morgan's Ground there are dozens of grass snakes emerging from hibernation – a privileged sight. In the summer skylarks are seen and heard in the sky above the cereal growing in these and neighbouring fields.' They [the fields] form part of a rich corridor for wildlife, areas which we are fast losing.' 'This is a great wild life corridor, with nest birds and mammals in spring, but in the winter it comes into its own being a great area for winter thrushes, finches and buntings – all declining species.'

4.1.14 A larger area, an 'Area of Special Landscape Value' (ASLV) was proposed in the unsuccessful 2017 NDP. The proposed RCVL does not include Lake 104 (a lake created by gravel extraction) in order to overcome the objections raised. The owners of the site have confirmed 'that the removal of the Lake 104 site from the proposed ASLV (Policy FNP12)[57] would address my Client's primary concern with the previous version of the Neighbourhood Plan'.[58]

4.1.15 Policy SP5 of CDLP (replacing Policy UT1, see Section 5.1 below) refers to 'Cotswold Water Park: Post-Mineral Extraction After Use'. This policy therefore applies to Lake 104, 103 and 103a but not to the agricultural landscape to the west of the lake - the area which is now proposed as an RCLV. Thus, there would be no longer be any conflict between the two policies (the RCLV and Policy SP5) – this conflict was the basis for the objection to the ASLV policy in the unsuccessful 2017 NDP.

4.1.16 It is considered that a RCVL would enhance the amenity of Lake 104, protecting the views towards the town. The Appeal Inspector (for the development referred to in 4.1.4 and 5.1.8) writes, '…it is the combination of the landscape character of the site together with its location in relation to Fairford and the public accessibility it enjoys which results in its main amenity value.'[59]

4.1.17 In addition, the RCVL would go a long way to upholding to local wishes made clear in The Fairford Health Check as long ago as 2005 which led to the FTC policy aim 'to perpetuate the distinct green character that makes Fairford special, and to designate … the riverside as an area that cannot be built upon or spoiled'[60].

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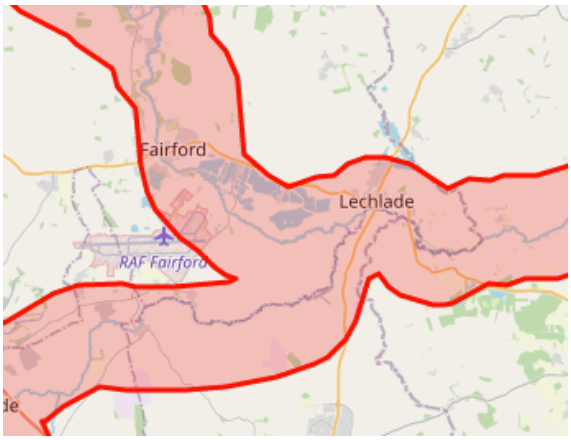
[57] Now RCVL Policy FNP 8

[58] See email from David Neame, 15 January 2018, to Roz Capps, in Evidence Base

[59] Lake 104, 103, 103a Appeal Ruling APP/F1610/A/07/2043652/NWF, para. 237, p.32

[60] See para. 1.2.7 of this document

4.1.18 The two areas together have the potential to make a significant contribution to the National Pollinator Strategy since Fairford, and this area is squarely on one of the proposed B-Lines. 'The B-Lines are a series of 'insect pathways' running through our countryside and towns, along which we are restoring and creating a series of wildflower-rich habitat stepping stones.'[61] Wildflower areas have already been planted by volunteers elsewhere in Fairford eg. Coln House School garden close to Dilly's Bridge.




4.1.19 Detail from map showing the proposed B-Lines across England, supporting the National Pollinator Strategy. Fairford and the proposed Area of Special Landscape Value, fall within the B-Line area.

4.1.20 Evidence of this area as a 'valued landscape' can be found in the 100m of hedgerow and hedge infill planting along the eastern boundary of Morgans Ground and the work listed in para. 4.2.7. Consultation day comments indicate a high degree of value being placed upon the range of wildlife in the area. In addition, Fairford Town Council are taking a lead in their work on the ERDF Wild Towns Project and are initiating projects in the town associated with this project[62].

4.1.21 This policy also supports CDC in its 'Ecological Emergency Plan', in particular the intention to, 'Promote the creation of new natural green spaces and green links across the District'[63].

4.1.22 Agricultural Land Classification: 3 Good to Moderate. Outside Fairford Development Boundary

4.1.22 Towards Morgans Ground from PROW BFA30/BFA33 junction

4.1.23 Looking west along Moor Farm pumping station PROW BFA31

[61] https://www.buglife.org.uk/our-work/b-lines/, 'What are B-Lines'. Also includes link to map from which detail 4.1.19 is taken

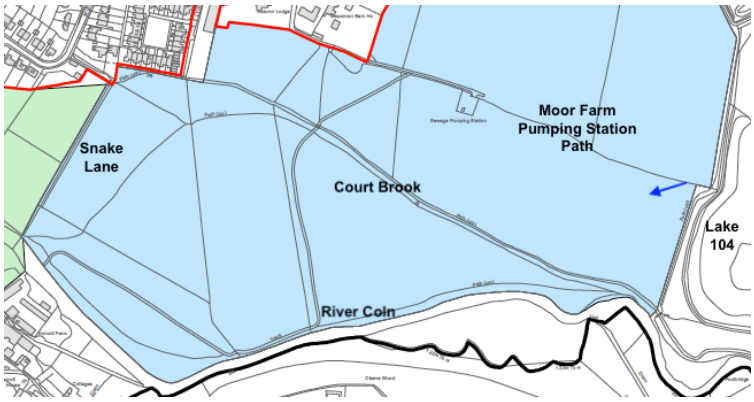
[62] Fairford News, Fairford Town Council, August 2020, pp. 2-3. NDP Supporting Evidence

[63] Cotswold District Council Ecological Emergency Action Plan Annex A: Leading the Way Towards Nature Recovery, para. o)

**4.2 River Coln floodplain, from Snake Lane (the end of the Fairford – Horcott Local Gap) to the hedge line west of the PROW BFA31 and south of the Moor Farm Pumping Station path.**

4.2.1 The fields here were once fully functioning water meadows for which some of the infrastructure (eg. leats and sluices) is still visible. In winter the River Coln regularly breaches its banks, and even where this is not the case, the ground is often extremely wet and boggy underfoot. These are ideal for water meadow restoration and the NDP would support such an undertaking. Restored water meadows here would improve the wildlife corridor to the nearby SSSI and Whelford Pools Reserve as well as the quality of the grassland. That the restoration of water meadows is recognized as important was clear in the grants available from Countryside Stewardship and the Environmentally Sensitive Area Scheme (ESA).

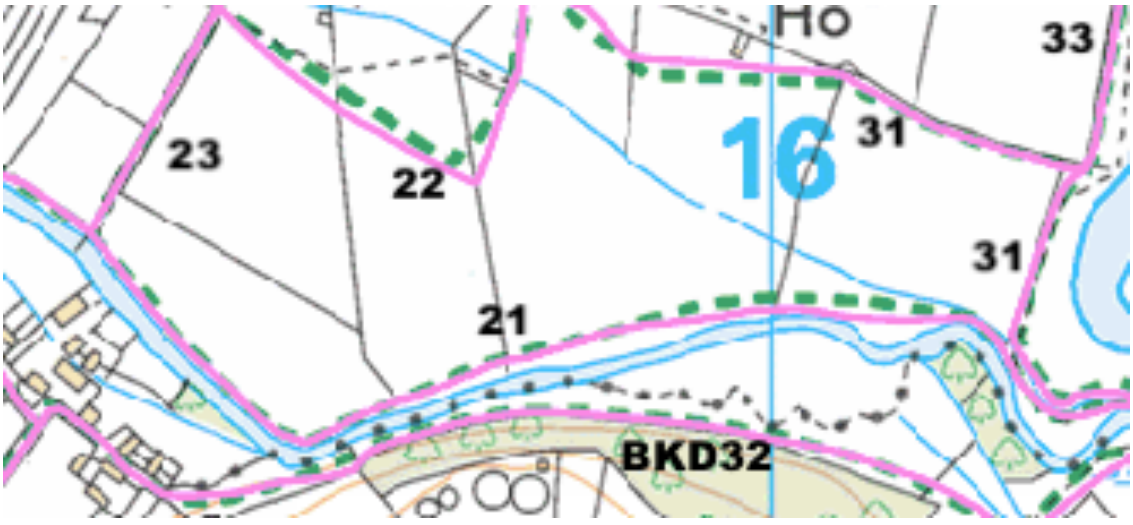
4.2.2 The whole area is outside the Development Boundary.




4.2.3 Map showing River Coln floodplain area

4.2.4 View across floodplain towards River Coln

4.2.5 A PROW BFA21 runs the whole length of the river here; another, BFA23 runs north out of the floodplain, leading into Moor Lane. Further east, a third PROW, BFA22, runs north, linking up with the web of PROWs around the northern half of the proposed RCVL (BFA28, BFA30 and BFA31, BFA34)




4.2.6 Map showing PROW numbers in this area, all with the prefix BFA. South of the river the path number BKD refers to the fact that this is PROW is in Kempsford Parish. Detail from Gloucestershire County Council: Highways Public Rights of Way Map

4.2.7 Evidence of this area as a 'valued landscape' can be found in the work carried out by local volunteers.

- Translocation of Ranunculus (Water Crowsfoot) – it had been identified that there was a lack of in-stream vegetation in the river downstream from Cutlers Farm. Vegetation was taken from around the Bull island / Town bridge where it was abundant, and replanted in 6 locations. It has established itself in 3 locations. More work is planned. Ranunculus provides cover for fish and invertebrates as well as helping to maintain river levels during summer months.
- Natural bank repaired in four locations by weaving hazel fascines. This is designed to allow silt to be deposited in the slow water behind the fascines; eventually vegetation will establish and close the gap in the damaged bank. This will allow marginal vegetation to re-establish and create habitat, including for water voles.
- Eight gaps in bankside filled with natural material to create a dead hedge – this is to prevent dogs speeding up erosion and to maintain suitable habitat for water voles.
- Overshading reduced in two locations by removing dense willow. This will allow light into the river and facilitate in-stream vegetation growth and will promote the growth of bankside vegetation suitable for water voles.
- Invasive Himalayan Balsam removed along 3 stretches of the river between Courtbrook and the footbridge across the river (end of BFA21)). This work was done in 2017 and no growth was identified in 2018. It is vitally important it does not establish otherwise it will push out native species and, as it is an annual plant, will leave riverbanks exposed to erosion in winter.
- Ad-hoc removal of litter from within the river when work is undertaken.
- Hedgerow planting (see photographs 4.2.7. 4.2.8 and 4.2.9 below).

Planned projects

- Installation of bat boxes and barn owl boxes
- Regular river fly monitoring + unofficial monitoring of water vole population
- Regular monitoring of river water quality

4.2.8, 4.2.9 and 4.2.10
Volunteers hedge planting alongside BFA33, Morgans Ground

# 5. 0 ALREADY DESIGNATED LANDSCAPE AREAS

5.0.1 Certain areas in Fairford Parish have already been covered by other designations, most of which the NDP supports wholeheartedly, the exception being the gravel extraction site (5.3). They are:

- Cotswold Water Park – lakes formed as the result of mineral extraction
- Special Landscape Area
- Fairford Conservation Area
- Possible Gravel Extraction Site

## 5.1 Cotswold Water Park

5.1.2 Although the whole parish lies within the Cotswold Water Park (CWP), two areas of post mineral extraction are specifically covered by Policy SP5 of the Cotswold District Council Local Plan 2011-2031: these are Horcott Lakes, and lakes to the east of the town, including Lake 104.

5.1.3 Horcott Lakes
(Fairford Parish boundary in blue)

5.1.4 Lakes to the East of Fairford
(Fairford Parish boundary in blue)

5.1.5 Policy SP5 of Cotswold District Council Local Plan 2011-2031

*COTSWOLD WATER PARK: POST-MINERAL EXTRACTION AFTER USE*

*Proposals for sports, leisure, and/or recreational development, whether outdoor or water-based, will be permitted on former mineral extraction sites that lie within the Upper Thames Clay Vales National Character Area (National Character Area 108 (Upper Thames Clay Vales)[64] provided the proposals:*

*a. protect and enhance biodiversity;*
*b. strengthen the landscape character and reinforce the Cotswold Water Park's sense of place;*
*c. enhance public accessibility and enjoyment of the lakes and countryside;*
*d. take account of the implementation of measures put in place as part of the approved restoration and aftercare scheme(s) associated with former mineral extraction*
*e. e. satisfactorily mitigate potential unacceptable adverse impacts on residential amenity; and*
*f. maintain the character of settlements and their settings.*

64 This includes the Fairford/Horcott parish

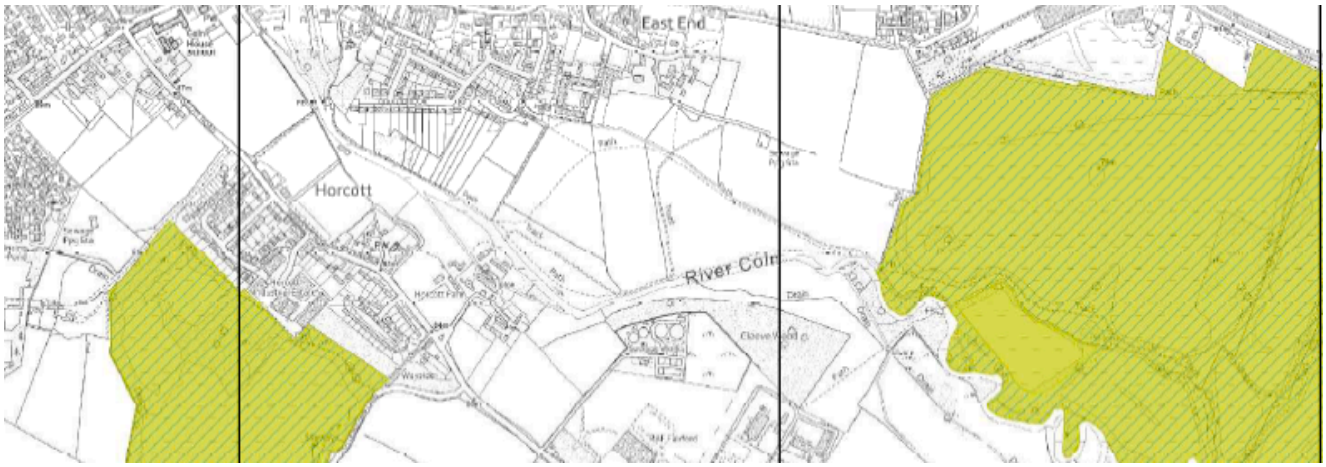
*5.1.6 Policy SP5: 12.4.4 … encourages appropriate outdoor and in particular, water-based activities, while ensuring that local issues and concerns, such as access and the protection of tranquillity, are addressed. New routes for sustainable transport, notably cycling and walking will be encouraged to support tourism and improve local accessibility.'*

*5.1.7 Policy SP5: 12.4.6 The area is an important resource for biodiversity with the lakes supporting rare aquatic species and waterfowl ... It is important that developments within the area enhance this valuable biodiversity resource, both at a site level and the broader landscape scale. Wildlife is one of the main reasons why visitors are drawn to the area.'*

5.1.8 Lakes 104, 103 and 103a have already been granted permission for 200 holiday homes and leisure centre, with most of the development around Lakes 103 and 103a. The PROWs around Lake 104 (BFA30, BFA31, BFA32 BFA33) are protected and the tranquillity of the western half of this lake is preserved. This plan does not seek to alter any of the arrangements already in place for these lakes. Lake 105 bordering on Whelford Road is a water skiing and water sport centre. Lakes 102 and 102a are SSSI, and Whelford Pools Nature reserve is set around lakes 111, 111a and 111b.

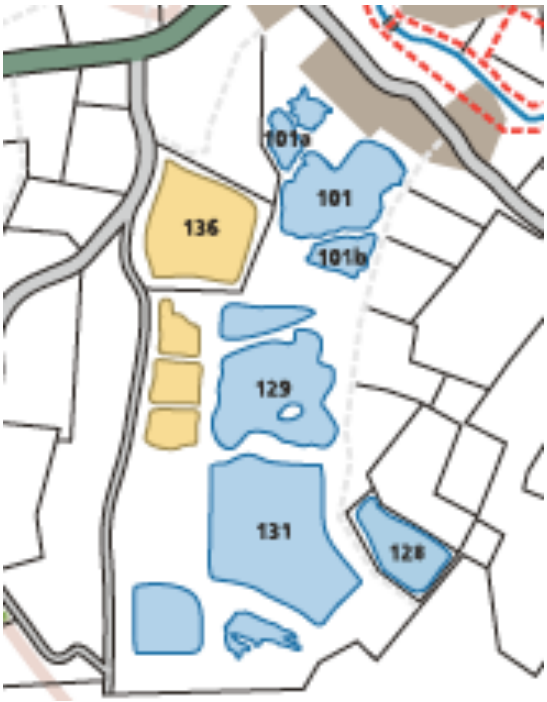
5.1.9 Gravel extraction at Horcott Lakes is over. The future for these lakes is uncertain although it is hoped that continued community use and access to the footpaths can be assured. In the past this area has been designated as suitable for quiet activities (fishing etc.) and it is to be hoped that any future use of this site will indeed 'allow local residents to be able to enjoy access to the countryside from their homes, with both existing lakes and future landscapes adjacent to settlements protected as an informal leisure and recreation amenity.'[65]

5.1.10 In January 2021 Natural England designated the whole of the Cotswold Water Park as SSSI.




5.1.11
Detail from Natural England map showing new Cotswold Water Park SSSI designation (hatched green) in Fairford Parish

[65] Strategic Review and Implementation Plan for the Cotswold Water Park, Stage 111, Vision and Implementation Plan, July 2008, p.18, para.4.5 bullet point 4

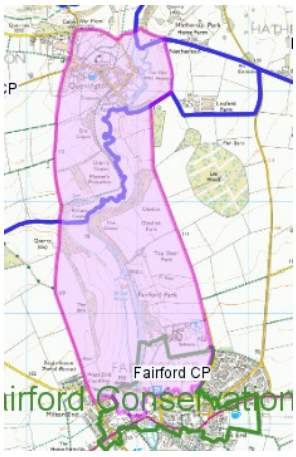



5.1.12 Cotswold Water Park Lake Numbers for Horcott Lakes. (Detail from CWP map.)

5.1.13 Cotswold Water Park Lake Numbers for lakes south west of Fairford (detail from CWP map)

## 5.2 Special Landscape Area

5.2.1 Fairford Special Landscape Area extends from Town Bridge and the Greens north to the edge of the parish boundary, and beyond, accentuating one of the most distinctive features of the town – the penetration of natural landscapes into its centre. It is protected by CDLP Policy EN6.




5.2.2
Special Landscape Area = mauve
Parish boundary = blue line
Fairford Conservation Area = green line

5.2.3 CDLP Policy EN6: *SPECIAL LANDSCAPE AREAS*
*Development within Special Landscape Areas … will be permitted provided it does not have a significant detrimental impact upon the special character and key landscape qualities of the area including its tranquillity.*

*5.2.4 Para. 10.6.1. The purpose of SLA designation is to protect locally significant and valued landscapes that have particular intrinsic qualities or character. Although not nationally designated, in some cases they provide important settings and effective buffers for the Area of Outstanding Natural Beauty.*

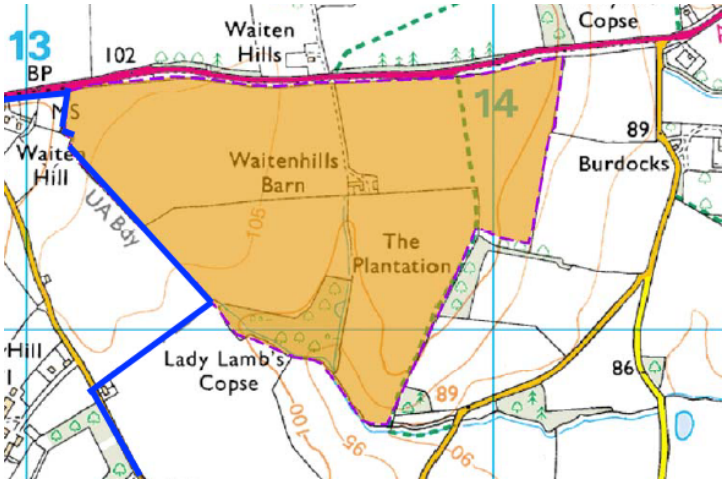
5.2.5 The SLA in question extends north beyond the parish of Fairford and overlaps the Fairford Conservation Area in the south. The land to either side of the river rises on oolitic limestone. This is a beautiful river valley landscape, with some of the best views from the west, looking over Gassons Field towards Horcott Hill (beyond the parish boundary). The permissive Pitham Brook Path runs along a brook on the west bank of the River Coln providing good views of various leats, sluices and the Cascades.

5.2.6 By the late 17th century the course of the river above the town included a mill leat. In the 1780s that stretch of the river was made into a feature of the park, being formed into Broadwater Lake, which contains two islands and is spanned at the southern end by an 18th-century bridge. The cascade feeding it had been constructed by 1757. The mill leats, weirs, bridge and sluices are still in visible and in use today, of interest to industrial archaeologists as well as landscape historians.

5.2.7 A pump house beside the Cascades fed a reservoir situated at the highest point to the east of the town, within Fairford Park. The pump house and reservoir are proposed as Non-Designated Heritage Assets (41 and 44a) as part of Fairford's industrial heritage.

5.2.8
The Cascades in the Special Landscape Area

**5.3 Draft Minerals Local Plan for Gloucestershire 2018-2032 – Allocation 8 Lady Lamb Farm p.149-150**




5.3.1
Area to the west of Fairford included in the Draft Minerals Local Plan for Gloucestershire 2018=2032
Blue line = western boundary of Fairford parish.
Map detail p. 149, Allocation 8 – Area of Search at Lady Lamb Farm.

5.3.2 This area (on the south-eastern slope of Waiten Hill) has been identified as a possible site for gravel extraction. At the moment this is open farm, woodland, farmhouse and farm buildings and footpaths. A new access onto the A417 would be required.

### 5.4 RAF/USAF Fairford

5.4.1 RAF/USAF Fairford is not in the parish of Fairford but its presence has had a great influence on the settlements of Horcott and Fairford. It was built during WW2 and, effectively, cut Horcott off from the village of Kempsford and the rest of Kempsford Parish.

5.4.2 Presently under the provisions of the Military Lands Act 1892 (s14) the Secretary of State for Defence is empowered to make byelaws to regulate the use of land being used for military purposes. The Byelaws for RAF Fairford are currently under review.

5..4.3 Current provisions include height restrictions for buildings and a right to shoot over the adjacent Horcott Lake in order to avoid bird strikes. For this reason Horcott Lakes will need to be managed for the foreseeable future. In addition, there are tight restrictions on the flying of drones in this and the surrounding area.

## 6.0 Responses to 2020 Pre-submission consultation comments on Policies FNP8, FNP9, FNP10, FNP11, FNP12, FNP13

6.1 In general responses from the statutory consultees were supportive of these proposals but various objections came from the representatives of landowners who would be adversely affected by the proposals in that, if accepted, the proposals would inhibit developments on their land. Where comments cover several policies, responses have been provided in the text on the specific policy concerned.

### 6.2 Policy FNP8 Protecting Local Green Spaces

6.2.1 **CDC** have requested that the references to CDLP policies be deleted, leaving only the NPPF Local Green Space criteria to be met for each site. This has been done.

6.2.2 There seems to have been a basic misunderstanding in the **Abbey Mill Homes** response which claims that 'Part of the Yells Yard site is proposed for designation within the emerging plan as a local green space under Policy FNP8,' (p.2). This is not the case. Only 3 areas are proposed for this designation: Walnut Tree Field, Upper Green and Coln House playing field.

### 6.3 Policy FNP9 Protecting the Fairford-Horcott Local Gap

6.3.1 **CDC** has queried whether this policy would be in conflict with LP policy DS4 and thence LP policies H3, H5, H7 and EC6. However, the policy intent is to ensure that any development that is otherwise appropriate in this location is located and designed in such a way as not to undermine its visual integrity as explained in P9.3. CDLP Policy DS4 refers to 'land that falls outside Development Boundaries and Non-Principal Settlements [and] is referred to as countryside, even if it is technically previously developed land.' The land comprising the

Fairford-Horcott Local Gap therefore certainly falls into this category. However, it is questionable whether all the particular policies CDC references are applicable to this site.

6.3.2 Policy H3 relates to affordable housing on rural exceptions sites and includes self-build one-off plots.

6.3.3 Policy H5 concerns housing for rural workers ie. where 'there is an essential need for a worker to live permanently at or near their place of occupation in the countryside'. It is difficult to see the relevance of this in the proposed local gap.

6.3.4 Policy H7 allocates particular sites for gypsies and travellers with the proviso in 3d that, 'Where a sufficient supply of pitches or plots cannot be achieved at the above locations new sites will be considered.' It is difficult to see how the probable size of a local authority traveller site is compatible with the aim of maintaining the essential open character of the gap.

6.3.5 Policy EC6 provides for the conversion of rural buildings provided that 'the building is structurally sound, suitable for and capable of conversion to the proposed use without substantial alteration, extension or re-building'. Since the only building (apart from a small facilities building for the football club) in the proposed local gap is a small Cotswold stone field shelter (a non-designated heritage asset) any conversion would necessarily involve 'substantial alteration, extension or re-building' and therefore the provisions of EC6 would not apply.

6.3.6 Thus the only relevant policy which might be impacted by the Policy FNP9 would be policy H3. Policy FNP9 9.1 states that 'proposals that may otherwise be acceptable outside a Development Boundary defined in Policy FNP1 will not be supported if they do not maintain its open character'. However, since the whole aim of this policy is to 'maintain an open character' it is unlikely that any proposed development would be in conflict with the provisions of CDLP Policy H3.

6.3.7 **Abbey Mills Homes** object to the inclusion of the smaller of the 2 fields described in p.3.2 of the Landscape and Local Green Space Study on the grounds that a) its 'ongoing and historic use for the storage of caravans and other machinery is not compatible with this policy', b) it does not 'fulfill the policy objective of being an important local green space' and c) development on this field would 'not lead to any coalescence concerns'.

6.3.8 a) The study recognizes the field's current use for caravan storage and such a use is not seen as incompatible with the policy as this does not harm the land's essentially open character. There has never been any objection to the established use of the land for storage purposes and the inclusion of the field in no way seeks to impede this use. In addition, the position of the field on the boundary of the Conservation Area (para. 3.2.2) does mean that it has a dual function in protecting the setting of the Conservation Area and in maintaining the open, rural landscape in which the settlements sit.

6.3.9 b) This policy does not define this field as 'an important local green space' (see 6.2.2).

6.3.10 c) This field is one of the few remaining to form what is an extremely narrow gap. At present an open vista is retained through from Cirencester Road to Horcott Road and these fields are an important feature which the Local Gap designation is designed to retain: a 'gap', not a narrow corridor.

6.3.11 The **Knight Frank** submission posits that the CDLP 'identifies Horcott as an integral part of Fairford' and that therefore Horcott 'is not treated as a separate settlement'. Additionally, the objection suggests that the 'statutory requirement to preserve the setting and significance of the Conservation Area provides ample control over development in this Local Gap area'.

6.3.12 There is in principle no contradiction between the functional definition of Fairford/Horcott as one overall settlement and the boundary showing that settlement having two distinct, visual components. However, there is sufficient historical evidence (para. 1.2.18 and Section 8 of the Character and Design Assessment and the1834 map - para. 6.7.5 below) to justify the policy position purely on these, historical grounds. In addition, allowing development adjacent to the boundary is counter to the plan-led system as operated by the use of settlement boundaries (as per the CDLP). It is regretted that CDLP does not draw a distinction between the two settlements but even allowing for this, local gaps are justified on visual coalescence grounds alone.

6.3.13 Certainly some of the proposed Fairford-Horcott Local Gap is adjacent to the Conservation Area but not all and the Gap serves a far wider function (para. 3.0.1 and 3.0.2 of the Landscape and Local Green Space Study) unrelated to the important status of, and protections resulting from, the boundary of Conservation Area.

## 6.4 Policy FNP10 River Coln Valued Landscape

6.4.1 **CDC** welcomed the considerations given to the River Coln Valued Landscape as green/blue infrastructure but is concerned that it is difficult to see how it would be implemented or what its practical effect would be. It is hoped that the additions/clarifications in Policy FNP10 supporting text will answer these questions.

## 6.5 Policy FNP11 Valuing Hedgerows and Trees

6.5.1 We agreed with **CDC**'s suggestion of some word changes and the Policy and supporting text have been revised accordingly.

## 6.6 Policy FNP12 Achieving High Standards of Design

6.6.1 **CDC** recommended word change has been made.

6.6.2 An addition has been made to Appendix 3 Design: 'Proposals for new development are strongly encouraged to consider applying the Building with Nature Standards from the planning stage, and to seek the Building with Nature accreditation, in order to support the FTC in its ongoing efforts to improve biodiversity and sustainability in the town.'

## 6.7 Policy FNP13 Conserving Non-Designated Heritage Assets

6.7.1 **CDC's** suggested changes have been included. A map showing the Cotswold Field Shelter in 1834 (see below) has been added as well as extra commentary for the Morgan Hall Park/Jones' Field designation. Following a Cotswold Archaeology Heritage Statement for Coln

House (October 2020), Applestone Court has been included in the NDHA list. An extra paragraph has been added to the Policy: 'Non-householder development on previously undeveloped land must allow for the evaluation of archaeological remains and the protection or investigation of non-designated heritage assets of archaeological importance. Archaeological investigation of any such sites must be carried out as required by the NPPF para.189.'

6.7.2 **Abbey Mill Homes** has challenged the inclusion of Yells Yard (No.7 in the list) as a non-designated heritage asset on the grounds that 'the buildings are curtilage listed and within the Conservation Area'. We accept that a part of the area designated as NDHA might be curtilage listed and have revised the boundary accordingly after consultation with CDC. However, we do not accept that simply being within a Conservation Area is grounds for deletion: many of the proposed NDHAs are within the Conservation Area.

6.7.3 **Knight Frank** would like to see the removal of the Cotswold Stone Field Shelter (No.30 on the list) on the grounds that it is not of architectural or historic interest, not old and not rare, leaving only landmark status (which it certainly has).

6.7.4 The evidence presented by Knight Frank acknowledges the fact that a barn could have been on the site before 1877/82, but argues that this one has been heavily altered. In fact, a parish map of 1834 (1834 Map GA P141MI71) shows this barn isolated in the field, much as it is today.

6.7.5 Detail from 1834 Map - Glos Archives P141MI71

6.7.6 It appears likely that the courtyard of barns referred to by CgMs was built around this much earlier barn. The reasons for the conclusion that in spite of the evidence of an earlier date, this particular building dates from the start of the C20th appears to be based solely on repair work on part of the site. However, the 1834 map shows a far earlier date for the barn, giving an age of at least 186 years, and the fact that it has undergone what appear to be unsympathetic repairs and that a dry stone wall has been allowed to collapse, suggests that the building needs more, rather than less, attention. There may well be other stone barns across the Cotswolds as a whole, but they are becoming rarer as buildings fall into ruin or are converted into homes; small barns such as this really are rare. The designation criteria of A (architectural interest), B (historical interest), C (age), and D (rarity) all stand.

6.7.8 **Response from Gloucestershire county Council Archaeologist** in email[66] to FTC re. Coln House Playing Field. Extract reads, *'The county Historic Environment Record informs that the site is of high archaeological interest. An archaeological evaluation in the northern part of the site established the presence of archaeological features at a depth of 0.32m below present ground surface which suggest the presence of an extensive Anglo-Saxon settlement and a wall dating to the medieval period was also recorded. Extensive evidence has also been recorded in the field to the west of the site including prehistoric features and a round barrow and further evidence of Anglo-Saxon settlement including sunken floored buildings and a possible hall. It is highly likely therefore that archaeological remains are present across the whole of the playing fields.*
*'Due to the potential for extensive and highly significant archaeological remains within the site any development proposals will need to consider the impacts of the proposals on such remains. Advice from this department will consider the extent of belowground impacts and whether archaeological investigation will be required in order to inform our advice and any necessary archaeological mitigation. The requirement for archaeological investigation will be based on the extent of the belowground impact. From our initial discussions my advice is to ensure where possible belowground impacts should be reduced which also applies to any proposed landscaping such as tree planting and drainage and that there would be no future plans for upgrade of the pitches which would have a belowground impact (as I am aware of from other sports pitch facilities).'*

## 7.0 Summary

7.1 This study provides a proportionate evidence base to support three important, complementary policies of the NDP. Those policies do not necessarily rule out any form of development altogether and do not seek to impose a 'green belt by stealth'. Other policies of the plan make more than sufficient provision for the continued growth of the town over the next few years. These landscape policies seek to preserve the essential historic character of the town through this period of growth, for the enjoyment of residents and visitors alike.

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# Evidence base
# Fairford Character and Design Assessment

**March 2020, revised September 2022**

**Milton End**

**Borough**

**East End North**

**East End South**

**Horcott**

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River Coln, Bull Island

## 1.1 Introduction

1.1.1 This Character and Design Assessment is intended to inform an understanding of the distinct features of Fairford and Horcott, and how they combine to create their unique character. The work has been carried out by a sub-group of the Fairford Neighbourhood Plan Steering Group with co-opted members from the local community. It was decided to divide the town of Fairford using the tithing divisions first referenced in 1779: Milton End, west of the river; Borough, the centre of the town; and East End, east of Borough, a large area which has been subdivided into two (north and south of the A417) for manageability. Horcott, a separate settlement with its own distinct history, became the fifth area for analysis.

1.1.2 Initially a proforma (Oxford City Council, Character Assessment Toolkit) was used to identify significant features of each of the areas, supported by large numbers of photographs, and the analysis has been done using the Higham Ferrers example. Inevitably in each area there are buildings which are atypical (eg. Newcroft Cottage, an early1970s house in The Croft, surrounded by Victorian and Georgian buildings) and these have either been discounted or, if it was felt that their distinctiveness was intrinsic to the overall character of the area, this has been recorded. In the Conservation Area, on-site fieldwork has been supported by the historical record and evidence from the Historic England, Listed Buildings database. However, it was felt that the Listed Buildings themselves (over 100 in the parish) should not be specifically featured except insofar as they contribute to the character of each area as a whole.

1.1.3 All this work has been carried out by local residents who do not have specific architectural or planning backgrounds. It is hoped that this Character and Design Assessment will enable developers, planners, designers and local residents of the future to produce high quality designs of houses, landscape and other buildings all of which should enhance the local character of the parish.

## 1.2 Historical Development of Fairford and Horcott[1]

### 1.2.1 Fairford Town

Fairford is a unique rural settlement area dating from the late Mesolithic/Neolithic period[2]. There is physical evidence of continuous settlement from that time, about 4000 BCE, through to the present day including Iron Age, Roman, Anglo-Saxon and Norman structures and artefacts. The existing settlement dates largely from the Tudor period.

[1] Some of this material can also be found at Fairford Neighbourhood Plan, Chapter 2: 'The Neighbourhood Area'. It is repeated and expanded here as it is hoped that this will be a stand-alone reference document.

[2] Archaeological Evaluation at land off Horcott Road, Fairford; Worcestershire County Council p. 21

1.2.2 The ancient roots of the town can clearly be seen in the layout of the roads and buildings. Fairford is distinctively set within a web of important tracks which have developed over the centuries from Iron Age, Roman, Anglo-Saxon and medieval drove roads (see Section 9) and salt routes. These tracks, mostly now roads, are on the routes from Wales and the west, to Lechlade, the highest navigable point of the River Thames, and London.

1.2.3 'The Gloucestershire Historic Towns Survey: Cotswold District archaeological assessment: Fairford', by GCC Archaeology Dept., 1998 and updated in 2007 gives a very complete record of this history of the town with maps of the town's development. Since this 2007 report, excavations for the pre-quarrying survey at Horcott in 2007-9, and pre-building archaeological investigations along Cirencester Road in June and July 2015, have produced even more evidence of Neolithic, Roman and Anglo-Saxon settlement.

1.2.4 The earliest written record of Fairford is in 850 and the town also appears in the 1086 Domesday Book[3]. Fairford Mill is mentioned and reference is made to a priest living among the inhabitants of the settlement, which would suggest the existence of a pre-Conquest church. It was a Royal Borough for about 500 years (mostly in the female line) since William the Conqueror granted it to his wife.

1.2.5 By the 12th century the town was recorded as having ancient borough status and had a market charter[4]. The town bridge had been built by the late 12th century and by 1540, when seen by Leland[5], it had four stone arches. An alternative route into the town was provided by Mill Lane, which crossed the river with a substantial bridge[6]. It was, however, in the early 14th century that the town, positioned in an area of sheep farming, began to prosper. The late 15th century saw a revival of its economic fortunes on the back of the wool trade, leading to a period of considerable growth.

1.2.6 Originally the main road from the west (now the A417) crossed the town bridge and continued north-eastwards in a straight line and straight on to The Croft with a large triangular market place to the south bounded by the street now known as London Street running ESE; the High Street, ran north from the Market Place to the church. In 1307 there were 68 burgages[7]. The infilling of the western edge of the Market Place may have occurred when Fairford became more prosperous and expanded due to the wool trade in the 15th century. Today's road layout through the centre of Fairford was the legacy of a wealthy wool merchant named John Tame who was rebuilding the older, possibly pre-conquest Church at this time (completed in 1497). A little later the main road was diverted and the present London Street became the main road. This is the origin of the road layout we see today, which remains the same as it was then.

1.2.7 John Tame's wealth was inherited by his son Edmund (1487-1534) who completed the work on the parish church. Most of the present fabric of the church is 15th century, but there is some 13th and 14th century work in the respond of the north arcade and the lower part of the tower. John Tame's splendid tomb still survives in the chancel of the church he had rebuilt and it was later endowed with a wonderful set of late medieval stained glass windows, the only complete set still existing in any parish church in England. King Henry VIII visited Fairford in 1520 and it is likely that he worshipped at the new church. Fairford Church and its windows attract an average of ten thousand visitors every year to the town, from all over the world[8].

1.2.8 Fairford Manor and lands passed through the hands of several families until 1650 when Andrew Barker bought it after the sequestration of Robert Tracy at the end of the Civil Wars, Tracy having supported the Royalist cause. 1668 saw

[3] Victoria History of the Counties of England: Gloucestershire (VCH), Vol.7 Oxford University Press, 1981, p. 78 Ref. 18
[4] Ibid, Vol 7 p.69
[5] Ibid, Vol 7 p.71, Ref 57
[6] Ibid, Vol 7 p. 71, Ref 62
[7] A burgage was a town (borough) rental property (to use modern terms), owned by a king or lord. The property (burgage tenement) usually, and distinctly, consisted of a house on a long and narrow plot of land with a narrow street frontage (a burgage plot).
[8] Figures from Parochial Church Council Annual Report 2015

the further granting of a charter for a weekly market, which is still in existence, as well as twice-yearly fairs, which were held in May and November, the last of these fairs being held in 1908.

1.2.9 The building of Fairford Park was begun by Andrew Barker in 1661, the house being some 410 metres to the north of the town centre. The Park was further landscaped in the 1780s and a few features still remain of that landscaping: the Votive Column (the Obelisk) which was a landscaping feature near the northern edge of Barker land, the Cascades, the picturesque bridge to the north of the Mill Pond.

1.2.10 Fairford farmworkers were deeply involved in the Swing Riots of 1830, after the introduction of new threshing machines and the loss of gleaning rights – thus bringing a greater threat of winter starvation.[9] Several men from Fairford were sentenced to transportation to Australia in punishment.

1.2.11 The estate remained in the hands of the Barker family until 1945. The family had left Fairford in 1897/98 and the house was leased to Colonel Albert Palmer until his death in 1940.

1.2.12 Fairford Park was requisitioned during World War 2 for use as an American military hospital and the house fell into a state of disrepair. It was demolished in the late 1950s to make way for Farmor's School which moved from the town centre building (now Fairford Community Centre) where it had been since 1738. The Park site now also contains Fairford Primary School, the Pre-School and the Leisure Centre. After WW2 the grounds of Fairford Park contained the largest Polish Hostel in Gloucestershire until 1957.

1.2.13 After the Second World War, Fairford Park Estate was purchased by Ernest Cook and in 1952 it was formed into part of the Ernest Cook Trust, an educational charity with extensive landholdings to the north of Fairford and elsewhere in the country. The Trust still manages the Estate and protects the landscapes to the north of the town. It also has an influence over changes to some buildings on which it has restrictive covenants.

1.2.14 The East Gloucestershire Railway came to Fairford in 1873 from Witney. This brought considerable benefit to the local agricultural community with easier marketing of products. A quiet line for the first 70 years it became busy during WW2, bringing construction materials, munitions and servicemen to the new RAF base as well as materials to Fairford Park House which was a USAF military hospital at this time. The railway closed in 1962, before the Beeching cuts.

1.2.15 RAF Fairford was established to the south of the town in 1943-44 and played a role in the airborne landings in Normandy. After the war the airfield saw the testing flights of Concorde before becoming an important American air base, still used by the United States Air Force. It is also the venue for the annual Royal International Air Tattoo. This event is very important to the town as a tourist attraction since many personnel are needed to run the event; visitors come for the whole duration and stay in local hotels, homes and camping sites.

1.2.16 In the mid/late C20th various new phases of building were undertaken largely to the north east of the town between Leafield Road, London Road, Hatherop Road and Hatherop Lane; the century ended with smaller developments in Groves Place (2000) Coln Gardens (1995/6) Fayre Gardens (2000).

1.2.17 The presence of the Special Landscape Area to the north and RAF Fairford to the south have had a significant effect on the development of the town limiting development in these directions, resulting in over-expansion to the east / west. Fairford Gate (north and south), Stoneleigh and Keble Fields, all undertaken since 2012, represent the largest and quickest growth the town has ever seen. This rapid increase in building has had a detrimental effect on the richly historic,

[9] 'on Friday at a small town called Fairford, about seven miles from Cirencester, a large body of people had assembled, and had destroyed all the thrashing machines, and them that were put down, and many other Farming Implements and that the gentlemen and Farmers of the place, had not been able to persuade their servants to assist in defending them.' Letter from Duke of Beaufort to Lord Melbourne. Jill Chambers: Gloucestershire Machine Breakers, The story of the 1830 riots. Vol. 1: The Riots, Trials and Appendices, 2012, p. 32.

rural character of the town, exacerbated by the fact that infrastructure improvements to support the increase in population and traffic have not been undertaken.

### 1.2.18 Horcott

The hamlet of Horcott was in the parish of Kempsford, to the south, for centuries until the construction of RAF Fairford cut it off from the rest of the parish and closer links with Fairford developed. In 1987 it became part of the parish of Fairford, retaining its own distinct town councillors on Fairford Town Council until 2015. It is worth noting that the RAF base was not named RAF Whelford (as would have been usual since this was the nearby settlement) since there was a pre-existing RAF Welford in Berkshire.

1.2.19 The first record of Horcott, meaning 'dwelling in a muddy place', is from the 12th century. At this time there was a mill on the River Coln at what now is Horcott Farm – the old flume channel still exists. The mill probably marked a minor river crossing point and this (Cutler's Ford) remains the best place to wade across the river on foot. A small farming hamlet of about 7 houses grew up over the centuries and a 17th century cottage survives. Various buildings, now listed, from the 18th century settlement confirm that this remained a small agricultural community. A row of labourers' cottages, the Roman Catholic Church of St Thomas of Canterbury, a presbytery and school (long closed) were built in the 19th century. The main growth of the hamlet occurred during the middle of the 20th century when private and council housing was built to the southwest[10]. A footbridge (Dilly's Bridge) linking Horcott and Fairford was only installed, by charitable gift, in 1990.

1.2.20 In order to carry out this Character Assessment the town has been divided into 5 geographical areas as shown on the plan with Horcott considered individually as a separate settlement. The main geographical areas are as follows.

1 Milton End: from Town Bridge westwards to edge of Fairford town, west of the river (Section 2)

2 Borough: the centre of Fairford town, from Town Bridge eastwards (Section 3)

3 East End North: the town east of Borough, north of A417, to the edge of town, east and north of A417 (Section 4)

4 East End South: the town east and south of Borough, south of A417, to the edge of town, east and south of A417 (Section 5)

5 Horcott (Section 6)

## 1.3 General Features

There are some features which are common, particularly in the Conservation Area which extend into all areas. In order to save repetition these are listed here. Illustrative images can be found in Section 8, 'Gallery of Fairford and Horcott Building Features'.

- Cotswold stone defines the character of the pre-C20th buildings – either rubble stone or ashlar. Elsewhere, in more modern building, a variety of other materials include render, wood, brick, concrete and reconstituted stone; the latter two attempt to replicate the colour and texture of the natural stone, with varying degrees of success. The colour of Cotswold stone in this area is generally the white/cream stone, not the yellower stone of the north Cotswolds. (FNP12 Nos.3, 9[11])
- Steep roof pitch (no less than 45$^{0}$, no more than 55$^{0}$) is typical of traditional buildings in the Cotswold District generally, although there are significant variations from this in the local area, most notably taller C18th buildings in the High Street/Market Place, Park Street and Milton Street, large farm houses (including Milton and Park Farm

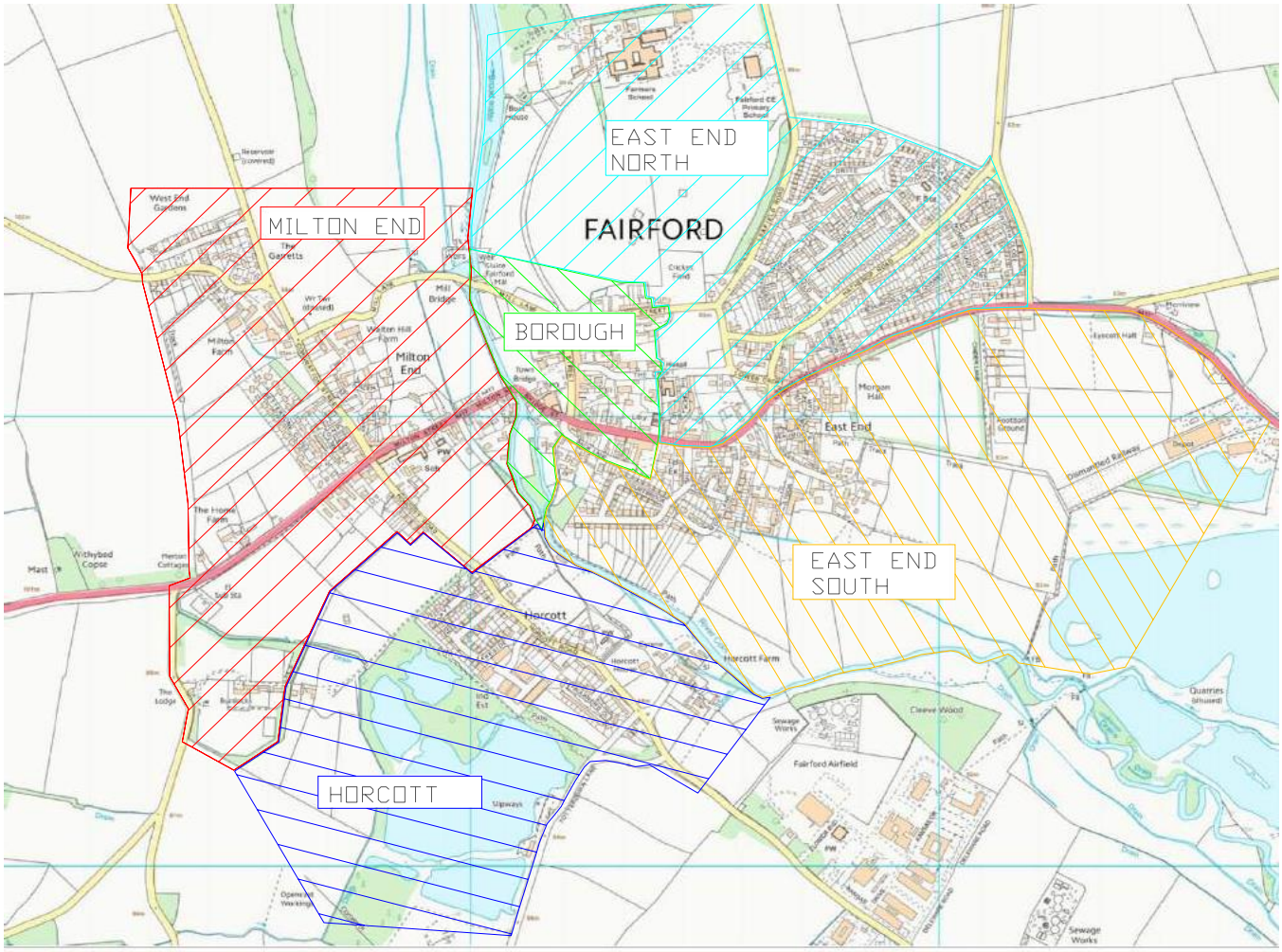
[10] VCH: Vol 7 p97

[11] FNP12 Refers to the Design Principles Policy of Fairford Neighbourhood Plan (FNP12: Achieving High Standards of Design). The numbers coming after this reference refer to specific items on the list of principles. Thus FNP12 No.3 refers to the colour of Cotswold stone which should be used in Fairford. See Section 9 of this document for the complete list and policy details.

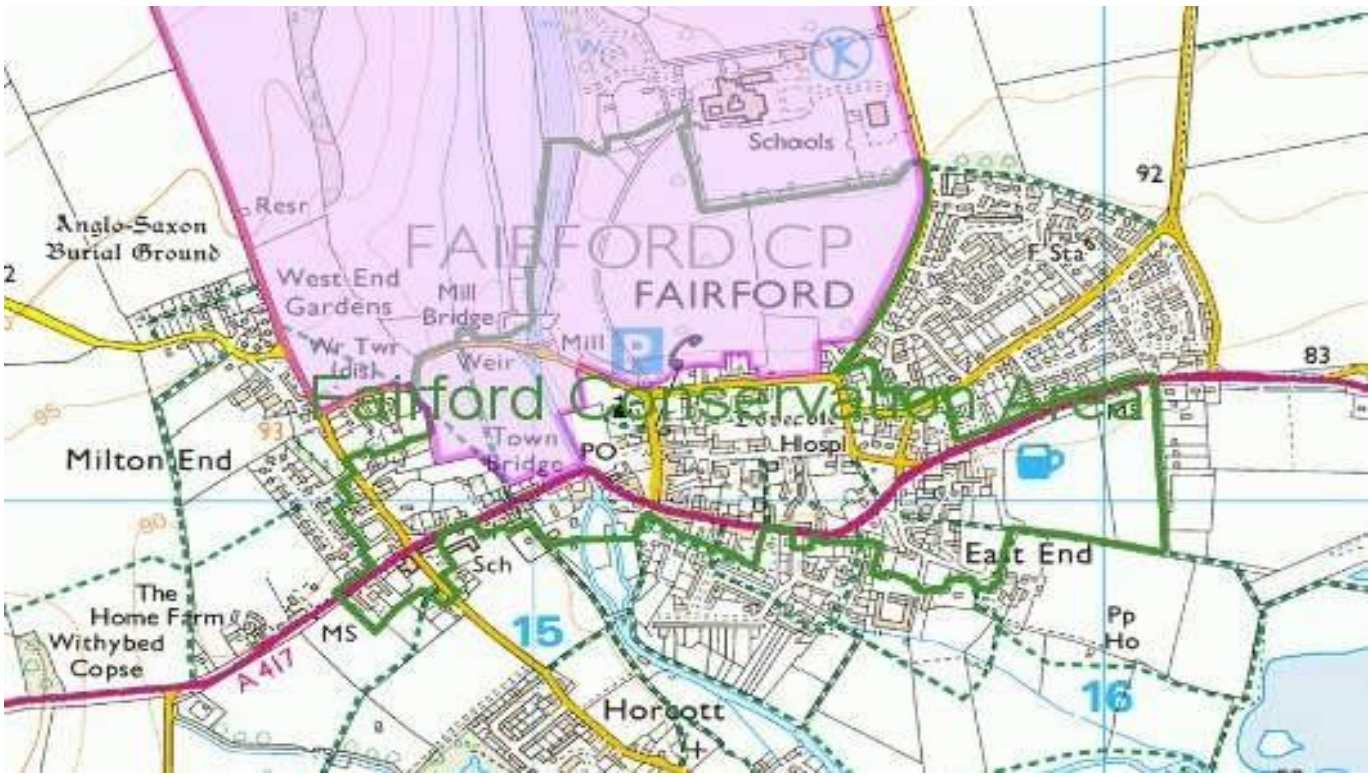
houses) and older cottage type buildings on the edges of the old town. Stone tiles are a traditional and historic roof covering – and have guided the pitch of the roofs. Some houses in the Cotswolds were originally thatched and the steep pitch was required to allow water to be shed efficiently and to prevent wind blowing up beneath stone tiles. This pitch was carried through with slate and then clay tiles. It is this steep pitch (and thus the relatively narrow width of the building beneath) which can easily be overlooked and result in new unbalanced or disproportionate buildings.

- Dormer windows –pitched-roof and low-level catslide dormers. (FNP12 No.7)
- Chimneys – tall, stone or brick and functional. The use of fake (often fibre-glass) chimneys in developments of the past few years is to be regretted, especially since flues are often still needed. (FNP12 No.7)
- Simple pitched-roof porches generally with solid wooden doors in the older properties.
- Windows – stone and wood mullions, lintels and rebates. More recently, both iron and PVC have been used.
- Decorative features – stone carvings, rosettes, moulded and shaped render, dentils, balls, staddle stones.

## 1.4 Location of Character Areas, Conservation Area and Special Landscape Area




1.4.1 Map showing the location of each character area described. Explanations of the boundaries of each area are to be found at the beginning of each separate section.



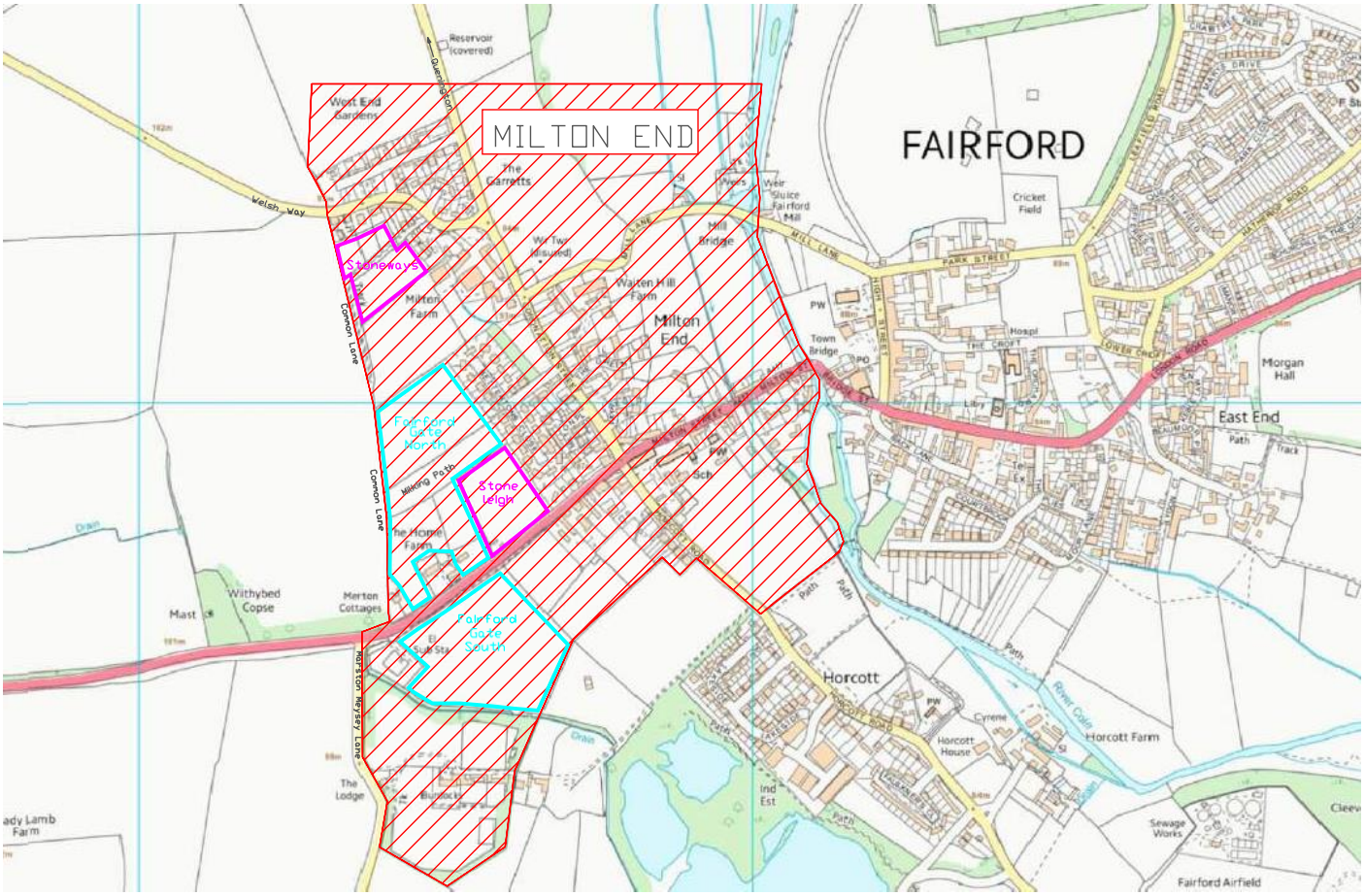

1.4.2 Green line marks boundary of Fairford Conservation Area, mauve the Special Landscape Area

1.4.3[12] St Mary's Church, High Street

[12] Photograph/map numbers are integrated into the paragraph number system

## 2.1 Milton End: from Town Bridge westwards to the edge of town

See map below for Street Names. See Character Area Maps Section 1.4 to see area boundary and relationship to other character areas




## 2.2 Layout and History

2.2.1 This area is largely defined by intersecting roads, the A417 and Horcott Road / Coronation Street. Marston Maisey Lane and Common Lane[13] have been taken as the westward boundary. Buildings grew up around the river crossing, the 'fair ford' but the buildings seen today date from the C18th and follow the line of the Cirencester Road. To the north, buildings were built along the Welsh Way (near the Anglo-Saxon burial ground). To the south are fields separating Fairford and Horcott; these fields are vital in maintaining the separate identities of the two settlements. This gap (FNP9[14])[15] is equally important for both settlements and this has been reflected here in allocating Coln House playing field to Milton End

[13] Common Lane is a PROW. A map of all PROWs can be found at Section 12 of this document

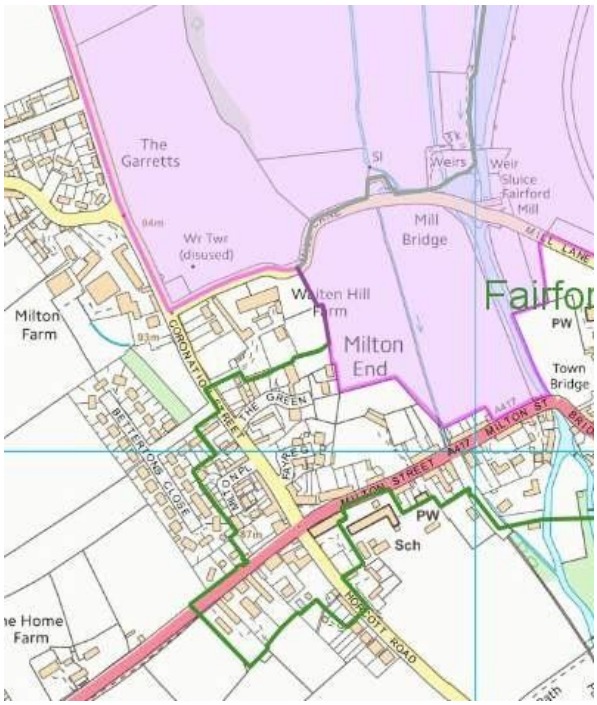
[14] The full justification for the Fairford-Horcott Local Gap FNP9 is to be found in the Fairford Neighbourhood Plan Evidence Base: Landscape and Local Green Space Study, Section 3

[15] FNP numbers = Fairford Neighbourhood Plan Policy Numbers. These are listed in Section 13, 'List of Land Use Policies'. Thus FNP9 refers to 'Protecting the Fairford – Horcott Local Gap'.

(Fairford) and Carters Ground/The Short Piece to Horcott (although the original parish boundary allocated these fields to Fairford).

2.2.2 However, historically, the centre of settlement here is the area around Milton Place, Milton End on the 1828 map (at 2.3.3). 'Milton' here is a contraction of 'Milltown'. The first enclosures in the area occurred here, in 1754 and the buildings were largely for agricultural workers. Bye's Farm (now Milton Farm) is marked on the 1754 enclosure map. Whilst Milton Place is a cul-de-sac - the only one in Fairford from this period, mid C18th (FNP12 No.10) - the buildings back onto what was once common land which the inhabitants would access from the gardens at the backs of their houses. Once one of the poorest areas of Fairford (see Swing Riots 1830), this was a self-sufficient community and in recent memory there was a wide variety of shops: grocer, greengrocer, butcher, blacksmith, confectioner, fish and chips, to the extent that some residents need not cross the river from one year to the next.

2.2.3 Recent years have seen the growth of edge-of-town developments expanding into surrounding countryside from the main intersecting roads, organised off cul-de-sacs. The most recent of these, by far the largest, is Pip's Field and Fairford Gate North and South but also includes Stoneways, off Welsh Way; all developed after 2012.




2.2.4 Milton End Conservation Area (bounded by green line) and Special Landscape Area (mauve)

2.2.5 Two significant archaeological finds have been made in this area. The first, made in the mid C19th, was of an Anglo-Saxon burial ground near West End Gardens. Various artefacts were discovered during quarrying and are now in the Ashmolean Museum. Finds include belt buckles, broaches, bowls etc. and the intact skeleton of 6 foot 6 inch tall man. A Teutonic glass vase (2.2.7) provides evidence of wide trading patterns in the period. Unfortunately, excavations were neither organised nor well-recorded.[16]

2.2.6 In more recent years, prior to gravel extraction, a hengiform barrow was discovered 250m south of The Burdocks. It is significant in that it is the only one found so far to the west. No other barrows are known to survive as earthworks on the Upper Thames gravels in Gloucestershire and Wiltshire and, as such, the barrow is very rare. Its significance is enhanced by its association with the nearby and perhaps contemporary Bronze Age ring ditch.

[16] A full account of the finds can be found in William Michael Wylie's 'Fairford Graves: A Record of Researches in and Anglo-Saxon Burial Place in Gloucestershire' (Oxford, 1852, John Henry Parker)

2.2.7

2.2.8

Teutonic glass vase and other artefacts found in Fairford Saxon Cemetery near West End Gardens

## 2.3 Topography

2.3.1 From Town Bridge to the Coronation Street junction the road has a slight uphill gradient. The land to the north of Milton Street and west of the river above Town Bridge rises from the river. The map below (2.3.3) gives a clear image of the lie of the land and some sense of the separation of the historic community from the main Fairford settlement on the other side of the river. An old map (2.3.4) also shows the drainage of springs in fields to the west, down to the A417, towards the electricity sub-station for Fairford.

2.3.2 This area to the West of Fairford is the Dudgrove Brook catchment, which does not drain directly into the river but runs southwards into Horcott Lakes. Overflow from the lakes runs beneath the runway of the air base, where it is managed with culverts and storage tanks, exiting near Gate 7. From here it runs down to join the River Coln downstream at Dudgrove.

2.3.3

OS 163 1828 Fairford detail © Cassini Publishing Ltd.

2.3.4

1834 Map (annotated 2020) showing spring flowing down to pond at base of www.cassinimaps.com Waiten Hill on corner of Marston Maisey Lane (once a watering spot for livestock)

## 2.4 Spaces

2.4.1 Leaving aside for the moment the most recent (post 2012) developments (see para. 2.4.8), the overall impression of this area is one of open space. There is rarely a building which does not have open space either in front of or behind it. Infilling over the years has seen housing extending further back into the landscape (Groves Place where once was Busby's Garage and workshops, Coln Gardens on the old market garden, Fayre Gardens on Fayre Court garden) but the rural landscape remains very much an integral feature of this area (FNP12 No.2). This has been reflected in the new development, Fairford Gate North with Milking Path Park, although less well elsewhere in the new developments. Even Milton Street, lined with housing as it is, provides a glimpse into the riverside landscape of Upper Green and boasts a small green at the Coronation Street junction.

2.4.2 On the river side of the area, to the north, are (FNP8) Upper[17] and Lower Green, the ancient 'greens' of the town where once drovers could have rested their animals in summer (this area was marshland and watermeadow) rising up to Gassons Field and open countryside. Mere Fields and Coln House Playing Fields provide an important gap, separating Milton End from Horcott (FNP9[18]). See section 6: Horcott

2.4.3 Lower and Upper Green in winter. Viewed from Mill Lane, near Mill Bridge

2.4.4 Photograph from 'Britain Above' 1928. All the fields, but one, to the west of Coronation Street have been developed within the last 90 years; those to the east are largely unchanged. Note the line of houses in the bottom left of the photograph on the bend in a track. This is West End Gardens; the track in front of the houses can clearly be seen, as can the allotments which belonged to the houses.

[17] Upper Green and Coln House Playing Field are proposed as a Local Green Spaces (together with Walnut Tree Field in 'Borough' section). For full details and arguments re. FNP8 Protecting Local Green Spaces, see Evidence Base: Landscape and Local Green Space Study, Section 2

2.4.5 To the south, on the river side, are Bull Island and a footpath to Horcott, passing between Coln House playing fields and the river bank, part of which the children of Coln House School (now closed) landscaped and maintained as a seating and picnicking area for locals and visitors.

2.4.6 Facing west and south of Milton Street the houses overlook fields separating Fairford from Horcott (see 6.6.5, 6.12.4) and open farmland lies to the north of the area.

2.4.7 Cul-de-sacs of all periods offer open, generally tarmacked spaces; these spaces have historically tended to be quite substantial but without pavements, a sense of openness being emphasised by generous front gardens, almost always bounded by Cotswold stone walls. However, cars parked on the roadside can be problematic (FNP12 No.11), particularly in Coronation Street, Milton Street and the entrance to Fairford Gate North, although in the case of Milton Street, they do serve to slow traffic before the Town Bridge. (The solution for new developments is reflected in FNP12 No.11)

2.4.8 The main change has been to the west of the area which has seen the construction of about 300 houses which has meant that those older buildings to the east now face modern developments, with the occasional remaining long view over towards Waiten Hill. The cul-de-sacs here, a significant feature of the layout, also create a feeling of enclosure whilst retaining a sense of space, emphasised by some front gardens, allotments and off-road parking spaces. Allotments were once a feature of the wide, drove road verges of the A417, Cirencester Road, all the way up to the top of Waiten Hill.

2.4.9 Milking Path Park in Fairford Gate North looking towards Waiten Hill (FNP12 Nos. 2,10)

## 2.5 Roads/Streets/Routes

2.5.1 The roads here are extremely varied, from the wider A417 (Milton Street), with most houses opening directly onto the pavement, no green verges or trees, to the narrow, single track lanes of Waterloo Lane and West End Gardens, both of which end in PROWs, one linking with Horcott, the other with the Welsh Way (FNP12 No. 10). These were, and still are, through routes for pedestrians. More recently cul-de-sacs are exactly that, dead ends, and serve simply to provide access for infill, small scale housing via shared surfaces.

2.5.2 Coronation Street is an important road as it is the main exit north and northwest from Fairford but the carriageway is narrower which causes particular, significant, parking/passing problems; cars parked on both sides of the road mean that there is, effectively, single lane traffic only. Along Milton Street parking on the north side of the road also affects the movement of traffic as the reduced width means that there is barely room for two cars to pass and only room for one lorry at a time. If there is no break in the line of parked cars, this often results in vehicles having to mount the pavement on the south side of the road in order to pass. Closer to the Town Bridge on-road parking is prohibited, but traffic can back up since the narrowing of the road at the bridge allows single file traffic only – and the approx. 90º bend in the road means that larger lorries always need the full width of the road and the full length of the bridge in order to make the turn.

2.5.3 Intersection of Milton Street and Horcott Road at Coln House School (1822, listed)

2.5.4 Waterloo Lane (late C18th, listed) looking south from Milton Street towards the footpath to Horcott

2.5.5 Groves Place cul-de-sac looking from Milton Street

2.5.6 Mill Lane looking west (FNP12 No.10)

2.5.7 The routes in this area are important both locally and in the district. The A417 was once a main route to London, further north the ancient Welsh Way was a traditional route for drovers moving animals from the West. There were routes along the Ridgeway to East Ilsley[19]; to Stow-on-the-Wold sheep market; some all the way to Smithfield, London. Fairford itself had large sheep sales at one time. Horcott Road / Coronation Street[20] links north and south: to the south is Horcott and the A419 beyond, to the north Quenington, Bibury and the Fosse Way.

2.5.8 Housing continues a short way along Horcott Road, to the south-east. The Virgills are noteworthy inasmuch as they were built with their backs to the road, probably for workers at The Retreat lunatic asylum, or for agricultural workers. In the mid C20th they were remodelled by Yells, a local builder, to face Horcott Road. The footpaths at this end of Horcott Road are sub-standard width and exist on one side only in places, which makes navigation difficult for wheelchair users.

2.5.9 Mill Lane provides access to Fairford over the Mill Bridge; this is very much a local route with limited visibility due to sharp corners, high banks and no pavement. In recent years a permissive foot/cycle path has been provided along the high edge of Gassons Field, to provide a safer route, particularly important with the increase in schoolchildren from the new developments.

[19] Animals would have been sold at sheep fairs in East Ilsley, Berkshire for fattening before they were sent to market in London.
[20] The name, 'Coronation Street', originally Milton End, commemorates the coronation of Edward V11 in 1902.

2.5.10 Running off Coronation Street and Welsh Way are a range of narrow tracks and access roads, the character of which reflect the history and purpose of each: farm entrances, access to housing, old farm tracks (West End Gardens, Common Lane), grass verges rather than pavements. Many of these paths provided routes to farms and cottages as well as links between drove roads (FNP12 No. 10).

2.5.11 Access road to Milton Farm

2.5.12 Wide entrance to The Green cul-de-sac

2.5.13 Recently there has been a great deal of new building: Stoneleigh, Fairford Gate and Stoneways. The layout of Fairford Gate North differs from the rest of the area in that the roads are all similar widths and unvarying materials arranged as one long snaking cul-de-sac with short side-arms, also cul-de-sacs. The development has maintained a central green space with a path which connects to a PROW at the base of Waiten Hill, and another into Betterton's Close, and then on into town. Fairford Gate South does include crescents (as well as cul-de-sacs) which alleviates some of the problems of navigation.

2.5.14 However, the layout here is not easy for visitors by car (especially strangers) to navigate as there is but a single entrance and exit point and several cul-de-sacs, which means that all cars must turn in the road at some point (there are turning places). It is also difficult for a stranger to distinguish one road from another. Cars parking on the narrow roads are becoming a significant problem (FNP12 No.11), particularly near the entrance to Fairford Gate North. Additionally, there is no link between Stoneleigh and Fairford Gate which it is understood some residents of Stoneleigh prefer for reasons of safety (children are more easily contained) and tranquillity but which is not typical of Fairford which has numerous old alleyways criss-crossing the town.

2.5.15 Betterton's Close (1960/70s, built on the site of an orchard) is another cul-de-sac which was designed to have no links to the surrounding houses but this development was smaller and its access road from Coronation Street is in the heart of Milton End. In contrast, the access roads to Stoneleigh and Fairford Gate are directly off the A417, a busy main road, so interaction between the various developments is more limited.

2.5.16 Layout of new developments

2.5.17 Access to Stoneleigh from A417 (Cirencester Road)

## 2.6 Green and Natural Features/Ecology

2.6.1 Milton End is, historically, an agricultural, rural community and this past is reflected in the nature of the green spaces in and around it. Milton Street has few green features but the Coronation Street / Cirencester Road crossroads are marked by a few trees and an attractive (if cluttered) small green. The old town boundary on the A417 towards Cirencester originally marked the beginning of the countryside and the road out of town was lined with hedges, trees, grass verges and mass plantings of daffodils in the spring. Many of these features remain but the town boundary has now moved westward as a result of new developments. In places Cotswold stone walls have replaced hedgerow though efforts have been made to retain hedgerows with existing mature trees, and there has been new tree planting although not in public spaces (FNP11).

2.6.2 However, fields, long gardens, allotments (on the corner of Mill Lane/Coronation Street) and paddocks surround and penetrate Milton End (FNP12 No.2). The Garretts overlook a wide-open field which slopes down towards the river, with wonderful wide views of the sky and the River Coln valley, the Mill, St Mary's Church, Fairford Park, and Horcott Hill beyond. West End Gardens face onto an old farm track with newer buildings opposite (built on old West End Garden allotments –see 1928 aerial photograph 2.4.4), whilst to the back the views are of open countryside; a stroll down an unmade road off Welsh Way will lead you to an ancient track (Common Lane) with views to Waiten Hill on one side and new housing on the other; walk down Coronation Street and the path passes a small paddock for horses – and on the opposite side of the road long gardens lead to a row of Cotswold stone cottages (FNP12 No.1).

2.6.3 Whilst there are a few hedgerows on public land in Milton End, they are used to demarcate garden spaces; the roadside, however, is generally bounded by stone walls (FNP12 Nos.4, 5). Verges which run alongside the road have few trees, except along Cirencester Road on the entry to Fairford. The treeline tends to be at a distance, across fields, along a pathway, in private gardens (FNP11).

2.6.4 The verges on either side of the road to Honeycombe Leaze are designated in the 'Conservation Road Verges' list, Ref. No. CRV101. Species to be found include: yellow-rattle (rhinanthus minor), wild liquorice (astragalus glycyphyllos) - abundant along the eastern verge amongst planted oaks - common broomrape (orobanche minor), pyramidal orchid (anacamptis pyramidalis), meadow crane's-bill (geranium pratense), greater knapweed (centaurea scabiosa), field scabious (knautia arvensis) and cowslip (primula veris).[21]

2.6.5 Common Lane is a lovely old drove road connecting Welsh Way (aka Blackford Road at this point) with the A417. The views across to Waiten Hill and the mature hedgerows are particularly valuable. Dog waste bins at either end of the path would be useful.

2.6.6 Common Lane looking south in the early springtime.

[21] 'Gloucestershire Conservation Road Verges Site Register' v1_3 2016. http://www.gloucestershire.gov.uk/extra/search?q=Grass+verge+cutting

2.6.7 Livestock grazing is a feature of the landscape, coming right into the centre of the town where cattle frequently graze in the Greens (Upper and Lower). This valley is a much visited and photographed part of Fairford. The area and fields along the Coln river valley leading to Quenington are in the Special Landscape Area.

2.6.8 The small riverside park created by Coln House School is well used and it is hoped the facility will continue to be maintained. Similarly, Coln House playing field[22] (see Horcott 6.6.4, 6.12.4 for information on Fairford-Horcott Local Gap FNP9) and the school gardens on the other side of the PROW are highly valued and should be retained in any future plans.

2.6.9 The mature trees along the A417 on the entrance into town from Cirencester are a crucial feature of this area.

2.6.10 Boundary of the last house in Fairford on Welsh Way. Further out of town stone walls are beginning to be replaced Wide grass verges (drove road) with hedgerow, wide grass verges typical of old drove roads, and significant drainage ditches (FNP11).

2.6.11 Original field hedgerow retained for new development on site leading out of town on A417.

2.6.12 Paddock running alongside Coronation Street looking north towards Milton Farm (FNP12 No. 2)

2.6.13 Stile into Gassons Field, running down towards the River Coln

[22] Coln House Playing Field is proposed as a Local Green Space. For full details and arguments re. FNP8 Protecting Local Green Spaces, see Evidence Base: Landscape and Local Green Space Study, Section 2

2.6.14 The Mill Pond from Mill Bridge

2.6.15 Waterford, 2 Groves Place overlooking River Coln before it divides at Bull Island (first in a 1990s terrace of 3 'buildings in a group' FNP12 No.1)

## 2.7 Landmarks

2.7.1 Gassons Field Water Tower on north-western edge of Fairford (see 'Spaces' photograph) defines the sense of openness and green space which is so much a feature of this area. It is a landmark building overlooking the town and a marker for the new path which has been built across the field. Within the Special Landscape Area.

2.7.2 Coln House (FNP8, FNP9) on the corner of the Milton Street and Horcott Road is a splendid early C19th listed building which stands on an awkward junction. Listed. Once a 'lunatic asylum', 'The Retreat' (as it once was) has lived up to its original name. 'Wings School' opened here in September 1944 to provide respite holidays for children from Europe in the immediate aftermath of WW2. In 1947 the buildings went up for sale and the site was sold to Gloucestershire County Council in 1948. Coln House School opened in 1950, closed in 2017. Within Conservation Area.

2.7.3 The Old Piggery Barn is a distinctive feature of the entrance to Fairford, clearly announcing the town's rural past and present. The large barn marks the agricultural, rural character of the town. It is thought that Yell's Yard and The Old Piggery may have had links with The Retreat (Coln House). Within Conservation Area.

2.7.4 Tudor House – late C16th early C17th, one of the oldest homes in Fairford and a prominent building in Milton Street. Listed. Within Conservation Area.

2.7.5 Mill Lane and the extensive network of Cotswold stone walls is part of the drove road system from the Welsh Way to Lechlade. It is thought that the height of the banks could have been due to the need to corral the cattle before crossing Mill Bridge. Within the Special Landscape Area.

2.7.6 The Oxpens. - although the actual buildings may not be old, as a site for keeping animals it dates back several centuries and was mentioned as Wormstalls in 17th century deeds. Within the Special Landscape Area.

2.7.7 The Marlborough Arms is prominent on the corner.

2.7.8 Milton Farm is an imposing house standing opposite the end of Mill Lane. The associated farm buildings, some of old Cotswold stone, are also prominent on the corner of Welsh Way.

2.7.9 The barns of Waiten Hill Farm on Mill Lane are clearly working buildings but their size alone makes them a landmark.

2.7.10 Fayre Court, a quite distinctive Arts and Crafts style house with links to the Titanic, overlooks Upper Green.

2.7.11 Waiten Hill, highly visible from the western edge of town and from the Special Landscape Area.

2.7.12 Mature trees along A417 on entrance into Fairford from Cirencester.

2.7.13 The Old Piggery Barn by the entrance to Yell's Yard

2.7.14 Tudor House detail (late C16th / early C17th - listed)

## 2.8 Buildings and Details

2.8.1 There are many listed buildings in this area which testify to its rich historic traditions. The history of dissenting voices and the commercial past of Milton End can be traced in various buildings: Fairford United Church on Milton Street with various significant monuments and tombs (former Baptist Chapel, listed and still very much in use), Hilary Cottage (Ebenezer Chapel – Particular Baptist), Old Chapel, Milton Place (Primitive Methodist Chapel) and flats neighbouring The Marlborough Pub (Salvation Army Hall, once Milton Hall). All the old shops (see Layout and History), pubs and other amenities (eg. 1887 school at Northville, Milton Street) have now been converted into private houses. Yell's Yard remained a functioning business space until recently (planning – Ref. 21/01041/FUL - is being sought for residential development), as do The Marlborough Pub and the Veterinary Surgery, all on Milton Street.

2.8.2 In the C19th the area expanded with a series of small-scale terraces for agricultural workers: Vines Row (1845), Dynevor Terrace (1860) and Dynevor Place (1865, built with red brick from the local brickworks). Larger houses are located in The Green and further into town; the listed Rose Cottage dates from C17th.

2.8.3 Fairford United Church, Milton Street (early C18th, listed)

2.8.4 Vines Row, 1.5 storey terrace (FNP12 No.1)

2.8.5 In the cul-de-sacs, the houses are set back from the road and look inwards, with well-planted front gardens, grass verges, few pavements and Cotswold stone boundary walls (FNP12 Nos. 4/5). This is in contrast to the older cottages of the 'main' roads where the buildings, in general, look onto the street. However, away from the crossroads (Waiten Farm Cottages, cottages north of the entrance to The Green), the houses tend to stand far back beyond long front gardens, once used to provide fresh food for the agricultural workers for whom they were built. Many of the long allotments of the West End Gardens cottages have been lost to modern housing of varying quality. More recent houses along Horcott Road follow this pattern with significant front gardens/parking areas.

2.8.6 One feature of a few large houses in this area (and in other parts of Fairford) is the way in which they turn sideways, gable end to the road eg. Ivy Villa, Hollyhock Cottage, Draycott, Cowley Cottage, all listed buildings. Waterloo Lane terrace of houses has a similar aspect. It is possible that these houses were built on double burgage plots; a building at 90º could be larger and extend more deeply into one of the plots and would leave the other plot to provide access and a garden.

2.8.7 Ivy Villa, Milton Street (late C18th, listed)

2.8.8 Draycott (early C19th, listed)

2.8.9 Throughout the C20th most of the housing expansion has come from infilling - one or two modern houses or short terraces. The C21st has seen a rapid expansion of housing provision in the larger developments to the west and north of the area.

2.8.10 The range of buildings in this area is wide including large 3-storey houses, agricultural barns large and small, stone and metal, bungalows and terraces. A key feature is the terrace. The earliest buildings along Milton Street are largely terraced but each home is individual. Heights and styles vary, with Cotswold stone the unifying feature; these are really 'buildings in groups'. However, moving out of the centre, the terracing is more organised and uniform, usually only 1.5 or 2 storeys high, and usually of 4 or so separate homes only. This pattern continued throughout the C20th with short terraces, single detached 2-storey houses and bungalows (FNP12 No.1).

2.8.11 To the west, along Marston Maisey Lane, are the large listed house and gardens: The Burdocks. A recent planning appeal stated that 'part of the significance of the listed building is its nature as a country house, which carries the implication of a location in the countryside.'[23] Once well separated from the town, the new Fairford Gate South development has resulted in these buildings losing their original sense of isolation from the town so, if the rural character of these buildings is to be retained, it is even more important that the remaining surrounding fields be preserved. The boundary of Fairford has now been pushed to the west along Cirencester Road (the A417).

[23] Appeal Decision APP/F1610/A/14/2213318, Land South of Cirencester Road, GL7 4BS, Para. 42

2.8.12 The new houses on the recent developments generally follow the Cotswold Design Code, incorporating dormer windows in nearly all the houses, using reconstituted Cotswold stone (natural stone on the main road frontage only). Unfortunately chimneys are fibreglass and non-functioning (FNP12 No.7). The houses tend to be sited more or less on the estate roads with small, enclosed gardens to the rear.

2.8.13 Materials used in Milton End are various, including Cotswold stone (ashlar and rubble), local red brick, yellow/brown bricks, reconstituted stone, stone, terracotta and cement roof tiles, slate.

2.8.14 Longlands: modern terrace of four houses off Welsh Way (FNP12 No.1)

2.8.15 Modern detached houses on A417, Cirencester Road, opposite Yell's Yard

2.8.16 A curiosity of the area is the covered alley leading from Coronation Street to Milton Place (below). The function of this construction, which boasts a window space and enclosed recess, is unknown (FNP12 No. 10).

2.8.17 Covered alley, Milton Place

2.8.18 Window in covered alley, Milton Place

## 2.9 Land Uses

2.9.1 This is largely a residential area but increasing numbers are working from home or are self-employed with home offices. Several enterprises used to work out of Yell's Yard (van hire, small businesses) but the future of this site is uncertain, see para.2.8.1. A veterinarians' surgery opens part time in Milton Street. There is now only a single pub, the Marlborough Arms, west of the river. Above all, Milton End sits at the heart of agricultural activity with working farmyards at both Waiten Hill and Milton Farm. Here housing meshes intricately with the farmland: fields separate houses, farm buildings are adjacent to residential developments, long views from homes over open countryside are common, farm machinery shares roads with cars, PROWs (BFAs 7,8,9,10,11,12) and tracks provide residents with direct connections into the natural world.

2.9.2 Western edge of town, showing Milton Farm 'gap'

2.9.3 Western edge of town, showing line of development.

2.9.4 Coln House School has closed after many years and its future use is uncertain but the small riverside park remains. The playing field provides a facility for town sports (FNP8).

## 2.10 Views

2.10.1 The view from Betterton's Close footpath across Milking Path Park to Waiten Hill.

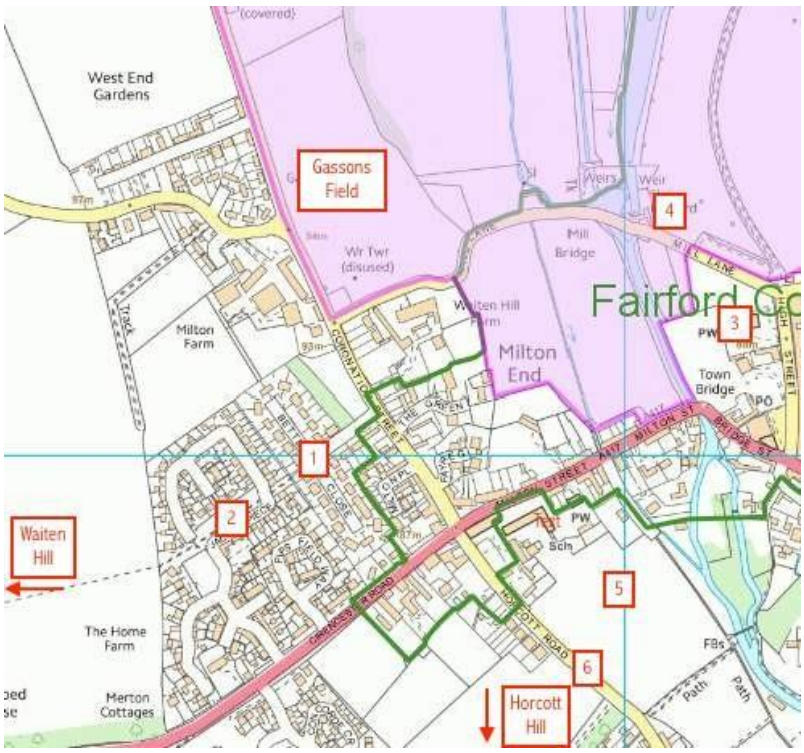
2.10.2 The view from Special Landscape Area through to Waiten Hill.

2.10.3 The views across Gassons Field to the Mill and St Mary's Church tower (below) over to Horcott Hill and into the Special Landscape Area.

2.10.4 Views over Coln House playing fields from Horcott Road towards St Mary's Church, the river and town centre beyond.

2.10.5
View west across to Waiten Hill from Coronation Street at intersection with Welsh Way, at edge of Special Landscape Area

2.10.6 View from Gassons Field to the Mill and St Mary's Church




2.10.7

'Views' references
NB NOT viewpoints but the general locations mentioned in 2.10

1. Bettertons Close
2. Milking Path Park
3. St Mary's Church
4. Fairford Mill
5. Coln House School Playing Field
6. Horcott Road

Special Landscape Area: mauve
Fairford Conservation Area boundary: green line

2.10.8

Milton End boasts the widest, most open views in Fairford, extending west over to Waiten Hills, south/south east to Horcott Hill and east across to the Special Landscape Area, St Mary's Church and the river bank.

## 2.11 Summary Table for Area 4. Milton End: from Town Bridge westwards to the edge of town

| Characteristic | Character Area Detail |
|---|---|
| Layout and Roads | The settlement here is largely gathered around 3 roads, the A417, Coronation Street and Welsh Way, with the A417 and Welsh Way forming the northern boundary. Much development is infill which has taken place over many years, off all roads in all directions, with the space between Welsh Way and A417 being most densely filled. Car parking is a significant problem along Milton and Coronation Streets. FNP 6 Roads/lanes/tracks are all features of the area. FNP12 No. 10, 11, 12 |
| Land uses | Residential, agricultural, equestrian, self-employed working from homes, hospitality, veterinary services, small businesses, education, leisure, electricity sub-station. |
| Building scale, appearance | Some large 3-storey listed buildings closer in towards the river as well as |

| | |
|---|---|
| | large agricultural barns and a high water tower. Along Milton and Coronation streets the houses are terraced although some are detached and semi-detached. Towards the edges of the settlement though the pattern has been one of lower level short terraces and 'buildings in groups', bungalows, detached houses of 1.5 or 2-storeys. FNP12 No. 1 |
| Green features | Grass verges, gardens with trees, fields and pastureland, town greens (Upper and Lower Green + Coronation Street Green), River Coln, mill pond. Hedges as well as stone walls (FNP12 No.5) |
| Open space | River walks (Pitham Brook Path), PROWs and historic tracks through fields and greens, gardens, playing field, riverside park. Coln House School playing field plays a crucial role in preventing the coalescence of Fairford and Horcott and forms part of the Fairford-Horcott Local Gap (FNP9). The Mere fields also have a crucial role in maintaining this gap – see Horcott 6.6.5, 6.12.4[24]. |
| Landmarks | Gassons Field Water Tower, Coln House School, The Old Piggery Barn, Tudor House |

## 2.12 Summary Comments

2.12.1 This area of Fairford has a character all of its own, with eclectic architecture, various sub-areas and a fascinating mix of styles. Much of this quality must arise from its history as a semi-autonomous part of the town, on the 'other' side of the river with a rebellious, dissenting spirit. Although most of the commercial activity of Milton End is no more, it is possible to see shadows of the earlier uses of many of the buildings. The cul-de-sac small developments are also all very different, ranging from the solid, larger houses of local businessmen and landowners, to the charming intimacy of smaller cottages.

2.12.2 In the same way, the PROWs themselves have an independent spirit: the track from West End Gardens continues to Welsh Way through gardens and old allotments; Milking Path and Common Lane split the new developments of Fairford Gate and Stoneways respectively, ensuring that the old routes remain open.

2.12.3 A distinctive characteristic of the area is the central position of two working farms with yards and grounds for storing machinery: agricultural activities come right into the heart of Milton End. The large number of houses which have recently been built has shifted the centre of gravity of the settlement to the west and also emphasised the residential nature of the area. Nonetheless, the atmosphere of a working, rural community is maintained.

2.12.4 However, the openness and the sense of a rural community has been weakened by the rate of development over recent years, and infilling has also had an effect. It is hoped that the open spaces which remain both within and at the edge of this area can be protected, most particularly around The Burdocks and in the proposed Fairford-Horcott Local Gap.

2.12.5 Overhead service cables and communication boxes are unattractive and detract from the street scene – a particular concern within a Conservation Area eg. the cluttered Green at the Coronation Street/Milton Street junction (FNP12 P12.2)

2.12.6 One major concern is the uncertainty over the future of Coln House and Yells Yard. Their prominent positions and the extent of their perimeters mean that any future plans should be carefully scrutinised and be sensitive to their history. The physical dominance of Coln House at the important crossroads must be a key factor in any decision-making. It should be noted that the site of the old school extends to both sides of Horcott Road and includes gardens, swimming pool and other related buildings. It should also be noted that the playing field forms an important component of the Fairford-Horcott

[24] The full justification for the Fairford-Horcott Local Gap FNP9 is to be found in the Fairford Neighbourhood Plan Evidence Base: Landscape and Local Green Space Study, Section 3

Local Gap (FNP9 - see Horcott 6.6.4, 6.12.4). The field appears in this section (rather than Horcott) due to the link with Coln House.

2.12.7 Additionally, it is hoped that the positioning of a red dog waste bin, in the centre of the footpath between Betterton's Close and Fairford Gate could be altered to allow the attractive view across to Waiten Hill to be enjoyed without interruption.

2.12.8 Fake chimney – Stoneleigh, Cirencester Road flue has had to be added to serve the same function as a chimney (FNP12 No. 7).

2.12.9 Overhead services, poles and 3 communication boxes degrade the prospect of listed buildings in a Conservation Area at the entrance to an historic town. These overhead service wires and poles continue along the length of Milton Street and elsewhere in the town (FNP12 P12.2).

## 2.13 Milton End Listed Buildings, Scheduled Monuments and other selected[25] HER records[26]

| Address | Date | HER reference number/s |
|---|---|---|
| Flemington House, Milton Street | Early C18th | 18107 |
| Holmdene, Milton Street (Veterinary Surgery) | Late C18th | 18109 |
| Tinker's Cottage, Milton Street (formerly 2 cottages) | 1785 | 18110 |
| 2 & 3 Waterloo Lane (formerly 4 cottages) | Late C18th | 18119 |
| 1,2 & 3 Milton Street | Late C17th / early and mid C18th | 18097 |
| Hampton Cottage, Milton Street | Late C18th / early C19th | 18099 |
| Tudor House, Milton Street | Late C16th / early C17th | 18101 |
| Tudor Cottage, Milton Street | Late C18th | 18102 |
| Anerley, Milton Street | Late C18th | 18104 |
| Milton House, Milton Street | Early C18th | 18098 |
| Draycott, Milton Street | Early C19th | 18100 |
| Northville, Milton Street | Early C19th | 18108 |
| Fairford United Church, Milton Street | 1853 | 18106 |

[25] For this and the other areas, the list of HER records is substantial, far too many to list all here. What is listed here and elsewhere in this document is, therefore, a selection only.

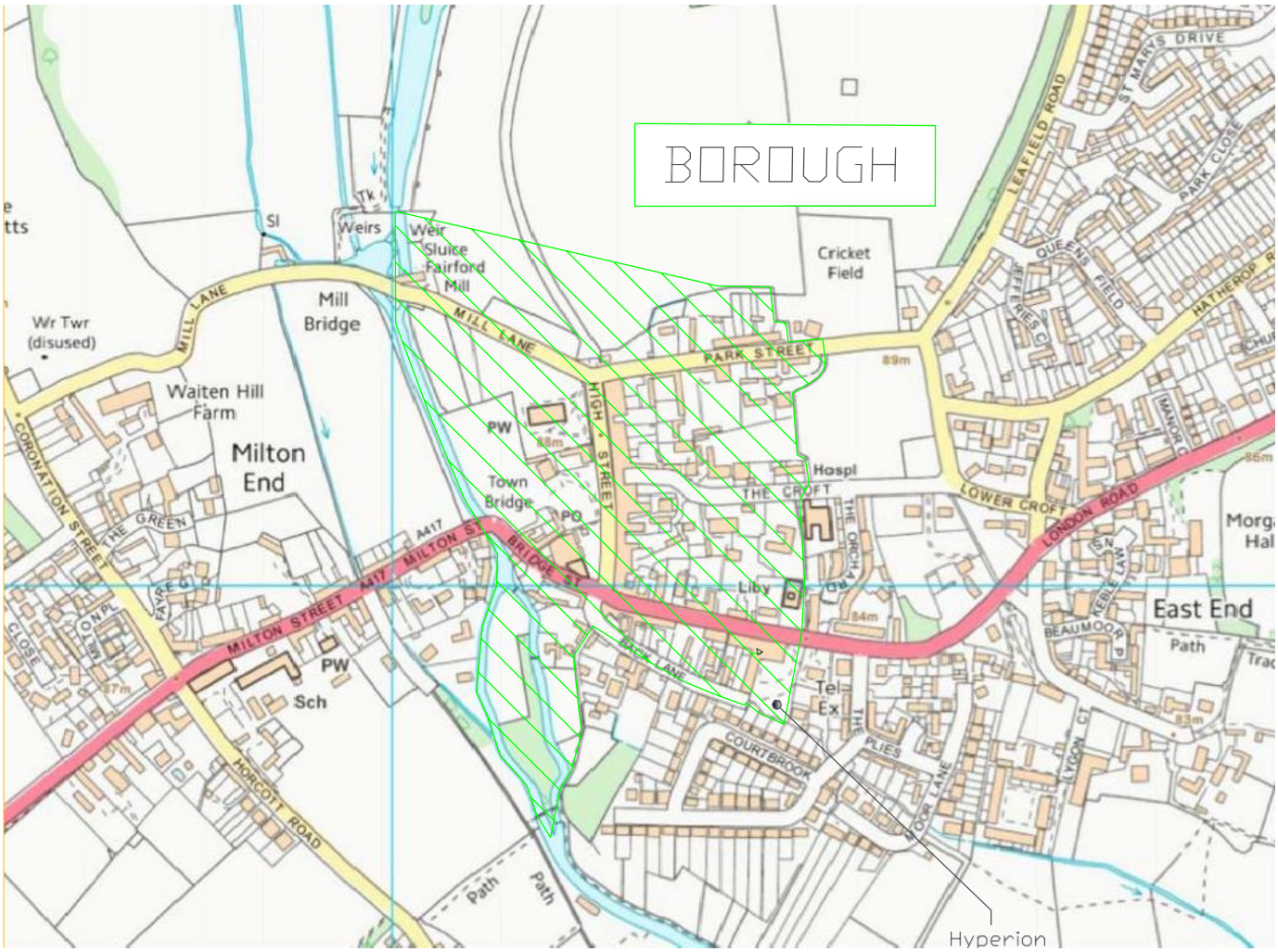
[26] This list has been created using the Historic England list of listed buildings: https://historicengland.org.uk/listing/the-list/ and the Gloucestershire County Council Historic Environment Record http://www.heritagegateway.org.uk/Gateway/Results_Application.aspx?resourceID=108. For definitive details on individual buildings, please refer to the Historic England and the Gloucestershire Heritage Environment Record information.

| | | |
|---|---|---|
| Various tombs and monuments | Mid C18th to early C19th | 43929 -> 43935 |
| Coln House School, Milton Street | 1822 | 18103, 20521 |
| The Manse, Milton Street | Late C18th / early C19th | 18105 |
| Ivy Villa, Cirencester Road | Late C18th | 18124 |
| Cowley Cottage, Coronation Street | Late C17th / early C18th | 18126 |
| Hollyhock Cottage, Coronation Street | Early C18th | 18129 |
| 1, Coronation Street | Late C18th | 18125 |
| 2,3 & 4 Coronation Street | C18th | 18128 |
| The Old Tracey, Coronation Street | 1607 / later C17th | 18127 |
| 1 Milton Place | Early / mid C18th | 18096 |
| Rose Cottage, The Green | Late C17th | 18139 |
| Burdocks, Marston Maisey Lane | 1911 | 18095 |
| The Lodge, Burdocks, Marston Maisey Lane | c. 1911 | |
| Pavilion to SE of Burdocks, Marston Maisey Lane | c. 1911 | 43926 |
| Gate piers and quadrant entrance wall to Burdocks, Marston Maisey Lane | | |
| Hengiform barrow and associated ring ditch – Scheduled monument. | Bronze Age (c.2000-700 BCE) | 3203 |
| Fairford Saxon Cemetery – Scheduled monument | | 6998, 280 and 281 |
| Land at Waiten Hill Farm – not listed | | 47327 |
| Pips Field (now Stoneleigh) – not listed | | 44843 |
| Fairford Gate South – not listed | | 45955, 45956 |
| Primitive Methodist Chapel, Milton Place – not listed | | 20581 |
| Site of The Marlborough Arms – not listed | | 20585 |
| South of Milton End | | 3056 |
| Fairford Gate North | | 42783, 42786 (now 40957) |

2.13.1 Mill Pond, The Mill and the River Coln (panoramic view, some distortion)

## 3.1 Borough: from Town Bridge eastwards, town centre

See map below for Street Names. See Character Area Maps Section 4.1 to see area boundary and relationship to other character areas.[27]




## 3.2 Layout and History

3.2.1 'Borough'[28] refers to the centre of Fairford, the core of which has developed over centuries but is in large part the product of the C18th. This is a Georgian town centre with a famous C15th church, and Fairford Park which, uniquely, creates green views at the northern end of the High Street (FNP12 No.2).

3.2.2 There has been a Town Bridge (listed) since the C12th, but the present bridge dates from the C18th and it is this bridge and the ford, which is the raison d'etre of the town as it carried a main Cirencester–London road, and was a stage stop for Cirencester/London and Bristol/Oxford coaches. It is this road which forms the southern base of the Market Place. The second bridge across the river, Mill Bridge, carries a narrow lane (Mill Lane) which leads into Park Street, and these two roads (Bridge Street/London Street and Mill Lane/Park Street) and the houses which line them, largely enclose the residential Borough area with Fairford Park off to the north. To the west is the river and to the east is Walnut Tree field[29]. A demarcating footpath passes Fairford Cottage Hospital and the library. Across London Street (A417) a further alleyway

[27] See map at 1.4.2 for Conservation Area Boundary

[28] Name taken from C19th tithing map

[29] Walnut Tree Field is proposed as a Local Green Space. The full justification for Protecting Local Green Spaces FNP8 is to be found in the Fairford Neighbourhood Plan Evidence Base: Landscape and Local Green Space Study, Section 2

leads through to Back Lane. The area includes Hyperion House (once the vicarage, now a care home). Back Lane marks the southern boundary of the Conservation Area here; thus the whole of Borough is within the Conservation Area.

## 3.3 Topography

3.3.1 The land rises gently away from the River Coln and away from the A417, levelling out at Park Street and the Walnut Tree Field before continuing to rise to the north.

## 3.4 Spaces

3.4.1 The heart of Fairford is the Market Place. It is an attractive, unassuming open space, enclosed by buildings dating from the C16th to the west and C18th to the east and south. The curved line of the eastern boundary is particularly pleasing although the bend is visually interrupted by car parking and traffic. The High Street, which runs off the Market Place, continues the line of buildings to the east, but the space opposite opens out with St Mary's Church and Fairford Park. This area is quite distinctive in the fine quality of the open space which intrudes into the heart of the town. (FNP12 No. 2) The churchyard and western burial ground run right down to the watermeadows, and parkland runs off to the north. The area between The Croft and London Street is a quiet 'oasis' of gardens surrounded by a number of listed buildings.

3.4.2 Market Place outside The Bull Hotel and Coffee Post

3.4.3 High Street and St Mary's Church looking back from Fairford Park (FNP12 No. 2)

3.4.4 This sense of openness continues along Park Street, a wide, quiet road, and thence to the edge of another open space, Walnut Tree Field. Further south, The Croft is yet another wide, this time, unusually, tree-lined road which opens out generously at the back of High Street properties. It is thought that this road once formed part of the main route through the town (see Roads/Streets/Routes below) and this could be an explanation for its width. The importance of the road is emphasised by the many beautiful, well-established lime trees.

3.4.5 However, along the A417, the space is far more constrained as the road narrows, buildings dominate and entrances open straight out onto the pavement; the narrow frontages and long gardens give evidence of the burgage plots of the medieval town. Back Lane too is constricted by high walls but the few long gardens help to mitigate the sense of enclosure.

3.4.6 With the exception of The Croft, there are few trees or green features in the centre of town in the public spaces. Nearly all the green features derive from private gardens/churchyard/parkland. (FNP11 Valuing Hedgerows and Trees)

## 3.5 Roads/Streets/Routes

3.5.1 By far the busiest and most problematic road in this area is the A417 (Bridge Street/London Street). Town Bridge is narrow and ends in an approx. 90º bend to the right so that longer vehicles (any lorry) take the whole width of the carriageway to make the turn and oncoming vehicles have to stop some way back in order to allow the manoeuvre. It is believed that the road once carried on in a straight line from the bridge, joining up with The Croft and thence out to the London Road at what is now The Railway Inn (see 3.5.2). However, the construction of a 'new house' by the then Lord of the Manor, John Tame, seems to have forced the turn in the road.

3.5.2 1928 aerial map of Fairford[30]. The pink arrow indicates the possible original line of the road beyond Town Bridge (believed to have been altered in the early C15th).

3.5.3 Gas Lane – shared surface

3.5.4 Towards the Market Place, Bridge Street narrows to such an extent that at one point there is no room for any pavement at all. On either side of this road are listed buildings, one of which has an overhanging first storey. The crossing, with no dropped kerbs, is also dangerous for pedestrians, especially those with impaired hearing or sight.[31]

3.5.5 The river crossing at Mill Bridge is also narrow (single lane only); the bridge here is less substantial than Town Bridge with locally forged iron railings dated 1868. The pure curve of these was altered when the road level was raised to avoid flooding. Mill Lane is narrow, high sided and without pavements in places. Leading off the lane are steps up into the churchyard. This is an old country road and unsuitable for heavy vehicles.

3.5.6 Beyond Mill Lane is Park Street, pleasant and wide, which forms part of a safe route to school, as does The Croft. The one-way entrance to The Croft from the High Street adds to the quietness and safety of this road. Further south, running parallel to the A417, Back Lane and Gas Lane are, effectively, shared surfaces which works well with vehicles, pedestrians and cyclists all using the same space. A section of Back Lane is extremely narrow with parked cars often making passing difficult (FNP12 No.11).

3.5.7 Although cul-de-sacs for cars, Back Lane and Gas Lane are useful back routes for cyclists and pedestrians, through to London Street, Courtbrook and Horcott via alleyways, PROWs and wider access points protected by bollards.

3.5.8 The car park at the top of the High Street in Fairford Park is well located and beautifully screened so that it does not interrupt or affect any views of the park or the church.

[30] Reference EPW022422 Britain from Above 1928

[31] See FNP6 Managing Traffic in the Town for full details concerning problems with the A417 (Bridge Street and London Street) at this point.

3.5.9 A feature of this area are the alleyways and PROWs which form a network between the roads: from High Street to The Croft, from The Croft to London Street, from London Street to Back Lane. In addition alleys create access to houses which have been built behind the main line of construction eg. Dorset Cottage, Market Place Mews[32]; alleys lead to back gardens and provide safe routes such as the one from the congested Bridge Street to the Market Place. Walnut Tree Field also provides a link from Park Street to The Croft. Another notable feature is the way in which buildings extend over alleyways. (FNP12 No.10)

3.5.10 Alleyway from Bridge Street to Market Place

3.5.11 Alley from Park Street terrace to the private gardens behind

3.5.12 Route from High Street to The Croft

## 3.6 Green and Natural Features/Ecology

3.6.1 The churchyard and watermeadows running down to the river are rich in wildlife. A favourite view of the town is from the far side of the river, looking back towards the Mill and Church; from here the extent of the watermeadows, the graveyard and the gardens of Fairford House can clearly be seen. The River Coln is noted for its trout fishing and the Mill Pond and cascades are valuable habitats.

3.6.2 Fairford Park, taken from the entrance at the top of the High Street

3.6.3 The Mill allotments looking across the river to The Greens

[32] These houses have probably been built on former burgage plots.

3.6.4 Fairford Park, at the top of the High Street, once formed a part of the park and gardens of a large house built in the C17th, demolished in 1955 to make way for what is now Farmor's School. The Park driveway also serves the Ernest Cook Trust Estate (ECT) offices and various other ECT buildings, most of which were once part of the estate of the original Fairford Park (now owned by ECT). The trees and open parkland here are largely inaccessible to residents but they are visible from the town and the ECT permissive footpath, Pitham Brook, which runs along the opposite banks and fields of the river.

3.6.5 It should be noted that all these green spaces are on private land; the public space of Market Place and High Street are notable for the absence of any green features beyond tub planters (FNP11 Valuing Hedgerows and Trees).

3.6.6 Bull Island is occasionally used for large events run by The Bull Hotel but much of the area is untended and is home to kingfishers, muntjac and roe deer, heron, swans, coots, ducks of many species. Otters and water voles have also been seen downstream of this area. The island gardens, together with the gardens of (now) Challis Mead Cottage were once productive areas supplying fresh produce to the hotel.

The Mill, Mill Bridge, the millpond and St Mary's Church

## 3.7 Landmarks

3.7.1 St Mary's Church, (late C15th Grade 1 listed) with exceptional stained glass windows, the only complete set still in existence in a parish church in England. 5 stars in Simon Jenkins' highly regarded 'England's Thousand Best Churches'. The church sits prominently at the corner of Mill Lane and the High Street, surrounded by its ancient graveyard.

3.7.2 The Mill Bridge and millpond

3.7.3 The Mill – the subject of the iconic view of Fairford which includes the River Coln and St Mary's Church.

3.7.4 The Dovecote – a listed building, reputed to be medieval, possibly C16th.

3.7.5 Market Place and High Street, including White Hart Court (from C15th, thought to have been built as a hostel for the stonemasons building the new church).

3.7.6 Town Bridge (listed)

## 3.8 Buildings and Details

3.8.1 This is the historic core of Fairford, all within the Conservation Area, and many of the buildings are listed. Most prominent are those in the High Street and Market Place. Much rebuilding occurred during the C18th with the result that the majority of houses which run along the eastern side of the High Street and Market Place are Georgian; the Bank (1901, Lloyds, recently closed, now a charity shop) and the old Magistrate's Court (1860) are notable exceptions. Many buildings are 3 or even 3.5 storeys and have been used for retail in the past but have been converted into residential homes today. The building in the High Street, opposite The Lodge on Park Street, once housed an old Dame School.

3.8.2 The fabric of most of the buildings to the west is much older. The Bull Hotel (now including the old George Inn) dates from the late C16th. White Hart Court (C15th, fabric dates mostly from C17th and C18th, listed) is thought to have been built as a hostel for the stonemasons building the new St Mary's Church. The Church is a Grade 1 listed building, which sits prominently at the corner of Mill Lane and the High Street, surrounded by its ancient graveyard and many listed tombstones[33]. Fairford House (mid C18th, listed) is notable by its absence; the grounds, iron gates, driveway, trees and stone boundary wall are all visible and are significant features of the street scene, but the house itself can only partially be seen from the far side of the river. Even more unusually for a house in such a key position, is the way in which the building itself turns its back on the town, facing the river instead.

3.8.3 Further to the east along London Street many of the buildings in a long terrace, are also C18th. One of them has what is possibly a C14th doorway. To the south, again, are many listed buildings ranging from C17th to C19th some of which have gardens leading out onto Back Lane and the boundary of the Conservation Area. Many of the units in the terrace are still used for retail but several commercial premises have been lost to residential conversions. Many gardens and yards are therefore functional spaces housing storage sheds, offices, workshops as well as car parking space; where this latter is not available cars are often parked on the lane itself which can result in difficulties for passing vehicles (FNP12 No.11).

3.8.4 White Hart Court, The Bull Hotel (this end previously The George Inn) and Coffee Post (all listed)

3.8.5 Tudor Cottage, London Street, doorway probably C14th (listed)

3.8.6 Running off the High Street is The Croft, once an area used to pasture animals, enclosed in 1770. Here are several C18th and C19th listed buildings and evidence of another earlier religious community: a Congregational Chapel and day school (1856-63). Also in The Croft was a school at Linden House. The terraced building arrangement of the High

[33] Sir John Betjeman (Poet Laureate) chose the lower half of the west window of St Mary's Church, Fairford as his luxury on Desert Island Discs in 1954.

Street continues for a short stretch (though at a lower height) into Croft Lane, and then recurs just before the Walnut Tree field in Croft Terrace (FNP12 No.1).

3.8.7 Evidence of the old network of gas lighting is still visible.

3.8.8 Croft Lane, lower level terrace leading to The Croft from High Street

3.8.9 Remaining doorway of the Congregational Chapel in the Croft, demolished 1965/1966

3.8.10 Larger, detached houses are also a feature of The Croft including Linden House and Croft House (late C18th, listed).

3.8.11 Terraced group of buildings, Park Street. The old cottage hospital is at the far end of the run seen here. The entrance near the blue car is an 'alleyway'. Note the absence of doors giving onto Park Street.

3.8.12 Entrance to Croft House (late C18th, listed)

3.8.13 Further north, Park Street (Calcot Street until end C19th), runs, as its name suggests, along the boundary of Fairford Park. The Lodge to the park (listed, early C19th) still stands at its entrance. Further east, once again, the pattern of buildings groups into 1, 1.5 and 2 storey terraces recurs, many of them listed, dating from C18th. (FNP12 No. 1). The highest terrace section was the old cottage hospital for Fairford, replaced with a new building in The Croft in 1887. All

along this terrace are in-built 'alleyways', leading to the rears of the buildings and their main entrances[34] (see photograph 3.5.11).

3.8.14 The rural traditions of this area are reflected in Park Farm House and, nearby, the most notable feature of this area: the dovecote (possibly C16th, listed, see cover photograph). In this area all the structures which had agricultural uses or were once stables (excluding the dovecote), coach houses etc. have been converted, mostly to residential uses.

3.8.15 The materials used here are all Cotswold stone and slate. The stone is the light, cream-coloured stone of the south Cotswolds (FNP12 No. 3). Windows and doors are, of course, generally Georgian but other styles are present eg. Gothic. Decorative features are also made of Cotswold stone and many have religious or stylistic links to St Mary's Church. Names/titles are sometimes carved out of the stone and a Dutch gable end (see 8.3.4) is a feature which can be seen from The Croft.

3.8.16 Park Lodge, Park Street (listed, early C19th)

3.8.17 Magistrates' Court, High Street (mid C19th, listed)

3.8.18 Borough is also the centre of many community activities with Fairford Community Centre (listed, early C18th), Palmer Hall and the library. The recently renovated Fairford Community Centre houses Fairford Town Council, the Parish Office of St Mary's Church, other offices and meeting rooms. Palmer Hall (1936) is a larger space with a fine Australian jarrah floor which was a gift of one-time resident at Fairford Park, Colonel Palmer of Huntley and Palmers biscuits, on land given by Arkells.

## 3.9 Land Uses

3.9.1 Religious, retail, hospitality, car parking, leisure, gardens, fishing, community events/organisation, financial, small business, catering, educational, allotments.

## 3.10 Views

3.10.1 The Mill and the view over towards St Mary's Church – the most frequently used image for Fairford – and vice versa, the views from St Mary's Churchyard back across the River Coln.

3.10.2 Views up and downstream of the River Coln from Town Bridge and Mill Bridge. In the past, town river races have been held between these 2 bridges eg. Jubilee celebrations.

3.10.3 Views into Fairford Park from High Street and Pitham Brook walk and Walnut Tree Field.

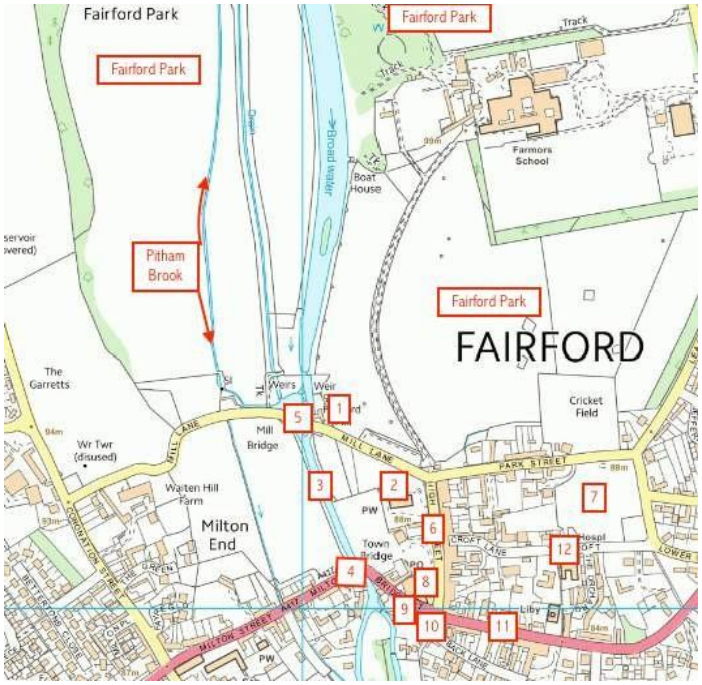
[34] It is thought that these buildings were once homes for Fairford Park staff and thus the main entrances would have provided quick access to Fairford Park House and gardens.

3.10.4 Market Place and High Street including White Hart Court.

3.10.5 Views from The Croft back towards the High Street as well as along the length of The Croft.

3.10.6 Along London Street from Back Lane junction.

3.10.7 Views of St. Mary's Church from the High Street.




3.10.8

'Views' references
NB NOT viewpoints but the general locations mentioned in 3.10

1. Fairford Mill
2. St Mary's Church
3. River Coln
4. Town Bridge
5. Mill Bridge
6. High Street
7. Walnut Tree Field
8. Market Place
9. White Hart Court
10. Back Lane
11. London Street
12. The Croft

## 3.11 Summary Table for Area 3: Borough

| Characteristic | Character Area Detail |
|---|---|
| Layout and Roads | The main A417 runs from Town Bridge to the south of the Market Place which is the centre of this area. The wide High Street links the Market Place to Park Street. Parallel roads run from Mill Bridge along Park Street, through The Croft and along Back Lane. A network of alleyways connects all sections of this area. (FNP12 No. 10) |
| Land uses | Residential, self-employed working from homes, hospitality, catering, administrative, small businesses, education, retail, religious, community sport/play, fishing, public lavatories. |
| Building scale, appearance | The historic heart of Fairford, largely Georgian. In the centre buildings as high as 3.5 storeys (Colston House) but more usually 3 or 2.5 often with characteristic dormers. Beyond this central area buildings are lower, generally 2 storeys with dormers and arranged into terraces (FNP12 No. 1). Materials: Cotswold stone and slate. Other styles include Gothic, various roof styles including Dutch gable. Historic church. |
| Green features | Grass verges, gardens with trees, parkland, churchyards. Hedges as well as stone walls (FNP12 No.5). Small park in front of library. |
| Open space | Wide public space of Market Place and High Street, much used for car parking. Notably lacking in trees in the public spaces; few hedges (FNP11). |

| | |
|---|---|
| | Green features create feeling of openness at the northern end of the Market Place. At the southern end of the Market Place, however, the road narrows, the traffic worsens. |
| Landmarks | St Mary's Church. The Mill. The Dovecote. Market Place and High Street including White Hart Court. River Coln. Town Bridge and Mill Bridge. |

## 3.12 Summary Comments

3.12.1 This is, on every level, a valuable and historic area. St Mary's Church is outstanding and is a source of much tourism. The Market Place is the venue for a weekly market and many community events. The groups of houses in a terrace are a common feature throughout Fairford, but here the range is seen at its most evident, with imposing 3 storeyed buildings in the centre moving out to 2 storeyed cottages (FNP12 No.1). One or two houses are of more recent (C20th) design.

3.12.2 The main issue for this area is heavy traffic: the A417 is unsuitable for HGVs at this point and it would be desirable to find some way of improving the situation for pedestrians crossing the A417 here whilst maintaining a rural, market town character. In addition, lack of parking space is problematic. A car park at the top of the High Street has helped the situation but not solved it.

3.12.3 Out-of-character flat roof on concrete extension at rear of London Street, viewed from Back Lane (FNP12 No. 9)

3.12.4 Fairford Community Centre, High Street (1738, listed) originally a boys' school, viewed from St Mary's Churchyard. The rear extension was added in 1815) to allow for the admission of girls. The 2 schools were run quite separately until 1922

## 3.13 Borough Listed Buildings and other selected HER records[35]

| Address | Date | HER Reference number/s |
|---|---|---|
| Mill House, Mill Lane | Early/mid C17th, extended 1827, altered mid C19th | 3205 |
| Mill Bridge (north of Mill House), Fairford Park | Late C18th | 18138 |
| Church of St Mary, High Street – Grade 1 Listed | Early/late C15th | 3113 |
| Fairford War Memorial | 1919 | 42483 |

[35] This list has been created using the Historic England list of listed buildings: https://historicengland.org.uk/listing/the-list/ and the Gloucestershire County Council Historic Environment Record http://www.heritagegateway.org.uk/Gateway/Results_Application.aspx?resourceID=108. For definitive details on individual buildings, please refer to the Historic England and the Gloucestershire Heritage Environment Record information.

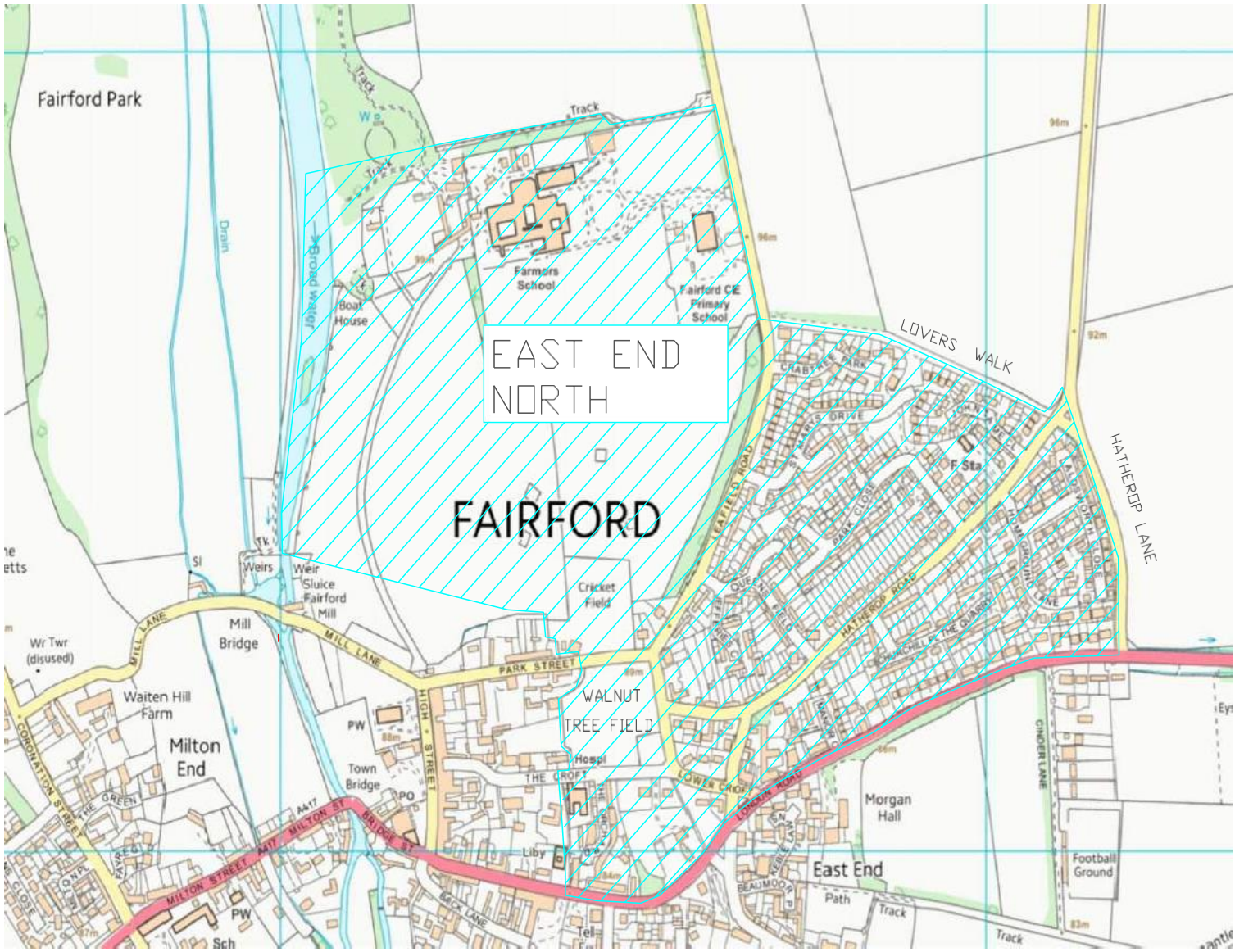
| | | |
|---|---|---|
| Various tombs and monuments in St Mary's churchyard | Various | 43897, 43901 -> 43908, 43910, 43912, 43914 -> 43921 |
| Fairford Community Centre | 1738, enlarged to rear C19th | 22103, 42590 -> 42594, 18140 |
| 10 High Street (Kim Sutton Gallery) | Early C18th | 18145 |
| 11 High Street | Mid C18th | 18146 |
| 4 High Street | Mid C18th | 18142 |
| Montague House, High Street | Mid/late C18th | 18143 |
| 1 High Street | Early/mid C18th | 18141 |
| Manchester House, High Street | Early C17th, raised C18th, shop front C20th | 18147 |
| Former coach house to Manchester House, High Street | Late C18th | 18136 |
| Lloyds Bank and Bank House, High Street | 1901 | 18148 |
| Police Station and former Magistrates' Court, High Street | 1860 | 18144 |
| 1 Market Place (Mr Ernest) | Mid/late C18th | 18084 |
| 2 Market Place | Mid C18th | 18085 |
| 4 Market Place | Early C18th | 18088 |
| Colston House, Market Place | Mid/late C18th | 18090 |
| Fairford House and balustrade to the front, Market Place | Mid C18th | 20580, 36242, 18092 |
| Bull Hotel, Market Place | Core late C16th, enlarged early C18th, then late C18th | 18093 |
| Co-operative Food, Market Place | Early/mid C18th | 18087 |
| Acacia House, Gloucester House, Market Place | Early C18th | 18091 |
| The Chanting House, Market Place | Late C15th / early C16th | 18094 |
| Laverton House, Market Place | Late C17th, raised and extended C18th | 18089 |
| 3 and 3B Market Place | Early 19th | 18086 (typo in record, 36 not 3B) |
| Dovecote in former Park Farm Yard, Park Street | C16th possibly, reputedly medieval | 2476 Monument No. 329764 |
| 1 Park Street (former lodge to Fairford Park) | Early C19th | 18114 |
| 4 - 7 Park Street | Mid C18th | 18115 |
| 16 Park Street | 1905 | 18116 |
| 12-15 Park Street | Mid/late C18th | 18117 |
| London House, including 3 London Street | Late C18th | 18150 |
| The White House, London Street | Late C18th | 18152 |
| Warren House, London Street | C18th core, refaced north gable end C19th | 18079 |
| 25 London Street | Mid C18th | 18082 |
| 26 London Street | Early/mid C18th | 18081 |
| 34 London Street | Early/mid C18th | 18078 |
| The White Cottage, High Street | Late C18th / early C19th | 18153 |
| 1 London Street (Colisseo) | Late C18th early C19th | 18076 |
| Terrance House and Hughendon House, London Street | Late C19th probably refronting older fabric | 18077 (typo in the record 'Terrace' |

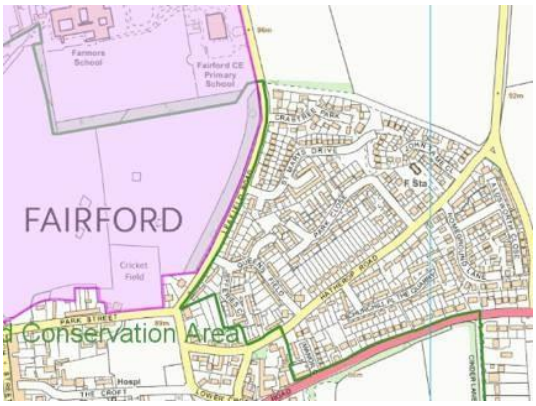
| | | | |
|---|---|---|---|
| | | | rather than 'Terrance'). 18122 (Post Office south of London Road) |
| 27 London Street | | Early/mid C18th | 18080 |
| Tudor Cottage, London Street | | Late C14th / early C15th core, enlarged late C18th and C20th | 18151 |
| Southcote House, London Street | | Early C19th | 18075 |
| The White Hart, Bridge Street | | From 1475, now mostly C17th | 15987 |
| Town Bridge | | Late C12 site of bridge, this structure probably C18th | 3302 |
| Croft House, The Croft | | Late C18th | 43895, 18133 |
| Gazebo at Croft House, The Croft | | Late C18th / early C19th | 43896 |
| Waynes Cottage, The Croft (formerly 2 cottages | | Mid C18th and late C18th/early C19th | 18132 |
| Former stable and coach house at Croft House, The Croft | | Early C19th | 43895 |
| Croft End, The Croft | | C18th, enlarged early C19th | 18134 |
| 1,2 & 3 Croft Terrace, The Croft | Early C19th | 18130 | |
| Brindle Cottage, The Croft | Late C18th | 18131 | |
| Linden End, The Croft | Early C18th core, extended C18th, C19th and early C20th | 18135 Linden House (Linden End listed building entry probably an error, should be Linden House) | |
| The Green – not listed | | 18120 | |
| Market Place – not listed | | 18121 | |
| Bridge over River Coln to north of Mill House | | 18138 | |
| Hyperion House (old vicarage) – not listed | C18th | 20583 | |
| The Bull Tap Inn – not listed | 1876 record | 20584 | |
| Site of The Plough – not listed | | 20586 | |
| Independent Chapel, The Croft – not listed | | 20582 | |

3.13.1 Entrance to Fairford House (listed, mid C18th) from the Market Square

## 4.1 East End North

See map below for Street Names. See Character Area Plan Maps (Section 4.1) for area boundary and relationship to other character areas[36].




4.1.1 East End North showing Conservation Area (bounded by green line) and Special Landscape Area (mauve)

[36] See map at 1.4.2 for Conservation Area Boundary

## 4.2 Layout

4.2.1 East End has been divided into 2 halves; both are east of Borough. One is to the north of the A417 (London Street/London Road), and the other to the south. This area, to the north, is largely bounded by Park Street, Leafield Road, Lovers' Walk and Hatherop Lane; much of the housing is bisected by Hatherop Road. This was the area which saw most of the expansion in housing during the C20th, starting with Victory Villas (London Street/Hatherop Road) and continuing with a series of infills and green site development, ending with Crabtree Park and St Mary's Drive.

4.2.2 The older area (within the Conservation Area) including the eastern end of Park Street and The Croft together with Mount Pleasant, was once on the fringes of the town. It retained its character and the sense of open space here derives from Walnut Tree Field, the Cricket Club and Fairford Park. The two schools (primary and secondary), a playgroup and Farmor's Secondary School Sports Centre are located in Fairford Park, off Leafield Road. A small industrial site, East Gloucestershire Engineering, operating from Mount Pleasant, off Lower Croft, recently closed to be replaced with residential properties (FNP17).

## 4.3 Topography

4.3.1 A steady gradient sees the land rising to the north, away from the river and its floodplain, once pasture and farmland, leased from the Fairford Park Estate. A small, stoney area was set aside for local use as a quarry, perhaps only suitable for stone walls or road bedding and it is possible to see the position of the quarry. Victory Villas were built in 2 rows, one facing onto London Road and the other, behind these, facing onto Hatherop Road[37]. Those overlooking London Road are about a metre higher than the road level; those behind, overlooking Hatherop Road are significantly lower than road level, the more westerly ones being the lowest, requiring steps down from the pavement. In effect, a segment seems to have been cut out of the slope to the north[38].

4.3.2 Victory Villas set back from London Road, probably about a metre higher than the road.

4.3.3 Victory Villas, steps down from Hatherop Road, significantly lower than road level.

## 4.4 Spaces

4.4.1 Fairford East North includes the largest concentrated area of housing in Fairford at present. To the west Walnut Tree Field and the Cricket Ground, both belonging to the Ernest Cook Trust Estate, provide an open green fringe and

[37] Hatherop Road begins at Mount Pleasant and continues all the way to Hathrop. Hatherop Lane refers only to that section of road between the A417 north to the triangle of trees where it meets Hatherop Road.

[38] Land near Waiten Hill Farm (Milton End) also shows signs of quarrying (HER 47327)

recreational area, with Lovers' Walk and Hatherop Lane bordering agricultural land beyond (to the north and to the east). Within this outer band are a range of different estates with various densities (from 2-storey blocks of flats to executive-style large homes). However, smaller open spaces have been created within these developments for the use of residents. Paths link streets; in places alleyways bring a real sense of intimacy and community to an area (FNP12 No.10).

4.4.2 Elsewhere gardens can allow a greater sense of space as at the end of Lower Croft, where large gardens extend the general open outlook.

4.4.3 The Quarry – open space

4.4.4 Alleyway between Aldsworth Close and Homeground Lane (FNP12 No.10)

4.4.5 Wide, open entrance, Crabtree Park, Leafield Road

## 4.5 Roads/Streets/Routes

4.5.1 An earlier pattern of roads can be seen in The Croft, Lower Croft and Mount Pleasant area with grass verges, roads of varying widths (FNP12 No.10), Cotswold stone boundary walls (FNP12 No. 5) and houses opening straight onto the pavement. Road names can be confusing with 'Mount Pleasant' covering what would usually be considered several separate roads.

4.5.2 A triangle of garden space at the end of Lower Croft is surrounded by roads with no pavement space on the north and west sides which makes pedestrian navigation hazardous.

4.5.3 Mount Pleasant street layout

4.5.4 Mount Pleasant lane, no pavement (FNP12 Nos. 10,11)

4.5.5 Beyond these old street patterns which are more typical of edge of settlement, C20th patterns prevail. Between the long, relatively straight Hatherop Road and London Road (A417) the local council built Victory Villas in the 1920s, set well back from the road with long, substantial, productive gardens to the rear (now built on as The Quarry). In 1953 Queensfield was built, following the line of Leafield Road, with a short close but allowing access through from Hatherop Road to Leafield Road. Since this time, all new developments in the area have consisted of cul-de-sacs: Churchill Place (1950s) and The Quarry (1950s), Homeground Lane (1960s), Jefferies Close (1980s access provided by demolishing 19 Queensfield), Park Close, Aldsworth Close and Manor Close. In the 1980/90s St Mary's Drive, Crabtree Park, Beauchamp Close, Warwick Close and John Tame Close were all built, all cul-de-sacs, all with similar road widths. There is a pedestrian/cycle route between Crabtree Park, St Mary's Drive, Prince Charles Road; and a route through from Park Close to Leafield Road. Older alleys run between Churchill Place / London Road, Aldsworth Close / Homeground Lane, and Lower Croft / London Road (FNP12 No.10).

4.5.6 Road names here can also often be confusing as far as addresses go eg. Park Street on one side of the road, Queens Field on the other; Churchill Place on one side, Hatherop Road on the other. The cul-de-sacs tend to be narrower and quieter with good pavement arrangements. . Whilst Hatherop Road is somewhat wider, on-street car parking slows traffic down. However, this can also cause problems for pedestrians and cyclists due to poor lines of sight and restricted traffic flow on what is a relatively narrow, busy road (FNP12 No.11).

## 4.6 Green and Natural Features/Ecology

4.6.1 East End North is surrounded by rural and green landscapes. The Walnut Tree Field[39] is a well-used recreational area (children's playground, skate ramp, tennis courts), largely grass with some trees, several newly planted by local volunteers in an effort to increase the number of trees in the town (FNP11). To the north the Cricket Ground (1889) provides lovely views over Fairford Park but are largely hidden from view by a fine high Cotswold stone wall.

4.6.2 Along Leafield Road views of the parkland open up and continue on the west all the way to Fairford Primary School and beyond. The two schools, set within Fairford Park, have the benefit of extensive views across the Park, much of which, in this area, has been given over to sports grounds both for Farmor's School (the secondary school) and for local sports clubs: cricket and rugby.

4.6.3 Lovers' Walk follows an old pathway all the way along the lines of houses from Crabtree Park and John Tame Close, separating Fairford from the countryside with farmland beyond. Stone pillars for gates stand at either end of Lovers' Walk as this path was once a main entrance to Fairford Park when arriving from the railway station (although the path itself is much older than the railway). In a small way, green space has been allowed by design to intrude into the residential area at St Mary's Drive park (FNP12 No. 2).

4.6.4. Lovers' Walk comes out onto Hatherop Road and Hatherop Lane. Here houses with garden fences harshly separate housing from the road and the rural countryside (see 4.12 and FNP 12 Nos. 4/6). Other green spaces are grassed areas, with a few trees, created as a part of development (The Quarry, Park Close), and grassed verges along Hatherop Road but little provison has been made for biodiversity. Hedgerows are a more prominent feature in this area; in Fairford high Cotswold stone walls tend to have been the boundary of choice in the town, giving way to lower stone walls and/or hedges further away from the centre of town. Attractive railings (Park Villas) are also a feature (FNP12 No.5).

[39] Walnut Tree Field is proposed as a local Green Space. For full details and arguments re. FNP8 Protecting Local Green Spaces, see Evidence Base: Landscape and Local Green Space Study, Section 2

4.6.5 St Mary's Drive park looking towards St Mary's Drive (FNP12 No. 2)

4.6.6 Park Villas, Mount Pleasant (1835/40) with ironwork fencing and hedging (FNP12 No. 5) - a short terrace once on the outskirts of the town (FNP12 No.1)

## 4.7 Landmarks

4.7.1 Walnut Tree Field

4.7.2 Keble House and its cedar tree

4.7.3 The Railway Inn

4.7.4 The Obelisk (The Votive Column Monument) which once stood at the end of the view north from Fairford Park house (now demolished).

4.7.5 The large beech trees on the east side of Keble House dominate the view along London Road from the east.

4.7.6 Fairford Park is a significant presence along Leafield Road

4.7.7 Schools complex – Farmor's School (secondary), Primary School and the sports centre.

## 4.8 Buildings and Details

4.8.1 The buildings in this area fall into two sub-areas: those within the boundary of C19th/early C20th Fairford (within the Conservation Area) and those which were built, largely, after the Second World War, in a series of developments with their own styles.

4.8.2 Probably the most important building in the older area is Keble House (early C18th, listed), birthplace of John Keble of the C19th Oxford Movement and built by his grandfather. It is difficult to see more than the upper storeys due to high walls, hedges, trees, especially in summer. However, the property on London Road is quite distinctive due to the cedar tree which extends out over the road. John Keble's descendant, Edward Keble lived at Keble House while he was vicar in Fairford 1946-74. The present-day vicarage in Lower Croft was built on Keble House land in 1957.

4.8.3 Fairford Park was demolished after WW2 but a few remaining buildings (a fine stable block and yard) and parts of the parkland, including walled garden, remain. These are now the central offices for the Ernest Cook Trust.

4.8.4 Other large Cotswold stone buildings include Mount Pleasant House (C18th listed), also once a school (boarding from 1839) and Manor Farm House. This latter was the farmhouse for East End Farm, one of the many farms which dotted Fairford, and, like all those east of the river, has not been attached to a working farm for some time. Many of the buildings which surround it are old converted barns of varying sizes (Pinks Barn, Old Barn House), including one accessed by a staircase on the outside (Manor Farm Mews, now The Barn). It is likely that the barns and workshops of what was East Gloucestershire Engineering were once attached to the farm. These latter were very much working buildings, until very recently serving the agricultural community (FNP17). They were made of a wide variety of materials including corrugated iron, blockwork (probably reconstituted stone), natural stone etc.

4.8.5 East Gloucestershire Engineering barn

4.8.6 The Barn, cul-de-sac off Manor Close with external stone staircase to main entrance

4.8.7 Mount Pleasant is home to a few listed buildings with Park Villas (1835/40), a short terrace of 2-storey cottages and a row of 3 houses forming a terrace in Lower Croft (FNP12 No.1) just before the Railway Inn, the public house which would have been closest to Fairford railway station in the C19th.

4.8.8 Lower Croft Terrace (late C17th/C18th, listed) (FNP12 No.1) NB hedgerows, more typical of the street scene on the outskirts of town (FNP11). Allotment/garden in foreground.

4.8.9 The Railway Inn, London Road

4.8.10 Park Villas and the listed buildings in Lower Croft are more examples of a short terrace of buildings which were once on the edge of the town. Here also, are examples of buildings which have been built at a 90º angle to the highway (see para. 2.8.6): The Gearings (once a bakery), Morgan Hall Cottage and Pleasant Row (1837).

4.8.11 The Gearings

4.8.12 Mount Pleasant. Range of building materials – possibly once buildings belonging to Manor Farm

4.8.13 Fairford Cottage Hospital (1887) is an important feature of this area, both socially and architecturally. It no longer has any wards but is an important piece of infrastructure for the medical needs of the town and is still well supported by its League of Friends and by donations from the town. This is the only public building in the town built of brick. Fairford has several retirement developments and The Orchard, adjacent to the hospital, is one of them. The Orchard was built on the site of the old primary school which moved up to Fairford Park to be with Farmor's School and the Sports Centre. The oldest school building, which had contained the reception class, was extended and converted into Fairford Library.

4.8.14
The Orchard looking down the alleyway which runs from The Croft to London Street. The end of the terrace is a building which was once the police station, relocated from the High Street. Some of the design details are taken from that original C19th police station and magistrates' court.
In recent years, this building has been converted to residential use.

## 4.9 Land Uses

4.9.1 Residential. Education. Sports and recreation. Medical. Parks. Self employed working from home. Fire station. Agricultural. Hospitality.

## 4.10 Views

4.10.1 Views along the line of Lovers' Walk (from both directions); there are stone pillars which originally formed gateways at either end of Lovers' Walk and opposite on Leafield Road (4 in total).

4.10.2 Views north and east from the south-eastern end of Lovers' Walk, along and across Hatherop Lane

4.10.3 Any views from/into Fairford Park, especially those across the River Coln and towards the Obelisk.

4.10.4 Views westwards from Leafield Road.

4.10.5 Views along Park Street and over to the Walnut Tree Field.

4.10.6 Views of The Croft and northward from The Croft.

4.10.7

'Views' references
NB NOT viewpoints but the general locations mentioned in 4.10

1. Either end of Lovers Walk
2. Walnut Tree Field

## 4.11 Summary Table for Area 3: East End North

| Characteristic | Character Area Detail |
|---|---|
| Layout | Buildings, some relatively low density, bounded by Leafield Road, Lovers' Walk, Hatherop Lane and London Road (A417), bisected by Hatherop Road. Very largely organised into cul-de-sacs leading from Leafield Road and Hatherop Road. The area around Keble House, the Croft and Park Street is low density with large gardens, wide roads, wide verges and off-street parking. |
| Land uses | Residential, recreation/sport, light industrial/retail, |

| | |
|---|---|
| | hospitality, self employed working from homes, educational, allotments |
| Building scale, appearance | Max. 2 storeys (Manor Farm House and Keble House being exceptions, the former hidden from passing view altogether and the latter with only the higher storeys visible). Agricultural barns and converted barns. Newer houses are a good mix of bungalows, semi-detached and detached. Materials are largely Cotswold stone, yellow brick, render but other materials include concrete, corrugated iron, red brick, timber |
| Green features | Hedges, trees and grass verges (FNP12 No. 5). To the west the area overlooks playing field and parkland, farmland to the north and east. Green area, grass and trees in the middle of developments. Large beech trees by Keble House. |
| Open space | Open space surrounds this area (see Green Features) but the hard edge of buildings on the eastern edge of town has been criticised (see 4.12). |
| Landmarks | Walnut Tree Field. Keble House and cedar tree. Railway Inn. Obelisk and Fairford Park. Schools and Sports Centre off Leafield Road |

## 4.12 Summary Comments

4.12.1 This area features a C18th/C19 edge of town environment: traditional Cotswold stone cottages, stone walls transitioning to hedgerows, lower level stone walls and some infilling of more modern houses. However, the C20th saw large developments, firstly between the wars (Victory Villas and Hatherop Road) with others following from the 1950s to the 1980s. The primary school moved from what is, today, the Orchard and the library, up to Fairford Park alongside Farmor's School and the Sports Centre.

4.12.2 The range of housing is particularly wide in this area (large, listed Georgian buildings, modern bungalows, semi-detached and detached) with a huge range of materials (natural stone, render, pebbledash, tile, slate, corrugated iron, timber). Essentially this area has a number of sub-areas each with their own distinct characteristics. With the exception of a very few large, older houses eg. Keble House, most buildings are 2 storeys only. There are a few trees in public spaces but, on the whole, the area is notable for the lack of trees in public spaces (FNP11) and the lack of provision for biodiversity in those public green areas eg. St Mary's Drive Green and The Quarry Green. This is probably the largest residential area in Fairford and it has easy access to PROWs and the surrounding countryside.

4.12.3 East Gloucestershire Engineering was, until recently, a sliver of light industrial enterprise, a reminder of the area's busy, rural past (FNP17). This is also an area of schools, sports, playgrounds, medical care, food production (allotments) and housing for retirement: a crucial area for the well-being of the town. Interestingly, this area also provides a timeline for council housing design starting with Victory Villas and including a small purpose-built retirement development in The Quarry (no longer exclusive to retired residents).

4.12.4 Hatherop Road – overhead services (FNP12 P12.2) 4.12.5 Fairford's 'harsh edge', Hatherop Lane (FNP12 No. 6)[40]

4.12.6 Overhead services are visually intrusive and detract significantly from the attractiveness of the street scene; they also mean that tree planting can be difficult (FNP12 P12.2). Solid timber fencing on boundary lines is also an issue (FNP12 No. 6).

4.12.7 1 and 2 The Halt, Lower Croft (late C17th/early C18th, listed. (FNP12 No.1). Cotswold stone boundary wall, timber fencing between gardens (FNP12 No.5/6)

4.12.8 Hatherop Lane, an alternative to the solid timber fencing of the 'harsh edge' of Fairford.

## 4.13 East End North Listed Buildings and other selected HER records[41]

| Address | Date | HER reference number/s |
|---|---|---|
| Mount Pleasant House, Mount Pleasant | Late C18th | 18113 |
| 1, 2 (The Halt), 3 (Taree), Lower Croft | Late C17th/early C18th; No. 3 slightly | 18083 |

[40] 'Study of Land Surrounding Key Settlements in the Cotswold District', White Consultants, 2000, p. 30 'The abrupt and visually harsh edge between the modern housing development means that such areas are not integrated with the landscape setting.'

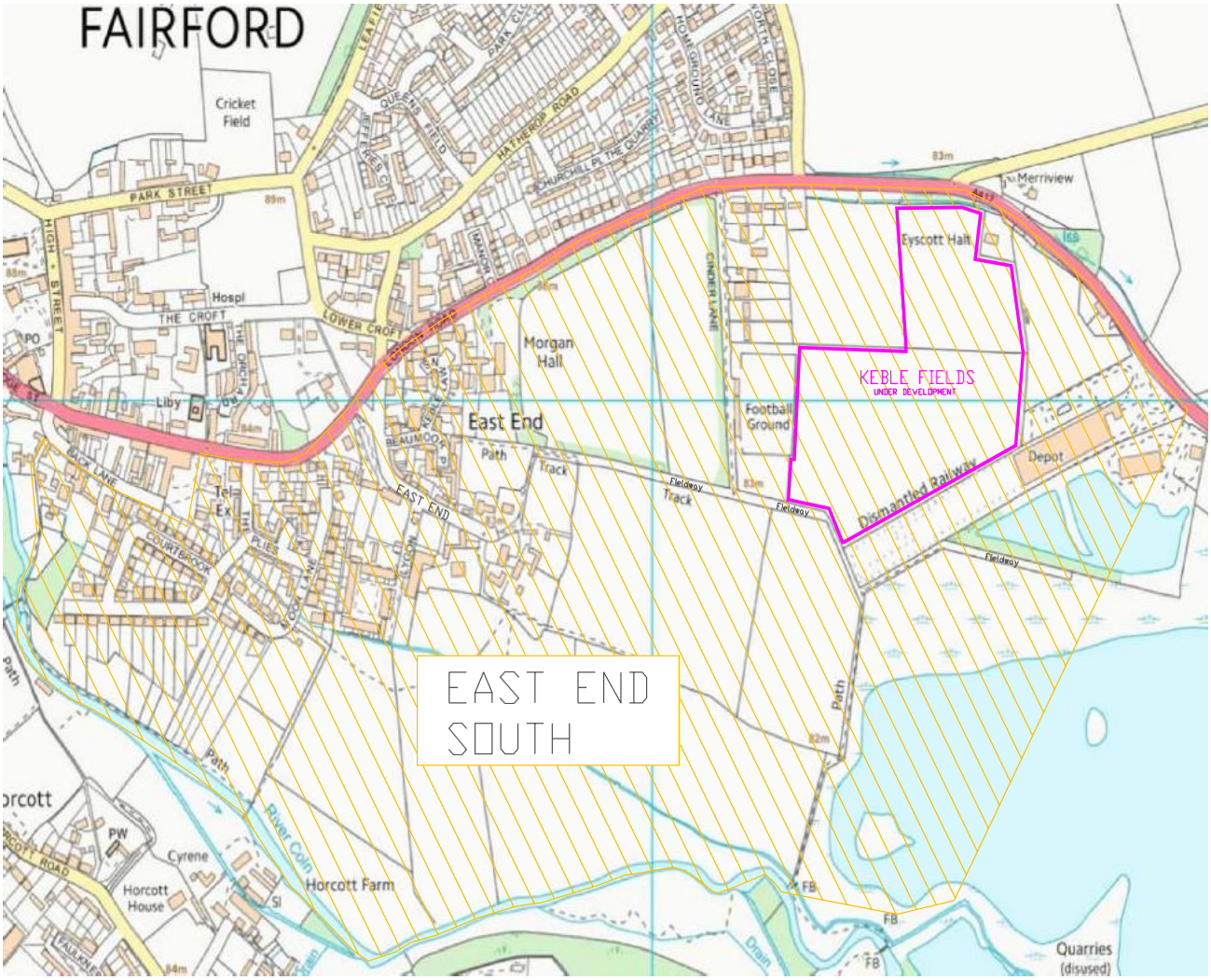
[41] This list has been created using the Historic England list of listed buildings: https://historicengland.org.uk/listing/the-list/ and the Gloucestershire County Council Historic Environment Record http://www.heritagegateway.org.uk/Gateway/Results_Application.aspx?resourceID=108. For definitive details on individual buildings, please refer to the Historic England and the Gloucestershire Heritage Environment Record information.

| | | |
|---|---|---|
| | later | |
| Mount Pleasant Cottage, Mount Pleasant | Early C19th | 18112 |
| Holmdene, Mount Pleasant | Late C17th / early C18th, enlarged late C18th, altered early/mid C19th | 18111 |
| Keble House, London Road | Early C18th, new front in 1780s | 2471 |
| Votive Column Monument (the Obelisk) | 1763 | 3180 |
| Fairford Cottage Hospital – not listed | C19th | 20273 |
| Site of The Railway Inn – not listed | | 20588 |

4.13.1 Keble House, London Road, with cedar tree.
NB Overhead services with pole (FNP12 P12.2)

## 5.1 East End South

See map below for Street Names. See Character Area Maps (Section 4.1) to see area boundary and relationship to other character areas



5.1.1 East End Lakes - Cotswold Water Park numbering and PROWs (red dotted lines)

5.1.2 East End South section of the Conservation Area

## 5.2 Layout and History

5.2.1 East End South refers to all of Fairford east of the River Coln and south of the A417, excluding buildings north of Back Lane and west of Gas Lane, all of which are in Borough and the Conservation Area. As with East End North there is a mixture of houses which once formed the boundary of C19th/early C20th Fairford and post WW2 development. The agricultural settlements from the old edge of town are still identifiable although most of the buildings have been converted to residential use (FNP17). The A417 here is known as London Road, changing to London Street as it nears the centre of town, at The Plies[42]. The fields and lakes to the south and east of this area have been included in this section as they form the proposed River Coln Valued Landscape for the town.

5.2.2 This is the area with fewest listed buildings as it is close to the river and watermeadows (no longer using traditional farming methods) and in the past buildings were located on higher ground, or on ground less likely to flood which was nearer to London Road. The track entering Fairford from the fields to the east (Fieldway) is very ancient, possibly a route of prehistoric man coming up the Thames valley to settle on the fertile river terraces.

5.2.3 At the end of East End and the start of open country is Moor Farm (originally Beaumoor Farm - early/mid C18th, listed), a large farmstead with associated agricultural buildings, now all converted to residential use. Here also are two larger houses, Morgan Hall (C16th, listed) and East End House (c.1750, listed) forming, originally, an outlying hamlet (included in the Conservation Area). Over the years terraces were built, near/on the London Road to house agricultural workers (Eastbourne Terrace, Gable Cottages).

5.2.4 Back Lane, running between the main road and meadows by the river, housed businesses with agricultural connections such as fellmonger, dairy and slaughterhouses. The land to the south of these buildings remained productive fields, smallholdings and was largely without buildings until the second half of the C20th.

[42] The A417 has several names through the town; travelling west to east it is Cirencester Road, Milton Street, Bridge Street, London Street, London Road.

5.2.5 Moor Farmhouse (early C16th, listed)

5.2.6 Newer developments started close to the A417 (eg. The Plies) but increasingly crept into the watermeadows flood plain area. The line of building was contained by land reserved for a bypass; when this scheme was abandoned the land was sold to the neighbouring homeowners (witness the long gardens down to the river).

5.2.7 Further out of town there are a few isolated houses (Terminus Cottage, Railway Cottage, Eyscott Halt) which were built for employees of the railway, long closed, which came to Fairford in the late C19th. It is likely that the railway terminated so far out of town to comply with the wishes of John Raymond Barker at Fairford Park. Just north of the old railway station a new housing development has recently been completed: Keble Fields. Those isolated railway workers' houses are isolated no more.

## 5.3 Topography

5.3.1 A large part of this area consists of watermeadows. The land rises marginally towards the north but essentially, the terrain is flat, with the River Coln, the Court Brook (the original town sewer, draining from Fairford into reed beds by the river) and the lakes (worked out gravel extraction areas) being key features of the landscape. The name, 'Moor Lane', appears in C17th documents and is a reference to the geography of the land; the low-lying area between the town and the River Coln, was very fertile and productive land known as 'Beau moor'[43]. The area between the town and the river contains many footpaths which are heavily walked, as is the PROW around Lake 104 to the east. The view to the south, across the river, is to the wooded slopes of Horcott Hill.

[43] This may reflect Norman ownership from C11th, as the manor of Fairford was granted by William the Conqueror to his wife, and remained a royal borough for many generations.

5.3.2 Moor Lane Court, Moor Lane – overhead services to recent development (FNP12 P12.2)

5.3.3 Looking north across the fields ('the moor') towards Beau Moor House

## 5.4 Spaces

5.4.1 There are few houses in this area which are not within 100 metres of open space. The river and its fields, Lake 104 and open grassland, are never far away and the large number of paths allows easy access. Closer to the town there are smaller public open areas in The Plies and Lygon Court. Fairford Town Football Club and Fairford Bowls Club both have their grounds within this area. NB The fields and meadows are proposed as the 'River Coln Valued Landscape' in FNP10[44]

5.4.2 Path/access road to Moor Farm pumping station, leading out of East End

## 5.5 Roads/Streets/Routes

5.5.1 The main A417 forms the northern boundary of this area, but several roads lead off it to the south, most, if not all, cul-del-sacs (depending on the definition). The environment here (to the south of the main road) is particularly friendly to pedestrians and cyclists with many safe routes through to all parts of Fairford which avoid the busy main road – although crossing the A417 to the north at East End (in both directions) can be hazardous near the Eight Bells and Keble House due to restricted visibility near the bends. These pedestrian/cycle routes are Fieldway[45], Cinder Lane, East End (mostly shared surface), Eight Bells path, Beaumoor Place path through to a small field (Beaumoor Field[46]), Snake Lane, Brookvale, Back and Gas Lanes (both shared surfaces), and a pedestrian route out to London Road from Moor Lane. Courtbrook, not strictly a cul-de-sac, is nevertheless quiet and safe for all users, as is The Plies (Nos. 15-20 are a cul-de-sac) (FNP12 No. 10, 12).

[44] The full justification for this FNP10 River Coln Valued Landscape can be found in 'Fairford Neighbourhood Plan Evidence Base: Landscape and Local Green Space Study, Section 4'

[45] 'Fieldway' is named as such on early enclosure maps. Improved signage is proposed. Gloucestershire Landscape Character Assessments for the Severn Vale; Upper Thames Valley; Vale of Moreton; Vale of Evesham Fringe (LDA 2006) states, 'Prehistoric settlement of the gravel terraces is likely to have been widespread [in the Upper Thames Valley]' at 3.7.2, p. 21

[46] The name of this field is uncertain but it is adjacent to Beaumoor Place.

5.5.2 Like Fairford Gate, the layout of the recent development at Keble Fields differs from the rest of the area in that the roads are all similar widths and unvarying materials however, here they are arranged generally following a circular route. A PROW connection with the town is maintained via Fieldway.

5.5.3 The wealth of paths in this part of Fairford continues into the fields themselves with field paths through from Moor Lane to the back of Lygon Court and over to East End. In addition there are numerous routes for walkers using the fields, including a PROW route to Horcott via a series of footbridges at the Broad Boards; for serious walkers this is also the start of a PROW to Lechlade (unsuitable for bicycles) (FNP7).

5.5.4 The drove road network is also evident here. The small green at East End was a pound for animals. Cinder Lane was a collecting area for animals and a large water trough was positioned in London Road, opposite Victory Villas in an area now generally used for parking. The lane appears clearly on the 1769 enclosure map and links with Fieldway. The name by which it is known today (Cinder Lane) is due to the fact that it was maintained with clinker from the railway, which opened in 1873. The railway station, now home to a small industrial site, cut through the ancient Fieldway track which was the route to the many small fields owned by local people but the PROW re-joins the Fieldway track at Lake 104.

5.5.5 Gable Cottages, East End just before shared surface; speed bump just visible on corner (FNP12 No.1, 10)

5.5.6 Entrance to Lygon Court with plenty of parking space (FNP12 No.11)

## 5.6 Green and Natural Features/Ecology

5.6.1 East End South, in large part, looks towards the river and its fields for green and natural features although there are also attractive open green spaces in The Plies and in front of the Eight Bells Pub, both of which, unusually, have trees. In addition the fallow field behind East End (a favourite spot for blackberrying) offers a rural view for residents of the retirement homes on Beaumoor Place. It is, however, the farmland and its footpaths that dominate. The land is cultivated by Horcott Farm for silage and arable crops. Access to the land from the farm is provided by Cutler's Ford, a favourite spot for residents in the summer for picnics, paddling etc.

5.6.2 Hedgerows and large trees along the roads, especially on the Morgan Hall/Jones' Field boundary, are a feature but, again, they are virtually all on private land (FNP11).

5.6.3 Also crossing the landscape is the Court Brook, a 'carriage' ditch (and, for a time, the town's main sewer) when the watermeadows were being managed; this allowed for the deliberate flooding (drowning) and drainage of the fields, which increased the fertility and brought earlier crops.[47] Otters, water voles and roe deer have been seen along the river

[47] See FNP Evidence Base: Landscape and Local Green Space Study, Section 4, FNP 10 'River Coln Valued Landscape' for proposal to reinstate the watermeadows

here. Also 30 different bird species (including herons, egrets, kingfishers, skylarks, thrushes, finches and bunting), several types of orchid and grass snakes (FNP10). Lake 104, a worked-out gravel pit, is a valuable area for birds and wildlife (the Lakes here are a Key Wildlife Site); and the old embankment 'humpty dumps' (a memory of the railway station) is a popular track for local children.

5.6.4 One of the long gardens running down to the river from houses in Moor Lane

5.6.5 Dilly's Bridge, Bull Island, north

5.6.6 Cable Cottages

## 5.7 Landmarks

5.7.1 One of the most important buildings in this area, Morgan Hall itself is largely invisible but the parkland in which it sits is very much a feature of Fieldway and, more importantly, it lines the entrance into Fairford from the east along London Road. The long Cotswold stone wall and depth of trees and hedgerow (FNP12 No. 5) should be considered a landmark of this space.

5.7.2 The Eight Bells Public House and the Green in front of it.

5.7.3 Hilary Cottage Surgery, whilst not in a prominent position, is nonetheless a landmark due to its modern design, unusual in the town.

5.7.4 Cable cottages – the preservation of this terrace was fought for in the 1960s.

5.7.5 Lygon Court built in the 1990's as retirement homes, is well designed. It consists of four terraces of cottages, of traditional design and materials, set around a green square. The wide entrance with landscaped gardens and trees is quite distinctive.

5.7.6 Gingerbread Cottage – tiny, charming and unique.

5.7.7 Dilly's Bridge – a replacement for the original wooden structure. Aesthetics appear not to have been a consideration in choice of design, so not lovely but heavily used and clearly a landmark.

5.7.8 Hilary Cottage Surgery, Keble Lawns

5.7.9 Gingerbread Cottage

## 5.8 Buildings and Details

5.8.1 The structure of an old agricultural settlement is still in evidence here. Behind a high wall and within its own grounds is Morgan Hall, dating from early C16th (listed), the earliest of the existing buildings. Although this is reputed to have been a Cromwellian stronghold during the English Civil War[48], as far as can be ascertained there is no documentary evidence to substantiate this claim. A ha-ha from the original parkland is still present and extends into Jones' Field, once an integral part of the park. Fully documented is the fact that American artist Edwin Austin Abbey lived here from the late C19th until his death. At this time, Morgan Hall became a centre for artists, in particular the Broadway Group, with cricket weekends and visits from such luminaries as AG Swinburne and John Singer Sergeant. At this time a studio was built onto the side of the building. Novelist Henry James was much taken with Fairford eggs and had them sent to London in a specially constructed container[49]. In later years the Hall was let to the Walter Jones family whose daughter, Daphne, was one of the inspirations behind BBC TV's 'Call the Midwife'.

5.8.2 Moor Farmhouse (early/mid C18th, listed) is no longer connected to a farm and all the surrounding barns and infrastructure of a working farm have been converted to residential use. Land is still used for storage (machinery, logs, wood chips etc.) and one of the sheds from the Polish Camp (a resettlement camp for displaced Polish persons in Fairford Park, 1947-1958) is to be found on the road to Moor Farm pumping station. The area behind Back Lane was also a working area, supporting the retail shops on London Street: a garage, workshops, electrical assembly, smallholding and the Gas Works: two gasometers which once provided gas to the town. Retort House is a reminder of those times.

5.8.3
Retort House, Gas Lane
This house is on Fairford Heritage Trail. The plaque reads,
'The site of the original Fairford Gas and Coal Company which was formed in 1852 and supplied gas to Fairford until 1972'

[48] Historic England entry for Morgan Hall listing states: 'Reputed to have been a Cromwellian stronghold during the war.' https://historicengland.org.uk/listing/the-list/list-entry/1089970

[49] Henry James writing to the artist's wife, Gertrude Abbey on the subject of the return of the specially constructed egg box: 'So it was kept longer than I knew. But, as I say, it is flapping straight to Morgan Hall now; and it shall always boldly go, henceforth, the very right day. Not a solitary egg was broken on the mother's breast.' 'Edwin Austin Abbey Royal Academician: The Record of His Life and Work', Vol 11 1894-1911, EV Lucas, (Methuen and Company Limited: London, 1921), p.276.

5.8.4 East End House is another of the large listed buildings in this area but some of the gardens have been taken for development, including an area called 'The Potato Garden' in 1836 (now a corner of Lygon Court). Terraces for agricultural workers of 1.5 and 2 storeys (FNP12 No. 1) were built in the C19th: Eastbourne Terrace, Cable Cottages. The coming of the railway also resulted in house building but closer to the station and a little way out of town: Eyscott Halt, Terminus and Station Cottages.

5.8.5 The next significant developments were in the second half of the C20th with The Plies (1950s), Courtbrook, Beaumoor Place and Keble Lawns (1970s). There are retirement homes at Beaumoor Place (high density, imitation Cotswold stone, blocks of flats) and Lygon Court (private community arranged around large courtyards, natural Cotswold stone) together with various small infill buildings (Moor Lane Court). Keble Fields, a large development of 120 homes was started 2016 and has recently been completed (2020); it is worrying that the colour of materials/finishes used on the Keble Fields development appears yellower than typical locally (FNP12 No.3). This is made more prominent by the raising of ground levels on the site (FNP12 No. 13). Most of these buildings follow the Cotswold Design Code and use either Cotswold stone or similar reconstituted material, including reconstituted stone (FNP12 no.9).

5.8.6 Reconstituted stone was popular in the 1970s as a substitute for Cotswold stone and can be seen in Courtbrook, where the local builder incorporated Cotswold stone features in some buildings, stone from an old barn that was demolished to make way for the new development. Other materials in the area include render, tiles, slate. There are three post-war bungalows at the end of East End, of materials and design which detract from the quality of the Conservation Area, but they are mostly set back in large gardens well screened by trees and shrubs. Boundaries in the area are mostly stone walls.

5.8.7 An exception to all other housing are the timber, Swedish houses in The Plies. These were built immediately after World War Two, bought from Sweden to help deal with the post-war housing shortage.

5.8.8 In addition to residential buildings are The Eight Bells public house (1869) and, behind it, Hilary Cottage Surgery. This surgery was built in the 1980s and is named for the building in Milton End that the GPs had previously used as a surgery: Hilary Cottage, Coronation Street. The building is notable for its neo-vernacular style with its huge roof and half-hipped gables. The public house is tied to the local brewery, Arkells (founded in 1843).

5.8.9 Courtbrook, with Cotswold stone 'buttresses' from old barn (FNP12 No.9)

5.8.10 Eight Bells Pub, East End

## 5.9 Land Uses

5.9.1 The land uses are housing, agriculture, leisure (playing fields and riverside walks), light industrial (railway station site), builders' yard, health care (the surgery) and retirement homes (Lygon Court, Beaumoor Place), telephone exchange (London Road), entertainment (the Eight Bells).

5.9.2 Builders' Yard, end of East End

5.9.3 Gate leading out of Beaumoor Field into Fieldway

5.10 Views

5.10.1 Views across the fields and along the River Coln

5.10.2 Views along Fieldway and across the meadows

5.10.3 Views north/north-east from the PROWs, from Moor Lane and along the river

5.10.4 Views around and across Lake 104

5.10.5 View across to Horcott Hill and Cleeve Wood

5.10.6 View across to Horcott Hill from Moor Lane

5.10.7

'Views' references
NB NOT viewpoints but the general locations mentioned in 5.10

1. River Coln
2. Fieldway, extends W to East End and E beyond disused railway along Lake 104 boundary
3. Moor Lane access to fields and paths
4. Lake 104

Horcott Hill is off the map, to the south

## 5.11 Summary Table for Area 5: East End South

| Characteristic | Character Area Detail |
|---|---|
| Layout | Between A417 and the River Coln, including fields and watermeadows. The many fields and paths mean that although there are several cul-de-sacs (inevitably given the geography of the area, between main road and river), pedestrians and cyclists have an easy east/west passage through the area, without using London Road (FNP12 Nos.10/11). Houses generally front to the access roads but some courtyard / garden arrangements in retirement homes. |
| Land uses | Residential, agricultural, light industrial, self employed, builders' yard, leisure/sport, telephone exchange |
| Building scale, appearance | This area has number of sub-areas each with their own distinct characteristics. Apart from the listed buildings most buildings in this area are quite small and include bungalows (in The Plies), 1.5 or 2 storey buildings with top storeys often within the roof space (FNP12 No.1). Timber Swedish houses. Decorative render. Cotswold stone or concrete/ reconstituted stone. Slate and tile roofing materials. |
| Green features | Hedges, trees and grass verges (FNP12 No.5), fields and farmland, lakes, river, ditch (Court Brook). Long gardens (Courtbrook/Moor Lane) and parkland (Morgan Hall), paths and lanes (FNP12 Nos.10/11) |
| Open space | Watermeadows and fields. River Coln. Beaumoor Field. The green opposite Eight Bells Pub. The Plies green. Lake 104, the site of the old railway station, football ground. Jones' Field. Morgan Hall parkland. |
| Landmarks | Morgan Hall boundary with London Road, Eight Bells Pub, Hilary Cottage Surgery, Cable Cottages, Lygon Court, Gingerbread Cottage, Dilly's Bridge |

## 5.12 Summary Comments

5.12.1 Most of the construction is C20th but an originally outlying hamlet of Fairford around Morgan Hall, East End House and Moor Farm (which could be described as a sub-area) is testament to the longer historic roots of the area and is largely within the Conservation Area. Typical short terraces are a feature here (Eastbourne Terrace, Moor Lane Court) but most of the late C20th housing consists of detached and semi-detached buildings.

5.12.2 Over to the east are a few isolated houses (Eyscott Halt, Station Cottage, Terminus Cottage) on the A417 which were built in support of the late C19th railway station, long closed. Current development at Keble Fields mean that these outlying buildings have become a more integral part of the town.

5.12.3 Many of the 'working' buildings in the area have been converted to residential use but there remain several functional areas ie. telephone exchange, surgery, industrial estate on the old railway site. The C20th buildings are in a range of styles, sizes and materials within the parameters of the Cotswold Design Code although not necessarily reflecting local style variations. A network of alleyways, paths, fields link all parts of the area.

5.12.4 As was the case in the past, this area also provides employment (Railway Industrial Park, Hilary Cottage Surgery, Eight Bells Public House) and leisure facilities (bowls, football, walks, fishing).

5.12.5 Whilst more ecologically diverse than other areas, there are still opportunities to improve biodiversity in the town eg. The Plies Green, Eight Bells Green.

5.12.6 In places unsightly overhead services interrupt the street scene. Wherever possible all efforts should be made to relocate these underground (FNP12 P12.2).

5.12.7 Wherever possible, natural stone of appropriate colour should be used as the material of choice for boundary walls, especially within or near the Conservation Area (FNP12 No.5).

Far left, 5.12.8 Eastbourne Terrace (FNP12 No.1). Overhead service cables are visually intrusive on the main road in the Conservation Area (FNP12 P12.2).

Near left, 5.12.9 Boundary, concrete block wall with trellis effect in Back Lane, replaced a dry Cotswold stone wall. The lane marks the boundary of the Conservation Area. (FNP12 No.5, 6)

5.12.10 Cotswold Design Code not enforced leading to external features (eg. roof) which are incongruous and out of keeping. Hedge removed and replaced with timber shed wall directly behind fencing (FNP12 No.5/6)

5.12.11 Daubney House, East End within Conservation Area, well-spaced buildings in relatively large plots

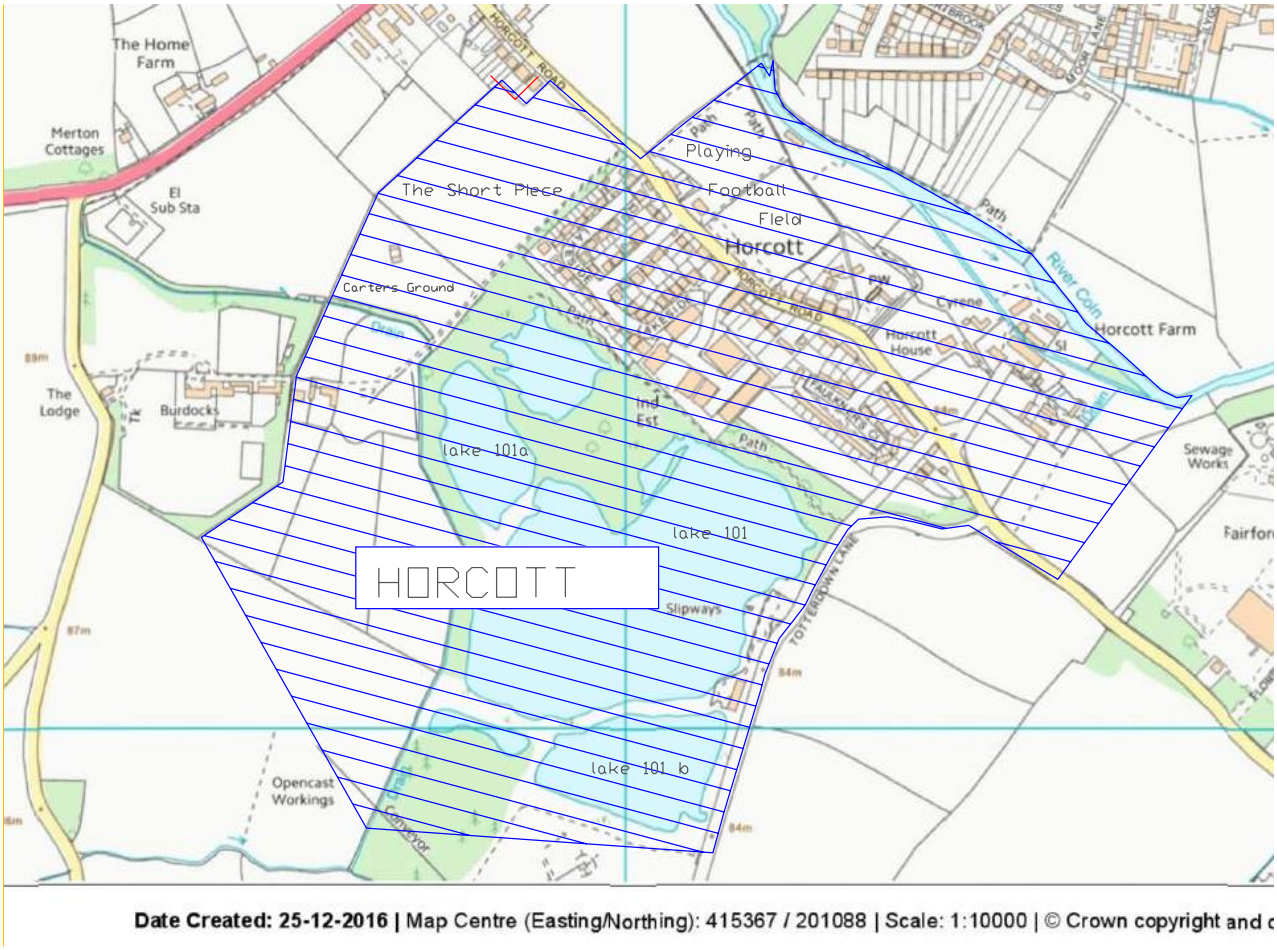
## 5.13 East End South Listed Buildings and other selected HER records[50]

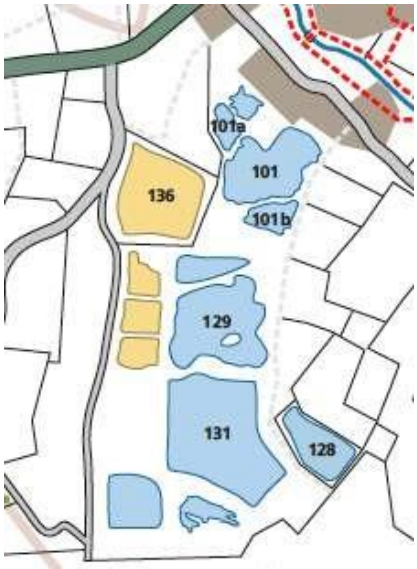
| Address | Date | HER Reference number/s |
|---|---|---|
| Morgan Hall, London Road | Late C16th, refaced and enlarged C18th | 18149 |
| Moor Farmhouse | Early/mid C18th, enlarged late C18th/early C19th | 15988 |
| East End House | c.1750 added to remains of early C17th house, with new entrance wing 1901 | 18137 |
| Site of The Eight Bells – not listed | | 20587 |
| Disused East Glos and Witney Railway | 3239, 15986 | |
| Gas Works, Gas Lane | 18123 | |

[50] This list has been created using the Historic England list of listed buildings: https://historicengland.org.uk/listing/the-list/ and the Gloucestershire County Council Historic Environment Record http://www.heritagegateway.org.uk/Gateway/Results_Application.aspx?resourceID=108. For definitive details on individual buildings, please refer to the Historic England and the Gloucestershire Heritage Environment Record information.

## 6.1 Horcott

See map below for Street Names. See Character Area Maps (Section 1.4) to see area boundary and relationship to other character areas




6.1.1
Horcott Lakes with Cotswold Water Park numbering. Those coloured yellow have been reinstated as farmland; area 136 contains a landscaped lake and is the area where the hengiform barrow was found.

## 6.2 Layout

6.2.1 This area is divided into two by Horcott Road. To the east are generally the oldest buildings many of which are listed. To the west post WW2 construction. To the south are a series of lakes, created over many years by gravel extraction (now exhausted).

## 6.3 Topography

6.3.1 The area is generally flat with two catchments divided by Horcott Road; the first lies between the River Coln and Horcott Road, the second sloping gently down from Horcott Road to Horcott Lakes. At the edge of the settlement the fields rise to the south up Horcott Hill.

6.3.2 To the east of Horcott Road - Horcott House (lateC18th/early C19th, listed)

6.3.3 Horcott Farm access road to the east of Horcott Road

## 6.4 Spaces

6.4.1 There are three distinct sub-areas in Horcott with different spatial types: agricultural, residential and industrial. The fields of Horcott Farm and Horcott House form the southern boundary of the area, the fields of The Mere, the northern boundary. The verges are generally wide and grassed between the footpath and the housing. The spaces are generally edged with hedges (FNP12 No.5) and/or low walls (Cotswold stone and brick).

6.4.2 The light industrial estate feels spacious and open with small green spaces at road junctions, wide footpaths and access roads, dominated by vehicles during working days. Faulkner's Close is built around a public central green space with small trees.

6.4.3 Travelling along the road, the most open areas are the Roman Catholic Church of St Thomas of Canterbury and presbytery grounds with their wide sweeping parking area to the front and a bench on the green verge beside the footpath. Further towards Fairford the road is lined on one side with open playing fields and a car park. Mere fields, Carters Ground and The Short Piece, (amongst others) provide a vital gap which separates Horcott from Fairford (FNP9).

6.4.4 Horcott Lakes[51] themselves are well used for fishing and local walks (Fairford Town Council has a yearly lease on a circular route around some of the lakes). The future of these lakes is uncertain as it is believed they are, at time of

[51] Horcott Lakes as used here refers only to Lakes 101,101a 101b, the lakes between Horcott itself and the Scout Hut. The lakes beyond, also Horcott Lakes, are currently inaccessible, visible only from Totterdown Lane.

writing, up for sale. Totterdown Lane, an old drove road, runs alongside all the lakes, offering spectacular views across the water, especially in the evening.

6.4.5 St Thomas' Catholic Church and Presbytery, Horcott Road

## 6.5 Roads/Streets/Routes

6.5.1 The whole area is accessed from Horcott Road which has a weight restriction of 18 tonnes between Totterdown Lane and the A417. The road has reasonably wide footpaths and verges, down either side in a few places but mostly on one side only, which may make navigation awkward for those with wheelchairs, pushchairs. Some of the more recent housing on Horcott Road has small front gardens but most houses lie within the cul-de-sacs. The industrial estate, also within a cul-de-sac, has wider roads and pavements in order to take the lorries which service the businesses.

6.5.2 There are several PROW footpaths: St Thomas' Roman Catholic Church to Waterloo Lane (in Fairford) BFA20, BFA41, Horcott Road to Dilly's Bridge BFA40, footpath through Horcott Farm, part of a route around the River Coln BKD32, BFA39. There are permissive paths around Horcott Lakes accessed from Totterdown Lane (a restricted byway BKD3) and a footpath leading down from Horcott Road. Some of these are accessible to cyclists; those from Horcott Road to the riverside and through to the town centre are not."

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6.5.3
Horcott Road, travelling towards Fairford.
NB Overhead services (FNP12 P12.2)

## 6.6 Green and Natural Features/Ecology

6.6.1 Horcott is surrounded by green spaces: Horcott Hill, Horcott Lakes, River Coln, Fairford-Horcott Local Gap (FNP9). To the east the view is primarily agricultural with fields, paddocks, playing fields, farmyards. The large gardens here are walled or fenced and clearly private (Horcott House, Old Schoolhouse) with long driveways (Horcott House, Roman Catholic Church, The Old Schoolhouse).

6.6.2 Most houses have both front and back gardens, often with hedges, fences or walls. Those nearest the lakes have views over fields and the water although the lake edges generally are heavily wooded.

6.6.3 A feature of Fairford is the lack of public trees and Horcott is no different. Whilst there are significant trees along the roadside (in the important Fairford-Horcott Local Gap in particular) they are largely on private land (FNP11).

6.6.4 Fairford-Horcott Local Gap (FNP9[52]) is the proposed designation attached to the green spaces between Fairford and Horcott. It is considered vital to maintain this gap in order to preserve the material integrity of Horcott as a separate settlement with its own history and character. The gap is particularly fragile at the Mere fields (Carters Ground and The Short Piece) where new buildings (eg. Fairford Gate South) are, literally, one field away from Horcott. Coln House playing field and Fairford Youth Football Club are also crucial sections of the gap (FNP9 - see Milton End, Section 2.2.1).

## 6.7 Landmarks

6.7.1 The distinctive features of Horcott are the farm, the larger buildings (including the industrial units), the Roman Catholic Church, presbytery and burial ground, and the high Cotswold stone walls to the east ie. the oldest part of the settlement. Colnside stands alone on the riverside, beyond the Fairford Youth Football Club playing fields.

6.7.2 Horcott Lakes are a well-known feature. Just beyond the Parish boundary, Horcott Hill itself is prominent on the skyline as is the 1944 water tower for the RAF Fairford (installed when the airbase was built in 1944).

6.7.3 The White House is quite distinctive - marks the beginning of Totterdown Lane and the end of the settlement. It is one of the older buildings in Horcott.

## 6.8 Buildings and Details

6.8.1 The hamlet of Horcott with a mill was originally centred on the River Coln at a ford (Cutler's Ford); thus although today a cul-de-sac, originally this would have been a continuing route (FNP12 No.10) through the ford to the fields beyond ((Moor Farmhouse opposite is only 450m away). A farmhouse and other agricultural buildings, dating from early C18th, and new, traditionally built farm cottages are all still integral parts of a working farm.

6.8.2 To the north east is a listed manor-style house, a C19th Roman Catholic church, presbytery and old schoolhouse (now a private home). These latter are directly accessed from the Horcott Road. The farm and its associated buildings, including a more recently built private bungalow (Cyrene) are accessed via cul-de-sacs off the main farm access track.

6.8.3 Further north, towards Fairford, is a terrace of C18th agricultural labourers' cottages, Horcott Cottages (FNP12 No.1), which follow the line of the road. Between these older buildings is a late 1990s small estate of large 'executive-style' houses which include some Georgian style features, presumably referencing other buildings in Fairford; these are

[52] For full details and arguments re. FNP9 Protecting the Fairford – Horcott Local Gap, see Evidence Base: Landscape and Local Green Space Study, Section 3

accessed from a cul-de-sac, and are on the site of the C19th Carriers Arms Public House. Elsewhere decorative fascia boards are a feature (Belton, Horcott Road).

6.8.4 The main growth of the hamlet occurred during WW2. Workers came to build the runway for the new airfield and were housed in huts at the foot of Horcott Hill. At the end of the war the huts were demolished and council housing was provided for those who remained. Over the next decade or so more public housing was built. Faulkner's Close and Lakeside are housing developments arranged as cul-de-sacs with a combination of bungalows (a few of which have since been converted to 1.5 storey buildings) and 2-storey buildings.

6.8.5 Between Faulkner's Close and Lakeside (both 1960s) is the Horcott Industrial Estate which consists of low-level factory Class B1 industrial units (creating 27 business spaces) which now house a range of businesses from a paperback book distribution centre to an MOT garage. This is another cul-de-sac arrangement. Apart from the barns and the modern executive homes, all housing in Horcott has a maximum of 2 storeys only.

6.8.6 Still in the parish but over a kilometre down Totterdown Lane is a small group of renovated, enlarged old farm buildings converted to residential use. The White House, one of the older houses in Horcott, marks the entrance to Totterdown Lane from Horcott Road.

## 6.9 Land Uses

6.9.1 The land uses are housing, agriculture and equestrian, recreation (playing fields and Horcott Lakes) and light industrial. Many residents work from home in this part of Fairford (electrician, general builder, roofing etc.)

## 6.10 Views

6.10.1 Winter (and summer, but particularly lovely in the winter) views of St Mary's Church from across the playing fields.

6.10.2 From Horcott Road looking towards Horcott House paddocks, Horcott Farm and Horcott Hill.

6.10.3 Views across the Horcott Lakes at all points including views from the permissive paths, Totterdown Lane and Lakeside.

6.10.4 Views back from Horcott Lakes to Horcott Hill.

6.10.5 Views from Horcott Farm and the river PROW north and east across the river.

6.10.6 View across The Short Piece towards the Conservation Area (below).

6.10.7 Looking across The Short Piece from near PROW to Horcott Lakes

6.10.8

'Views' references
NB NOT viewpoints but the general locations mentioned in 6.10

1. St Mary's Church
2. Coln House School Playing Field
3. Horcott House paddocks
4. Horcott Farm
5. Horcott Lakes
6. Totterdown Lane
7. Lakeside
8. The Short Piece

Conservation Area: green line
Horcott Hill: see 2.10.6

## 6.11 Summary Table for Area 5: Horcott

| Characteristic | Character Area Detail |
|---|---|
| Layout | Essentially linear. Horcott Road is the spine which links all buildings in a series of cul-de-sacs, some recent, others dating back into the centuries, linking the road with the river. To the east, large building plots, open ground, long drives, stone walls, hedges, fenced paddocks. To the west, medium sized building plots, light industrial sheds, hedges, grass verges. |
| Land uses | Residential, agricultural, equestrian, light industrial, self-employed working from homes. |
| Building scale, appearance | Max. 2 storeys even in the listed buildings. Highest are agricultural barns and the church. Newer houses are a good mix of bungalows, semi-detached and detached. Materials are largely Cotswold stone, yellow brick, render. |
| Green features | Hedges, trees and grass verges (FNP12 No.5). Much of Horcott overlooks playing fields and the river to the east; lakes to the west. Green area, grass and trees in the middle of Faulkner's Close. Fields and playing fields forming a gap between Horcott and Fairford (FNP9) |
| Open space | Horcott Lakes, playing fields, river walks, PROW through fields and garden. Mere fields (Carters Ground and The Short Piece) and Coln House Playing Field[53] form a key part of the proposed Fairford-Horcott Local Gap (FNP9[54]) as do the Fairford Youth Football Club grounds. |
| Landmarks | Horcott House, St Thomas' Roman Catholic Church and Presbytery, The White House |

[53] Coln House Playing Field is proposed as a Local Green Space. For full details and arguments re. FNP8 Protecting Local Green Spaces, see Evidence Base: Landscape and Local Green Space Study, Section 2

[54] The full justification for the Fairford-Horcott Local Gap FNP9 is to be found in the Fairford Neighbourhood Plan Evidence base: Landscape and Local Green Space Study, Section 3.

## 6.12 Summary Comments

6.12.1 Horcott is a distinct settlement with many of the features of an attractive small village (although the public house, The Carriers Arms, was lost in the 1990s): a wide range of housing styles, sizes, ages, values; playing fields, church, access to the river and lakes; employment opportunities in the light industrial estate. There is a good mix of age ranges in the buildings and the area is generally a safe place for children.

6.12.2 One of the problems is the distance from Horcott to the facilities in Fairford; elderly residents in particular can find it a long way to walk with a heavy shopping load. It might be worth considering supporting a small 'village' shop/sandwich bar in the industrial estate.

6.12.3 A second issue is the presence of large lorries on the road accessing the industrial estate. Signposting from the industrial estate is inadequate.

6.12.4 The importance of the fields and playing fields which separate Horcott from its neighbouring, larger settlement is recognised in the Fairford Neighbourhood Plan policy FNP9, Protecting the Fairford – Horcott Local Gap. The significance of the gap and its importance to local Horcott residents cannot be sufficiently strongly emphasised.

6.12.5 Unsightly overhead services interrupt the street scene. Wherever possible all efforts should be made to relocate these underground should the opportunity arise (FNP12 P12.2).

6.12.6 Horcott House looking from Horcott Road across the horse paddock to the southeast façade of the house

## 6.13 Horcott Listed Buildings and other selected HER records[55]

| Address | Date | HER reference number/s |
|---|---|---|
| Horcott Farmhouse, Horcott Lane | Early C18th, altered early C19th | 43937 |
| Horcott House, Horcott Lane | Late C18th / early C19th | 43938 |
| Bailiff's Cottage, Horcott Farm | Late C17th | 43939 |
| Presbytery of Roman Catholic Church of St Thomas of Canterbury | c. 1865 | 43922 |
| Roman Catholic Church of St Thomas of Canterbury | 1845 | 8272 |
| Site of Carriers Arms, Horcott Road – not listed | | 17217 |
| Field barn and storage shed – not listed | | 12840 |

[55] This list has been created using the Historic England list of listed buildings: https://historicengland.org.uk/listing/the-list/ and the Gloucestershire County Council Historic Environment Record http://www.heritagegateway.org.uk/Gateway/Results_Application.aspx?resourceID=108. For definitive details on individual buildings, please refer to the Historic England and the Gloucestershire Heritage Environment Record information.

| | | |
|---|---|---|
| Horcott Farm Mill and assoc. earthworks (at Cyrene) – not listed | | 15676 |
| Horcott Mill – not listed | | 3211 |
| Land off Horcott Road – not listed | | 48671 |
| Water Tower, Horcott Hill – not listed | | 19908 |

## 7.1 Conclusion

7.1.1 The valley that descends to the bend of the River Coln at Fairford/Horcott has been inhabited by homo sapiens for, literally, thousands of years. The two fords, the proximity to the River Thames, the fertility of the land as the high ground of the 'wolds' descend and give way to the gravel of the Thames basin - all have played their parts in the development of the settlement, and, crucially, continue to be features which affect the town today. The river crossing is a pinch-point on a trunk road; rain falling in Withington, the high point in the water catchment area, drains down through fields and the river to this spot[56]; the geological features give rise to variations in water-table levels here; routes criss-crossing the landscape as paths, tracks, drove roads and lanes, find their meeting points in or near the town.

7.1.2 This is an ancient landscape, with a long and rich history about which discoveries are still being made. It was only 2013 when the skull, followed by the skeleton, of an 18-24 year old Sub-Saharan African woman was found by children playing in the River Coln near Cutler's Ford[57]. The bones were dated between 896CE – 1025CE ie. some time between Alfred the Great and King Canute.

7.1.3 The C15th Church of St Mary's is one of the most important parish churches in England; visitor numbers are increasing, with up to 20,000 recently. The town centre is, with only a couple of exceptions, Georgian (to the east). To the west it is largely a century or so older, and to the north is open parkland, a rare feature in any town centre. The road through the town is lined, on both sides of the river, with listed buildings, one of which still has a doorway dating back to the time of the Peasants' Revolt and the Black Death. The town contains several examples of agricultural workers' cottages dating back a hundred and fifty to two hundred years, and these together with the range of C20th council housing, demonstrate a changing pattern of housing for workers over the centuries. Some of the tenant farms for Fairford Park have gone but the patterns of their footprint remain both in the conversion of many agricultural buildings and in the productive fields and meadows within and around the town. Above all, this is a rural community which is deeply connected with the landscape within which it sits.

7.1.4 Since the Second World War there has been a tremendous growth in building. In addition a huge volume of gravel has been extracted and there has been a massive loss of facilities of all kinds in the town which has led to the impoverishment of culture and community. During this time there has also been a decline in understanding of the geography and other important aspects of the town on the part of the authorities. Flooding incidents have occurred with unprecedented frequency but the recent EA Flood Alleviation Scheme should significantly mitigate this risk. The impact of so much gravel extraction and increased urbanisation has never been investigated and the town's infrastructure is showing ever-increasing strain. The recent losses of the police station and the bank (although the town is now served by a mobile bank 3 times a week) are cases in point.

## 7.2 Dangers

[56] A flood alleviation scheme was installed in 2014. See FNP4 for outstanding issues.

[57] Anyone following 'The Last Kingdom' series by Bernard Cornwell (also a BBC TV series) might be interested to know that Fairford is the manor gifted to Uhtred by King Alfred on his deathbed, and the presence of such a woman in Fairford is imagined. All in the sixth book of the series, 'The Death of Kings' 2011 (before the discovery of the skeleton). The attribution of this skeleton is unverified and has yet to be formally confirmed and included in County Records.

7.2.1 The ruination and potential loss of ancient Drove Roads and linking tracks. Fairford is particularly rich in these wide roads and pathways but insensitive tarmacking, cutting into the verge heedlessly, traffic riding up onto verges etc. is damaging them. Drove roads are ideal routes for sustainable travel and so vital for a sustainable C21st future.

7.2.2 Unfortunately, the major loss to archaeology in the parish was to gravel extraction before 1990. Since then, full in-depth archaeological excavations with full recording of finds has been standard practice before gravel extraction. In the case of recent housing sites pre-determination surveys and evaluations have resulted in short reports. Archaeological post-excavation is a very protracted process and full reports can take many years to prepare – well after the site in question has been built upon. Ideally, the Council for British Archaeology Best Practice advice should be followed and where there is evidence of potentially valuable findings, the site should be left untouched and any evidence left in the ground for future generations.

7.2.3 Loss or damage to listed and other historic buildings. The effect of increasingly heavy traffic through the centre of town (lined with listed buildings which sit right on the pavement) has a detrimental effect on the structures of these old buildings. The pollution caused by exhausts eats into the soft Cotswold stone of the fabric of the buildings.

7.2.4 Loss of characteristic local stone colour. The stone of the southern Cotswolds is the light white/cream coloured stone – the butter yellow belongs to the north Cotswolds. Yet, the main approach into Fairford from the west is now lined with a butter yellow Cotswold stone wall (FNP12 No.3), and the colour of stone in the Keble Fields development to the east is inappropriately yellow.

7.2.5 Loss of listed tombstones. Those in St Mary's Churchyard, and in Fairford United Churchyard are urgently in need of conservation.

7.2.6 Insensitive development which fails to knit in with the rest of the town. This is not simply a question of style (covered in the Cotswold Design Code) but is, literally, a question of knitting in with paths and networks of routes around the town as well as compatibility with the particular location in the town, in terms of style and layout. As has been shown, Fairford was originally, and remains (just), a web of interlinking routes (paths, roads, shared surfaces etc.) which hold the town together. The current predilection for single point entry/exit cul-de-sacs can lead to inward-looking communities, cut off from the rest of the town. Larger developments should not only link in with existing pathways but should create more of their own.

7.2.7 One of the characteristics of Fairford/Horcott, like many other Cotswold towns and villages, are the open spaces (fields, parks, large gardens, greens) which are found throughout the town. These should not be regarded as opportunities for development but preserved wherever possible, their biodiversity enhanced. A permeable edge of town which allows the rural landscape to break up the line of development, should be protected and enhanced.

7.2.8 The boundary of the Conservation Area was last reviewed 29 years ago and there is urgent need for review because of the pressure of new developments. In the past few years the town has expanded significantly to the west and to the east. Fairford is designated a Principle Settlement in CDLP Policy DS1; it has been identified as one of 'the most sustainable locations to deliver future growth' (CDLP para. 6.1.9).

7.2.9 The area at the north west of the existing Conservation Area should be brought within the boundary to make sure that the special agricultural character and appearance of this area are not further eroded. Barns, outbuildings and new building works are transforming the farming environment of the Waiten Hill Farm area. The last remaining functional agricultural buildings are at Milton Farm and this corner of the town should be conserved.

7.2.10 Conservation Area proposed boundary change
Blue line = Proposed area for inclusion in Conservation Area
Green line = Current boundary of Conservation Area

7.2.11 Street clutter – poles, overhead cables, broadband boxes, signs and notices – detract significantly in several places. The clearest example of this is in Milton Street and particularly, the Green on Coronation Street. Wherever possible, such clutter should be minimized or even relocated underground. Attention should also be paid to the quality of street furniture, particularly in the Conservation Area (FNP12 P12.2).

7.2.12 Pedestrian guard barrier at the end of Keble Alley, alongside an important listed building (Keble House). Basic, functional street furniture but lacking in sensitivity to the needs of a Cotswold Conservation Area.

7.2.13 The Green, Coronation Street showing the street clutter of overhead cables and broadband boxes.

7.2.14 Residents and planners need to be vigilant as developers have occasionally tried to flout planning and design rules, the most recent example of this being an unauthorized and completely inappropriate extension to Fayre Court, affecting what is probably the most sensitive view in the town. Earlier examples of inappropriate design are eg. in Back Lane. These were not challenged and continue to detract from the Conservation Area in this area.

7.2.15 Opportunities to improve the ecological biodiversity in the town's many green spaces should be taken whenever and wherever possible.

## 7.3 Hopes

7.3.1 The archaeology and history of the valley will be secured, preferably left undisturbed in the ground, or, where totally unavoidable, excavated fully and thoroughly.

7.3.2 Residents and visitors to Fairford/Horcott will have a greater sense of the long and deep history of the place, and value it accordingly.

7.3.3 Residents and visitors to Fairford/Horcott will have a more detailed appreciation of the beauty and distinctiveness of the town and its enhanced biodiversity.

7.3.4 Characteristic and valuable features of the townscape will be preserved and enhanced.

7.3.5 The network of pedestrian routes (PROWs, paths, alleyways) and cycleways will be enhanced and more closely linked, both within the town and in the wider landscape.

7.3.6 Problematic issues which have been identified will be remedied over time.

7.3.7 Community cohesion will be encouraged.

7.3.8 Opportunities for appropriate tourism, an important source of prosperity for the town, will be enhanced.

7.3.9 Fieldway looking west from Cinder Lane

7.3.10 River Coln from Town Bridge, looking towards Mill Bridge

## 7.4 Afterword

7.4.1 In mid-February 2021, in the middle of the third Coronovirus-19 lockdown, reports started coming in of work being carried out at the western end of Lake 104. Over the next few days, increasingly alarmed, more and more posts appeared in social media, photographs were shared as well as feelings of anger and grief. It had been known that Lakes 103, 103a and 104 had outline planning permission for holiday homes but there had been no warning of the devastation which was underway.

7.4.2 Lake 104 February 2021. The small figure on the left is standing on a PROW

7.4.3 Lake 104 PROW Winter flooding 2019. The 'small figure' from the previous photograph (7.3.2) was on this path.

7.4.4 The area around the lake is increasingly prone to flooding since water drains down from the Fairford catchment area into the lake and the Court Brook. It is a Zone 3 flood plain and thus not suitable for development.

7.4.5 Within a week the beauty of a well used and much loved PROW had been destroyed, the wildlife and biodiversity eradicated.

7.4.6 Lake 103 viewed from the north – brush and branches pushed together to form a barrier. February 2021

7.4.7 Over the years the residents of Fairford have been involved in appeals against various (but not all) developments on land they particularly value and the struggle for this area was particularly hard fought and bitter. At one planning appeal the question was asked, 'If you value this so highly, then why have you not said so, or done anything, earlier?' To which the obvious answer was, 'No-one dreamt that this area could possibly be developed.'

7.4.8 It is hoped that this document will provide the evidence to prove that the residents do care, very much, for their town and its environs.

7.4.9 River Coln upstream of The Cascades

# 8.0 Gallery of Fairford and Horcott Building Features – Conservation Area Details

## 8.1 Doorways and Porches

8.1.1

8.1.2

8.1.3

8.1.4

8.1.5

8.1.6

8.1.7

8.1.8

8.1.9

## 8.2 Street / house lighting

8.2.1

8.2.2

## 8.3 Dormer windows, roofs and chimneys

8.3.1

8.3.2

8.3.3

8.3.4

8.3.5

8.3.6

8.3.7

8.3.8

8.3.9

8.3.10

8.3.11

## 8.4 Windows and surrounds (stone and wood)

8.4.1

8.4.2

8.4.3

8.4.4

8.4.5

8.4.6

8.4.7

8.4.8

8.4.9

8.4.10

8.4.11

8.4.12

## 8.5 Decorative features

8.5.1

8.5.2

8.5.3

8.5.4

8.5.5

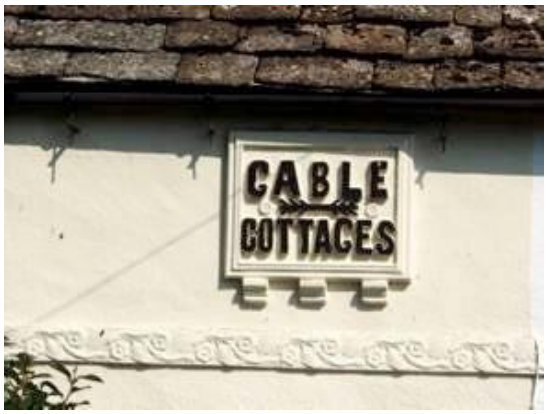
8.5.6

8.5.7

8.5.8

8.6.1

8.6.2




8.6.3

8.6.4

8.6.5 Fire insurance mark - 34 London Street

8.6.6

# 9.0 Design Principles (FNP12)

9.1 The 'harsh edge' of east Fairford

9.2

FNP12 Achieving High Standards of Design

Proposals for new development, including extensions to existing buildings, should be of the highest design standards, in accordance with the Cotswold Design Code and should have regard to the guidance of the Fairford Character and Design Assessment and to the following key design principles.

a) There are key views listed and illustrated in Appendix 3 which should not be obstructed or their contribution to defining the character of the town and its relationship with the surrounding landscape harmed.
b) More generally, development layouts and and building orientation should not obstruct the occasional glimpse views of the surrounding landscape from within the town. See paragraphs 2.4.1, 2.4.9, 2.6.2, 2.6.12, 3.2.1, 3.4.1, 3.4.3, 4.6.3, 4.6.5[58].
c) Short runs of low-level buildings in groups (1, 1.5 or 2 storey) should be placed at the edges of any development with higher (max. 2.5 storey) buildings kept to the centre for developments outside the town centre boundary. See paragraphs 2.6.2, 2.6.15, 2.8.4, 2.8.10, 2.8.14, 2.11, 3.8.6, 3.8.13, 3.11, 3.12.1, 4.6.6, 4.8.7, 4.8.8, 4.12.7, 5.5.5, 5.8.4, 5.11, 5.12.6, 6.8.3.
d) The Cotswold stone of Fairford is the light, white/cream-coloured stone (not the yellow stone of the northern Cotswolds) with a light-coloured pointing and these are dominant and defining characteristics of the town and should therefore be the default material unless the nature and location of the proposal allow for the use of non-vernacular materials. See paragraphs 1.3, 3.8.15, 5.8.5, 7.2.4.
e) All solid fencing/walling should contain a 13cm$^2$ hole to enable the passage of hedgehogs and small mammals. If the barrier is particularly long eg. in a boundary wall, then several holes should be included at regular intervals, ideally about every 5m. It is recommended that attention be paid to the needs of small mammals as recommended in eg. https://www.hedgehogstreet.org/development. See paragraphs 2.6.3, 2.8.5.
f) Frontages and boundaries, where they are to be defined, should be demarcated with Cotswold stone walls, iron railings or hedging. Practical maintenance arrangements should be in place if a hedge is to be planted. See paragraphs 2.6.3, 2.8.5, 2.11, 3.11, 4.5.1, 4.6.4, 4.6.6, 4.11, 4.12.7, 4.12.8, 5.7.1, 5.11, 5.12.5, 5.12.7, 5.12.8, 6.4.1, 6.11.
g) Close-board timber fences should not be used to define boundaries to the frontage/roadside of new buildings. See paragraphs 4.12.5, 4.12.6, 5.12.8.
h) Bin storage should be incorporated into new housing and commercial proposals in a manner which is sympathetic and does not detract from their character and appearance.

[58] All paragraph references in this Section 9 and in Section 11 refer to paragraphs in this document: Fairford Character and Design Assessment

i) Where 1960s imitation or reconstituted stone is to be replaced/covered, use natural and/or heritage materials, including roughcast render, rather than reproduction. See paragraphs 1.3, 3.12.3, 5.8.5, 5.8.9.

j) Provision should be made for thoroughfares for pedestrians and cyclists providing quick and safe access to main arterial routes (alleyways and through routes are a typical feature of the town). Where linking alleyways are incorporated into new design they should be at least 2m wide. See paragraphs 2.2.2, 2.4.9, 2.5.1, 2.5.6, 2.5.10, 2.8.16, 2.11, 3.5.9, 3.11, 4.4.1, 4.4.4, 4.5.1, 4.5.4, 4.5.5, 5.5.1, 5.5.5, 5.11, 6.8.1.

k) Development layouts formed of cul-de-sacs and crescents are not typical of old Fairford.

l) Overhead services generally detract from the special character and appearance of the street scene and landscape and the opportunity should be taken as part of suitable development proposals to re-site them underground as part of that scheme. See paragraphs 2.12.5, 2.12.9, 4.12.4, 4.12.6, 4.13.1, 5.3.2, 5.12.5, 5.12.6, 6.5.3, 6.12.5, 7.2.10.

This policy complements the design policies of the CDLP (Policy EN2) and the application of the Cotswold Design Code (Appendix D of the CDLP) by requiring proposals to have regard to the Fairford Character and Design Assessment, prepared to evidence the FNP, and by identifying a number of specific characteristics and features of Fairford and Horcott. It has been formulated to have regard to the NPPF's approach to design whilst providing a distinctiveness to the Plan area. FTC commits to developing a Fairford Design Code in due course to integrate with the District Code, following the principles of the National Model Design Code.

9. 3 Additional considerations (desirable but <u>not</u> covered by Policy FNP12)

- In new residential and industrial development provision should be made for onsite car parking to development plan standards The use of raised tables and shared surfaces should be encouraged. This could entail providing separate small car parks and garaging. See paragraphs 2.4.7, 2.5.14, 2.11, 3.5.6, 3.8.3,4.5.4, 4.5.4, 4.5.6, 5.5.6, 5.11.
- Other than in exceptional circumstances, existing land contours should be maintained and the final scheme should reflect those original contours. The visual impact of raised land levels must be positive and not detract from the quality of the adjacent landscape / townscape. See paragraph 5.8.5
- If the site (or parts of the site) are to be raised to mitigate flooding then its impact on surrounding properties should be assessed in order to ensure that there is no increase in flood risk elsewhere.

9.4 Once 'The White Hart Inn' and 'The George', now White Hart Court residential housing and Coffee Post with Bull Hotel rooms above.

9.5 View across Horcott Lakes, winter 2022

9.6 List of Key Views

1. From Betterton's Close footpath across Milking Path Park to Waiten Hill
2. From Common Lane across to Waiten Hill
3. Across Gassons Field to the Mill and St Mary's Church tower, over to Horcott Hill and Cleeve Wood (south)[59] and into the Special Landscape Area (north).
4. The Mill, Upper and Lower Green, and the view over towards St Mary's Church and vice versa (the views from St Mary's Churchyard back across the River Coln)
5. Views from Pitham Brook Path
6. Westward from Leafied Road
7. Into Fairford Park from High Street + Walnut Tree Field
8. Up and downstream of the River Coln from Town Bridge and Mill Bridge
9. Any views within/into Fairford Park, especially those across the River Coln, towards the Obelisk and from the gateway at the top end of Lovers Lane
10. Along the line of Lovers Lane (from both directions)
11. Along Park Street and over to Walnut Tree Field including views to St Mary's Church
12. St Mary's Church from the High Street
13. Market Place and High Street including White Hart Court
14. From The Croft back towards the High Street as well as along the length of the Croft
15. Over Coln House playing fields from Horcott Road towards St Mary's Church
16. South west from Horcott Road across The Short Piece towards the Conservation Area
17. Along London Street from Back Lane junction; also along London Road towards the junction with the Market Place
18. Across the fields and along the River Coln
19. South from the end of the track off Moor Lane to the meadows and Snake Lane, across to Horcott Hill and Cleeve Wood
20. South from the track to the south from Moor Lane
21. Along Fieldway and across the meadows
22. Around and across Lake 104
23. From Horcott Road looking towards Horcott House paddocks, Horcott Farm and Horcott Hill
24. Across the Horcott Lakes at all points including views from the permissive paths

[59] This long view from Gassons Field across to Cleeve Wood and Horcott Hill could not be shown on the map

25. Back from Horcott Lakes (causeway seating area) to Horcott Hill
26. From Horcott Farm and the river PROW north and east across the river
27. Along London Road (both directions) particularly towards Keble House from Railway Inn
28. From green by Eight Bells towards East End House
29. North and south along river from River Walk passing gardens at the rear of Courtbrook and Moor Lane
30. South east from Cirencester Road west of The Old Piggery and along Cirencester Road in both directions
31. South from footpath south of The Burdocks
32. Westward from gateway half way down Totterdown Lane across Horcott Lakes
33. Along Milton Street, both directions
34. From Gassons Field to Milton Farm agricultural buildings and on towards Waiten Hill

## 10.1 FNP13 Conserving Non-Designated Heritage Assets

The FNP identifies the buildings and structures, as listed in Appendix 2 and shown on the Policies Map, as Local Heritage Assets by way of their local architectural or historic interest. Proposals that wil result in harm to, or unnecessary loss of, a Local Heritage Asset will be resisted, unless it can be demonstrated that there is a public benefit that outweighs harm or loss.

Non-householder development on previously undeveloped land must allow for the evaluation of archaeological remains and the protection or investigation of other non-designated heritage assets of archaeological importance that may not be listed in Appendix 2.

This policy identifies several buildings, structures and other features that have local, social, historical and/or architectural interest in order that their significance is understood and taken into account in development proposals. They are therefore specifically regarded as 'non-designated heritage assets' in respect of para. 203 of the NPPF.

CDLP Policy EN12 provides the basis on which proposals will be judged in seeking to avoid unnecessary loss of, or damage to, its local heritage value. Each asset has been assessed against the criteria provided in that policy for buildings, structures and historic parks and gardens as set out in the Evidence Base (FNP13 Conserving Non-Designated Heritage Assets). This document includes photographs and maps showing the location of each of the assets.

In addition, as mentioned in the 'Brief History of Fairford' Section 2.16-2.23, there is abundant evidence of prehistoric, Roman, Saxon and medieval settlement within and around the town. The policy therefore draws specific attention to the likelihood of below ground archaeological remains so that development proposals make the necessary provision for investigations.

The Fairford Neighbourhood Plan identifies the following as Non-Designated Heritage Assets.

1. Palmer Hall
2. Fayre Court
3. Fairford Cottage Hospital
4. Library / Old School
5. Hyperion House
6. The Old Piggery
7. Yells Yard
8. Park Farm House
9. Waiten Hill Farm House
10. Milton Farm House
11. Milton Farm Stone Barns
12. The Swedish Houses in The Plies
13. Bridge over disused railway
14. Cable Cottages

15. Dynevor Terrace
16. Eastbourne Terrace
17. Vines Row
18. Terrace of Houses between Mr Ernest in the Market Place and The Plough, London Street: 7A, Tynedale, The Plough Inn
19. Terrace of Cottages on Milton Street backing onto Lower and Upper Green
20. 2, 3, 3a High Street
21. 9 High Street
22. 29, 30, 33 London Street
23. 35 London Street
24. 5-9 Coronation Street
25. Park Villas
26. Linden Cottage
27. Glebe Court canopy
28. The Oxpens
29. Mill Lane
30. Cotswold Stone Field Shelter
31a. Cattle Trough in Carters Ground
31b. Cattle Trough by Track in Field East of Polish Camp Site
32a. Fairford Gate South Stile
32b. The Short Piece Stile
32c. Virgills Stile
32d. Milton Street Stile
32e. Upper Green Stile
32f. Oxpens Stile
32g. Gassons Field Stile
32h. Garretts Stile
32i. Waiten Hill Stile
33. Gassons Field Water Tower
34. Milestone
35. Red Pillar Box, Market Place
36b. Telephone Box: Queensfield
36c. Telephone Box: The Green, Coronation Street
37a. Iron Railings on Mill Bridge
37b. Iron Gates to Waterloo Cottage
38a. Stone Gate Pillar – Hatherop Lane
38b. Stone Gate Pillar – Lovers Walk
38c. Stone Gate Pillar – Leafield Road
39. Entrance arch and Ernest Cook Estate Yard
40. The Boathouse
41. Pump House by The Cascades
42. The Cascades
43. Fairford Park
44a. Reservoir – East
44b. Reservoir - West
45. Paddock on Coronation Street
46. Morgan Hall Park including Jones' Field
47. Fieldway
48. Applestone Court

## 11.1 Specific References to other FNP Policies

11.2 FNP6 Managing Traffic in the Town – paragraph 2.11[60]

11.3 FNP7 Improving Access to Visitor Attractions – paragraph 5.5.2

11.4 FNP8 Protecting Local Green Spaces – paragraphs 2.4.2, 2.6.8, 2.7.2, 3.2.2

11.5 FNP9 Protecting the Fairford-Horcott Local Gap – paragraphs 2.2.1, 2.4.2, 2.6.8, 2.7.2, 2.11, 2.12.6, 6.4.3, 6.6.1, 6.6.4, 6.12.4

11.6 FNP10 River Coln Valued Landscape – paragraphs 5.4.1, 5.6.3

11.7 FNP11 Valuing Hedgerows and Trees – paragraphs 2.6.1, 2.6.3, 2.6.10, 3.4.6, 3.6.5, 3.11, 4.6.1, 4.8.7, 4.12.2, 5.6.2, 6.6.3, 6.11, 6.12.4

11.8 FNP17 Sustaining a Successful Town Centre – paragraph 4.2.2

11.9 Fuller details and arguments for FNP8, FNP9 and FNP10 can be found in the Evidence Base of Fairford Neighbourhood Plan: Landscape and Local Green Space Study.

## 12.1 Drove Roads/Tracks

12.1 Map showing Drove Roads and Linking Tracks (in green)

12.2 The drove road and track system in this area has been mapped by local historians using local records and measurements of road widths. Inevitably, some of the conclusions are speculative.

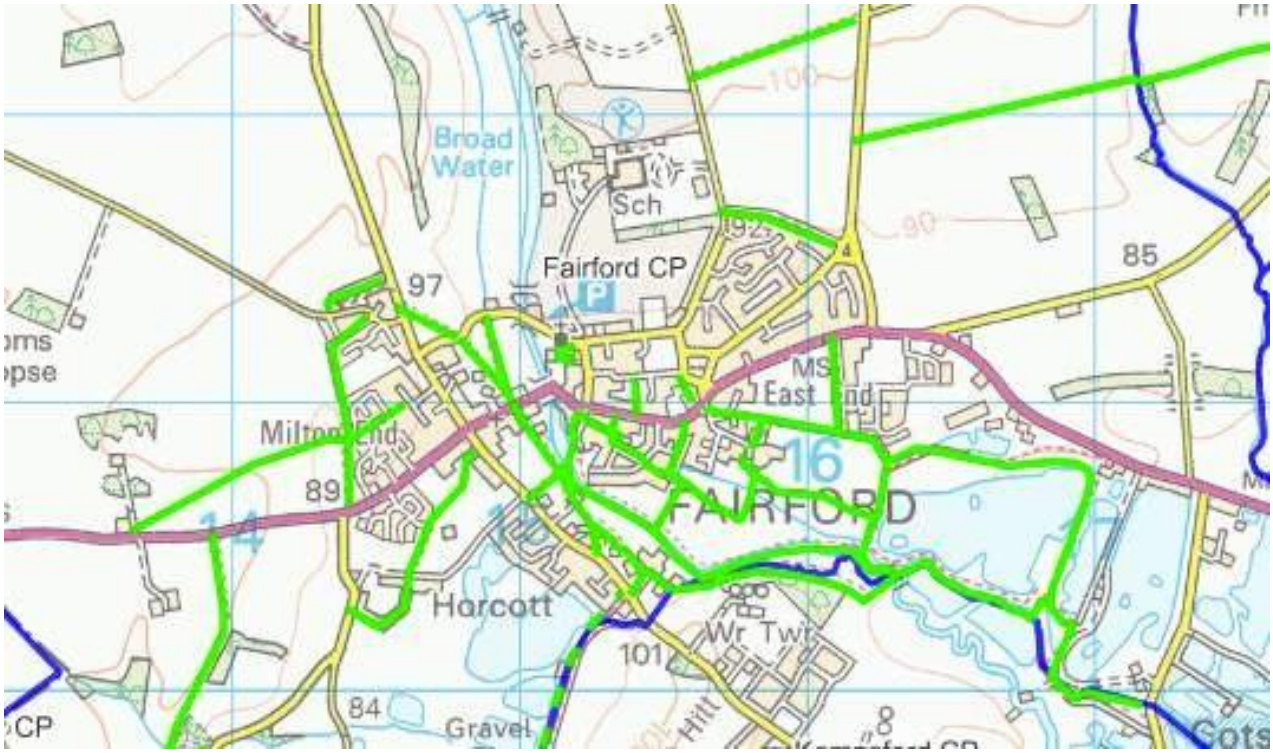
[60] All paragraphs in this Section 11 refer to paragraphs in this document: Fairford Character and Design Assessment

12.3 The drove road south of the A417 going down Rhymes Lane was cut by the airfield but would have linked with Totterdown Lane. Welsh Way and Salt Way (in parts aka Akeman Street) meet at Ready Token crossroads.

12.4 It should be noted that tracks such as Fieldway were not drove roads (which were, essentially, long-distance routes) but were local trackways providing access to nearby drove roads, local fields etc.

12.5
Welsh Way looking back towards Fairford. Roof of Sunhill Close house visible in the distance.

12.6 Map of PROWs in and around Fairford[61] (PROWs = green lines)




[61] Detail from Gloucestershire County Council PROW online map at https://www.gloucestershire.gov.uk/highways/public-rights-of-way/rights-of-way-online-map/

## 13.1 Full List of Land Use Policies

| | |
|---|---|
| FNP1 | The Fairford and Horcott Development Boundaries |
| FNP2 | Providing a New Burial Ground |
| FNP3 | Maintaining Viable Community Facilities |
| FNP4 | Managing Flood Risk |
| FNP5 | Investing in Utilities Infrastructure Improvements |
| FNP6 | Managing Traffic in the Town |
| FNP7 | Improving Access to Visitor Attractions |
| FNP8 | Protecting Local Green Spaces |
| FNP9 | Protecting the Fairford – Horcott Local Gap |
| FNP10 | River Coln Valued Landscape |
| FNP11 | Valuing Hedgerows and Trees |
| FNP12 | Achieving High Standards of Design |
| FNP13 | Conserving Non-Designated Heritage Assets |
| FNP14 | A New Low Carbon Community in Fairford |
| FNP15 | Housing Type and Mix |
| FNP16 | Zero Carbon Mix |
| FNP17 | Growing Our Local Economy |
| FNP18 | Sustaining a Successful Town Centre |
| FNP19 | New Visitor Accommodation |

## 14.1 Fairford and Horcott Character and Design Assessment: Consultation Feedback

This document has been sent to the following organisations for comment and feedback:

Fairford Community Voice Committee
Fairford Planning Watch email list (100 addresses)
Interested residents
Cotswold District Council Heritage and Design
Fairford History Society

Responses include:
We've read with great interest your letter and the attachment. So much hard work by your team.

One thing we query, date of building of Bettertons Close. We're sure most of the bungalows were built in the sixties. Good luck with all you're doing.

The tremendously detailed Character and Landscape Design Assessment for Fairford is of great interest too, a valuable and I think unrivalled record of the town past and present.

Just read all that and once again what a huge work, really interesting. Rather embarrassed by my front garden, though. It is of no consequence but my railings were made by Chew Maker same as Mill Bridge but a year or so earlier, I am not sure you need any more stuff. I am not sure either that Park Villas is on Mount Pleasant but is in fact Park St. Doesn't matter either way. I just hope that they read it properly, live in hope.

Thanks for all your hard work again.

Fairford History Society approved this document.

This is a very useful document and provides a good description of the town. As with the NDHAs, we have not had time to review the document in great depth or to visit the area to check the detail or to research sources to check for accuracy, so these comments are very much on the basis of a "quick look" at the document. The document only seems to cover the settlements of Fairford and Horcott and not the wider parish. Given the possibilities of further gravel extraction or other developments that might be useful in the longer term (Extract from CDC Heritage and Design response. Full details available).

Response to draft Milton End section only: I find the history element fascinating - of place in general and of Milton End in particular: for example, the reconstruction of Fayre Court (between the wars, I think); the use of Coln House as a convalescent home for war-wounded in the First World War; the history of occupants of some of the older houses; and the oral recollections of some longer term residents. But I am not sure how germane this is to your project.

## 11.1 Bibliography

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## 12.1 Acknowledgements

With many thanks to:
Alison Hobson and Fairford History Society for all the research and referencing
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- Gloucestershire Archives
- Cassini Publishing Limited
- Gloucestershire County Council Archaeology
- English Heritage: Britain from Above
- Fairford History Society
- Ordnance Survey

The Fairford Neighbourhood Plan Steering Group
The Fairford Neighbourhood Plan Environment and Infrastructure Sub-Group
Fairford Community Voice Committee
Fairford Town Councillors, Town Clerks and all the residents of Fairford who have helped in the creation of this document.

# FAIRFORD NEIGHBOURHOOD PLAN
# 2020 - 2031

# BASIC CONDITIONS STATEMENT



AUGUST 2022

Published by Fairford Town Council under the Neighbourhood Planning (General) Regulations 2012 (as amended)

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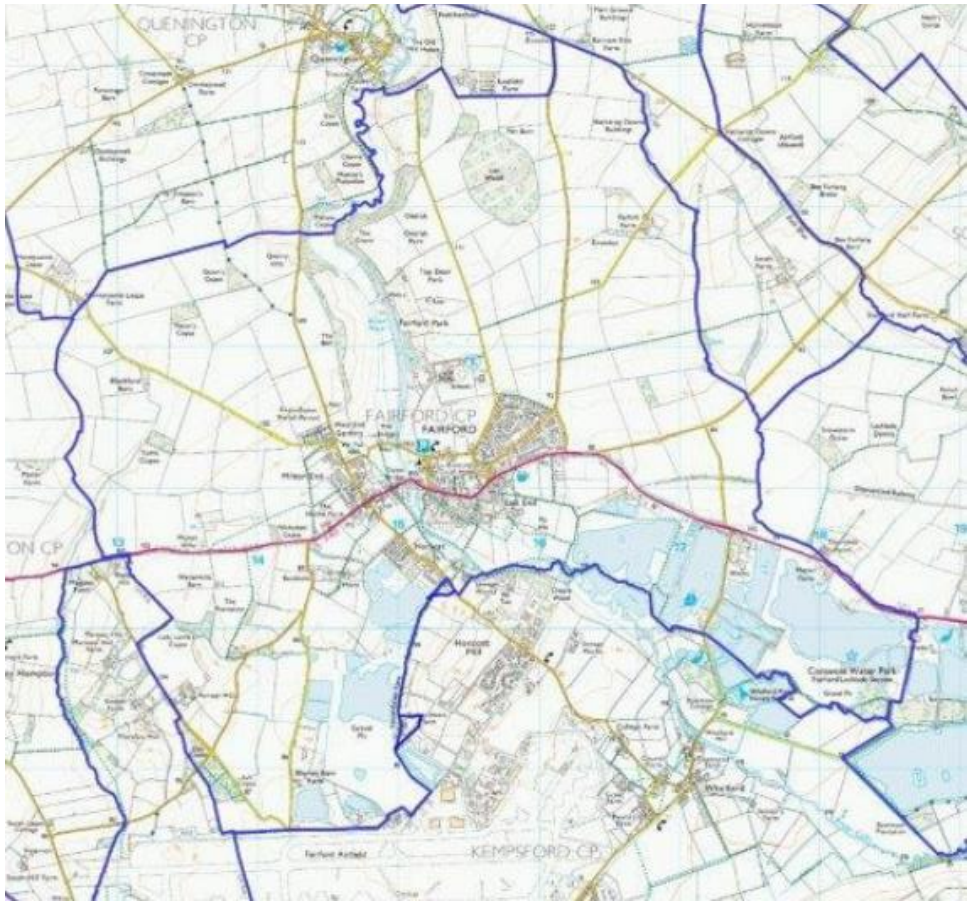
## 1.INTRODUCTION

1.1This statement has been prepared by Fairford Town Council ("the Town Council") to accompany its submission of the Fairford Neighbourhood Plan ("the Neighbourhood Plan") to the local planning authority, Cotswold District Council ("the District Council"), under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 ("the Regulations").




*Plan A: Fairford Designated Neighbourhood Area*

1.2 The Neighbourhood Plan has been prepared by the Town Council, the 'Qualifying Body', for the Neighbourhood Area ("the Area"), which coincides with the boundary of the Parish of Fairford as shown on Plan A above. The District Council designated the Area on 20 November 2013.

1.3 The policies described in the Neighbourhood Plan relate to the development and use of land in the designated Area. They do not relate to 'excluded development', as defined by the Regulations. The plan period of the Neighbourhood Plan is from 1 April 2020 to 31 March 2031, the end date of which corresponds with the plan period of the Cotswold District Local Plan 2011-2031 ("the Local Plan") adopted in 2018.

1.4 The statement addresses each of the four 'Basic Conditions', which are relevant to this plan, required of the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Town & Country Planning Act.

1.5 The Regulations state that a Neighbourhood Plan will be considered to have met the Conditions if:

a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Development Plan,
b) (Not relevant for this Neighbourhood Plan),
c) (Not relevant for this Neighbourhood Plan),
d) The making of the Neighbourhood Development Plan contributes to the achievement of sustainable development,
e) The making of the Neighbourhood Development Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
f) The making of the Neighbourhood Development Plan does not breach, and is otherwise compatible with EU obligations that have been incorporated into UK law,
g) prescribed conditions are met in relation to the Neighbourhood Development Plan and prescribed matters have been complied with in connection with the proposal for the Plan (in respect of the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 and other material considerations).

1.6 The responsibility for determining if a Neighbourhood Plan has had regard to national policy and is in general conformity with strategic policy rests with a combination of the qualifying body, the local planning authority and the independent examiner (Planning Practice Guidance §41-070 and §41-074). Case law, established in the Tattenhall Neighbourhood Plan in 2014 (see §82 of EWHC 1470) but endorsed by the Courts on a number of occasions since, makes clear that:

> *"… the only statutory requirement imposed by Condition (e) is that the Neighbourhood Plan as a whole should be in general conformity with the adopted Development Plan as a whole … any tension between one policy in the Neighbourhood Plan and one element of the … Local Plan (is) not a matter for the Examiner to determine."* (our emphasis)

1.7 It is noted that the case law has not yet explicitly established the same principle for Condition (a) in respect of the regard to national policy, but it seems reasonable to expect the Courts would reach the same conclusion, given there will also be a range national policies influencing plan making, and that those policies may also be in tension. In any event, the Town Council and District Council have endeavoured to work together closely in preparing the Neighbourhood Plan to avoid any disagreement on these matters in its submitted version (see §2.4 for further details).

1.8 The Town Council is also mindful of the 'Planning for the Future' White Paper published by the Government in August 2020. The Paper proposed to make significant changes to both the development plan and management systems and indicated that there is a future for neighbourhood planning in that system, but the precise role that plans will play was not made clear. There is considerable uncertainty now on the direction these changes will take but no new system will be in place before the making of this Neighbourhood Plan and no account has therefore been taken.

**2.BACKGROUND**

2.1 The decision to proceed with a Neighbourhood Plan was made by the Town Council in 2013. The key driver of this decision was a sense of wanting to plan positively for the future of the town in the light of an increasing number of speculative planning applications for large housing developments being consented in the absence of an up-to-date Local Plan and an adequate supply of housing land.

2.2 A steering group was formed comprising the residents and Town Council representatives. The group has been delegated authority by the Town Council to make day-to-day decisions on the preparation of the Neighbourhood Plan. However, as the qualifying body, the Town Council approved the publication of the formal documents.

2.3 The first version of the Neighbourhood Plan was completed in 2016 and was examined in 2017. The examiner judged that some elements of the Plan did not meet the basic conditions and he recommended to the District Council that the plan should not proceed to referendum. The Town Council was disappointed at the examiner's findings but accepted the District Council and examiner's decision and agreed to commence the preparation of a new plan with revised site and more robust evidence.



2.4 Again, the Town Council has consulted local communities extensively over the duration of the new project. It has also worked closely with officers of the District Council, the relationship with whom has improved since the adoption of the Local Plan in August 2018. In contrast with the first version, the Town Council is pleased that the District Council now judges that each policy meets the basic conditions.

2.5 In this respect, the Town Council acknowledges that the Planning Practice Guidance (§41-053) states that "it is only after the independent examination has taken place and after the examiner's report has been received that the local planning authority comes to its formal view on whether the draft neighbourhood plan meets the basic conditions." However, it is also mindful that, once submitted for examination, it has no further opportunity to modify the Neighbourhood Plan, other than through its withdrawal and resubmission. Further, S12(4) of the Town & Country Planning Act 1990 defines the local planning authority as the decision maker in respect of determining if the basic conditions have been met in order to make a neighbourhood plan, with modifications to the submitted plan as necessary. But, the Planning Practice Guidance regards the task of arriving at a planning judgement to be shared by the local planning authority, the qualifying body and examiner during the examination, in collectively considering if the basic conditions have been met (§41-070 and §41-074).

2.6 In which case, and with the history of this project firmly in mind, it has been vital that both the Town Council and the examiner are left in no doubt of the position of the District Council. In this regard, the Town Council notes the advice to the examiner in §2.9.6 of the NPIERS 'Guidance to service users and examiners' (2018) in respect of the standard of proof that the examiner must apply in reaching a planning judgement and in its §2.14.1 in respect of the requirement for accuracy, clarity and simplicity.

2.7 The Town Council expects that the examiner of the new plan will wish to understand the reasons why some proposals in the first plan did not meet with its examiner's approval. However, this is a new plan, albeit with the same vision, objectives and almost all the policies. It has refreshed and bolstered the evidence base and a new SEA has been prepared (the original being the main source of contention at the first examination). The adopted Local Plan now brings certainty to the strategic policy framework, although as noted in Section 4, the Town Council's prior misgivings about the delivery of the two Local Plan site allocations in the town have proved to be well founded. The Town Council therefore hopes the examiner of the new plan will begin the examination with a fresh pair of eyes and not regard the first examination as a benchmark.

2.8 The Neighbourhood Plan contains 19 land use policies, which are defined on the Policies Map where they apply to a specific part of the Area. The Plan has deliberately avoided containing policies that duplicate saved or forthcoming development plan policies or national policies that are already or will be used to determine planning applications. The policies are therefore a combination of site-specific allocations or other proposals and of development management matters that seek to refine and/or update existing policies.

**3. CONDITION (A): REGARD TO NATIONAL PLANNING POLICY**

3.1 The Neighbourhood Plan has been prepared with full regard to national policies as set out in the National Planning Policy Framework (NPPF) of 2021 and is mindful of the Planning Practice Guidance (PPG) in respect of formulating Neighbourhood Plans. As demonstrated in Table A, this plan has taken to opportunity to refine some adopted Local Plan policies to reflect the amendments to the Use Classes Order introduced in September 2020 as they apply to this Area (PPG 13-009c). In overall terms, there are four NPPF paragraphs that provide general guidance on neighbourhood planning, to which the Neighbourhood Plan has directly responded:

General Paragraphs

3.2 The Town Council believes the Neighbourhood Plan "support(s) the delivery of strategic policies contained in local plans … and … shape(s) and direct(s) development that is outside of these strategic policies" (§13). It considers the Neighbourhood Plan contains only non-strategic policy proposals or proposals that refine strategic policy to fit the circumstances of the Area without undermining the purpose and intent of those strategic policies (§18). It considers that the Neighbourhood Plan sets out more "detailed policies for specific areas" including "the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies" (§28).

3.3 The Town Council considers that its Neighbourhood Plan has provided its community with the power to develop a shared vision for the Area that will shape, direct and help to deliver sustainable development, albeit in a modest way, by influencing local planning decisions as part of the statutory development plan. The Neighbourhood Plan contains a housing site allocation proposal to redress the under-delivery of the Local Plan site allocations (§29). In this regard, the NPPF provisions of meeting local housing needs (as per §67) have been met, and slightly exceeded, for the plan period to 2031, thus enabling the District Council to engage the provisions of §14 in managing housing development proposals if those circumstances arise. The Plan is underpinned by relevant and up-to-date evidence. This is considered to be adequate and proportionate, focused tightly on supporting and justifying the policies concerned (§31).

Specific Paragraphs

3.4 Each policy engages one or more specific paragraphs of the NPPF. Those that are considered to be of the most relevance and substance are identified in Table A below.

| Table A: Neighbourhood Plan & NPPF Conformity Summary | | | |
|---|---|---|---|
| **No.** | **Policy Title** | **NPPF Ref.** | **Commentary** |
| FNP1 | The Fairford and Horcott Development Boundaries | 15, 16, 17, 29 | The principle of defining Development Boundaries to distinguish between the urban and rural is a well established strategic policy in Cotswold District (§17 and §29) and fundamental to operating the plan-led system (§15). The boundaries are unambiguous for all parties in the process to understand and are the product of the policies contained within the FNP to deliver sustainable development (§16). |
| FNP2 | Providing a new burial ground | 93 | The policy encourages proposals to increase the capacity of this local service to remain in step with the growing population of the town (§93). It was not possible to bring forward a site-specific proposal so the policy sets out the criteria by which proposals will be judged. |
| FNP3 | Maintaining viable community facilities | 93 | The policy identifies those community facilities to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs (§93). This is especially important as greater demand is placed on those facilities from the growing population. |
| FNP4 | Managing flood risk | 159 - 169 | The policy addresses one of the most important planning issues in the town for many years. It is consistent with, and partially refines the NPPF's provisions for managing flood risk (§159 - §169) with the benefit of extensive local experience, expertise and research. It acknowledges the wide variety of flooding sources and their effects of the town to ensure applicants understand and respond carefully to those risks in their proposals as relevant to their location, nature and scale. |

| | | | |
|---|---|---|---|
| FNP5 | Investing in utilities infrastructure improvements | 20, 25, 26, 28 | The policy is similar in its content to FNP4 in that past failures in delivering timely and quality improvements to supporting utilities infrastructure have poorly served the community. It aims to tackle this problem by raising the awareness of developers and utility providers in considering capacity and quality matters at the earliest opportunity in the design process and not to rely on standard obligations of the service providers to eventually find solutions to foreseeable problems, albeit at the town (non-strategic) scale (§20 and §28). The Town Council has engaged extensively with the local providers to ensure they support the policy (§25 and §26). |
| FNP6 | Managing traffic in the town | 104, 105 | The policy draws attention to the challenges created by the town's historic road patterns and widths, its location on the local highway network and its growing geography and population. It requires that proposals take full account of their traffic effects so they may be assessed and mitigation measures identified (§104). Its impact ought to be to direct windfall schemes not identified in the FNP to have given this matter the same consideration as the Town Council in its choice to allocate the Leafield Road site in FNP14 in managing the growth of the town (§105). |
| FNP7 | Improving access to visitor attractions | 84, 106 | The policy recognises the value of tourism to the local economy and seeks to better connect the town with nearby attractions (§84) in the most sustainable ways by encouraging walking and cycling (§106). |
| FNP8 | Protecting Local Green Spaces | 101, 102, 103 | The policy responds to the provisions of §101 to make designation proposals, informed by its evidence base in respect of meeting the tests of §102. Its wording then reflects the Green Belt equivalency of §103. |
| FNP9 | Protecting the Fairford – Horcott Local Gap | 174, 190 | The policy identifies the gap between the town and its smaller neighbour as especially precious in conserving their respective identities and character. The gap is therefore valued as a landscape (§174) and extends to the River Coln valued landscape as the gaps widens into the countryside south of the town. |

| | | | |
|---|---|---|---|
| | | | The evidence base also highlights its role in defining the significance of the setting to the Fairford Conservation Area, which requires conserving and enhancing as a designated heritage asset (§190). Importantly, the FNP has made positive proposals for growth on the other side of town, so the policy does not impede the wider spatial strategy. |
| FNP10 | The River Coln Valued Landscape | 174 | The policy identifies the land as a valued landscape (§174) which extends into the town as part of the Local Gap of FNP9. It does not prevent development but requires proposals to acknowledge, understand and respond to the sensitivity of the openness of the landscape in relation to their nature, scale and location. Importantly, the FNP has made positive proposals for growth on the other side of town, so the policy does not impede the wider spatial strategy. |
| FNP11 | Valuing Hedgerows and Trees | 131, 179 | The policy recognises the biodiversity value (§179) and visual amenity value (§131) of aged or veteran trees and requiring this to be considered when determining planning applications. |
| FNP12 | Achieving High Standards of Design | 127, 128, 190 | The policy responds to the new drive in the NPPF for achieving well-designed places (§128 and §129). It identifies a small number of key design principles that add value to the Cotswold Design Code to relate specially to Fairford, as well as cross referencing the Character & Design report prepared especially for the FNP. The town and its Conservation Area are special and are very worthy of this design approach (§190). |
| FNP13 | Conserving Local Heritage Assets | 203 | The policy identifies a number of non-designated heritage assets and is worded to reflect the provisions of §203 in respect of decision making. The assets were identified in the separate evidence document based on the Historic England advice. |

| | | | |
|---|---|---|---|
| FNP14 | A New Low Carbon Community in Fairford | 60, 62, 63, 65, 67, 69, 70, 124, 128 | The policy allocates land for housing development (80 homes) on the NW edge of the town. It is the product of a need to redress the under-supply of new homes as a result of the failure to deliver the two sites in the adopted Local Plan and discussions with a key landowner in the town and wider area. The separate Strategic Environmental Assessment covers the site assessment process and demonstrates the net positive sustainability effects of the proposal when compared to reasonable alternatives. No Housing Needs Assessment was required as the goal was to tackle the Local Plan deficit (61 homes), the Local Plan having justified the scale of housing growth for the town over the plan period, taking into account the very significant unplanned growth over the last decade. As such the indicative housing target (§67) is zero but the new site more than compensates for the loss of the Local Plan sites.<br><br>The policy will contribute to boosting local housing supply (§60) suited to different occupant types (§62), including affordable homes (§63) and self-build homes (§65). The site is medium sized suited to delivery by the SME housebuilder sector (§69 and §70). It also sets out some key development principles to ensure a successful scheme is delivered, notably in making efficient use of the land (§124), high design quality (§128) and assimilating the scheme with the town edge to the countryside. |
| FNP15 | Housing Type & Mix | 62, 133 | The policy sets an ambition for shaping the emphasis of future housing type delivery to meet the needs of the town (§62). The evidence base indicates a need for more 2 and 3 bedroom homes to maintain a healthy supply of a range of housing types in the town. It also encourages proposals to exceed the minimum national standards for Lifetime Homes to reflect the needs of an aging local population (§133). |
| FNP16 | Zero Carbon Buildings | 58, 149, 152, 153, 157 | This policy is intended as an interim measure pending either the adoption in the Local Plan Review of a similar policy covering the whole district or an acceleration towards the same objective than is currently proposed by the Government in its Future Homes Standard. It is intended here to help shape |

| | | | |
|---|---|---|---|
| | | | Fairford in a way that contributes to radical reductions in greenhouse gas emissions as encouraged by §149.<br><br>It is vital to note that to remain consistent with the Government's current approach, the policy does not make the PassivHaus (or equivalent certified standard) a requirement. Rather it is encouraging of such proposals even though such a provision is bound to be in place nationally within the next five years and many developers are already planning for delivering to this standard in their layouts and building specifications.<br><br>It encourages applicants to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption now rather than in five years' time (§157(d)). |
| FNP17 | Growing Our Local Economy | 82, 84, 85, 86 | The policy identifies the Whelford Lane Industrial Estate as a well-established location to promote economic growth of a kind (B2 and B8) suited to a location outside the town boundary (§82). It is also suited to former B1 office and light industrial business uses, now Class E(g). As employment in rural areas is scarce and suitable opportunities to grow industrial businesses are few, given the environmental and connectivity constraints, the policy provides for the intensification of the Estate (§84 and §85) but not at the cost of undermining the town centre (§86) that may occur if other Class E uses are promoted. |
| FNP18 | Sustaining a Successful Town Centre | 84, 86 | The policy acknowledges the importance of the small town centre to serving the local community. It is considered to be at critical mass with any loss of a commercial unit likely to undermine the vitality and viability of the centre (§84 and §86). It accepts that there are now limits on how development can be managed through the planning system and it will only apply where planning permission is required. |

| | | | |
|---|---|---|---|
| FNP19 | New Visitor Accommodation | 84 | The policy recognises the value of tourism to the local economy and seeks to encourage suitable additions to the town's visitor accommodation to bolster that value (§84). |

3.5 It is considered that all of the policies have had full regard to national policy, with no incidence of two or more national policies being in tension, nor of the Town Council having to strike a balance between them. As a result, the Neighbourhood Plan, as a whole, meets Condition (a).

**4. CONDITION (D): CONTRIBUTING TO ACHIEVING SUSTAINABLE DEVELOPMENT**

4.1 Given the intended scope of the Neighbourhood Plan, the Town and District Councils agreed that an SEA would be necessary as a matter of principle and the Town Council proceeded to appoint AECOM to prepare first a scoping report for a Sustainability Appraisal (SA/SEA) in 2018 for consultation with the statutory bodies and then draft and final SA/SEA reports at the Pre-Submission and Submission stages. The District Council provided a formal screening opinion confirming the need for an SEA in October 2020.

4.2 The separate SA/SEA Report sets out the sustainability effects of the policies of the Neighbourhood Plan. The Report concludes:

> *"The assessment has concluded that the current version of the Fairford Neighbourhood Plan is likely to lead to **significant long-term positive effects** in relation to the Population and Community, Health and Wellbeing, and Economy and Enterprise SA themes. These benefits largely relate to the delivery of new housing to meet local needs; the support for employment and support for tourism growth to develop the local economy; the protection of the public realm and of settlement identities; and the provision of new and protection of existing green/ open spaces. This is also expected to lead to **minor positive effects** in terms of the 'biodiversity' SEA theme, improving connectivity and supporting net gain in new development.*
>
> ***Minor positive effects** are also predicted in relation to the Climate Change SA theme given the delivery of a New Low Carbon Community in Fairford. Policy FNP14 includes numerous requirements for new development which support national and local mitigation and adaptation objectives, implementing the climate emergency declared by CDC. While it is recognised that land between Leafield Road and Hatherop Road is partially at high risk of ground water flooding, it is considered that there is sufficient space within the Leafield Road site for development to avoid those areas at highest risk from groundwater flooding; with neutral effects anticipated in this regard once mitigation has been adopted. **Uncertain significant positive effects** are predicted in relation to the Transportation SA theme, and will depend on the phasing of development and associated infrastructure delivery at land between Leafield Road and Hatherop Road. **Neutral effects** are anticipated in relation to the Landscape and Historic Environment SA theme given the criteria set out in the FNP policies and the higher-level policy framework of the Local Plan (2018) and NPPF (2021). **Minor long term negative effects** are predicted in relation to the Land, Soil and Water SA theme due to the loss of greenfield land at land between Leafield Road and Hatherop Road; however, given this is not best and most versatile agricultural land, effects are not anticipated to be significant."*

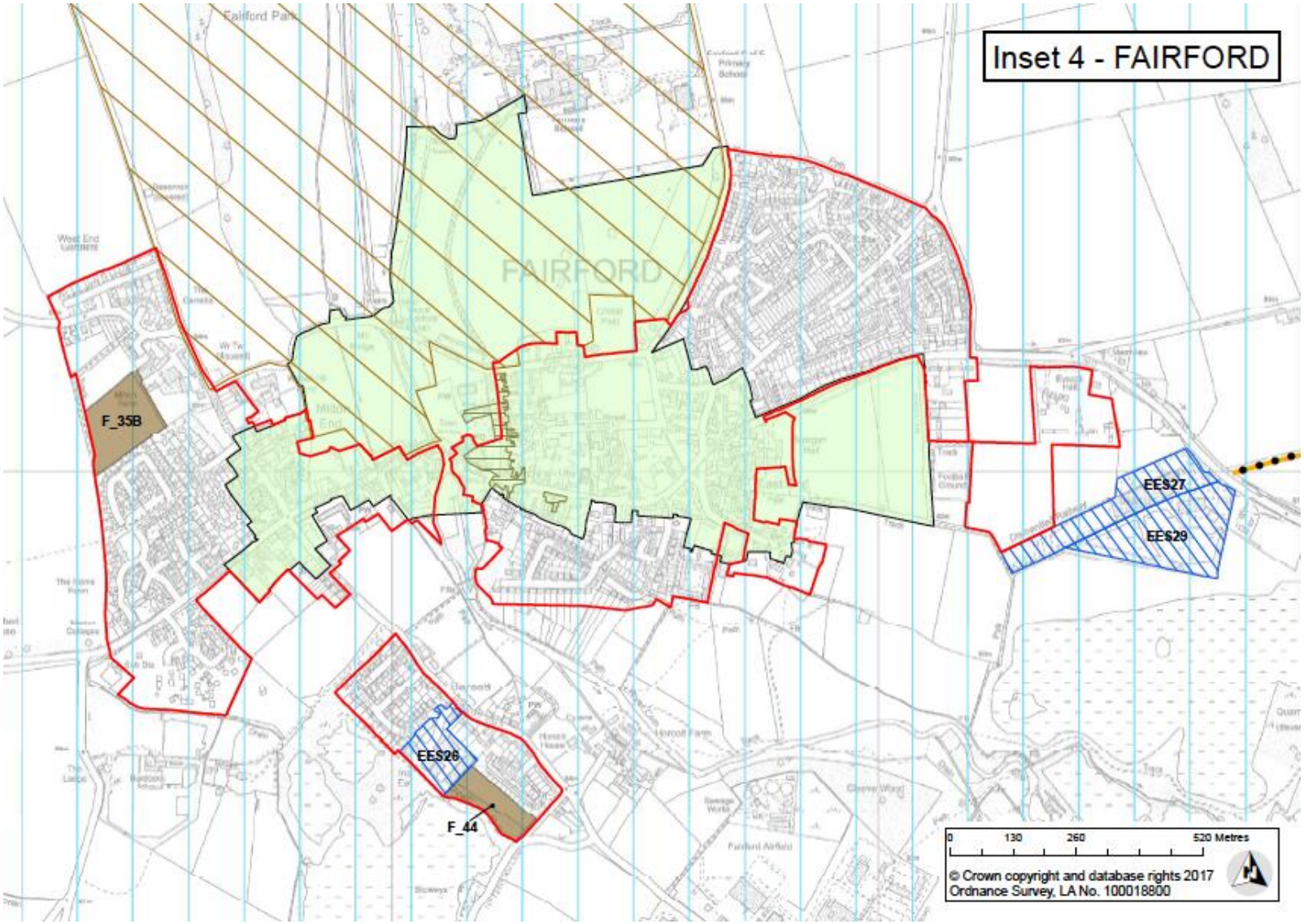
## 5. CONDITION (E): GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN

5.1 The Neighbourhood Plan has been prepared to ensure its general conformity with the strategic policies of the Local Plan, which covers the period 2011 – 2031. In doing so, the Town Council has worked closely with the District Council with the aim of ensuring that both consider this basic condition has been fully met. The Town Council has also been mindful of the provisions of the Gloucestershire Minerals Local Plan, also adopted in 2018 for the period to 2032, and of the Gloucestershire Waste Core Strategy adopted in 2012 for the period to 2027, both of which also form part of the development plan.

5.2 The Planning Practice Guidance (§41-074) states that:

> *"When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:*
> - *whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with*
> - *the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy*
> - *whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy*
> - *the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach"*

5.3 The Local Plan (Policy SA1) defines Fairford as a Principal Settlement in the South Cotswolds Sub-Area in its settlement hierarchy. Its Policy DS1 (Development Strategy) identifies the Principal Settlements as the focus of the strategy for housing and employment allocations. Policies DS2 and DS4 operate a development boundary mechanism to in turn focus development within the built up areas of the settlements including those site allocations. Its Policy S5 is specific to Fairford and allocates two housing sites – at Milton Farm and at Faulkner's Close – for 61 dwellings, as well as identifying four established employment sites and four local infrastructure projects (see the Inset 4 Policies Map of the Local Plan in Plan B below). However, as the Town Council long suspected, it is now known that neither of the housing sites will come forward for delivery in the plan period for various reasons.




*Plan B: Cotswold District Local Plan 2011-2031 Policies Map: Fairford*

5.4 The Neighbourhood Plan has sought to add value to the Local Plan by refining some of its policies to better fit with the Fairford context and, in the case of Policy FNP14 (and therefore FNP1 as well), to replace the loss of the two housing sites of Policy S5 to ensure local housing needs continue to be met in the plan period. This will in turn ensure that the District Council is able to use the Neighbourhood Plan to engage NPPF §14 in relevant development management decisions – most notably in having to demonstrate only a three year housing land supply – for as long as the §14 conditions are met. As noted above, although there are few differences between this version of the FNP and its predecessor, the District Council is now satisfied that the relationship between the two plans has been resolved. It now considers that this basic condition has been met.

5.5 During the completion of the Neighbourhood Plan in early 2022, the District Council consulted on Issues & Options for the partial review of the Local Plan. It proposes to maintain the current plan period to 2031 but to update policies in the light of it declaring a Climate Emergency and to encourage thinking about the District to 2040 and beyond. It is too early for this Neighbourhood Plan to take into account draft policy proposals but it is noted that the direction of travel on climate change policies is consistent with that taken by the Neighbourhood Plan (for example, see Policy FNP16 in Table B).

5.6 An assessment of the general conformity of each policy, and its relationship with adopted policy where relevant, is contained in Table B below.

| Table B: Neighbourhood Plan & Development Plan Conformity Summary | | |
|---|---|---|
| **No.** | **Policy Title & Refs** | **Commentary** |
| FNP1 | The Fairford and Horcott Development Boundaries | The policy redefines the Development Boundaries of Policy DS2 and its wording restates that of the policy. The Boundaries required redefinition to accommodate the new site allocation of FNP14 and to remove one of the S5 allocations (F35B – which is no longer available for development, per the landowner). |
| FNP2 | Providing a new burial ground | The policy refines Policy S5(d) by setting out criteria to aid future site selection. This use and any ancillary buildings or structures are required to adhere to policies relevant to a countryside location (e.g. EN2, EN4, EN6) and to take account of parking (INF5), highways (INF4) and flood (EN14) effects. It is one form of community infrastructure improvement encouraged by Policy INF2. |
| FNP3 | Maintaining viable community facilities | The policy relates closely to Policy INF2 in identifying the specific community facilities in Fairford to which that policy applies. |
| FNP4 | Managing flood risk | The policy restates and bolsters (to a modest extent) the provisions of EN14 on flood risk in order to draw attention to the importance of this issue and its complexities in Fairford. |
| FNP5 | Investing in utilities infrastructure improvements | The policy restates and bolsters (to a modest extent) the provisions of INF1 and INF8 to address past weaknesses in the timeliness and quality of supporting infrastructure as the town continues to grow. It is vital that developers work with the utilities companies at the earliest stages of designing their proposals to ensure that those proposals include details to address these matters in relation to their nature, scale and location. |
| FNP6 | Managing traffic in the town | The policy is consistent with INF3 in requiring proposals to consider carefully their traffic effects on the town's limited road network and to make proposals for actions that respond to the list of clauses in INF3. |
| FNP7 | Improving access to visitor attractions | The policy complements S5, EC10 and INF3 in encouraging proposals to better connect the town to its nearby attractions through sustainable means, e.g. walking and cycling. |

| | | |
|---|---|---|
| FNP8 | Protecting Local Green Spaces | The policy designates three Spaces in addition to those designated by EN3 and its wording is consistent with that policy and with the NPPF. |
| FNP9 | Protecting the Fairford – Horcott Local Gap | The policy complements EN1 and EN4 by defining a valued landscape (in the form of a gap preventing the visual coalescence of Fairford and Horcott) as an essential means of protecting and conserving the historic and natural character of the town and its near neighbour. It is similar in intent and wording to EN6 but local in application. |
| FNP10 | The River Coln Valued Landscape | The policy complements EN1 and EN4 by defining a valued landscape (in the form of a distinct landscape area south of Fairford but an extension to its gap with Horcott closer to the town) as an essential means of protecting and conserving the historic and natural open character of the setting to the town. It is similar in intent and wording to EN6 but local in application. |
| FNP11 | Valuing Hedgerows and Trees | The policy refines EN7 to fit with the Fairford context and to bolster its provisions. |
| FNP12 | Achieving High Standards of Design | The policy restates EN2 in its cross referencing of the Cotswold Design Code but also refines that policy by identifying some key design principles and key views specific to Fairford. |
| FNP13 | Conserving Local Heritage Assets | The policy is consistent with EN1 in seeking to conserve a specific type of local heritage asset, which it identifies, and for completeness it restates EN12, both of which reflect the NPPF. |
| FNP14 | A New Low Carbon Community in Fairford | The policy replaces part of S5 in allocating land for 80 homes to substitute for the 61 homes allocated by that policy that will not now be delivered. It is not considered that there is a material difference in total housing quantum, which will contribute to the overall development strategy of the District (DS1). Given there is no available land for allocation within the Development Boundaries defined by the Local Plan Policies Map, the land has had to be found outside but adjoining the Boundary following a site assessment process. As with the Local Plan site allocation process, this required a temporary suspension of Policy DS2 to allow the assessment of sites to determine the most suitable site to allocate.<br><br>The process, aided by the SA/SEA, has taken full account of the effects of development on the built, natural and historic environment and landscape (EN1 and EN4). There is clear evidence from the landowner that the policy is viable and of an intent to deliver the homes later in the plan period once some of the local infrastructure challenges have been addressed. |

| | | |
|---|---|---|
| | | The landowner has committed to confirm this in the Regulation 16 period and at the examination itself if requested. The development principles capture the key mitigation measures that should form part of subsequent proposals, including habitats effects (EN9) (via the separate Habitats Regulations Assessment – see Section 6), traffic (INF3), infrastructure (INF1 and INF2), design (EN2) and green infrastructure (INF7). |
| FNP15 | Housing Type & Mix | The policy refines H1(1) by encouraging proposals to give an emphasis to the delivery of small and medium sized family homes and to deliver homes that are especially suited or adaptable to meeting the needs of older households. The evidence base indicates that these are of particular relevance to Fairford as it continues to grow and its population ages. In addition, the policy supplements INF5 by requiring EV charging infrastructure in new car parking arrangements, again to reflect the town's relatively remote location from larger centres of population where such charging infrastructure is more commonplace. This is also consistent with Government ambitions to enable switching to EVs by 2030. |
| FNP16 | Zero Carbon Buildings | There is no adopted strategic policy on this matter, but this policy is consistent with the Local Plan objectives (notably its sixth 'Climate Change & Flooding') of ensuring new development is of a sustainable design and maximises energy efficiency. The District Council has declared a Climate Change & Ecological Emergency and is at the forefront of local planning authorities wishing to use the planning system to make its contribution to this goal. The Evidence Paper: Responding to the Climate Crisis published as part of its Issues & Options consultation for the Local Plan Partial Review anticipates precisely this same policy response thus (in its §4.25 on p20):<br><br>*Recognising the cost effectiveness of building-in net zero carbon performance from the start, rather than retrofitting later, and furthermore recognising the necessity for new build to achieve net zero carbon performance at the earliest possible date, planning policy for new developments of every scale could include:*<br>• *to require zero combustion of fossil fuels (for either heating or cooking) from the earliest possible date, with heating to be provided predominantly by high efficiency electric means (heat pumps).*<br>• *to require the installation of on-site renewable energy generation whose annual output will be equivalent to at least the building's expected annual total of regulated and unregulated energy demand.*<br>• *to require that all new buildings are net zero carbon in both construction and operation, using the UK Green Building Council definitions 34 of net zero (or equivalent).* |

| | | |
|---|---|---|
| | | In its Evidence Paper: Neighbourhood Development Plans, it preferred option is to 'place a duty on those preparing neighbourhood plans to respond to climate and ecological emergencies'. Although it is noted that Local Plan policy cannot place such duties on neighbourhood plans in practice, it is a signal that the District Council takes the matter seriously. It is therefore fully supportive of Policy FNP16, the provisions of which once made may inform its own Districtwide policy response in due course. |
| FNP17 | Growing Our Local Economy | The policy is consistent with the employment development goals for maintaining and enhancing the vitality of the rural economy (EC1). It is also consistent with the safeguarding intent of EC2 but updates its wording to reflect the changes made to the Use Class Order in 2021. It seeks to promote the intensification of the well-established Estate for B2 and B8 uses (as per EC2) and for Class E(g) uses (former B1). Although the change of use of buildings in those uses to other uses in Class E is no longer defined as 'development', there is vacant land within the Estate and the policy seeks to prevent new buildings on that land being used for retail uses (Class E(a)) that are wholly unsuited to this relatively remote location and that may undermine the town centre. |
| FNP18 | Sustaining a Successful Town Centre | The policy complements and partially updates EC8 in respect of changes to the Use Class Order and Permitted Development Rights affecting town centres that postdate the adoption of the Local Plan. |
| FNP19 | New Visitor Accommodation | The policy restates EC11 in encouraging proposals for new visitor accommodation as this sector is an important feature of the local economy. It also highlights the potential for such accommodation to be delivered as part of rural diversification proposals for converting or extending farms or other established agricultural uses in the countryside beyond the defined Development Boundaries, and is consistent with policies EC5 and EC6 in these respects. |

5.7 It is considered that all of the policies are in general conformity with the strategic policies of the adopted Local Plan, with no incidence of two or more strategic policies being in tension, nor of the Town Council having to strike a balance between them. As a result, the Neighbourhood Plan, as a whole, meets Condition (e).

## 6. CONDITIONS (F & G): COMPATIBILITY WITH ENVIRONMENTAL LEGISLATION AND OTHER MATTERS

6.1 The requirements in respect of Strategic Environmental Assessment (SEA) have been addressed in Section 4 of this Statement. Suffice to say that the process for preparing the Sustainability Appraisal (incorporated the SEA) and the content of the respective reports has followed the requirements set out in the EU Directive 2001/42 as translated in the UK's Environmental Assessment of Plans & Programmes Regulations 2004.

6.2 The Town Council has also met its obligations in relation to the habitats provisions of EU Directive 92/43/EEC (and the associated Conservation of Natural Habitats and Wild Flora and Conservation of Habitats and Species Regulations 2017 (as amended)). The District Council screened the emerging Neighbourhood Plan in October 2020 (alongside the SEA screening) and again in January 2021 to determine if these obligations may apply. Natural England advised the latter screening that the making of the Neighbourhood Plan had the potential to have a significant effect on the North Meadow & Clattinger Farm Special Area of Conservation, a European site (as defined in the 2017 Regulations). As a result, the Town Council provided the District Council with all the necessary information to inform an Appropriate Assessment (see the separate HRA report, the final version of which is dated April 2022). In May 2022, Natural England formally agreed with the Appropriate Assessment that the Neighbourhood Plan will not result in adverse effects on the integrity of any of the sites in question. The Town Council incorporated the advice of the Assessment by adding a reference to Policy FNP14 to require the proposals to have regard to the emerging Interim Mitigation Strategy for the Special Area of Conservation.



6.3 The Town Council has been mindful of the fundamental rights and freedoms guaranteed under the European Convention on Human Rights in process of preparing the Neighbourhood Plan and considers that it complies with the Human Rights Act. The Neighbourhood Plan has been subject to extensive engagement with those people local to the area who could be affected by its policies and their views have been taken into account in finalising the Plan.

6.4 In respect of Directive 2008/98/EC – the Waste Framework Directive – the Neighbourhood Plan does not include any policies in relation to the management of waste, nor does the area include a waste management site. On that basis, this Directive is not considered relevant to the Neighbourhood Plan and therefore could not be breached.

6.5 In respect of Directive 2008/50/EC – the Air Quality Directive – the Neighbourhood Plan includes some policies may indirectly relate to Air Quality. These policies are tested in accordance with national policy and guidance relevant to their content. The policies are not considered to breach the requirements of the Air Quality Directive as they comprise small-scale interventions and do not negate from the framework for measurement and improvement of air quality set in the Directive.

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# FAIRFORD NEIGHBOURHOOD PLAN 2020-2031

## CONSULTATION STATEMENT

VERSION 2.1 / 20-SEPTEMBER-2022

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# 1 INTRODUCTION

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Fairford Neighbourhood Plan 2016-2031.

The legal basis of this statement is provided by Section 15 (2) of part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:-

I. Contain details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan,

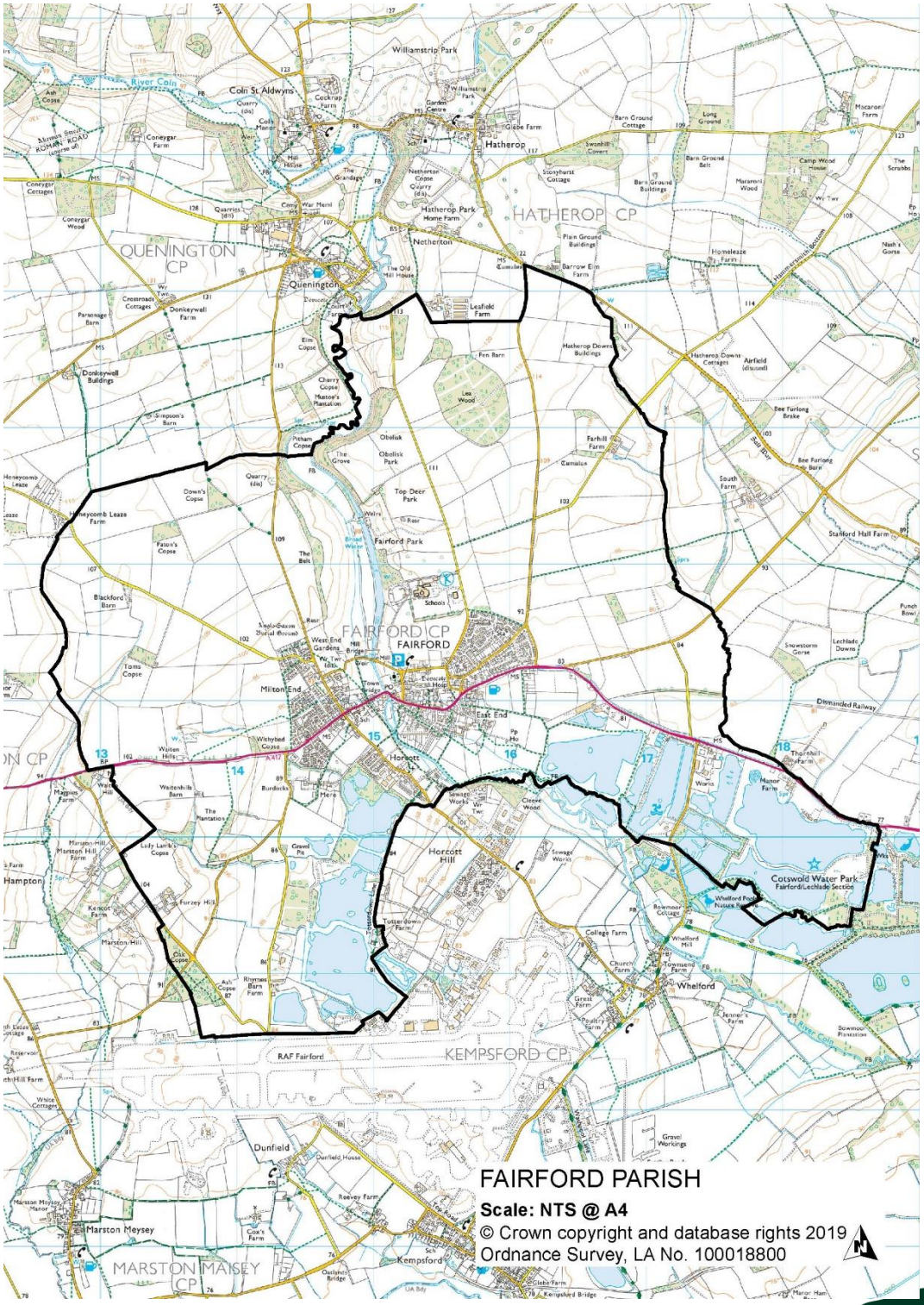
II. Explain how they were consulted,

III. Summarise the main issues and concerns raised by the persons consulted, and

IV. Describe how those issues and concerns have been considered and, where relevant addressed in the proposed Neighbourhood Development Plan.

# 2 AREA COVERED BY THIS PLAN

The Neighbourhood Area was designated by Cotswold District Council on 20th November 2013 following the statutory publicity and covers the whole of the parish but does not intrude into any of the adjoining parishes.



# 3 TIMETABLE AND HISTORY

## ORIGINAL PLAN

The Town Council had striven for constructive engagement with residents over the development of the Town over many years. Three previous consultations had resulted in the comprehensive Fairford Health Check (2005), Fairford Horizon 2011-16 (2011) and Fairford Community Plan (2014). Following production of these, the Town Council resolved that the vision and aims from the Community Plan should be incorporated into a Fairford Neighbourhood Plan after full consultation with residents. Work began on the Plan in 2015, and it went for examination in October 2017. Parts of this Plan, including policies on flood risk and utilities, were rejected by the Examiner.

The original FNP was based upon the results of wide consultation with the local community. This process included leaflets, meetings, workshops, questionnaires, discussions and public consultation drop-in days, and there were invitations throughout to participate and to make comments. The results from this process, including the Household questionnaire and the Business questionnaire, and the issues identified and comments received, were carried over into the new FNP.

The Consultation Statement produced for this original Plan and an Addendum to it are in **Appendix 2**.

The key dates for the original Plan were:

| Date | Event | Outcome/ comments |
|---|---|---|
| Nov 2011 | Town Council carries out housing needs survey | |
| Aug 2013 | Public meeting in Fairford - | sub-committee of councillors and residents formed; |
| Aug 2013 | Neighbourhood Area Designation Request submitted to CDC | |
| Nov 2013 | Neighbourhood Area designated by CDC | |

| Date | Event | Outcome/ comments |
|---|---|---|
| Feb 2014 | Community Questionnaire sent out | Community Views clearly established |
| July 2014 | Completion and adoption of Community Plan | Community plan published |
| June 2015 | Town Council agreed to setting up of Neighbourhood Plan Steering Group | |
| January 2016 | Questionnaire sent to every household in Fairford, | Good response analysed by GRCC. Issues determined |
| Sept 2016 | Consultation open days | |
| Nov 2016 | Start of Reg 14 consultation period | |
| Oct 2017 | Reg 16 Examination | Plan rejected by Examiner Policies on Leafield Road site, Flood Risk and Utilities not accepted. |

## CURRENT PLAN

After discussion, a new Steering Group was formed to produce a revised plan with more robust evidence, and a professional investigation was commissioned to carry out groundwater monitoring and review flood risk in Fairford, based on the underlying geology (WRA November 2018). Subsequently, an independent company, AECOM, was commissioned by Locality to carry out site assessments and produce a Sustainability Appraisal. Evidence from these reports was used in preparing the new plan.

Current Steering Group Members are:

- Jon Hill and Margaret Bishop – Joint Chairs
- Cllr Richard Harrison
- Cllr Jennie Sanford
- Sarah Basley
- Cllr Andrew Doherty.

With much secretarial help from Fairford Town Council Deputy Clerk, Roz Morton.

Lizzie Garthwaite contributed to the Group in its early stages.

Various events during the preparation period impacted on the Plan. The Water Cycle Study carried out for the Cotswold District (JBA, 2015) predicted that the Sewage Treatment Works (STW) at Fairford will require some infrastructure upgrade to accommodate higher flows and/or to prevent water quality deterioration. The study further concluded that Fairford STW has limited spare capacity without the need for an upgrade.

CDC adopted its Local Plan in August 2018, and this plan allocated 2 sites for 61 (previously 77) additional houses in Fairford. Thames Water has investigated the problems of sewage and surface water flooding and published a Drainage Strategy for Fairford in 3 stages between 2018 and 2020.

Water Resource Associates (WRA) was commissioned to produce a report on flood risk and groundwater levels. This was published in November 2018, with the conclusions that "*There is no scope for SuDS drainage using infiltration in low-lying areas associated with the Coln alluvial corridor due to frequent high groundwater levels*". They pointed out that effective SuDS infiltration schemes require that groundwater levels are at least 1 m below the bottom of soakaways, and *"Ideally development would be directed away from the Coln and Court Brook corridor"*. This confirmed local feeling that areas south of the main road A 417 are unsuitable for building development and should be kept as green space for floodwater storage.

Preliminary recommendations of the Plan were presented to residents in March 2019. The feedback from this consultation supported the preferred site off Leafield Road. See **Appendix A** for details of presentation and residents' feedback.

In July 2019, CDC declared a Climate Emergency, and published their strategy for response in September 2020. Whilst national policy does not demand it, they note that increasing numbers of homes are being built to net zero carbon standards, and are developing an electric vehicle strategy that encompasses electric vehicle charging.

Since March 2020, there were unavoidable delays due to the Covid 19 restrictions.

In September 2020 the "Reg 14" (Pre-Consultation) version of the Plan was issued. Responses from consultees were collated and changes made to the Plan (see Section 4 below). Since then the Steering Group refined the policies but progress was slow due to Covid.

During 2021, Natural England changed the designation of the Sites of Special Scientific Interest (SSSI) within the Cotswold Water Park, and all the lakes within the vicinity of Fairford now have SSSI status.

After discussions with the landowners and developers, the site between Leafield Road and Hatherop Road was revised to include only the southern part of site F51B. AECOM updated their Site Assessment report and produced a final SA/SEA report.

Below is a summary of events leading up to the production of this Consultation Statement.

| **Date** | **Event** | **Outcome/ comments** |
|---|---|---|
| Oct 2017 | Fairford Neighbourhood Plan Steering Group formed to create a | |

| Date | Event | Outcome/ comments |
|---|---|---|
| | revised Plan with more robust evidence | |
| Oct 2017 – date | Regular meetings of the Steering Group, either by Zoom or in person. | |
| 2018 | CDC adopted its Local Plan | Fairford has to deliver 61 new dwellings |
| 2018-20 | Thames Water Drainage Strategy developed | |
| Nov 2018 | Hydrogeological Survey of Fairford report produced (WRA 2018) | |
| Mar 2019 | Open day for community consultation on seven potential sites. | See feedback in Appendix A |
| Apr 2019 | AECOM produce Sustainability Appraisal (SA) of potential sites. | |
| Sep 2020 | Fairford Neighbourhood Plan "Reg 14" (Pre-Consultation) version issued. | |
| Nov 2020 | Period for comments from residents and statutory consultees ends. | Responses from residents and statutory consultees collated. |
| Jan 2021 | CDC Habitat Regulations Assessment (HRA) Screening Report on Special Area of Conservation (SAC) near Cricklade issued. | |
| Mar 2021 | Natural England (NE) change designation of Site of Special Scientific Interest (SSSI) North Meadow, Cricklade. | AECOM commissioned to update Site Assessments |
| May 2021 | AECOM issue Addendum to Site Assessment (SA) Report. | Including an assessment of Yells Yard |
| Dec 2021 | AECOM issue SA/SEA report | Final changes to Plan |

| Date | Event | Outcome/ comments |
|---|---|---|
| Feb 2022 | Consultant Neil Homer produces the Basic Condition Statement (BCS). | |
| Feb 2022 | AECOM produce HRA for CDC | CDC to review |
| Feb 2022 | AECOM produce HRA for CDC to review and present to Natural England | CDC send HRA to NE who are not satisfied that assessment is robust enough to justify conclusion that proposals will not result in adverse effects |
| May 2022 | Natural England concur with CDC's Appropriate Assessment (AA) of the AECOM HRA that "will not result in adverse effects on the integrity of any of the sites" near Cricklade. | Finalise FNP text and supporting documents (Basic Condition Statement and this Consultation Statement) accordingly |
| May 2022 | Consultant Neil Homer updates the Basic Condition Statement (BCS). | |
| September 2022 | "Reg 16" (Submitted) version of Plan issued to CDC Including this Consultation Statement and other supporting documents | CDC to review |

Subsequent to the issuing of the "Reg 16" version of the Plan the following steps will take place:

- CDC appoint an Examiner.
- The Examiner examines the Plan.
- The Examiner issues his report.
- Either the Plan is accepted (with or without amendments) or it is rejected.
- If accepted:
    - CDC make any amendments required to the Plan.
    - A Public Referendum is held.
    - If more than half of the people who vote, vote in favour of the Plan:
    - CDC take the decision to make the Plan.

# 4 PRE-SUBMISSION CONSULTATION

## A) COMMUNITY CONSULTATION.

After consultants AECOM had considered the 2017 SHELAA sites (from the CDC Local Plan) and carried out detailed assessments of all potential sites, they proposed seven sites as suitable for further consideration and assessment by the Steering Group, provided constraints could be overcome. There were no sites without constraints.

Factors considered in the Steering Group's appraisal included flood risk and groundwater levels, proximity to SSSI Lakes, Heritage considerations including settings of listed buildings and Conservation Area, etc.

An Open Day for community consultation was held on 14th March 2019, when information was presented to the public in a series of display boards. The public were asked to comment on seven key themes. These were:

- Natural and Historic Environment
- Climate Change, Spatial Strategy and Water Management Infrastructure
- Housing Provision and Mix
- Community and Business Infrastructure (including Highways)
- Local Economy and Town Centre
- Local Green Spaces
- Local Green Gap proposals

There was also a display of the seven sites which AECOM had selected as potentially suitable for development, with pros and cons, showing number of houses suggested for each site and giving the assessments from CDC SHELAA of 2017, from AECOM and from the FNP Steering group. The public were asked to "vote" (with stickers) on whether they would support housing on each site (Yes, No, Maybe). The revised Leafield Rd/Hatherop Rd site (southern part of F51b) performed much the best.

Further details and full results are given in Appendix A

## B) STATUTORY CONSULTATION

The six-week Statutory Consultation for Draft Pre-Submission of the Neighbourhood Plan took place during the autumn of 2020 after the "Reg 14" version of the Plan was issued. During this period, the consultation was advertised in the Town Council Newsletter which is delivered to every household in Fairford, the Town Council Website, Neighbourhood Plan

website and the Town Council and local Facebook pages. Hard copies were available from? As Neighbourhood Plan Guidance requires, the following were consulted:

- Residents
- Community organisations
- Elected representatives
- Businesses
- Landowners
- Developers
- Active players in voluntary sector
- Government Organisations (Environment Agency, Natural England, English Heritage etc)
- Non-government statutory bodies (National Grid, Thames Water etc)

## C) RESPONSES FROM STATUTORY CONSULTEES AND LAND INTERESTS

The responses from Statutory Consultees are collated in this document:

*Document Name*: Collated-Stat-consultees-responses.pdf

*Link*: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/Collated-Stat-consultees-responses.pdf

A summary of changes due to responses from Statutory Consultees and Land Interests is given below:

### NATIONAL GRID

**No record of assets in the Neighbourhood Plan Area**: No changes required.

### GCC HIGHWAYS (DANIEL TIFFNEY)

**Found it to be a thorough plan and encouraged by the number and ambition of the objectives**: No changes required.

### GLOUCESTERSHIRE COUNTY COUNCIL (ECOLOGY)

**support for conservation and enhancement of local biodiversity**: Additional wording added in policies FNP10 and FNP11.

### GLOUCESTERSHIRE COUNTY COUNCIL (LIBRARY)

**Community facilities**: New text added to FNP3.

### MOD – DEFENCE INFRASTRUCTURE ORGANISATION

**Supports principle of the plan and para 3.**10: No changes required.

### GLEESON

**(Various)**: 5.2 and 5.6 re-worded (also for CDC). "Future" road added. p14.11 – kept

### THE ERNEST COOK TRUST

**(Various)**:

a) *Tourism etc*: This item *out of scope*, no changes required.

b) *Climate change*: Additional content noted and added.

c) *Community facilities*: No changes required.

d) *Access for visitors*: No changes required.

e) *Design standards*: No changes required.

f) *Non-designated heritage assets*: Noted, no further changes required.

g) *New visitor accommodation*: Addressed by FNP18. No further changes required.

### KNIGHT FRANK (REPRESENTING MR R BLOCK)

a) *land west of Horcott Road*: FNP8 updated

b) *Bat house (No 30)*: To be kept as NDHA, no further action.

### HANSON

**(F_44) "**not suitable": New hydrology evidence does not support site, consideration of new SSSI designation adjacent to and adjoining site. Proposed changes to development boundary on this site removed and current local plan site boundary kept. The reduction in the housing quota in the adopted Local Plan recognises that only part of the site may be developable.

### COTSWOLDS WATER PARK

Noted Vision and Implementation Plan (2008) and Biodiversity Action Plan.

### EARLSWOOD (BEAUMOOR PLACE)

**Parking for Hilary Cottage Surgery**: At the examination of the previous draft NDP in 2017 it was questioned whether car parking for surgery staff was a public rather than a private benefit. Also, despite significant efforts it could not be established that this facility would be used by the surgery staff and would therefore provide a public benefit to justify a 'less than significant' impact on the setting of Morgan Hall and the significance of this and the Conservation Area. In this plan the proposal is not considered viable, no changes required.

**Meeting housing needs of ageing population:** Specialist accommodation for older people or 'affordable' housing could still be provided in areas adjacent to the development boundary under policies H3 or H4 of the Local Plan, subject to other policy requirements. No changes required.

**Support inclusion of F_38 within development boundary and suggest reference to windfall developments in FNP1:** The inclusion of the site within the development boundary shown in the draft plan was an unintentional carry-over from the previous draft Plan. The acceptability of the scale of development proposed in the previous plan and the subsequent planning application (17/05185/FUL) was called into question by CDC's Conservation Officer, and this led to the latter planning application being withdrawn. This calls into question the deliverability of the site's housing contribution.

**Suggest additional clause for policy FNP3:** This is already covered by CDLP policy INF2 and chapter 8 of the NPPF (July 2021), which would be a material consideration in determining applications which might otherwise fail. It is a constant aspiration of Fairford Town Council to support improved community and other facilities in the town.

**Object to P4.3 blanket requirement:** P4.3 refers specifically to "Land … that is subject to high groundwater levels such that adequate and effective SuDS drainage systems cannot be

**Object to FNP6 threshold for requiring Transport Assessments**: Requirement reviewed and considered reasonable. No further change made.

**Question viability of FNP14 requirements:** Site F_51B is subject to less constraints than other potential smaller sites in and around Fairford, which generally either have drainage issues or are in close proximity to heritage assets. Additional coverage in the latest SA/SEA.

**Dependence of FNP14 on upgrade to STW?**: STW capacity is the same issue whether the housing capacity is achieved by one large site or multiple small sites. However, the requirement for upgrading is considered easier to determine for one large site. No further change made.

**Additional allocation of smaller sites would provide choice**: Given the various constraints on these smaller sites, this would provide less certainty for the delivery of the housing requirement. (See also NPPF para 73.) This choice may also be provided by additional windfall sites allowed for under CDLP policies, although see Para. 2.73 of FNP re. Infill. No further change made.

**Housing allocations should be "at least" not "approximately"**: Housing capacity is determined by land area and type of housing to be provided (with appropriate factors) and we have been advised it should be stated as approximate. No further change made.

**FNP14 does not include requirement for housing for older people**: Both FNP14 and FNP15 refer to 'Lifetime Homes'. It should be noted that the FNP14 site is not particularly suitable for elderly people because of its location. More specialist accommodation (of which there is already a significant amount in Fairford) may be provided elsewhere under CDLP policy H4. No further change made.

**Illustrative Master Plan proposal:** Noted, but it does not seem to address all the issues raised by CDC on the previous withdrawn planning application. No further change made.

**Issues on SAR assessment:** We have reviewed and are satisfied that AECOM's assessment in the SAR is generally reasonable. No further change made.

**Disagree with SHELAA assessment re heritage impact:** Refer to the Conservation Officer's assessment on application 17/05185/FUL. Differences from 2017 SHELAA to be addressed in SA/SEA.

**FRA and Drainage Strategy**: It is well established that groundwater levels in Fairford vary significantly over longer periods. There does not yet seem to be sufficient evidence to give confidence in the deliverability of a scheme like that shown in the 'Illustrative Masterplan', although this might be achieved in the future. No further change made.

**Failure to consider the site in the SA/SEA**: Now included in 'reasonable alternative' options assessment.

### PEGASUS

*(This is part of the Earlswood Homes responses)*

### TURLEY (ON BEHALF RAINIER DEVELOPMENTS)

**(F_39C, F_52) "not most suitable":** Site discounted due to access, no further action.

**Rainier have provided an updated illustrative scheme**: Illustrative scheme is noted, but comes too late for inclusion in the NDP and does not address all the issues and suggestions raised by the Town Council. This is essentially an 'omission site' proposal.

**FNP1: Land is not included within Development Boundary**: The land is not included withing the development boundary because it was being proposed by FTC for employment rather than housing. It is still possible to include some housing related to employment outside the DB, under policy EC3.

**FNP16: No explanation of how access could be delivered**: This was suggested by FTC to Rainier but has apparently not been pursued with the owner of the Industrial Estate. In the absence of demonstrated deliverability, the proposed employment allocation has been dropped.

**Illustrative Masterplan shows direct access onto A417**: This is at a location where a smaller development has already been refused permission on highway safety grounds. The alternative of access to the employment development via the existing housing estate is not suitable.

**Concern about how F_52 has been assessed relative to 51_B and 51_C**: Considered in updated SA/SEA.

### ABBEY MILL LAND

This response too late for plan but considered by AECOM SA/SEA separately. Considered as another 'omission site' proposal.

**Evidence base not up to date or robust. No new call for sites since 2017 SHLAA**: With no visibility as yet of sites submitted to the latest SHLAA round, we have relied on proactive approaches from landowners and a new assessment (by independent consultant AECOM) of those that were already under consideration. Subsequent to the

Regulation 14 consultation, an assessment of the Yells Yard site has now been included in and Addendum to the Site Assessment Report, on the same basis as the others.

**Failure to make provision for small and medium house builders:** F_51B is not a 'large site' in national policy terms. NPPF para 69 is relevant to local planning authorities. Para 70 now makes it clear that Neighbourhood Plan bodies can also allocate medium sized sites. FNDP has considered smaller sites, but these are already covered as 'windfall' sites by CDLP policy DS2. Site F_51B is subject to less constraints than other potential smaller sites in and around Fairford, and therefore gives greater certainty of deliverability.

**No proper assessment of previously developed land**: This is covered by National and Local Plan policies, as above. Land needed for all uses includes existing light industrial. Caravan storage use was refused consent when this was sought.

**"up to 20 new high quality homes":** This number is not reasonably achievable without extending into greenfield land (and the proposed Local Gap) outside the existing development boundary as was proposed by the recent planning application that was refused consent. There are also landscape and heritage setting issues with a subsequent smaller proposal that has not yet been determined.

**"reduce the need for such an extensive area of productive best and most versatile (BMV) agricultural land to be permanently lost to residential development":** No evidence has been provided that land at Leafield Road/Hatherop Road is 'best and most versatile'.

**"local green space" :** Part of the site lies within the Local Green Gap Policy, but is not designated as local green space.

**Buildings in the site are curtilage listed / "Non-designated heritage assets are those not statutorily recognised i.e. not listed or within a Conservation Area")**: The curtilage of the NDHA in question was re-drawn and no longer includes buildings within the site in question. Non-designated heritage assets can be identified separately within a conservation area.

### GCC PROPERTY MANAGEMENT

**(Coln House School)**: More suitable residential elsewhere technically too late for residential FNP.

### COTSWOLD DISTRICT COUNCIL

**(Various items)**

a) *NDP and Local Plan*: Add "alongside the Local Plan" to 1.3.

b) *Dev boundary*: Minor rewording.

c) *F44*: Text changed to be explicit as to why discounted.

d) *FNP1 and dev boundary*: CDC consulted, and boundary finalised.

e) *FNP2 (Burial Ground)*: Added off street parking where feasible.

f) *FNP3 (Community facilities)*: Added map

g) *FNP4 (footnote)*: Noted.

h) *FNP5*

i. *modify 5.1 to be clear as to what's in infrastructure*: No further action

ii. *conflict 5.2 and 5.6:* Both items reworded

iii. *5.8 – more definitive*: No further action.

i) **FNP6 (Traffic)** *GCC matter – threshold of 10 may be counterproductive*: kept 10 but re-worded.

j) **FNP9 (The Gap)** – *are we overriding the exception in the LP?* No, no action.

k) **FNP10 (River Coln valued landscape)**: Updated.

l) **FNP11 (Hedges and trees)**: Updated.

m) **FNP12 (Design)**: Updated.

n) **FNP13 (list and map reference clarity)**: Updates and refinements made.

o) **FNP14 ("bullets")**: Alphabetised list, noted will engage GCC Highways.

p) **FNP15** – *conflict with FNP12 and Electric vehicle charging "ready"*: re-drafted.

q) **FNP16** – *change of classes?* New classes used.

r) **FNP17** – *not just car parking*: Added walking/cycling.

s) **FNP18** – *visitor accommodation*: Reworded, town boundary redrawn.

### HISTORIC ENGLAND

**Conservation area appraisal:** CDC have not prepared a Conservation Area Appraisal as such for Fairford, but we have produced a Character and Design Assessment and the Landscape and Local Green Spaces Study, which CDC have endorsed as meeting the immediate purpose. We are also now referring in the policy to taking account of any Conservation Area Appraisal or Management Plan in anticipation. There are also the original Fairford Conservation Area policy statement (1971) and the landscape assessments of the Special Landscape Area to the north of Fairford (White Consultants for Cotswold District Council).

The other points raised have been reviewed and addressed by the group and/or AECOM as appropriate.

There appears to have been some confusion over the location of sites 5 and 10, since some HE comments appear to refer to 10 which is not proposed in the plan.

### NATURAL ENGLAND

**NPPF para 112 note**: Site 5 not considered to be "best and most versatile land" no changes made.

NB: In March 2021 the North Meadow site near Cricklade was designated a Site of Special Scientific Interest (SSSI) for which Natural England required a Habitat Regulations Assessment to be made. In 2022 this Assessment was made by AECOM for CDC and has been approved by Natural England.

### THAMES WATER

**(5.18)** P5.18 updated.

**FNP5**: Statement requested by TW added to FNP5.

## D) RESPONSES FROM RESIDENTS

The following (redacted) responses to the "Reg 14" submission were received from residents:

*Document Name*: Collated-residents-responses.pdf

*Link*: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/Collated-residents-responses.pdf

The following table summarises these responses and the replies thereto.

| Response | Page | Response and reply |
|---|---|---|
| **1** | 1 | Support and thanks |
| **2** | 2 | Support but need access road |
| **3** | 3 | Surgery parking<br>*We were unable to substantiate the proposed public benefit – letter from surgery, NDP Steering Group choose to have a policy that puts all the required housing in one place rather than several smaller scattered developments.* |
| **4** | 4-5 | Jones' Field in curtilage of Morgan Hall<br>*This is not proposed in the NDP.* |
| **5** | 6 | Beaumoor never flooded<br>*Acknowledged, but site known to be waterlogged at times.* |
| **6** | 7-8 | Beaumoor in scope<br>*Site has been discounted.* |
| **7** | 9-10 | Lechlade – welcomes the report – impact on Lechlade – cycle path<br>*Further response in more detail.* |

| Response | Page | Response and reply |
|---|---|---|
| **8** | 11 | Cannot cope with houses<br>*The NDP is not able to prevent further development, it can only try to ensure the most suitable developments happen in the most suitable sites.* |
| **9** | 12 | Leafield road<br>*Noted.*<br>Green area<br>*Noted.*<br>No of houses<br>*Noted correct figures.* |
| **10** | 13 | Several issues -<br>1. No houses<br>*The NDP is not able to prevent further development, it can only try to ensure the most suitable developments happen in the most suitable sites. Note need for infrastructure to keep pace but the plan is for residential or business development.*<br>2. affordable?<br>*NDP recognises the importance of affordable housing.*<br>3. School places<br>*NDP must fit to the Local Plan which dictates a minimum of 61 houses in the plan period.*<br>4. Traffic<br>*The link road has been introduced for this reason.*<br>5. Vote<br>*Yes, the plan is subject to a referendum.*<br>6. Crime<br>*Government directed and must fit into the Local Plan and dictates a minimum of 61 houses in the plan period.* |
| **11** | 14 | New development adjacent Keble Fields<br>*Existing planning application, not in scope of the NDP.* |
| **12** | 15 | New development adjacent Keble Fields<br>*Existing planning application, not in scope of the NDP.* |
| **13** | 16 | New development adjacent Keble Fields<br>*Existing planning application, not in scope of the NDP.* |
| **14** | 17 | Paragraph 2.16<br>*The text in question has been subsequently updated.*<br>FNP6 – Managing traffic in the town |

| Response | Page | Response and reply |
|---|---|---|
| | | *The NDP is unable to set traffic policy as part of development policy, notes and references to the issues observed have been added where appropriate.*<br>FNP13 – Conserving non-designated heritage assets<br>*The NDP does now include policy text similar to that recommended.* |

## RESPONSE TO RESIDENTS

This template letter was used to respond to residents on 8 December 2020:

**RE: Response to Fairford Neighbourhood Plan Regulation 14 Consultation.**

Thank you for taking the time to respond to our Reg 14 Consultation. The Steering group has considered your comments and discussed them at length.

There seem to have been some misunderstandings about the relationship of some of the supporting documents with the draft Fairford Neighbourhood Plan itself and the constraints on the Neighbourhood Planning process. To clarify:

- If we are to have a Neighbourhood Plan with the planning protections and benefits including the additional share of Community Infrastructure Levy funding it brings, this needs to provide for at least 61 homes (net) in Fairford/Horcott, which is the number set by the allocations in the Cotswold District Local Plan. It may be prudent to provide for a few more, depending on the capacity of the site(s) chosen, particularly as the housing requirement is likely to increase if/when the new standard Housing Need formula is implemented for the District. Importantly, the neighbourhood planning process allows us to have a say over the location of these new homes.
- The selection of sites for allocation in a Neighbourhood Plan is required to be supported by a Site Assessment Report and an Environmental Assessment and/or Sustainability Appraisal of the options available. These reports were produced by independent consultant AECOM, appointed by Locality and funded under a Government neighbourhood planning grant. They reviewed all the sites in and around Fairford identified by Cotswold District Council as having the potential for housing or employment, identifying the pros and cons and assessing those passing an initial screening test against the agreed Sustainability criteria. The Neighbourhood Plan Steering Group then had to select which site or sites would on balance best meet the need for sustainable housing and the sustainability criteria, as identified in the reports.
- Just because a site was assessed in the reports, it does not mean it is currently developable. It will certainly not be so if it conflicts with the policies and boundaries set in the Local Plan and/or Neighbourhood Plan.
- Equally, some sites within the Development Boundary could be developed in accordance with Local Plan policies without the need for an allocation in the Neighbourhood Plan, subject to the other policies.
- Proposed changes to the Planning system, including the new standard formula for calculating housing need, are likely to mean that both the Local Plan and the Neighbourhood Plan will need to be reviewed much sooner than we would have liked, possibly within the next 2-3 years.

However, getting a Neighbourhood Plan in place now still has significant benefits for Fairford in terms of additional Planning protection and an increased share of Community Infrastructure Levy (to be used as the local community sees fit). The likely need for review also means that there may be an opportunity to reconsider proposals for some other sites that could offer additional community benefits including incremental provision of housing for people with local connections.

- As regards community support for this Neighbourhood Plan, we have previously consulted extensively on the options as well as commissioning the Sustainability Appraisal report. Assuming that the final version of the draft Plan passes independent examination, it will be put to a local referendum to decide whether it should be implemented. Circumstances permitting, we expect this to be in May next year.

In addition, each resident's specific questions were answered individually.

More details of comments and responses can be found at **Appendix 1**.

All these responses were analysed by the Steering Group and taken into consideration when reviewing the Plan policies.

# 5 SUMMARY OF CHANGES MADE

A Summary of Changes Made to the Plan due to Pre-submission Consultation.

## DOCUMENT CHANGELOG (1.1.0 TO 1.2.0)

September 2022

**Summary of Changes:** The main changes are listed below; typographical and grammatical changes are not included here.

| Page | Section | Para. | Change | Status |
|---|---|---|---|---|
| 0 | 0 | 0 | Version and date updated | Change |
| iii – vi | Intro | Various | Introductory text re-ordered and re-written – "Executive Summary" and "Foreword" | Change |
| vii | References | Various | Minor corrections to names and titles | Change |
| 8 | 2 | 2.9 | Removed reference to "eastern end" | Change |
| 8 | 2 | 2.10 | Removed reference to "retail/commercial" | Change |
| 13 | 2 | 2.37 | Amended connection speeds wording | Change |
| 24 | 3 | 3.6 | Removed "since 2012" | Change |
| 31 | 5 | Vision | Added contextual sentence | Change |
| 35 | 6 | 6.4 | Paragraph content deleted but numbering retained to keep following consistent. | Deletion |
| 37 | FNP1 | FNP1.x | New numbering added for ease of reference | Change |
| 39 | FNP2 | FNP2.1 | New numbering added for ease of reference | Change |
| 41 | FNP3 | FNP3.x | New numbering added for ease of reference | Change |
| 45 | FNP4 | FNP4.x | New numbering added for ease of reference | Change |
| 49 | FNP5 | FNP5.x | New numbering added for ease of reference | Change |
| 53 | FNP6 | FNP6.x | New numbering added for ease of reference | Change |
| 55 | FNP7 | FNP7.x | New numbering added for ease of reference | Change |
| 57 | FNP8 | FNP8.x | New numbering added for ease of reference | Change |
| 59 | FNP9 | FNP9.x | New numbering added for ease of reference | Change |

| Page | Section | Para. | Change | Status |
|---|---|---|---|---|
| 59 | FNP9 | 6.49 | Updated references to supporting documentation. | Change |
| 61 | FNP10 | FNP10.x | New numbering added for ease of reference | Change |
| 63 | FNP11 | FNP11.x | New numbering added for ease of reference | Change |
| 64 | FNP11 | 6.57 | Minor amendments to text | Change |
| 65 | FNP12 | FNP12.x | New numbering added for ease of reference | Change |
| 65 | FNP12 | FNP12.1 (a) | Text updated for clarity and accuracy | Change |
| 67 | FNP12 | FNP12.2 | New text to incorporate design code and/or conservation area appraisal into policy | Change |
| 67 | FNP12 | 6.62 | Design code block moved into policy | Change |
| 69 | FNP13 | FNP13.x | New numbering added for ease of reference | Change |
| 71 | FNP14 | FNP14.x | New numbering added for ease of reference | Change |
| 74 | FNP14 | 6.75 | Corrected and removed references to directions for sites (compass references) | Changes |
| 74 | FNP14 | 6.76 | Corrected and removed references to directions for sites (compass references) | Changes |
| 75 | FNP15 | FNP15.x | New numbering added for ease of reference | Change |
| 79 | FNP16 | FNP16.x | New numbering added for ease of reference | Change |
| 81 | FNP17 | FNP17.x | New numbering added for ease of reference | Change |
| 81 | FNP17 | FNP17.1 | Added “via Whelford Road” | Change |
| 83 | FNP18 | FNP18.x | New numbering added for ease of reference | Change |
| 85 | FNP19 | FNP19.x | New numbering added for ease of reference | Change |
| 96 | MAPS | MAP E | Key views map removed and replaced with historical environment and landscape designations map | Change |
| 101 | A3 | 1st section | Text and points removed as they are duplicates of that already included in policy | Change |
| 101 | A3 | Key Views | Various updates to text and corrections to naming | Change |

## DOCUMENT CHANGELOG (1.0.9 TO 1.1.0)

February 2022

**Document Name**: 20220213-Changelog-(1.1.0).pdf

**Link**: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/Changelog-1.1.0.pdf

**Summary of Changes:** The main changes are listed below; typographical and grammatical changes are not included here but can be found in the referenced document.

| Page | Section | Para. | Change | Status |
|---|---|---|---|---|
| 0 | 0 | 0 | Version and date updated | Change |
| iii | Our Vision | 1 | Added "and sustainable" after "sensitive" | Change |
| 4 | 1 | 1.13 | Updated current stage details | Change |
| 5 | 1 | 1.15 – 1.19 | Updated paragraphs asto reflect the stage completed to date and the current stage of the document. | Change |
| 8 | 2 | 2.5 (4) | Replaced "serious" with "continuing harmful" | Change |
| 8 | 2 | 2.9 | Amended text to reference additional roads | Change |
| 13 | 2 | 2.37 | Replaced "Internet facilities are inadequate" with "Broadband speeds are poor." | Change |
| 24 | 3 | 3.9 | Amended reference to F44 to indicate it is considered unlikely to be developable, noted SSSI boundary change, moved F35B note to earlier in paragraph. Simplified ending to refer to the F51B. | Change |
| 24 | 3 | 3.9 | Changed F51B/C reference to "southern part of F51B" | Change |
| 25 | 4 | 4.3 | Corrected last sentence to refer correctly to website continuation | Change |
| 27 | 4 | 4.11 | F51B/C Reference | Change |
| 30 | 5 | 5.4 | Changed "By 2024 …" text to "Many more …" | Change |
| 31 | 5 | 5.7 [4] | Added new sentence (b) referencing the sports/community building | Addition |
| 35 | FNP1 | All | Update policy text and paragraphs as suggested by NH | Change |
| 35 | FNP1 | 6.5 | Amended text to remove reference to Faulkner Close since we are not removing that location in our development boundary changes. | Change |

| Page | Section | Para. | Change | Status |
|---|---|---|---|---|
| 41 | FNP3 | 6.20 | Added "now very" before "limited" | Change |
| 47 | FNP5 | Policy 1 & 3 | These blocks are not policy and have been moved to supporting text – 6.25, 6.26 | Change |
| 48 | FNP5 | Sub-heading | "Supporting Evidence" sub-heading removed | Change |
| 51 | FNP6 | Policy 1 | Moved last sentence "Transport assessments must …" into its own paragraph | Change |
| 55 | FNP8 | Policy 2 | Updated with new text | Change |
| 55 | FNP8 | 6.48 | Updated with new text, amalgamating previous three separate supporting text paragraphs | Change |
| 63 | FNP12 | Policy Text | Updated with new text | Change |
| 64 | FNP12 | 6.62 | Updated with new text, amalgamating previous three separate supporting text paragraphs | Change |
| 65 | FNP13 | P13.2 | Moved the list of NDHA to Appendix 2 (replacing previous Appendix 2 content). Original appendix 2 content was determined as not being required | Change |
| 65 | FNP13 | All | Updated with new text | Change |
| 67 | FNP14 | Policy 1 | Changed "proposes" to "allocates" | Change |
| 67 | FNP14 | (b) | Added new list item to reference "FNP15: Housing Type and Mix" | Change |
| 67 | FNP14 | (c) | Old (b) now references "FNP16: Zero carbon homes" for sustainable development | Change |
| 68 | FNP14 | (b) | Split out reference to drop-off point and safe route to school into its own list item | Change |
| 68 | FNP14 | Policy 3 | Moved SAC mitigation paragraph from supporting text into the policy body itself | Change |
| 69 | FNP14 | 6.73 (Old P14.10) | Removed as better dealt with in §3.9 | Change |
| 71 | FNP15 | All | Split into FNP15 and "new" FNP16 – separating out housing type/mix and zero carbon related elements of policy | Change |

| Page | Section | Para. | Change | Status |
|---|---|---|---|---|
| 73 | FNP15 | 6.101 | Removed 1st "therefore" (2nd sentence) | Correction |
| 77 | FNP17 (Old 16) | Para 3 & 6.95 | This text moved from FNP17 to this location to go with zero carbon content. Removed redundant wording at beginning of 6.95 (referencing climate emergency declarations) | Change |
| 77 | FNP17 (Old 16) | P17.1 (Old P16.1) | Policy and supporting paragraphs on "BREEAM" moved to new FNP16 Zero Carbon | Change |
| 77 | FNP17 (Old 16) | Policy 1 | Updated with new text | Change |
| 79 | FNP 18 (Old 17) | Policy 2 | Updated with new text (2nd sentence) | Change |
| 83 | 7 | Para 4 | Amended end sentence to add community reference | Change |
| 83 | 7 | Community Infrastructure Projects | Added new section heading, paragraphs and list to support agreed projects list | Addition |
| | Appendix 2 | ALL | Old Appendix 2 replaced with new content (the migrated NHDA list) | Change |
| 99 | Appendix 3 | "Key Views" | Added reference to the new "Fairford Views" map | Addition |
| | Appendix 4 | Last para | Added "Further localised flooding was experienced in 2020 and 2021." at end | Addition |
| | Appendix 4 | ALL | Appendix 4: FNP4 Supporting Evidence moved to separate document | Change |

## DOCUMENT CHANGELOG (1.0.7 TO 1.0.9)

November 2021

**Document Name**: 20211128-Changelog-(1.0.9).pdf

**Link**: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/Changelog-1.0.9.pdf

**Summary of Changes:** The main changes are listed below; typographical and grammatical changes are not included here but can be found in the referenced document.

| Page | Section | Para. | Change | Status |
|---|---|---|---|---|
| 0 | 0 | 0 | Version and date updated | Change |
| ii | Flood Risk | 3 | Changed to "the Southern part of F51B" | Change |
| iii | Foreword | 2 | Removed reference to new squadron at RAF Fairford | Change |
| 2 | 1 | 1.3 | Added additional text suggested by CDC (from "Response Table") | Change |
| 3 | 1 | 1.13 | Changed to "Plan Process" | Change |
| 7 | 2 | 2.3 | Removed "trunk" from "A417 trunk road" | Change |
| 7 | 2 | 2.5 | Last bullet point changed "serious" to "harmful" | Change |
| 8 | 2 | 2.8 | Added "... bottleneck..." wording | Change |
| 8 | 2 | 2.11 | Added "... rural economy ..." wording | Change |
| 9 | 2 | 2.15 | Added text "... to schools and town-centre businesses," | Change |
| 9 | 2 | 2.16 | Updated paragraph with latest text | Change |
| 17 | 2 | 2.59-60 | Updates to reflect changed plans at RAF Fairford | Change |
| 18 | 2 | 2.62 | Changed "defines" to "identifies" | Change |
| 18 | 2 | 2.64 | Changed "commerce-sourced" to "commerce-funded" | Change |
| 19 | 2 | 2.67 | Added "local" before "Character and Design" | Change |
| 19 | 2 | 2.67 | Added "has been prepared and" after previous change | Change |
| 19 | 2 | 2.70 | Changed "extremely limited." to "... private vehicles" | Change |
| 21 | 3 | 3.2 | Added 2021 to list of NPPF revision years | Change |
| 21 | 3 | 3.2 | Last sentence changed to note NPPG and NDC | Change |

| Page | Section | Para. | Change | Status |
|---|---|---|---|---|
| 22 | 3 | 3.7 | Added new explanatory text at end of bullet 1 (from "Response Table") | Change |
| 24 | 3 | 3.9 | Added note on withdrawal of F35B at end of paragraph | Change |
| 35 | FNP1 | P1.4 | Replaced "are not" with "should not" | Change |
| 37 | FNP2 | P2.1 | Bullet 2 – Added new text at end of paragraph | Change |
| 40 | FNP3 | P3.5 | Updated wording as per library service suggestions | Change |
| 49 | FNP5 | P5.18 | Updated with new Thames Water wording (from "Response Table") | Change |
| 50 | FNP5 | P5.20 | New paragraph with words Thames Water (from "Response Table") | Added |
| 55 | FNP8 | P8.2 | Edited to add "Local Green Spaces" and remove para 10.3.1 reference | Change |
| 55 | FNP8 | P8.3 | Updated NPPF references | Change |
| 55 | FNP8 | P8.5 | Added "Very special circumstances …" paragraph | Added |
| 57 | FNP8 | P8.2 | Changed to "the policies" (from "Response Table") | Change |
| 58 | FNP9 | P9.4 | Removed "distinctive" from "as a distinctive Local Green Space | Change |
| 62 | FNP11 | P11.2 (b) | Added "within the site" at end of paragraph | Change |
| 64 | FNP12 | P12.1 | Changed to explicit reference to Policy EN2 | Change |
| 64 | FNP12 | P12.2 (c) | Added "relevant", change to "Design Code" | Change |
| 66 | FNP13 | P13.2 | NDHA list moved to main policy block – style and colour updated | Change |
| 68 | FNP13 | P13.3 | New policy paragraph (P13.3) – Incorporating beginning of old P13.6 "Non-householder development …" | Change |
| 69 | FNP14 | FNP14.2 | Changed bullet list to letter list for ease of reference | Change |
| 69 | FNP14 | FNP14.2 | Added "… in the layout for the future provision of a …" | Change |

| Page | Section | Para. | Change | Status |
|---|---|---|---|---|
| 71 | FNP14 | FNP14.10 | Added new bullet points (x3) with additional text from the reasonable justifications document in relation to this site | Added |
| 71 | FNP14 | FNP14.11 | Updated last sentence to reflect timing of developments and plan | Change |
| 72 | FNP14 | P14.15 | Added this new paragraph “SSSI IRZ / NE” | Added |
| 72 | FNP14 | P14.16 | Added this new paragraph “charging points” | Added |
| 72 | FNP14 | P14.17 | Added the new paragraph “… (SAC) …” | Added |
| 77 | FNP16 | P16.3 (16.2) | Policy paragraph deleted (referred to Coln House school) | Deleted |
| 77 | FNP16 | P16.4 (16.5) | Removed reference to Coln House School | Deleted |
| 77 | FNP16 | P16.7 | Policy paragraph deleted (referred to Coln House school) | Deleted |
| 80 | FNP17 | P17.2 | Updated references to use classes | Change |
| 90 | MAP C | MAP C | Latest Heritage Assets map applied | Change |
| 97 | A3 | 3 | New paragraph – building with nature | Added |

# A1. MATERIAL FROM MARCH 2019 PUBLIC CONSULTATION

The work of the Fairford Neighbourhood Plan Steering Committee to date was presented to the public in a series of display boards. The public were asked to comment on seven key proposals. Seven potential sites for housing development were presented showing number of houses and the assessments from SHELAA, AECOM and NDP; the public were asked to "vote" (with stickers) on whether they would support housing on each site (Yes, No, Maybe).

## A.1. PUBLIC VIEWS ON SEVEN KEY PROPOSALS

As transcribed from manuscripts.

### NATURAL AND HISTORIC ENVIRONMENT

t) Good

u) Yes agree-really important and "gaps" need to be fought for

v) Green spaces need to be protected and it seems that they are being

w) Fencing which is a barrier to all wildlife should be banned, support your objective

x) Important to bear these in mind

y) Approve

z) We need to retain the natural environment

aa) We need to retain the green belt, once it is concreted over there is no going back

### CLIMATE CHANGE, SPATIAL STRATEGY AND WATER MANAGEMENT INFRASTRUCTURE

a) Approve

b) Seems very sensible

c) Sewage is a problem as is flooding

d) Support your objective. Fairford needs to become carbon neutral. We should have local renewable energy, e.g wind and solar. Fairford should declare a climate emergency. FTC should set an example by becoming carbon neutral

e) Concerned about flooding and pressures on water supply

f) Housing, built to higher sustainable standards-Allotments

g) Ok

## HOUSING PROVISION AND MIX

a) I think Fairford has had plenty of expansion and should be allowed to settle-No more building

b) Need more affordable housing

c) Support your objective, all new housing should have solar panels, there should be no more building on the flood plain

d) I agree affordable housing is needed for the younger generation

e) No more housing, or at least until better infrastructure-roads etc

f) Fairford has increased by 40% within the last 5 years. The town needs to be able to settle and get used to the additional population

g) Large scale development on the edge of the town will not help support the town centre. More likely to go elsewhere by car for shops

## COMMUNITY AND BUSINESS INFRASTRUCTURE (INCLUDING HIGHWAYS)

a) And services- Risk of creating a divided community.

b) Housing has increased by 40%. There is no industry or commerce in Fairford so the option is to commute with the result local roads get very congested

c) Consideration needs to be given to London street. It is much more busy. Traffic across the bridge is dangerous at times

d) Leafield road is already a problem from 8.20-9.00am, so this would need looking at access improved

e) Definitely need more local employment. There should be no more housing without increased employment opportunities as increased commuting out of Fairford is not sustainable-support your objective

f) Concerns about parking in the town, no spaces

g) Use Coln house school as flats rather than build more houses, affordable 1 or 2 beds for younger people

## LOCAL ECONOMY AND TOWN CENTRE

a) Encourage expansion of local businesses reduced rates etc-keep parking free

b) Agree-use of Coln House school site-mixture residential, small business, studio space. Local employment area priority

c) Local businesses need our support

d) Support your objective

e) New primary school is needed at Cirencester end

f) The town centre needs more shops

g) More shops and services

h) Small scale in-fill developments are more likely to support the town centre but they don't seem popular as far as comment stickers show. More affordable housing for local young people. Don't develop posh suburbs for out commuters

## LOCAL GREEN SPACES

### LOCAL GREEN SPACES: WALNUT TREE FIELD

a) Love it

b) Excellent facility

c) Very good facility-wonderful for the children

d) An excellent community space

e) Must be kept-wonderful space for youngsters of all ages

f) Central, important to keep this empty community resource

g) All green local spaces are important to the character of Fairford and the well being of its inhabitants

h) It's a brilliant space, Would love to see a better skate park

i) Essential green space

j) Keep

### LOCAL GREEN SPACES: UPPER GREEN

a) Keep

b) Beautiful space

c) This is essential for the character of Fairford

d) Historic space and an asset to the town

### LOCAL GREEN SPACES: COLN HOUSE SCHOOL PLAYING FIELD

a) Would be fabulous to protect this green space

b) Public open space

c) Keep

d) This would be good to keep it as it is

e) Potential for opportunity to be an asset facility for the town

f) Should be maintained for the use of the community

g) Keep for the community

h) The Horcott gap is important

### LOCAL GREEN GAP PROPOSALS

a) Endorse local green gap proposals

b) Good

c) No preference

d) Support

e) Do not allow any development

f) Important to maintain space between Horcott and Fairford

g) Area of Special Landscape Value

h) Homeground and Morgans Ground needs to be protected as green space-its such an area of local beauty used by my children as a perfect place to enjoy and play

i) Problem of balance-gaps needed and preservation of countryside - not spilling into surroundings

j) Good

k) Need to protect

l) Parking is a problem at the schools. Farmors school should allow parking on their playing field

m) Asset to the town

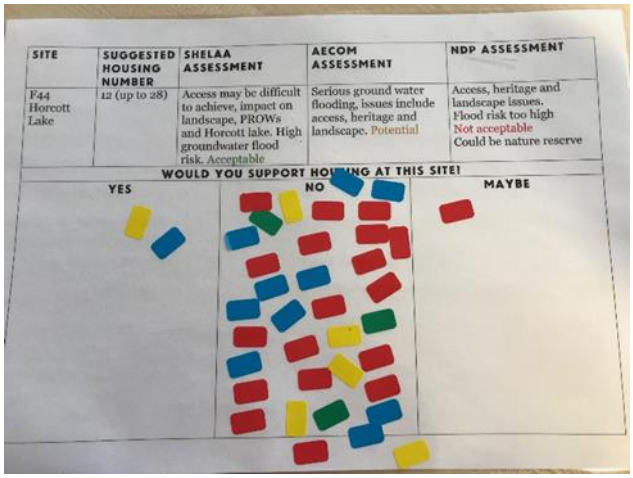
# A.2. PUBLIC VOTING ON SEVEN POTENTIAL SITES:

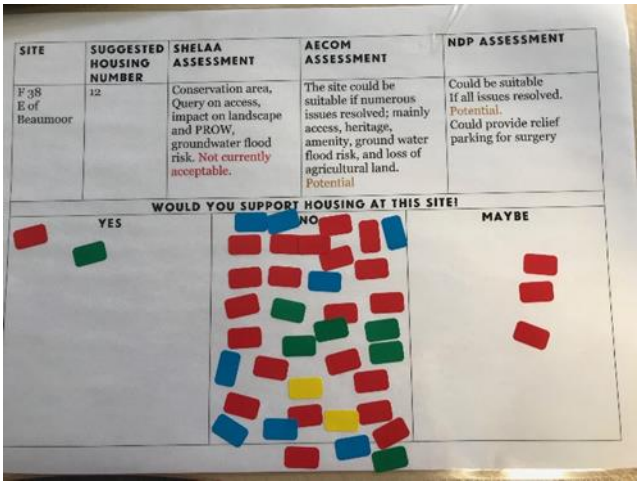
## DO YOU SUPPORT HOUSING ON THIS SITE?

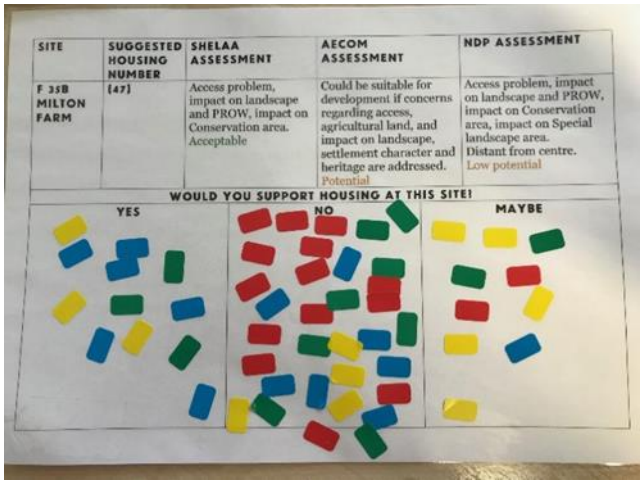
| Site | Location | Yes | No | Maybe | Total | Yes (%) | No (%) | Maybe (%) |
|---|---|---|---|---|---|---|---|---|
| F_44 | Faulkner's Close (Horcott Lake) | 2 | 37 | 1 | **40** | 5% | 93% | 3% |
| F_35B | Milton Farm | 12 | 33 | 10 | **55** | 22% | 60% | 18% |
| F_38 | East of Beaumoor Place | 2 | 38 | 3 | **43** | 5% | 88% | 7% |
| F_15 | Jones's Field | 8 | 31 | 12 | **51** | 16% | 61% | 24% |
| F_51B/C | Leafield Road | 41 | 15 | 9 | **65** | 63% | 23% | 14% |
| F_39C | South of London Road | 5 | 23 | 10 | **38** | 13% | 61% | 26% |
| F_52 | West of Terminus Cottage | 0 | 26 | 7 | **33** | 0% | 79% | 21% |

## VOTING BOARDS USED

Photographs of the various voting board used follow.



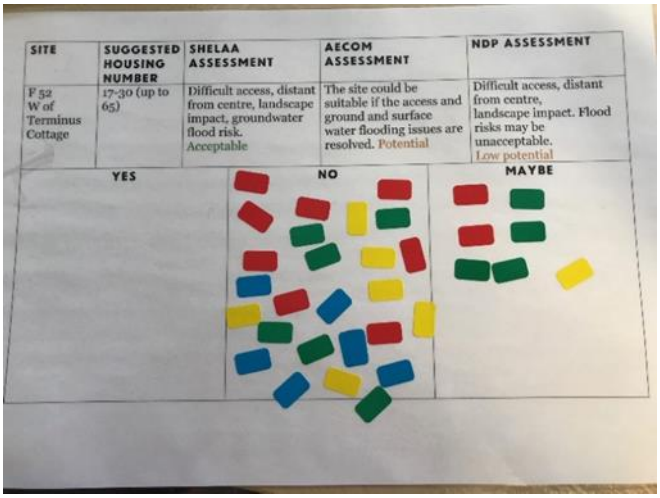



| SITE | SUGGESTED HOUSING NUMBER | SHELAA ASSESSMENT | AECOM ASSESSMENT | NDP ASSESSMENT |
|---|---|---|---|---|
| F 15 Jones Field | About 20 (up to 50) | Conservation area, limited access, impact on landscape and PROW, (Morgan Hall) Acceptable. | The site could be a suitable development location if the issues relating to access, heritage, and loss of agricultural land are resolved. Potential | Could be suitable if access and heritage issues mitigated. Potential. Could provide Parking area and allotments |

WOULD YOU SUPPORT HOUSING AT THIS SITE?

YES NO MAYBE



| SITE | SUGGESTED HOUSING NUMBER | SHELAA ASSESSMENT | AECOM ASSESSMENT | NDP ASSESSMENT |
|---|---|---|---|---|
| F 52 W of Terminus Cottage | 17-30 (up to 65) | Difficult access, distant from centre, landscape impact, groundwater flood risk. Acceptable | The site could be suitable if the access and ground and surface water flooding issues are resolved. Potential | Difficult access, distant from centre, landscape impact. Flood risks may be unacceptable. Low potential |

YES NO MAYBE

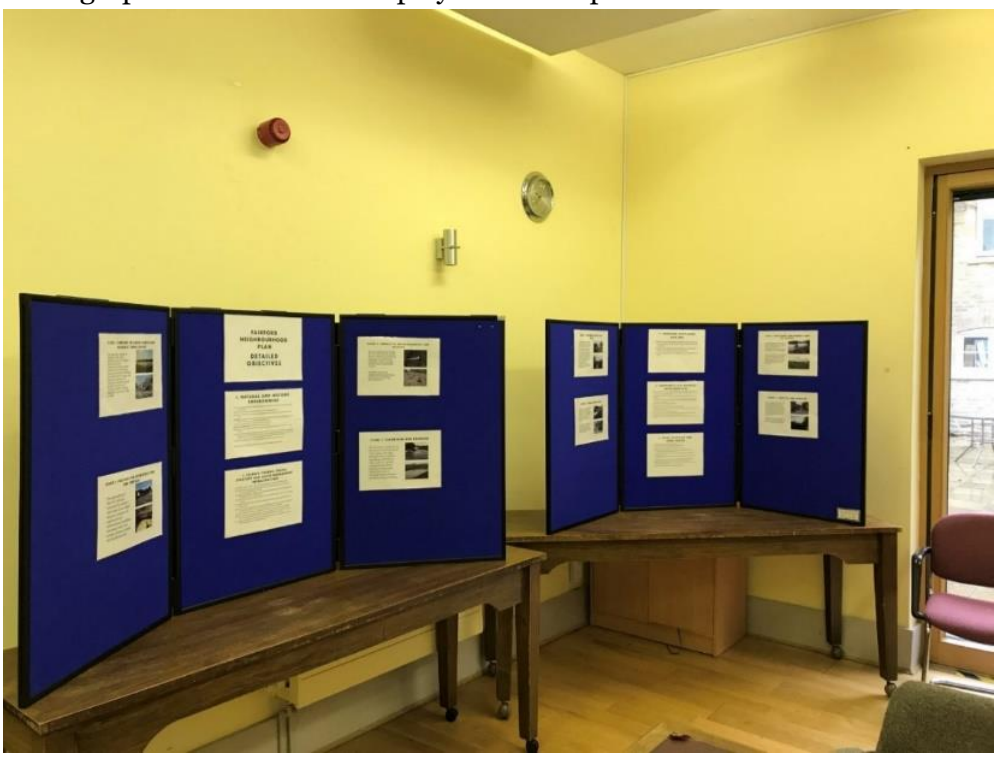
| SITE | SUGGESTED HOUSING NUMBER | SHELAA ASSESSMENT | AECOM ASSESSMENT | NDP ASSESSMENT |
|---|---|---|---|---|
| F 39C S of London Road | 32 | Access problem, landscape impact, groundwater flood risk. Acceptable | The site could be suitable if the access and ground and surface water flooding issues are resolved. Potential | Access could be via Industrial site. Flood risks may be unacceptable. Low potential. Could be employment site |

WOULD YOU SUPPORT HOUSING AT THIS SITE?

YES NO MAYBE

## PUBLIC CONSULTATION DISPLAYS

Photographs of the various displays from the public consultation follow.



# A2. MATERIAL FROM 2017 NEIGHBOURHOOD PLAN.

Original material from the 2017 consultation statement can be found in the following documents and locations.

## 2017 CONSULTATION STATEMENT

*Document Name*: FNP-Consultation-statement-Feb-2017-Final.pdf

*Link*: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/FNP-Consultation-statement-Feb-2017-Final.pdf

## 2017 CONSULTATION STATEMENT APPENDICES

*Document Name*: FNP-Consultation-Statement-Appendix-Feb-2017-Final.pdf

*Link*: https://fairfordtowncouncil.gov.uk/wp-content/uploads/2022/09/FNP-Consultation-Statement-Appendix-Feb-2017-Final.pdf

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# Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) for the Fairford Neighbourhood Plan

SA Report to accompany the submission version of the Neighbourhood Plan

Fairford Town Council

December 2021

## Quality information

| Prepared by | Checked by | Verified by | Approved by |
|---|---|---|---|
| Rosie Cox<br>Senior Environmental Planner | Alastair Peattie<br>Associate Director | Nick Chisholm Batten<br>Associate Director | Nick Chisholm Batten<br>Associate Director |

## Revision History

| Revision | Revision date | Details | Name | Position |
|---|---|---|---|---|
| V1 | 03/09/21 | Draft for QB review | Roz Capps | Fairford Town Council |
| V2 | 13/12/21 | Full draft for QB review | Roz Capps | Fairford Town Council |
| V3 | 22/12/21 | Final for Locality review | | |

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# Non-technical Summary

## What is a Sustainability Appraisal?

A sustainability appraisal (SA) has been undertaken to inform the Fairford Neighbourhood Plan (FNP). This process is required by the Strategic Environmental Assessment Regulations.

Neighbourhood Plan groups use SA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

## What is the Fairford Neighbourhood Plan?

The FNP has been prepared as a Neighbourhood Development Plan under the Town & Country Planning Act 1990 and Planning & Compulsory Purchase Act 2004, as amended by the Localism Act and the Neighbourhood Planning (General) Regulations 2012. The FNP presents a plan for the town of Fairford for the period to 2031. The area covered by the FNP is shown in **Figure 1.1**.

Prepared in the context of the Cotswold District Local Plan (2018), the FNP sets out a vision and range of policies for the neighbourhood area. The Fairford Neighbourhood Plan is being submitted to the Cotswold District Council for their consideration under Regulation 15of the Neighbourhood Planning (General) Regulations 2012, as amended.

## Purpose of this SA Report

This SA Report, which accompanies the Submission version of the FNP, is the latest document to be produced as part of the SA process. The first document was the SA Scoping Report (May 2018), which includes information about the neighbourhood area's environment and community. The second document was the SA Report which accompanied the Regulation 14 consultation version of the FNP, in 2020.

The purpose of this SA Report is to:

- Identify, describe and evaluate the likely significant effects of the FNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SA process which has been carried out to date.

The SA Report contains:

- An outline of the contents and main objectives of the FNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SA Framework of objectives against which the FNP has been assessed;
- The appraisal of alternative approaches for the FNP;
- The likely significant environmental effects of the FNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the FNP; and
- The next steps for the FNP and accompanying SA process.

# Assessment of reasonable alternatives for the FNP

The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'.

FTC have explored a number of policy options that are presented in FNP Appendix C: Strategy Options. Appendix C considers the main strategy options, in terms of policies, to meet the FNP objectives. Options are considered for the following topic areas:

- Housing allocations
- Town centre and local economy
- Spatial strategy for facilities
- Infrastructure contributions
- Green space/ countryside
- Preferred direction for future growth

As the delivery of new housing through the Neighbourhood Plan is what is most likely to have a significant effect, it was determined that this issue should be the focus of the consideration of alternatives through the SA process. The other topic areas, set out above, are not considered likely to result in significant effects and therefore are not considered through the assessment of reasonable alternatives.

The task of establishing reasonable alternatives for the delivery of new housing involved giving consideration to 'top-down' factors (strategic issues/ higher level policy) and 'bottom-up' factors (site options), before finally bringing the evidence together and establishing reasonable alternatives.

## Top-down considerations

The adopted Cotswold Local Plan (2018) sets out Fairford's role as a 'Principal Settlement' (Policy DS1 (Development Strategy)) and allocates two sites within the town to deliver a total of 61 new dwellings (Policy S5 (Fairford)):

- F_35B Land behind Milton Farm and Betterton's Close (49 dwellings); and
- F_44 Land to rear of Faulkner Close, Horcott (12 dwellings).

The Local Plan indicates (para 7.8.8) that because of pressure on infrastructure in Fairford, any large development should be towards the latter part of the plan period.

In 2018, FTC commissioned a comprehensive study on the hydrology and geology of the area (WRA), including groundwater levels. The results have informed subsequent work, which indicates that the site F_44, Land to the rear of Faulkner's Close, is unsuitable for development due of high flood risk.[1] Additionally, since the adoption of the Local Plan. Site F_35B (Milton Farm) has been withdrawn, and is no longer available for development.

FTC are therefore seeking to allocate an alternative site through the FNP to deliver the 61 homes supported through the Local Plan. FTC wish to allocate a site which is more sustainable (i.e. has a reduced level of flood risk) and will provide an increased level/ mix of housing to meet local needs in line with the objectives of the FNP. FTC has been working with CDC to ensure that the proposals of the FNP are acceptable.

## Bottom-up considerations

The second step involves identifying the site options that are potentially in contention for allocation through the FNP. This process was led by FTC, with support from AECOM (through a 'Site Options Assessment' technical support package).

[1] WRA (2018) Groundwater Monitoring and Review of Flood Risk at Fairford

Site selection for the FNP began with the Cotswold SHELAA (2017). Sites identified within the SHELAA as being included in error, withdrawn or duplicated; where development has been completed and/ or construction has started and that fall outside the neighbourhood area were not carried forward for consideration through the site assessment process.

The remaining sites identified through the SHELAA along with any additional sites proposed (based on the evidence available and consultation carried out by FTC), were assessed through the AECOM Site Assessment Report (2019).

Since 2019, a Site Assessment Report Addendum was produced in 2021 by AECOM, to reflect updated evidence and take account of the representations received through the Regulation 14 consultation on the FNP (December 2020). The following updates are of relevance for the SA:

- A new site 'Yells Yard' (Site 12) has been submitted to the Town Council for consideration through the FNP, and the SOA Addendum concludes the site is potentially suitable for development.
- Site 1 Land to rear of Faulkner's Close (F_44) now intercepts with the recently notified extension of the Cotswold Water Park SSSI designation. Combined with previously identified constraints (notably access, ground water flood risk, heritage, biodiversity and landscape) the site is not considered suitable for development through the FNP.
- Site 3 Land Behind Milton Farm and Betterton's Close (F_35B) is no longer available, nor deliverable and therefore not suitable for consideration through the FNP.
- Site 8 Land east of Beaumoor Place is being proposed for only ten new homes including five retirement homes and space for surgery parking.
- It is also noted that Site 5 'The southern half of Land north of Crabtree Park & Land off Leafield Road' is now referred to as 'Land between Leafield Rd. and Hatherop Rd'.

The conclusions of the AECOM Site Assessment Addendum (2021) are set out in **Table 4.1** of the main report, along with the site name, area in hectares, SHELAA reference, and SHELAA summary findings.

Of the sites identified, the following six are considered 'potentially suitable', and are therefore appropriate to consider as potential allocations through the FNP, if constraints are overcome:

- New Site 5: The southern half of Site 5 - Land between Leafield Rd. and Hatherop Rd. (SHELAA Ref F_51B & F_51C)
- Site 7: Jones' Field (SHELAA Ref F_15);
- Site 8: Land east of Beaumoor Place (SHELAA Ref F_38);
- Site 10: F_39C Field south east of granted planning permission at London Road; and
- Site 11: Land west of Terminus Cottage and Station (F_52)
- Site 12: Yells Yard

These six sites were taken forward for further consideration by FTC.

The red line boundary of New Site 5 has since been amended to include only its southern part. The site no longer abuts Leafield Road, following the field boundary and adjoining Hatherop Road to the east. The site will now be referred to as 'new site 5' (See **Figure 4.1** below).

## Appraisal of site options

To support the consideration of the suitability of these sites, the SA process has undertaken an appraisal of the key environmental constraints present at each of the sites and potential effects that may arise as a result of development at these locations. In this context the sites have been considered in relation to the SA Framework of objectives and decision-making assessment questions developed during SA Scoping (**Section 3.3** in the main body of this SA Report) and the baseline information.

The location of these sites can be seen in **Figure 4.1** in the main body of this SA Report.

**Tables AB.1 – AB.6** within Appendix B presents the appraisal of the six site options and provide an indication of each site's sustainability performance in relation to the eight SA themes. Summary findings of the site appraisal are presented in Chapter 4, and reproduced below in **Table NTS.1**:

**Table NTS.1 Summary appraisal findings for site options**

| Site | Biodiversity | Climate Change | Landscape and Historic Environment | Land, soil and Water Resources | Population and Community | Health and Wellbeing | Economy and Employment | Transportation |
|---|---|---|---|---|---|---|---|---|
| New Site 5 | | | | | | | | |
| Site 7 | | | | | | | | |
| Site 8 | | | | | | | | |
| Site 10 | | | | | | | | |
| Site 11 | | | | | | | | |
| Site 12 | | | | | | | | |

| Key | | | |
|---|---|---|---|
| Likely adverse effect (without mitigation measures) | | Likely positive effect | |
| Neutral/no effect | | Uncertain effects | |

In terms of Biodiversity, all site options perform negatively due to the potential impacts on nationally and locally designated sites through recreational disturbance, pollution and sewage capacity issues downstream. Sites 1, 7, 8, 10, 11 and 12 also perform negatively as they have the potential to adversely impact upon BAP priority habitats, mature trees, hedgerows, and railway embankment, which are likely to be ecological diverse and support connectivity.

It is recognised that there is potential for long term positive effects on biodiversity at New Site 5 if biodiversity net gain is delivered through the provision of open space and allotments. However, this is uncertain at this stage.

Site 8 performs negatively against the Climate Change SA Theme as the site is located partially within Flood Zone 2 (south of site). There are also small areas of low risk of surface water flooding within the site.

This would preclude development at this site. While New Site 5, site 10 and 11 also include areas of high risk of groundwater flooding, these are assessed as neutral given that development could avoid the high flood risk areas.

Sites 11 and 12 perform negatively against the Landscape and Historic Environment SA Theme given the sites' potential to impact upon open landscape, local views and the rural setting of the town. New site 5, sites 7 and 12 also have the potential to lead to negative effects due to impact on the Special Landscape Area and/ or designated heritage assets (notably Fairford Conservation Area and Grade II Listed buildings). Uncertain effects are predicted for Sites 8 and 10 given the potential for development to enhance the character and appearance of sites, particularly given the landscape and heritage setting at these locations has already been compromised by employment and residential development.

Sites 7, 8, 10 and 11 perform negatively against the Land, Soil and Water SA Theme given that they contain best and most versatile (BMV) agricultural land (Grades 1 – 3a). Development has the

potential to lead to the loss of this natural resource. Site 12 is assessed as uncertain as it is located on Grade 3 agricultural land, which could be BMV (if found to be Grade 3a). However, this is uncertain at this stage. New site 5 is also assessed negatively against this SA Theme as a result of the loss of greenfield land.

All sites are assessed positively against the Population and Community SA Theme as all sites will deliver housing which will contribute towards local needs. While it is recognised that Site 10 is now being promoted for employment, it is considered that either use would lead to positive effects against this SA theme.

All sites have the potential to contribute to the improvement of existing or provision of new services/ facilities. At this stage the level of improvements or provision that could be delivered is not known. While not as well connected to the town centre and local facilities as other sites, new site 5 is identified as leading to positive effects of greater significance for the Population and Community SA Theme given its scale. Significant positive effects are also anticipated in this respect in relation to Sites 7 and 8 given sites have been promoted for the delivery of community benefits.

All sites, with the exception of Sites 10 and 11 perform positively against the Health and Wellbeing SA Theme as all have good access to open space and recreation, and the sustainable transport offer of the town. Uncertain effects are predicted for sites 10 and 11 given the adjacent employment uses at London Road industrial estate. It is considered that residents' health may be adversely affected by noise and dust disturbance, and/or air quality pollution.

In terms of the Transportation SA Theme, Sites 7, 8 and 10 are assessed as neutral. While sites are located in close proximity to bus stops, local knowledge suggests these services are relatively unreliable, and there is not an easily accessible train station. High car use is likely to continue. Given the road access routes for Site 11 and 12 are currently undetermined, uncertain effects are predicted for these site against the Transportation SA Theme.

Uncertain effects are predicted against the Economy and Enterprise SA Theme for Site 10 as the use of the site is currently unknown. While the use of the site for employment would lead to positive effects against this SA theme, the use of the site for housing would result in the loss of a potentially suitable employment site within the neighbourhood area.

Sites 3, 7 and 8 are assessed as uncertain for the Economy and Employment SA Theme given they are not well located in terms of local employment sites, and there is uncertainty around the extent to which local services will be/ can be utilised. New site 5, sites 11 and 12 perform positively against this SA Theme as they are located in close proximity to employment sites, providing access to local jobs

## Establishing the reasonable alternatives

As set out above, the Local Plan sets out Fairford's role as a 'Principal Settlement' (Policy DS1 (Development Strategy)) and allocates two sites within the town to deliver a total of 61 new dwellings (Policy S5 (Fairford))[2].

However, FTC have since commissioned a comprehensive study on the hydrology and geology of the area (WRA, 2018), with results indicating that Local Plan site allocation F_44 (Land to the rear of Faulkner's Close), is unsuitable for development due to high flood risk.[3] Additionally, since the adoption of the Local Plan, Site F_35B (Milton Farm) has been withdrawn, and is no longer available for development. FTC are therefore seeking to allocate an alternative site through the FNP to deliver the 61 homes supported through the Local Plan.

Taking account of the objectives of the Neighbourhood Plan, along with the adopted Cotswold Local Plan and wider evidence, FTC with support from AECOM, have identified five reasonable spatial strategy options based on the six sites assessed above. It should be noted that Site 8 and Site 11 were previously rejected through the SA for reasons set out in the Regulation 14 SA Report. However, following discussions between FTC and AECOM, it was decided to include them for consistency and to ensure that all reasonable alternatives were explored. These options identified are set out in **Table**

[2] It is noted that in a previous iteration of the Local Plan, Policy S5 allocated 77 dwellings at Fairford.
[3] WRA (2018) Groundwater Monitoring and Review of Flood Risk at Fairford

**NTS.2** below, and shown in **Figure 4.2** of the main report. It is noted that a reduced capacity is now being promoted for Yells Yard, of ten homes.

**Table NTS.2: Reasonable alternative growth options**

| Site | Option A | Option B | Option C | Option D | Option E |
|---|---|---|---|---|---|
| New Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C) | 80 | | | | |
| Site 7: Jones' Field (SHELAA Ref F_15) | | 52 | 52 | 52 | |
| Site 8: Land east of Beaumoor Place (SHELAA Ref F_38) | | | | 12 | 12 |
| Site 10: F_39C Field south east of granted planning permission at London Road | | 31 | | | 31 |
| Site 11: Land west of Terminus Cottage and Station (F_52) | | | 34 | | 34 |
| Site 12: Yells Yard | | | | 10 | 10 |
| **TOTAL** | **80** | **83** | **86** | **74** | **87** |

# Appraisal of reasonable alternatives

The appraisal of the reasonable alternatives under the SA themes is presented in **Appendix C**, with summary findings presented in **Chapter 4**, and reproduced below in **Table NTS.3**: To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SA themes. This will provide an indication of the comparative sustainability performance of the reasonable alternative options in relation to each theme.

**Table NTS.3: Summary reasonable alternatives appraisal findings**

| SA theme | Option A Site 5 | Option B Sites 7 & 10 | Option C Sites 7 and 11 | Option D Sites 7, 8 and 12 | Option E Sites 8, 10, 11 and 12 |
|---|---|---|---|---|---|
| **Biodiversity** | | | | | |
| Rank of preference | **2** | **4** | **1** | **3** | **4** |
| Significant effect? | **Uncertain** | **Uncertain** | **Uncertain** | **Uncertain** | **Uncertain** |
| **Climate change** | | | | | |
| Rank of preference | **1** | **2** | **2** | **3** | **3** |
| Significant effect? | **Yes - positive** | **No** | **No** | **Yes - Negative** | **Yes - Negative** |
| **Landscape & historic environment** | | | | | |
| Rank of preference | **1** | **2** | **3** | **4** | **5** |
| Significant effect? | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** |
| **Land, soil and water resources** | | | | | |
| Rank of preference | **1** | **4** | **4** | **2** | **3** |

| SA theme | Option A Site 5 | Option B Sites 7 & 10 | Option C Sites 7 and 11 | Option D Sites 7, 8 and 12 | Option E Sites 8, 10, 11 and 12 |
|---|---|---|---|---|---|
| Significant effect? | Yes - Negative | Yes - Negative | Yes - Negative | Yes - Negative | Yes - Negative |
| **Population and community** | | | | | |
| Rank of preference | 1 | 3 | 3 | 3 | 2 |
| Significant effect? | Yes - positive | Yes - positive | Yes - positive | Yes - positive | Yes - positive |
| **Health and wellbeing** | | | | | |
| Rank of preference | 1 | 3 | 3 | 2 | 3 |
| Significant effect? | Yes - positive | No | No | No | No |
| **Economy & Enterprise** | | | | | |
| Rank of preference | 1 | 4 | 2 | 3 | 3 |
| Significant effect? | No | Uncertain | No | No | No |
| **Transportation** | | | | | |
| Rank of preference | 1 | 2 | 3 | 3 | 4 |
| Significant effect? | Yes - Positive | No | Uncertain | Uncertain | Uncertain |

**Summary findings**:

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the FNP. The appraisal has highlighted the potential for a number of **positive effects** as a result of development at individual options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the FNP. **All options** perform equally in this respect given all will deliver a similar level of growth.
- **Option A (new site 5)** will deliver a walking route to the town's schools and provision for a future link road. While further details of the link road are unknown at this stage, it is considered that its delivery would likely provide improved accessibility in and around the town, improve safety, and reduce potential adverse effects on the local environment.
- The potential for positive effects are also considered for Sites 7 and 8 **(Options B-E)** under the population and community SA theme, given sites have been promoted for the delivery of community benefits alongside housing growth.

The appraisal has highlighted the potential for **negative effects** as a result of development at individual options, which are summarised as follows:

- **Option D** and **Option E** are have the potential to lead to negative effects in relation to the climate change SA theme given the presence of Site 8 which falls partially within Flood Zone 2.
- **Options B-E** will result in the permeant loss of BMV agricultural land, delivering long term negative effects against the land, soil and water resources SA theme. **Option A** although not constrained by BMV land, will also lead to long term negative effects through the loss of greenfield land.
- **All options** have the potential to lead to long term negative effects on the local townscape and setting of Fairford, and the important heritage offer (including Fairford Conservation area and Listed Buildings). Site 12 is notable in this respect, recognising that the conclusions of the sites' Heritage and Landscape Assessments anticipating a "*moderate adverse significance of effect*".

Alongside this, further option specific constraints are identified including:

| SA theme | Option A Site 5 | Option B Sites 7 & 10 | Option C Sites 7 and 11 | Option D Sites 7, 8 and 12 | Option E Sites 8, 10, 11 and 12 |
|---|---|---|---|---|---|

- **All options** may increase recreational and disturbance pressures related to designated biodiversity sites and include ecological features on site, with Option B and Option E identified as worst performing in this respect. It is however recognised that the design and layout of development, including potential mitigation, retention, enhancement, and net-gain opportunities will determine the overall significance of effects.
- **All options** will likely lead to continued high car use, however Options B-E are less likely to encourage modal shift than Option A given the delivery of new transport infrastructure, and the opportunities presented when delivering growth at scale on a single site (i.e. delivering connected, green, active communities). This is similarly the case for the population and community SA theme.
- **Options C-E** perform less positively in relation to for transport given road access routes for Site 11 and 12 are currently undetermined.

## Preferred approach for the FNP

The following text has been provided by FTC regarding the preferred approach for the FNP.

Using the AECOM appraisal and ranking, we have applied a score (tallied the ranking) for each of the five options

| Option | Score |
|---|---|
| A | 9 |
| B | 22 |
| C | 18 |
| D | 20 |
| E | 23 |

Option A is the preferred site for the FNP Steering Committee for the following reasons:

- The concentration of the allocation on a single site, rather than spread over several smaller sites, makes the provision of affordable housing, self-build houses and community facilities (playgrounds, landscaping, e-charging points etc) more viable. Also if the allocation is spread over several sites, there will be a number of different constraints to overcome for the different sites.
- The NPPF (2021) requires Local Planning to steer development away from areas with higher flood risk towards areas with a lower probability of flooding. Option A has enough land of low flood risk to accommodate the housing requirement.
- Option A (new site 5) is not in any water supply Source Protection Zone (SPZ).
- The development of Option A includes the provision in the layout for a future link road from Hatherop Road to Leafield Road.
- Finally, the ranking by AECOM of the options clearly shows Option A to be by far the most preferable option.

## Appraisal of the current version of the FNP

The current version of the Fairford Neighbourhood Plan presents a number of planning policies for guiding development in the neighbourhood area

Utilising the SA Framework of objectives and assessment questions developed during the earlier scoping stage of the SA, the SA process has assessed the policies put forward through the current version of the Neighbourhood Plan. The SA Report has presented the findings of the assessment under the following SA themes:

- Biodiversity and Geodiversity;
- Climate Change;
- Landscape and Historic Environment;
- Land, Soil and Water Resources;
- Population and Community;
- Health and wellbeing;
- Economy and Enterprise; and
- Transportation

The summary appraisal findings are set out overleaf in **Table NTS.4**.

## Table NTS.4: Summary of FNP appraisal

### Summary by SA Theme

#### Biodiversity

- Policy FNP11 (Valuing Hedgerows and Trees) will likely lead to significant positive effects on biodiversity.
- The site allocation policy FNP14 (A New Low Carbon Community at Fairford) will likely lead to minor positive effects, however there is a level of uncertainty at this stage.
- Policy FNP12 (Achieving High Standards of Design), Policy FNP09 (Protecting the Fairford-Horcott Local Gap) and Policy FNP10 (River Coln Valued Landscape) are predicted to lead to minor positive effects.
- All other policies are not predicted to impact upon biodiversity.

Overall, the Fairford Neighbourhood Plan is predicted to have a residual **uncertain long-term minor positive** effect on the Biodiversity SA theme.

#### Climate Change

- Policy FNP04 (Managing Flood Risk), Policy FNP14 (A New Low Carbon Community in Fairford) and Policy FNP15 (Sustainable Homes and Housing Need)) will lead to significant effects on climate change.
- Policy FNP08 (Protecting Local Green Spaces), Policy FNP09 (Protecting the Fairford - Horcott Local Gap), Policy FNP12 (Achieving High Standards of Design), and Policy FNP11 (Valuing Hedgerows and Trees) are predicted to lead to minor positive effects.
- All other policies are not predicted to impact upon climate change.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **minor positive effects** on the Climate Change SA theme.

#### Landscape and Historic Environment

- Policies FNP09 (Protecting the Fairford-Horcott Local Gap), FNP10 (River Coln Valued Landscape), and Policy FNP13 (Conserving Non-Designated Heritage Assets) will lead to significant positive effects on landscape and the historic environment.
- Policy FNP12 (Achieving High Standards of Design) and Policy FNP08 (Protecting Local Green Spaces) will lead to minor positive effects.
- The site allocation policy FNP14 (A New Low Carbon Community in Fairford) will lead to residual neutral effects on landscape and the historic environment.
- All other policies are not predicted to impact upon the landscape and historic environment.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **neutral effects** on the Landscape and Historic Environment SA theme.

#### Land, Soil and Water Resources

- Policy FNP05 (Investing in Utilities and Infrastructure Improvements) will lead to significant positive effects on land, soil and water resources.
- Policies FNP08 (Protecting Local Green Spaces), FNP09 (Protecting the Fairford-Horcott Local Gap), FNP10 (River Coln Valued Landscape) and FNP11 (Valuing Hedgerows and Trees) will lead to minor positive effects.
- The site allocation Policy FNP14 (A New Low Carbon Community in Fairford) will lead to minor negative effects on land, soil and water resources.
- All other policies are not predicted to impact upon land, soil and water.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **minor negative effects** on the Land, Soil and Water SA theme.

#### Population and Community

**Summary by SA Theme**

- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP15 (Sustainable Homes and Housing Need)) and Policy FNP03 (Maintaining Viable Community Facilities), will lead to significant positive effects on the population and community.
- Policy FNP02 (Providing a New Burial Ground), Policy FNP09 (Protecting the Fairford-Horcott Local Gap), and Policy FNP12 (Achieving High Standards of Design) will lead to minor positive effects.
- All other policies are not predicted to lead to significant effects, however there is the potential for indirect minor positive effects on population and community.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Population and Community SA theme.

**Health and Wellbeing**

- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP15 (Sustainable Homes and Housing Need), Policy FNP03 (Maintaining Viable Community Facilities), and Policy FNP08 (Protecting Local Green Spaces), will lead to significant positive effects on health and wellbeing.
- Policy FNP12 (Achieving High Standards of Design) and Policy FNP15 (Providing the Right Homes) will lead to minor positive effects.
- All other policies are not predicted to lead to significant effects, however there is the potential for indirect minor positive effects on health and wellbeing.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Health and Wellbeing SA theme.

**Economy and Employment**

- Policy FNP16 (Growing our Local Economy), Policy FNP18 (Sustaining a Successful Town Centre) and Policy FNP18 (New Visitor Accommodation) will lead to significant positive effects on economy and employment.
- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP07 (Improving Access to Visitor Attractions), will lead to minor positive effects.
- All other policies are not predicted to impact upon economy and employment.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Economy and Employment SA theme.

**Transportation**

- The site allocation policy FNP14 (A New Low Carbon Community in Fairford) will lead to significant positive effects on transportation.
- Policy FNP12 (Achieving High Standards of Design), Policy FNP06 (Managing Traffic in the Town) and Policy FNP01 (The Fairford and Horcott Development Boundaries) will lead to minor positive effects.
- All other policies are not predicted to impact upon transportation.

Overall the Fairford Neighbourhood Plan is predicted to have residual **uncertain significant positive effects** on the Transportation SA theme.

The assessment has concluded that the current version of the Fairford Neighbourhood Plan is likely to lead to **significant long-term positive effects** in relation to the Population and Community, Health and Wellbeing, and Economy and Enterprise SA themes. These benefits largely relate to the delivery of new housing to meet local needs; the support for employment and support for tourism growth to develop the local economy; the protection of the public realm and of settlement identities; and the provision of new and protection of existing green/ open spaces. This is also expected to lead to **minor positive effects** in terms of the 'biodiversity' SEA theme, improving connectivity and supporting net gain in new development; however, there remains some uncertainty relating to potential effects on nationally designated sites and the biodiversity value of Horcott Lakes. It is however recognised that biodiversity net gain is likely to be secured through development, leading to positive effects in this regard.

**Minor positive effects** are also predicted in relation to the Climate Change SA theme given the delivery of a New Low Carbon Community in Fairford. Policy FNP14 includes numerous requirements

for new development which support national and local mitigation and adaptation objectives, implementing the climate emergency declared by CDC. While it is recognised that land between Leafield Road and Hatherop Road is partially at high risk of ground water flooding, it is considered that there is sufficient space within the Leafield Road site for development to avoid those areas at highest risk from groundwater flooding; with neutral effects anticipated in this regard once mitigation has been adopted.

**Uncertain significant positive effects** are predicted in relation to the Transportation SA theme, and will depend on the phasing of development and associated infrastructure delivery at land between Leafield Road and Hatherop Road.

**Neutral effects** are anticipated in relation to the Landscape and Historic Environment SA theme given the criteria set out in the FNP policies and the higher-level policy framework of the Local Plan (2018) and NPPF (2021).

**Minor long term negative effects** are predicted in relation to the Land, Soil and Water SA theme due to the loss of greenfield land at land between Leafield Road and Hatherop Road; however, given this is not best and most versatile agricultural land, effects are not anticipated to be significant.

# Recommendations

To improve the sustainability performance of the Fairford Neighbourhood Plan two recommendations were made in relation to the pre submission version of the FNP in June 2020 (See **Section 4.15** of the main report). **Table NTS.4** below sets out where recommendations have been taken into consideration within the current, submission version of the FNP:

**Table NTS.4: FNP recommendations**

| Recommendation June 2020 | Addressed in FNP? |
|---|---|
| Part of 'land between Leafield Road and Hatherop Road' site allocation falls within a SSSI IRZ for Cotswold Water Park SSSI. It is considered that there is the potential to strengthen Policy FNP14 by including a reference to the Cotswold Water Park SSSI IRZ and requiring early consultation with NE as part of any proposal. | Yes – supporting text of Policy FNP14 states that *"Any development of this site should take account of the Cotswold Water Park SSSI IRZ and should consult Natural England at an early stage."*. Furthermore, requirements set within Policy FNP14 (i.e. required improvements to the local utilities infrastructure and open space/ recreation provision) will provide a level of mitigation, recognising key issues for the SSSI relate to water quality and recreation. |
| To strengthen the FNP's climate change focus, the FNP could seek to incentivise a shift away from petrol/diesel vehicles, including ensuring development proposals, where possible, realise opportunities for integrated vehicle electric charging points and associated infrastructure. | Yes - Policy FNP15 (Sustainable Homes and Housing Needs) has been revised to state that *"in residential developments all garage and off-street parking must include provision for the safe charging of electrical vehicles. Schemes including communal parking areas must include a scheme for communal charging points."* |

# Next steps

The Fairford Neighbourhood Plan and this SA Report are being submitted to Cotswold District Council for their consideration. Cotswold District Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the Neighbourhood Plan meeting legal requirements and its compatibility with the Local Plan (2018).

If the subsequent Independent Examination is favourable, the Fairford Neighbourhood Plan will be subject to a referendum, organised by Cotswold District Council. If more than 50% of those who vote agree with the Fairford Neighbourhood Plan, then the Neighbourhood Plan will be 'made'. Once made, the Fairford Neighbourhood Plan will become part of the Development Plan for Fairford.

# 1. Introduction

## Background

1.1 AECOM has been commissioned to undertake an independent Sustainability Appraisal (SA) in support of Fairford's Neighbourhood Plan.

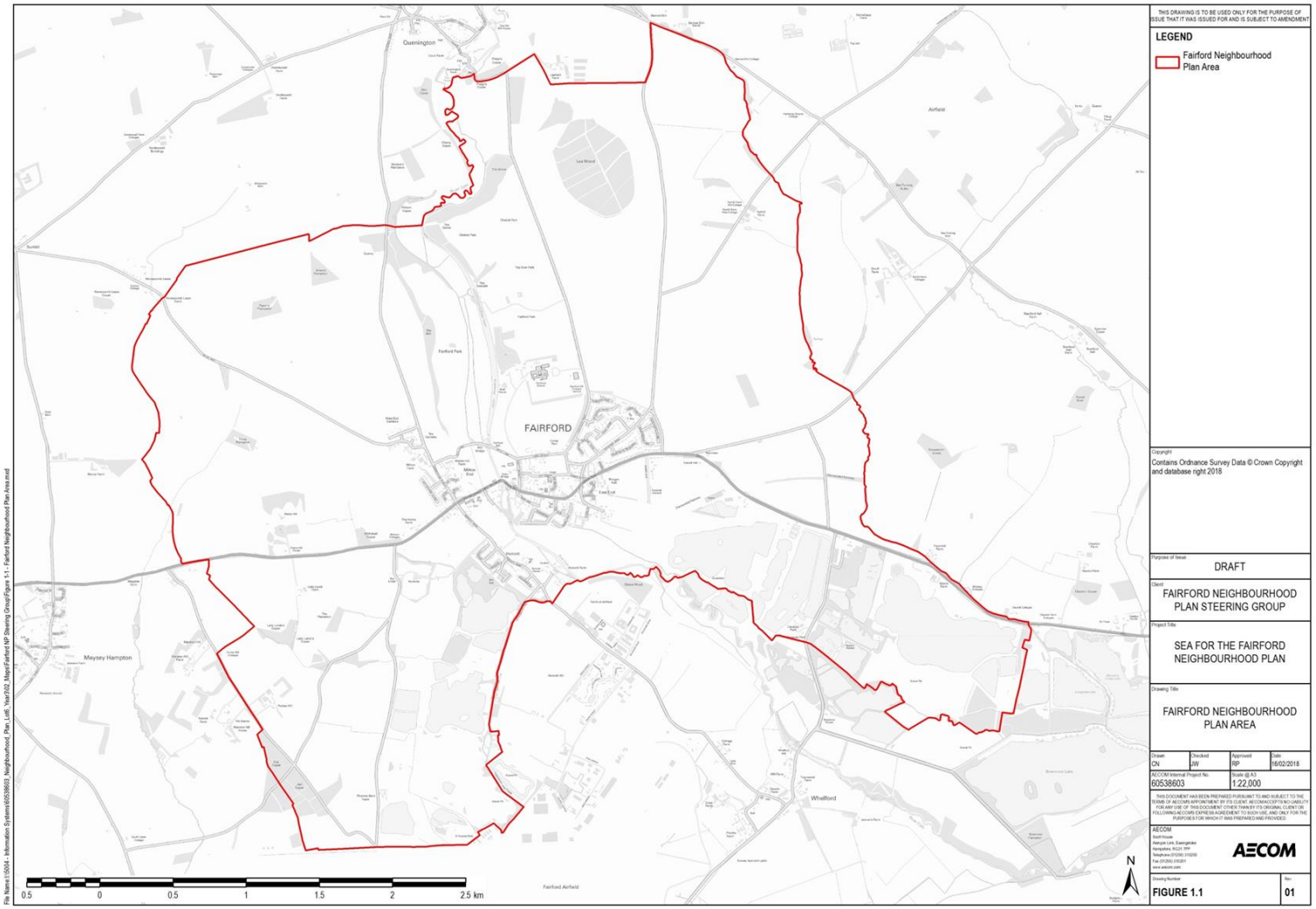
1.2 The FNP has been prepared as a Neighbourhood Development Plan under the Town & Country Planning Act 1990 and Planning & Compulsory Purchase Act 2004, as amended by the Localism Act and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan has been prepared in the context of the Cotswold District Local Plan (2018). The Fairford Neighbourhood Plan is being submitted to the Cotswold District Council for their consideration under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, as amended.

1.3 Key information relating to the Fairford Neighbourhood Plan is presented in **Table 1.1**.

**Table 1.1: Key facts relating to Fairford Neighbourhood Plan**

| | |
|---|---|
| Name of Responsible Authority | Fairford Town Council |
| Title of Plan | Fairford Neighbourhood Plan |
| Subject | Neighbourhood Planning |
| Purpose | The Fairford Neighbourhood Plan has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan must meet the basic conditions.<br>The Neighbourhood Plan will be used to guide and shape development within the Fairford neighbourhood area. |
| Timescale | To 2031 |
| Area covered by the plan | The neighbourhood area covers the parish of Fairford in Cotswold District (**Figure 1.1**) |
| Summary of content | The Fairford Neighbourhood Plan sets out a vision, strategy and range of policies for the neighbourhood area. |
| Plan contact point | Roz Capps, Deputy Clerk, Fairford Town Council<br>Email: roz@fairfordtowncouncil.gov.uk |

## Figure 1.1 Fairford Neighbourhood Plan area



# Sustainability Appraisal (SA) explained

1.4 SA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SA for the Fairford Neighbourhood Plan seeks to maximise the developing plan's contribution to sustainable development.

1.5 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)[4]. It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans; however, a Neighbourhood Plan is not a Local Plan and SA is not therefore legally required.

1.6 The Fairford Neighbourhood Plan has been screened by Cotswold District Council and has been determined to require a Strategic Environmental Assessment (SEA). To meet this requirement, the Neighbourhood Plan is undergoing an SA process which incorporates the requirements of the SEA Directive.

1.7 The SA will be undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SA will also meet submission requirements and the basic conditions in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.

1.8 The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.9 In line with the SEA Regulations this SA Report must essentially answer four questions:

1. What's the scope of the SA?
2. What has Plan-making / SA involved up to this point?
    - 'Reasonable alternatives' must have been appraised for the plan.
3. What are the appraisal findings at this current stage?
    - i.e. in relation to the draft plan.
4. What happens next?

1.10 These questions are derived from Schedule 2 of the SEA Regulations, which present the information to be provided within the report'. **Table 1.2** presents the linkages between the regulatory requirements and the four SA questions.

# Structure of this SA Report

1.11 This document is the SA Report for the FNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as presented in **Table 1.2**.

[4] Environmental Assessment of Plans and Programmes Regulations 2004

**Table 1.2: Questions that must be answered by the SA Report in order to meet regulatory[5] requirements**

| SA Report question | | In line with the SEA Regulations, the report must include…[6] |
|---|---|---|
| **What's the scope of the SA?** | What is the plan seeking to achieve? | • An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes |
| | What is the sustainability 'context'? | • The relevant environmental protection **objectives**, established at international or national level<br>• Any existing environmental **problems** which are relevant to the plan including those relating to any areas of a particular environmental importance |
| | What is the sustainability 'baseline'? | • The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan<br>• The environmental characteristics of areas likely to be significantly affected<br>• Any existing environmental **problems** which are relevant to the plan including those relating to any areas of a particular environmental importance |
| | What are the key issues & objectives? | • Key **problems**/**issues** and **objectives** that should be a focus of (i.e. provide a 'framework' for) assessment |
| **What has plan-making/SA involved up to this point?** | | • Outline reasons for selecting the **alternatives** dealt with (and thus an explanation of the 'reasonableness' of the approach)<br>• The likely significant effects associated with **alternatives**<br>• Outline reasons for selecting the preferred approach in-light of **alternatives** appraisal/a description of how environmental objectives and considerations are reflected in the draft plan. |
| **What are the assessment findings at this stage?** | | • The likely significant effects associated with **the Submission version of the plan**<br>• The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing **the Submission version of the plan** |
| **What happens next?** | | • The next steps for plan making/SA process. |

[5] Environmental Assessment of Plans and Programmes Regulations 2004
[6] NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

# 2. Local Plan context and vision for the Fairford Neighbourhood Plan

2.1 The FNP has been prepared in the context of the Cotswold District Local Plan, adopted 3rd August 2018.[7] Once made the FNP will form a part of the statutory Development Plan for the area, together with the Local Plan. The Local Plan covers the period to 2031, and is the key planning policy document for the District.

2.2 Policy DS1 (Development Strategy) of the Local Plan designates Fairford as a 'Principal Settlement'. Principal Settlements have been identified as the most appropriate locations to deliver future growth in the District, selected on the basis of their social and economic sustainability, including accessibility to services and facilities.

2.3 Policy S5 (Fairford) of the Local Plan allocates the following two sites to deliver a total of 61 new dwellings for Fairford:

- F_35B Land behind Milton Farm and Betterton's Close (49 dwellings); and
- F_44 Land to rear of Faulkner's Close, Horcott (12 dwellings).

2.4 Policy S5 also identifies the following existing employment sites which will be protected:

- Horcott Industrial Estate (EES26);
- London Road (EES27);
- Whelford Land Industrial Estate (EES28); and
- New Chapel Electronics (EES29).

2.5 The FNP will form a key part of the statutory development plan for Fairford alongside, but not as a replacement for the Local Plan.

2.6 Neighbourhood plans can develop policies and proposals to address local place-based issues, and can add detail to, or even modify, strategic policies of the Local Plan providing it is in general conformity. In this way it is intended that FTC use the Neighbourhood Plan to plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan. FTC has been working with CDC to ensure that the proposals of the FNP are acceptable. This demonstrates a collaborative approach to plan making for the town.

## Vision statement for the Fairford Neighbourhood Plan

2.7 The vision statement for the FNP, which was developed during earlier stages of plan development, is as follows:

*"Fairford has built upon its status as an attractive and historic Cotswold market town, retaining the old and incorporating the new to be a vibrant, thriving community that successfully serves the wider rural area.*

*Well considered planning has ensured that Fairford has only grown and developed at a level that renewed and improved infrastructure is able to support. The features of Fairford that define much of its character and attraction – with parkland and green spaces interwoven into the town and the mix of buildings from six centuries– have been preserved and enhanced.*

*A range of regular local events, and the promotion of Fairford's location as a base from which to explore the South Cotswolds, has encouraged visitors. Despite increasing visits, improved transport provision allows easy access to an attractive town centre with space for events,*

[7] Cotswold District Council (2018) Cotswold District Local Plan 2011 – 2031 [online] available at: https://www.cotswold.gov.uk/planning-and-building/planning-policy/adopted-local-plan/local-plan-2011-to-2031/

*community groups and recreation. Increased attendance at events and activities has helped to support local businesses and the rural economy.*

*Fairford has proactively engaged with the climate change agenda to provide low carbon housing and increase the use of low (and no) carbon forms of transport. While provision has been improved for all forms of transport, targeted improvements to facilities, signage and navigation aids has reduced barriers for pedestrians, cyclists and those with limited mobility. Planning policy has been used to good effect to reduce vehicle usage and mitigate its effects in high-traffic areas of the town, and the link road to the east has reduced traffic in the town centre.*

*The local environment is key to the attractiveness of Fairford. Policies to improve provision for wildlife and to improve the ecosystem have been beneficial for people and the environment. Investing in green infrastructure has led to greater abundance and diversity of wildlife while supporting the mental and physical health of the local population.*

*Fairford has worked hard to ensure that the local economy remains vibrant. Local planning policy has ensured that residential development has not crowded out business and that space remains for a mixed local economy including light industrial, retail and service businesses.*

*The demographic challenges faced by our rural area have been met by development appropriate to the needs of residents, alongside housing, schooling and transport improvements, which encourage new families to live, work and study in Fairford.*

*Fairford truly is "A Good Place to Be""*

2.8 Underpinning the FNP vision statement are the Neighbourhood Plan policies. The latest iteration of these policies has been appraised in **Chapter 5**.

# 3. The Scope of the SA

## SA Scoping Report

3.1 The SEA Regulations require that: *"When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies".* In England, the consultation bodies are Natural England, the Environment Agency and Historic England.[8] These authorities were consulted on the scope of the FNP SA in May 2018.

3.2 The purpose of scoping was to outline the 'scope' of the SA through setting out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability issues for the Neighbourhood Plan; and
- An 'SA Framework' of objectives against which the Neighbourhood Plan can be assessed.

3.3 Baseline information (including the context review and baseline data) is presented in **Appendix A.**

3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1** below.

**Table 3.1 Consultation responses received on the SA Scoping Report**

| Consultation response | How the response was considered and addressed |
|---|---|
| **Natural England**<br>**Yana Bulachka, West Midlands Team** | |
| We have no further comments in response to the updated Fairford NDP SA Scoping report. | Comment noted. |
| **Historic England**<br>**David Stuart, Historic Places Adviser South West** | |
| "Thank you for your consultation on the SEA Scoping Report for the Fairford Neighbourhood Plan.<br>We have been consulted previously on an SEA Scoping Report for this Plan and are unsure of the relationship between these two exercises, and the need for both.<br>We have no specific comments on the Report you have provided but have attached our response to the Regulation 16 consultation (which includes our previous SEA Scoping response) as the issues highlighted therein may also have a bearing on your work, especially the gathering and assessing of relevant heritage evidence." | Comment noted. |
| **Historic England previous Scoping response (August 2016)**<br>**David Stuart, Historic Places Adviser South West** | |

[8] In-line with Article 6(3).of the SA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme'.'*

| Consultation response | How the response was considered and addressed |
|---|---|
| "Thank you for your consultation on the Sustainability Appraisal Scoping for the emerging Fairford Neighbourhood Plan.<br><br>We have only a few observations to offer.<br><br>We note that it is intended to formulate a small number of spatial options for distributing development in and around the town and that the SA/SEA framework will be used to assess these rather than the individual sites they may contain. It is important to bear in mind that the SEA process requires the assessment of both the individual and cumulative impact of impact on heritage assets, their significance and settings. Individual sites and the potential for impact on heritage assets which may occur through their selection may therefore well need to be identified and understood first in order to appropriately inform the suitability of the various spatial options. Such an exercise would include an assessment of the character and appearance of the Conservation Area, its setting and views into and out of it." | Comment noted. Spatial options for development (reasonable alternatives) have been assessed against the SA Framework as set out in Chapter 5 of this SA Report. |
| "We have had little previous involvement in this Plan preparation process other than correspondence at the end of last year over whether the community might wish to engage in or otherwise promote the production of a Conservation Area Appraisal and Management Plan. Given the development pressure upon the town which apparently exists, the aspirations for the neighbourhood plan, and the potential for impact all this no doubt has upon the designated and undesignated heritage assets in the area, including the conservation area, the existence of an up to date and suitably detailed Appraisal is likely to be key evidence with which to inform the spatial option and site selection processes." | Comment noted. Fairford Town Council agrees that an up to date Conservation Area Appraisal and Management Plan for Fairford is important and is working with Cotswold District Council to find a way to produce one. When possible, it is envisaged that a joint partnership model will be put in place and an up to date Conservation Area Appraisal and Management Plan will be written. |
| "An Appraisal will also help in the identification of heritage issues which the Plan might wish to address, directly through policy or proposal formulation or as part of a schedule of enhancements eligible for Community Infrastructure Levy contributions." | Comment noted. As above. |
| "Otherwise, we have produced guidance on the role of heritage in the SEA/SA process and this can be downloaded from our website at https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/" | Comment noted. |
| **Environment Agency**<br>**Thames Sustainable Places Team** | |
| "Thank you for consulting the Environment Agency on your Sustainability Appraisal for Fairford Neighbourhood Plan.<br>We regret that at present, the Thames Area Sustainable Places team is unable to review this consultation. This is due to resourcing issues within the team, a high development management workload and an increasing volume of neighbourhood planning consultations. We have had to prioritise our limited resource, and must focus on influencing plans where the environmental risks and opportunities are highest. For the purposes of neighbourhood planning, we have assessed those authorities who have "up to date" local plans (plans adopted since 2012, or which have been confirmed as being compliant with the National Planning Policy Framework) as being of lower risk. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local authority area." | Comment noted. |

| Consultation response | How the response was considered and addressed |
|---|---|
| "Together with Natural England, English Heritage and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf " | Comment noted. |

# Key sustainability issues

3.5 Drawing on the review of the sustainability context and baseline, the SA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of SA. These issues are as follows, presented by nine SA themes.

- **Air quality**
  - Air quality in the Fairford neighbourhood area is generally good as national air quality objectives are being achieved.
  - There are no Air Quality Management Areas (AQMAs) within the neighbourhood area, with the nearest AQMA located in Witney, approximately 23km to the north-east of the neighbourhood area.
  - Traffic and congestion have the potential to increase emissions and reduce air quality in the area; however air pollution is at a low baseline so possible effects are unlikely to be significant.
  - Housing growth in the wider area may impact on traffic and congestion in the neighbourhood area, which has the potential to increase emissions and reduce air quality.

3.6 Due to the absence of any significant air quality issues within the neighbourhood area, air quality has been **scoped out** for the purpose of the SA process.

- **Biodiversity**
  - There are two nationally designated sites in the north of the neighbourhood area, the Lea and the Grove Ancient Woodlands. There are also two nationally designated sites adjacent to the neighbourhood area, Cotswold Water Park Site of Special Scientific Interest (SSSI) and the Whelford Meadow SSSI. The entirety of the neighbourhood area is located within a residential, rural residential or rural non-residential Impact Risk Zone (IRZ) for one or both of these SSSIs.
  - Locally important sites are located within the neighbourhood area including two Strategic Nature Areas (SNAs), the Cotswold High Wold Plateau and the Cotswold Water Park.
  - A variety of Biodiversity Action Plan Priority Habitats are present within the neighbourhood area which support a range of species. These habitats should be preserved and protected in order to prevent the loss, fragmentation and deterioration of the ecological value of Fairford.
- **Climate change**
  - An increase in the built footprint of the Fairford neighbourhood area (associated with the delivery of significant new housing since 2011) has the potential to increase overall greenhouse gas emissions. It is recognised that this level of growth has not been accompanied by the delivery of new employment land.
  - Cotswold has had higher per capita emissions than the South West of England and England as a whole since 2005. Additionally, Cotswold has also seen a smaller reduction in emissions than the South West and England.

- Land adjacent to the River Coln and the Cotswold Water Park SNA is at the greatest risk of fluvial flooding within the neighbourhood area.
- The areas at high risk from surface water drainage and sewer flooding in Fairford include East End/London Road, Milton Street and Lakeside in Horcott. There is also a specific problem area in West End Gardens. Areas at Totterdown lane, land surrounding Rhymes Barn Farm, and sections of the A417 between Fairford town centre and Clayhill Cottages may also be vulnerable.
- The Fairford Neighbourhood Plan should seek to increase the neighbourhood area's resilience to the effects of climate change, particularly from flooding, by supporting and encouraging adaptation strategies. This may include through the planning of green infrastructure, and by diverting development to areas of lower flood risk in accordance with the NPPF.

- **Landscape and historic environment**
  - The Cotswold Area of Outstanding Natural Beauty (AONB) is located adjacent to the neighbourhood area, on the northern boundary.
  - The Fairford Parish is located within the Upper Thames Clay Vales National Character Area (NCA), however it is recognised that there is considerable variation within this area, as documented in the various sub-area character assessments for the Local Plan and previous draft Neighbourhood Plan.
  - The Local Plan (2011) designates a Special Landscape Area which covers the land in and around the river valley to the north of the town. The 2017 SLA Review concluded that this SLA remains valid as a locally designated area and that its boundaries should remain the same.
  - The neighbourhood area has a rich historic environment, with 122 listed buildings, two scheduled monuments, and one scheduled monument (adjacent to the northern boundary of the plan area), nationally designated for their cultural heritage resource.
  - High levels of HGVs passing through the town are having a damaging effect on the fabric of listed buildings and the Fairford Conservation Area through increased noise and dirt pollution.
  - Future management within the neighbourhood area should seek to protect the setting of heritage assets and landscape/townscape quality.
  - New development could lead to pressures on non-designated sites and townscapes, including from the loss of key built and natural features; for example green spaces.
  - Improvement in access to and enhancement of, historic environment assets and enhancements to local distinctiveness through high quality development has potential for positive benefits for tourism.

- **Land, soil and water resources**
  - The River Coln is the main watercourse flowing through the centre of the neighbourhood area. Threats to the water quality include 'storm' discharges from the STW.
  - Groundwater Source Protection Zones (SPZs) 1, 2 and 3 are present within the neighbourhood area.
  - There are two Nitrate Vulnerable Zones (NVZs) within the neighbourhood area: one groundwater NVZ area and one surface water NVZ area.
  - An agricultural land classification assessment has been undertaken in certain parts of the neighbourhood area, identifying Grade 2, Grade 3a and 3b agricultural land present. It should be noted that this is Pre-1988 provisional agricultural classification data.

- **Population and community**
  - Based on the most recent census data available, the population of the neighbourhood area has slightly increased between 2001 and 2011. This is in line with the increase observed for Cotswold, but less than the level of growth observed for the South West of England and England.
  - Fairford has received acute housing growth since 2011, and extant planning permissions will result in further significant growth over the next few years.
  - The population is expected to have increased considerably since 2011 on account of the recent housing growth in the area. Based on average household occupancy for the neighbourhood area, a 38.9% population increase has been calculated for the area in light of built, committed and allocated housing sites.
  - A larger number of residents within the neighbourhood area are within the older age categories (45-59 and 60+) in comparison to the regional and national trends.
  - The population of the neighbourhood area is ageing, potentially placing increased pressures on local health services and facilities.
  - There are three Lower Super Output Areas (LSOA) covering the neighbourhood area. E01022204: Cotswold 009C and E01022202: Cotswold 009A are both within the top 20% least deprived in England. E01022203: Cotswold 009B is one of the top 10% least deprived in England.
  - The level of social rented and shared ownership housing is increasing in the neighbourhood area.
- **Health and wellbeing**
  - The majority of residents within the neighbourhood area consider themselves to have ‘very good health’ or ‘good health’. While this percentage is higher than local trends, it is lower than the totals for the South West of England, and England.
  - A larger number of residents within the neighbourhood area consider themselves to have ‘bad health’ or ‘very bad health’ in comparison to the totals for the South West of England, and England.
  - The main challenges within the Joint Strategic Needs Assessment (JSNA) for Gloucestershire link to population, equality and diversity, deprivation, children and young people, adults and older people, health, the economy, the environment, accessibility, community and community safety.
- **Economy and enterprise**
  - Fairford is designated through the Local Plan as a Principal Settlement and in terms of its role, as a District Centre.
  - Fairford plays a vital role in supporting its community, and other nearby settlements, including the nearby RAF airbase.
  - Fairford has a range of shops and services, sufficient to meet day-to day needs of local residents. However most of the town centre 'retail' premises are small, which means that although Fairford appears to have a wide range of shops and services, these do not meet the needs of existing (and therefore forthcoming) residents in total capacity terms.
  - The town’s mix of shops and services are currently under strong competitive/viability pressures, with many shops lost to residential conversions.
  - The Cotswold Water Park provides a major resource for tourism in the neighbourhood area, notably water recreation and wildlife.
  - Based on the 2011 census data, a higher percentage of residents in the neighbourhood area have no qualifications compared to the Cotswolds and the South West. Additionally, there is a lower percentage of residents with Level 4 qualifications within the neighbourhood area compared with the Cotswolds. There is however a

higher percentage of residents with Level 4 qualifications within the neighbourhood area compared with the total for the South West and England.

- The three largest employment sectors for residents within the neighbourhood area are: professional occupations, skilled trades occupations, and managers, directors, and senior officials.

- **Transportation**
  - There are no railway stations located within the neighbourhood area. The nearest railway station is Kemble, located 15km away from Fairford.
  - While there are three bus services which run through the neighbourhood area, these run infrequently, finishing early in the day and therefore limiting potential usability for commuters.
  - With regard to highway networks, the A417 runs through the plan area, connecting residents to neighbouring towns.
  - Residents have access to a branch of the 'Cotswold District Council Cycle Route 4' which provides access to Cirencester and Northleach.
  - Over 87% of residents within the neighbourhood area have access to a car or van, perhaps in part due to the rural setting of Fairford.
  - A higher proportion of residents use a car or van to get to work, compared to local, regional, and national percentages. There is also a high level of out-commuting.

# SA Framework

3.1 The issues were then translated into an 'SA Framework'. This SA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SA framework for the FNP is presented below in **Table 3.2**.

**Table 3.2: SA Framework for the Fairford Neighbourhood Plan**

| SA theme | SA objective | Assessment questions |
|---|---|---|
| **Biodiversity & geodiversity** | To protect and enhance all biodiversity and geological features. | Will the option/proposal help to:<br>• Support the status of the nationally designated sites of significance within and/or adjacent to the neighbourhood area boundary, including the Cotswold Water Park and the Whelford Meadow SSSIs and Ancient Woodland?<br>• Support the status of the locally designated sites of significance within and/or adjacent to the neighbourhood area boundary, including the Cotswold Water Park SNA and the Cotswold high Wold Plateau SNA?<br>• Protect and enhance semi-natural habitats?<br>• Protect and enhance priority habitats, and the habitat of priority species?<br>• Achieve a net gain in biodiversity?<br>• Support enhancements to multifunctional green infrastructure networks?<br>• Support access to, interpretation and understanding of biodiversity and geodiversity? |
| **Climate change** | Reduce the level of contribution to climate change made by | Will the option/proposal help to:<br>• Reduce the number of journeys made? |

| SA theme | SA objective | Assessment questions |
|---|---|---|
| | activities within the neighbourhood area | • Reduce the need to travel?<br>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?<br>• Increase the number of new developments meeting or exceeding sustainable design criteria?<br>• Generate energy from low or zero carbon sources?<br>• Reduce energy consumption from non-renewable resources? |
| | Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding | • Ensure that no inappropriate development takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change?<br>• Divert development away from areas of higher to areas of lower flood risk and ensure flood risk to others is not increased.<br>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?<br>• Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?<br>• Ensure the potential risks associated with climate change are considered through new development in the neighbourhood area?<br>• Increase the resilience of biodiversity in the plan area to the effects of climate change, including enhancements to ecological networks? |
| **Landscape and historic environment** | Protect, maintain and enhance the cultural heritage resource within the neighbourhood area, including the historic environment and archaeological assets. | Will the option/proposal help to:<br>• Conserve and enhance buildings and structures of architectural or historic interest?<br>• Conserve and enhance conservation areas?<br>• Support the integrity of the historic setting of key buildings of cultural heritage interest?<br>• Conserve and enhance local diversity and distinctiveness?<br>• Support access to, interpretation and understanding of the historic environment? |
| | Protect and enhance the character and quality of landscapes and townscapes. | Will the option/proposal help to:<br>• Support the integrity of the Cotswold AONB?<br>• Conserve and enhance landscape character?<br>Protect and enhance key landscape and townscape features? |

| SA theme | SA objective | Assessment questions |
|---|---|---|
| **Land, soil and water resources** | Ensure the efficient and effective use of land. | Will the option/proposal help to:<br>• Promote the use of previously developed land?<br>• Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 2 and 3a agricultural land? |
| | Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. | Will the option/proposal help to:<br>• Reduce the amount of waste produced?<br>• Support the minimisation, reuse and recycling of waste?<br>• Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?<br>• Encourage recycling of materials and minimise consumption of resources during construction? |
| | Use and manage water resources in a sustainable manner | Will the option/proposal help to:<br>• Support improvements to water quality?<br>• Minimise water consumption?<br>• Protect groundwater resources?<br>• Protect the River Coln and nationally designated sites from pollution? |
| **Population and community** | Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. | Will the option/proposal help to:<br>• Promote the development of a range of high quality, accessible community facilities?<br>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?<br>• Minimise fuel poverty? |
| | Reduce deprivation and promote a more inclusive and self-contained community | • Maintain or enhance the quality of life of existing local residents?<br>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? |
| | Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures. | Will the option/proposal help to:<br>• Support the provision of a range of house types and sizes?<br>• Support enhancements to the current housing stock?<br>• Meet the needs of all sectors of the community?<br>• Provide quality and flexible homes that meet people's needs? |

| SA theme | SA objective | Assessment questions |
|---|---|---|
| | | • Promote the use of sustainable building techniques, including use of sustainable building materials in construction?<br>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities? |
| **Health and wellbeing** | Improve the health and wellbeing residents within the neighbourhood area. | Will the option/proposal help to:<br>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?<br>• Align to the five key priority areas outlined in the Joint Strategic Needs Assessment?<br>• Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?<br>• Reduce noise pollution?<br>• Promote the use of healthier modes of travel?<br>• Improve access to the countryside for recreational use? |
| **Economy and enterprise** | Promote a thriving and sustainable local economy | • Promote business creation and a diverse and resilient local economy?<br>• Support a wide range of jobs and training opportunities?<br>• Ensure the long-term availability of suitable land and buildings to support economic prosperity and change?<br>• Create an attractive economically viable town centre. Provide opportunities for all employers to access: different types and sizes of accommodation; flexible employment space; and high-quality communications infrastructure?<br>• Strengthen links with larger economic centres?<br>• Promote and support the rural economy? Promote the development of tourism in a sustainable manner? |
| **Transportation** | Promote sustainable transport use and reduce the need to travel | Will the option/proposal help to:<br>• Encourage modal shift to more sustainable forms of travel?<br>• Enable sustainable transport infrastructure enhancements?<br>• Facilitate working from home and remote working?<br>• Improve road safety? |

| SA theme | SA objective | Assessment questions |
|---|---|---|
| | | • Reduce the impact on residents from the road network? |

# 4. What has plan making/ SA involved to this point?

## Introduction

4.1 In accordance with the SEA Regulations the SA Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives/ an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

4.2 The 'narrative' of plan-making/ SA up to this point is told within this part of the SA Report. Specifically, this section explains how preparation of the current version of the FNP has been informed by an assessment of alternative locations for non-strategic scale development in the neighbourhood area.

## Overview of plan making/ SA work undertaken since 2013

4.3 Plan-making for the FNP has been underway since 2013. Work began with the designation of the neighbourhood area by CDC in November 2013. Since then a range of consultation events have since been carried out for the FNP to engage the community and enable their input into the plan making process. This has included leaflets, meetings, workshops, questionnaires, discussions and public consultation drop-in days, and there have been invitations throughout to participate and to make comments.

4.4 **Table 4.1** below summarises the key documents that have been prepared for the Neighbourhood Plan and accompanying SA process to date.

**Table 4.1 Key documents in neighbourhood plan making process**

| Year | Plan-making | SA |
|---|---|---|
| 2018 | Evidence gathering | Scoping Report |
| 2020 | Regulation 14 consultation | SA Report to accompany the pre-submission consultation |

4.5 The following sections more specifically present information on the work undertaken to develop and appraise reasonable alternatives for the Neighbourhood Plan.

## Developing the reasonable alternatives

4.6 The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'.

4.7 FTC have explored a number of options, in terms of policies, to meet plan objectives. These are presented in FNP Appendix C: Strategy Options. Strategy Options were considered for the following topic areas:

- Housing allocations;
- Town centre and local economy;
- Spatial strategy for facilities;
- Infrastructure contributions;

- Green space/ countryside; and
- Preferred direction for future growth.

4.8 As the delivery of new development through the Neighbourhood Plan is what is most likely to have a significant effect on SA objectives, it was determined that this issue should be the focus of the consideration of alternatives through the SA process. The potential sites and spatial strategy options (packages of sites) for delivering development in line with the FNP objectives, will directly or indirectly influence the topic areas identified above and FTCs preferred approach.

4.9 The task of establishing reasonable alternatives for the delivery of new housing involved giving consideration to 'top-down' factors (strategic issues/ higher level policy) and 'bottom-up' factors (site options), before finally brining the evidence together and establishing reasonable alternatives.

## Top-down considerations

4.10 Firstly, there is a need to reiterate the context of the adopted Cotswold Local Plan (2018), as already discussed above (**Section 2.1**). The Local Plan sets out Fairford's role as a 'Principal Settlement' (Policy DS1 (Development Strategy)) and allocates two sites within the town to deliver a total of 61 new dwellings (Policy S5 (Fairford))[9]:

- F_35B Land behind Milton Farm and Betterton's Close (49 dwellings); and
- F_44 Land to rear of Faulkner Close, Horcott (12 dwellings).

4.11 The Local Plan indicates (para 7.8.8) that because of pressure on infrastructure in Fairford, any large development should be towards the latter part of the plan period.

4.12 In 2018, FTC commissioned a comprehensive study on the hydrology and geology of the area (WRA), including groundwater levels. The results have informed subsequent work, which indicates that the site F_44, Land to the rear of Faulkner's Close, is unsuitable for development due of high flood risk.[10] Additionally, since the adoption of the Local Plan. Site F_35B (Milton Farm) has been withdrawn, and is no longer available for development.

4.13 FTC are therefore seeking to allocate an alternative site through the FNP to deliver the 61 homes supported through the Local Plan. FTC wish to allocate a site which is more sustainable (i.e. has a reduced level of flood risk) and will provide an increased level/ mix of housing to meet local needs in line with the objectives of the FNP. FTC has been working with CDC to ensure that the proposals of the FNP are acceptable.

## Bottom-up considerations

4.14 The second step involves identifying the site options that are potentially in contention for allocation through the FNP. This process was led by FTC, with support from AECOM (through a 'Site Options Assessment' technical support package).

4.15 Site selection for the FNP began with the Cotswold SHELAA (2017). Sites identified within the SHELAA as being included in error, withdrawn or duplicated; where development has been completed and/ or construction has started and that fall outside the neighbourhood area were not carried forward for consideration through the site assessment process.

4.16 The remaining sites identified through the SHELAA along with any additional sites proposed (based on the evidence available and consultation carried out by FTC), were assessed through the AECOM Site Assessment Report (2019).

4.17 Since 2019, a Site Assessment Report Addendum was produced in 2021 by AECOM, to reflect updated evidence and take account of the representations received through the Regulation 14 consultation on the FNP (December 2020). The following updates are of relevance for the SA:

[9] It is noted that in a previous iteration of the Local Plan, Policy S5 allocated 77 dwellings at Fairford.
[10] WRA (2018) Groundwater Monitoring and Review of Flood Risk at Fairford

- A new site ‘Yells Yard’ (Site 12) has been submitted to the Town Council for consideration through the FNP, and the SOA Addendum concludes the site is potentially suitable for development.
- Site 1 Land to rear of Faulkner’s Close (F_44) now intercepts with the recently notified extension of the Cotswold Water Park SSSI designation. Combined with previously identified constraints (notably access, ground water flood risk, heritage, biodiversity and landscape) the site is not considered suitable for development through the FNP.
- Site 3 Land Behind Milton Farm and Betterton’s Close (F_35B) is no longer available, nor deliverable and therefore not suitable for consideration through the FNP.
- It is also noted that Site 5 ‘The southern half of Land north of Crabtree Park & Land off Leafield Road’ is now referred to as ‘Land between Leafield Rd. and Hatherop Rd’.

4.18 The conclusions of the AECOM Site Assessment Addendum (2021) are set out in **Table 4.2** below, along with the site name, area in hectares, SHELAA reference, and SHELAA summary findings.

**Table 4.2 Suitability of sites for the purposes of the Fairford Neighbourhood Plan**

| Name | Size (ha) | Capacity (dwelling no.)[11] | SHELAA (2017) conclusion | AECOM Site Assessment Addendum (2021) conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? ) |
|---|---|---|---|---|
| Site 1: Land to rear of Faulkner's Close, Horcott (SHELAA Ref F_44) | 1.14 | 27 | Site is available, suitable and achievable. | **No** – the site intercepts with the recently notified extension of the Cotswold Water Park SSSI designation. When considered in-combination with previously identified constraints (access, ground water flood risk, heritage, biodiversity and landscape) the site is not suitable for development.<br>Its however recognised that the notification of additional land, which in the opinion of Natural England is of special interest, does not take effect unless and until it is confirmed by Natural England (with or without modification), and until such time the site remains subject to the effects of the previous notification.[12] Consequently, if the notification did not take effect then the conclusions of the February 2019 Site Assessment would remain valid. Site 1 would remain potentially suitable for development. |
| Site 2: Land west of Horcott Road (SHELAA Ref F_50) | 4.53 | 102 | Site is unsuitable:<br>• The site prevents the coalescence of Horcott and Fairford and provides a green space that forms the setting of the Conservation Area and its relationship with the countryside, which would be removed by the site's development.<br>• There are also non-designated heritage assets within the western part of the site, which is a historic stone field shelter and enclosure. These structures and their field setting would be severely compromised by development, even if retained.<br>• There are also highways concerns at Horcott Road's junction with London Road. | **No** - the site is not considered a suitable development location due to several significant constraints including landscape, historic environment, biodiversity, and access. |

[11] Indicative capacity calculated using AECOM's standard method; see Chapter 3 for further detail.
[12] Natural England (2020) Cotswold Water Park SSSI Notification Document [online] available at: https://consult.defra.gov.uk/natural-england/cotswold-water-park/supporting_documents/Cotswold%20Water%20Park%20Notification%20Document%20notified%207%20Jan%202020.pdf

| Name | Size (ha) | Capacity (dwelling no.)[11] | SHELAA (2017) conclusion | AECOM Site Assessment Addendum (2021) conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? ) |
|---|---|---|---|---|
| Site 3: Land Behind Milton Farm and Bettertons Close (SHELAA Ref F_35B) | 1.97 | 47 | Site is available, suitable and achievable. | **No** - the site is no longer available, not deliverable and not considered as an allocation. |
| Site 4: Land north of Farmor's School | 7.30 | 47 | N/A | **No** - the site is not considered a suitable development location due to several significant constraints including landscape, historic environment and location. |
| Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C) | 17.40 | 261 | Site is available and achievable but not suitable for development:<br>• The site is part of a field used for arable farming, which is generally flat and has long views.<br>• The site has no defined northern boundary.<br>• The site is adjacent to the Special Landscape Area to the west and the Conservation Area to the south-west.<br>• The site's development would be an intrusion into the open countryside, the scale of which would be too large in the context of the town. It would also compromise views of the town from Public Rights of Way.<br>• There are also concerns about how the site would be accessed and that the amount of development would require strategic level infrastructure upgrades. | **Potentially** - the site has a number of minor to significant constraints including heritage, landscape, groundwater flood risk, and infrastructure capacity. The site is unsuitable as a whole. However, the southern half of the site is potentially suitable with no significant constraints (coinciding with the scheme proposed by ECT). |
| Site 6: Land east of Aldsworth Close (SHELAA Ref F_51A) | 22.88 | 343 | Site is available and achievable but not suitable for development:<br>• The site is part of a field used for arable farming, which is generally flat and has long views.<br>• The site has no defined northern boundary.<br>• The site's development would be an intrusion into the open countryside, the scale which would be too large in the context of the town. It would also compromise views of the town from Public Right of Ways.<br>• There are also concerns about how the site would be accessed and that amount of development would require strategic level infrastructure upgrades. | **No** - the site is not considered a suitable development location at this time due to several significant constraints including landscape, groundwater flood risk and infrastructure capacity. |

| Name | Size (ha) | Capacity (dwelling no.)[11] | SHELAA (2017) conclusion | AECOM Site Assessment Addendum (2021) conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? ) |
|---|---|---|---|---|
| Site 7: Jones' Field (SHELAA Ref F_15) | 2.31 | 52 | Site is available but is not achievable. Suitability is uncertain:<br>• Site forms part of Fairford's historic landscape and is an important green space within the Conservation Area, contributing to the town's setting, character and its well-defined historic edge.<br>• Development of the site would have a detrimental impact on the setting of Morgan Hall (a Listed Building) and the Conservation Area.<br>• The site contains several mature trees, which form part of an area protected by Fairford's Conservation Area and is a Wood-pasture and Parkland Biodiversity Action Plan Priority Habitat. | **Potentially** - the site could be a suitable development location if the issues relating to access, heritage, and loss of best and most versatile agricultural land are resolved. |
| Site 8: Land east of Beaumoor Place (SHELAA Ref F_38) | 0.48 | 12 | Site is not suitable:<br>• It is considered that the site's development would have unacceptable impact on setting of Morgan Hall and the Conservation Area.<br>• The site is also currently landlocked and has access issues, although it has been suggested that this could be overcome by the demolition of a dwelling (derelict mobile home) that is in the ownership of the landowner (this still needs to be confirmed with the landowner). CDC conclude that the demolition of a dwelling within the Conservation Area would require further consideration. | **Potentially** - the site could be a suitable development location if numerous issues resolved; predominately access, heritage, amenity, ground water flood risk, and loss of best and most versatile agricultural land. |
| Site 9: Land at London Road (SHELAA Ref F_39D) | 0.49 | 12 | N/A | **No** - the site has planning permission and therefore it has been established that the site is suitable and available for development and does not need to be allocated. |
| Site 10: F_39C Field south east of granted planning permission at London Road | 1.31 | 31 | Site is developable, suitable and achievable (note for either limited housing (31 dwellings) or potentially employment development). | **Potentially** - the site could be a suitable development location if the access, biodiversity and ground and surface water flooding issues are resolved. |
| Site 11: Land west of Terminus Cottage and Station (F_52) | 1.40 | 34 | Site is available, suitable and achievable. | **Potentially** - the site could be a suitable development location if the access and ground and surface water flooding issues are resolved. |

| Name | Size (ha) | Capacity (dwelling no.)[11] | SHELAA (2017) conclusion | AECOM Site Assessment Addendum (2021) conclusion (Appropriate for taking forward for the purposes of the Neighbourhood Plan? ) |
|---|---|---|---|---|
| Site 12: Yells Yard | 0.82 | 25 | N/A | **Potentially** - the site could be a suitable development location if numerous issues resolved; predominately access, landscape and heritage. |

4.19 Of the sites identified in **Table 4.2** above, the following six are considered 'potentially suitable', and are therefore appropriate to consider as potential allocations through the FNP, if constraints are overcome:

- Site 5: The southern half of Site 5: Land between Leafield Rd. and Hatherop Rd. (SHELAA Ref F_51B & F_51C)
- Site 7: Jones' Field (SHELAA Ref F_15);
- Site 8: Land east of Beaumoor Place (SHELAA Ref F_38);
- Site 10: F_39C Field south east of granted planning permission at London Road; and
- Site 11: Land west of Terminus Cottage and Station (F_52)
- Site 12: Yells Yard

4.20 These six sites were taken forward for further consideration by FTC.

4.21 The red line boundary of Site 5 has since been amended to include only its southern part. The site no longer abuts Leafield Road, following the field boundary and adjoining Hatherop Road to the east. The site will now be referred to as 'new site 5' (See **Figure 4.1** below).

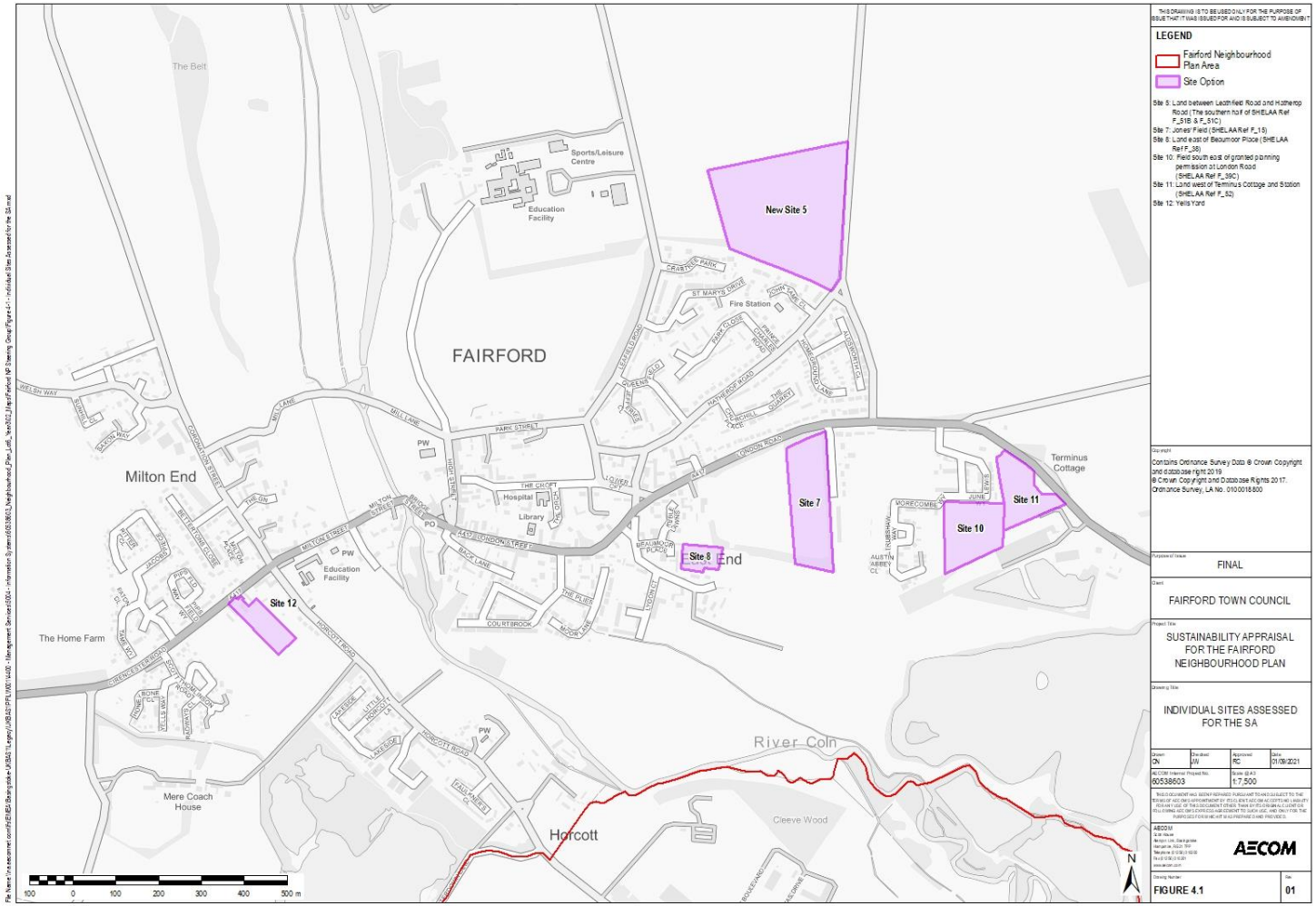
## Appraisal of site options

4.22 To support the consideration of the suitability of these sites, the SA process has undertaken an appraisal of the key environmental constraints present at each of the six remaining suitable sites and potential effects that may arise as a result of development at these locations. In this context the sites have been considered in relation to the SA Framework of objectives and decision-making assessment questions developed during SA Scoping (**Section 3.3**) and the baseline information. The location of these sites can be seen in **Figure 4.1** overleaf.

4.23 It should be noted that when considering access to community facilities and services, walking distances have been calculated from the edge of the site using google maps.

4.24 **Table 4.3** (also overleaf) presents summary appraisal findings in relation to the six individual site options, with the detailed appraisals presented within **Appendix B.**

## Figure 4.1 Individual site options for appraisal



4.25 **Table 4.3** below presents a summary of the findings of the site appraisal undertaken through the SA process.

**Table 4.3 Summary appraisal findings for site options**

| Site | Biodiversity | Climate Change | Landscape and Historic Environment | Land, soil and Water Resources | Population and Community | Health and Wellbeing | Economy and Employment | Transportation |
|---|---|---|---|---|---|---|---|---|
| New Site 5 | | | | | | | | |
| Site 7 | | | | | | | | |
| Site 8 | | | | | | | | |
| Site 10 | | | | | | | | |
| Site 11 | | | | | | | | |
| Site 12 | | | | | | | | |

| Key | | | |
|---|---|---|---|
| Likely adverse effect (without mitigation measures) | | Likely positive effect | |
| Neutral/no effect | | Uncertain effects | |

4.26 In terms of Biodiversity, all site options perform negatively due to the potential impacts on nationally and locally designated sites through recreational disturbance, pollution and sewage capacity issues downstream. Sites 1, 7, 8, 10, 11 and 12 also perform negatively as they have the potential to adversely impact upon BAP priority habitats, mature trees, hedgerows, and railway embankment, which are likely to be ecological diverse and support connectivity.

4.27 Given the increased scale of new Site 5 compared to all other options, it is recognised that there is potential for long term positive effects on biodiversity. Biodiversity net gain could be delivered through the provision of open space and allotments on site, however, this is uncertain at this stage.

4.28 Site 8 performs negatively against the Climate Change SA Theme as the site is located partially within Flood Zone 2 (south of site), which would preclude development in this part of the site. There are also small areas of low risk of surface water flooding within the site.

4.29 While new site 5, sites 10 and 11 also include areas of high risk of groundwater flooding, these are assessed as neutral given that development could avoid the high flood risk areas.

4.30 Sites 11 and 12 perform negatively against the Landscape and Historic Environment SA Theme given the sites' potential to impact upon open landscape, local views and the rural setting of the town. New site 5, sites 7 and 12 also have the potential to lead to negative effects due to impact on the Special Landscape Area and/ or designated heritage assets (notably Fairford Conservation Area and Grade II Listed buildings). Uncertain effects are predicted for sites 8 and 10 given the potential for development to enhance the character and appearance of sites, particularly given the landscape and heritage setting at these locations has already been compromised by employment and residential development.

4.31 Sites 7, 8, 10 and 11 perform negatively against the Land, Soil and Water SA Theme given that they contain best and most versatile (BMV) agricultural land (Grades 1 – 3a). Development has the potential to lead to the loss of this natural resource. Site 12 is assessed as uncertain

as it is located on Grade 3 agricultural land, which could be BMV (if found to be Grade 3a). However, this is uncertain at this stage. New site 5 is also assessed negatively against this SA Theme as a result of the loss of greenfield and agricultural land.

4.32 All sites are assessed positively against the Population and Community SA Theme as all sites will deliver housing which will contribute towards local needs. While it is recognised that Site 10 is now being promoted for employment, it is considered that either use would lead to positive effects against this SA theme.

4.33 All sites have the potential to contribute to the improvement of existing or provision of new services/ facilities. At this stage the level of improvements or provision that could be delivered is not known. While not as well connected to the town centre and local facilities as other sites, new site 5 is identified as leading to positive effects of greater significance for the Population and Community SA Theme given its scale. Significant positive effects are also anticipated in this respect in relation to sites 7 and 8 given sites have been promoted for the delivery of community benefits.

4.34 All sites, with the exception of Sites 10 and 11 perform positively against the Health and Wellbeing SA Theme as all have good access to open space and recreation, and the sustainable transport offer of the town. Uncertain effects are predicted for sites 10 and 11 given the adjacent employment uses at London Road industrial estate. It is considered that residents' health may be adversely affected by noise and dust disturbance, and/or air quality pollution.

4.35 In terms of the Transportation SA Theme, sites 7, 8 and 10 are assessed as neutral. While sites are located in close proximity to bus stops, local knowledge suggests these services are relatively unreliable, and there is not an easily accessible train station. High car use is likely to continue. Given that the road access routes for sites 11 and 12 are currently undetermined, uncertain effects are predicted for these sites against the Transportation SA Theme.

4.36 Uncertain effects are predicted against the Economy and Enterprise SA Theme for Site 10 as the use of the site is currently unknown. While the use of the site for employment would lead to positive effects against this SA theme, the use of the site for housing would result in the loss of a potentially suitable employment site within the neighbourhood area.

4.37 Sites 3, 7 and 8 are assessed as uncertain for the Economy and Employment SA Theme given they are not well located in terms of local employment sites, and there is uncertainty around the extent to which local services will be/ can be utilised. New site 5, sites 11 and 12 perform positively against this SA Theme as they are located in close proximity to employment sites, providing access to local jobs.

# Establishing the reasonable alternatives

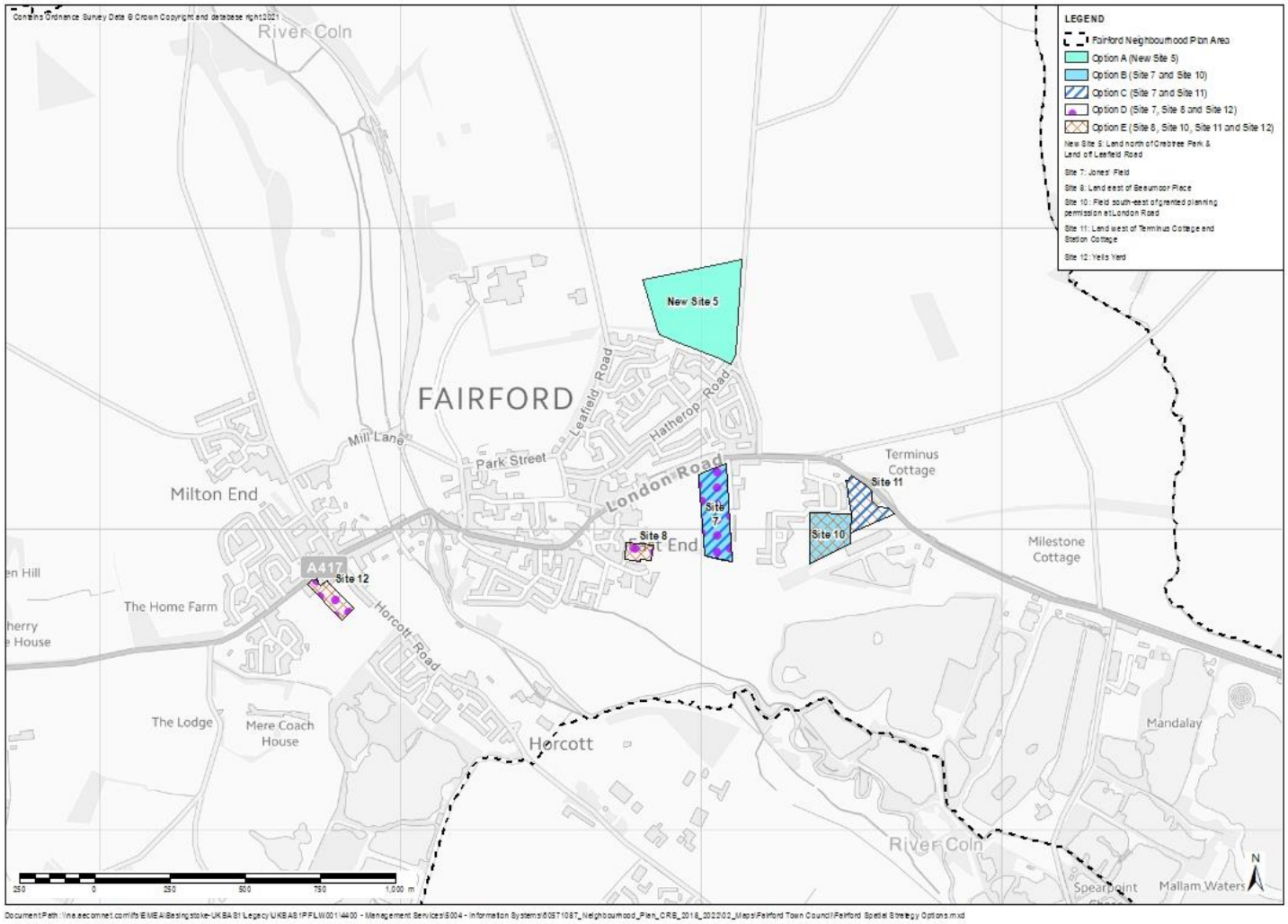
4.38 In light of the above FTC, with support from AECOM, have identified five reasonable spatial strategy options based on the six sites assessed above. It should be noted that Site 8 and Site 11 were previously rejected through the SA for reasons set out in the Regulation 14 SA Report. However, following discussions between FTC and AECOM, it was decided to include them for consistency and to ensure that all reasonable alternatives were explored. These options identified are set out in **Table 4.3** below, and shown in **Figure 4.2**, also overleaf. It is noted that a reduced capacity is now being promoted for Yells Yard, of ten homes.

**Table 4.3 Reasonable alternative growth options**

| Site | Option A | Option B | Option C | Option D | Option E |
|---|---|---|---|---|---|
| New Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C) | 80 | | | | |
| Site 7: Jones' Field (SHELAA Ref F_15) | | 52 | 52 | 52 | |
| Site 8: Land east of Beaumoor Place (SHELAA Ref F_38) | | | | 12 | 12 |

| | | | | | |
|---|---|---|---|---|---|
| Site 10: F_39C Field south east of granted planning permission at London Road | | 31 | | | 31 |
| Site 11: Land west of Terminus Cottage and Station (F_52) | | | 34 | | 34 |
| Site 12: Yells Yard | | | | 10 | 10 |
| **TOTAL** | **80** | **83** | **86** | **74** | **87** |

## Figure 4.2 Reasonable alternatives



# Appraisal of reasonable alternatives

4.39 The detailed appraisal of the reasonable alternatives under the SA themes is presented in **Appendix C**, with summary findings presented in **Table 4.4** below. To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SA themes. This will provide an indication of the comparative sustainability performance of the reasonable alternative options in relation to each theme.

**Table 4.4 Summary reasonable alternatives appraisal findings**

| SA theme | Option A Site 5 | Option B Sites 7 & 10 | Option C Sites 7 and 11 | Option D Sites 7, 8 and 12 | Option E Sites 8, 10, 11 and 12 |
|---|---|---|---|---|---|
| **Biodiversity** | | | | | |
| Rank of preference | **2** | **4** | **1** | **3** | **4** |
| Significant effect? | **Uncertain** | **Uncertain** | **Uncertain** | **Uncertain** | **Uncertain** |
| **Climate change** | | | | | |
| Rank of preference | **1** | **2** | **2** | **3** | **3** |
| Significant effect? | **Yes - positive** | **No** | **No** | **Yes - Negative** | **Yes - Negative** |
| **Landscape & historic environment** | | | | | |
| Rank of preference | **1** | **2** | **3** | **4** | **5** |
| Significant effect? | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** |
| **Land, soil and water resources** | | | | | |
| Rank of preference | **1** | **4** | **4** | **2** | **3** |
| Significant effect? | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** |
| **Population and community** | | | | | |
| Rank of preference | **1** | **3** | **3** | **3** | **2** |
| Significant effect? | **Yes - positive** | **Yes - positive** | **Yes - positive** | **Yes - positive** | **Yes - positive** |
| **Health and wellbeing** | | | | | |
| Rank of preference | **1** | **3** | **3** | **2** | **3** |
| Significant effect? | **Yes - positive** | **No** | **No** | **No** | **No** |
| **Economy & Enterprise** | | | | | |
| Rank of preference | **1** | **4** | **2** | **3** | **3** |
| Significant effect? | **No** | **Uncertain** | **No** | **No** | **No** |
| **Transportation** | | | | | |

| SA theme | Option A Site 5 | Option B Sites 7 & 10 | Option C Sites 7 and 11 | Option D Sites 7, 8 and 12 | Option E Sites 8, 10, 11 and 12 |
|---|---|---|---|---|---|
| Rank of preference | 1 | 2 | 3 | 3 | 4 |
| Significant effect? | Yes - Positive | No | Uncertain | Uncertain | Uncertain |

**Summary findings**:

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the FNP. The appraisal has highlighted the potential for a number of **positive effects** as a result of development at individual options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the FNP. **All options** perform equally in this respect given all will deliver a similar level of growth.
- **Option A** will deliver a walking route to the town's schools and provision for a future link road. While further details of the link road are unknown at this stage, it is considered that its delivery would likely provide improved accessibility in and around the town, improve safety, and reduce potential adverse effects on the local environment.
- The potential for positive effects are also considered for Sites 7 and 8 **(Options B to E)** under the population and community SA theme, given sites have been promoted for the delivery of community benefits alongside housing growth.

The appraisal has highlighted the potential for **negative effects** as a result of development at individual options, which are summarised as follows:

- **Options D** and **E** are have the potential to lead to negative effects in relation to the climate change SA theme given the presence of Site 8 which falls partially within Flood Zone 2.
- **Options B to E** will result in the permeant loss of BMV agricultural land, delivering long term negative effects against the land, soil and water resources SA theme. **Option A** although not constrained by BMV land, will also lead to long term negative effects through the loss of greenfield and agricultural land.
- **All options** have the potential to lead to long term negative effects on the local townscape and setting of Fairford, and the important heritage offer (including Fairford Conservation area and Listed Buildings). Site 12 is notable in this respect, recognising that the conclusions of the sites' Heritage and Landscape Assessments anticipating a "*moderate adverse significance of effect*".

Alongside this, further option specific constraints are identified including:

- **All options** may increase recreational and disturbance pressures related to designated biodiversity sites and include ecological features on site, with Options B and E identified as worst performing in this respect. It is however recognised that the design and layout of development, including potential mitigation, retention, enhancement, and net-gain opportunities will determine the overall significance of effects.
- **All options** will likely lead to continued high car use; however, Options B to E are less likely to encourage modal shift than Option A given the delivery of new transport infrastructure, and the opportunities presented when delivering growth at scale on a single site (i.e. delivering connected, green, active communities). This is similarly the case for the population and community SA theme.
- **Options C to E** perform less positively in relation to for transport given road access routes for Site 11 and 12 are currently undetermined.

# Preferred approach for the FNP

4.40 The following text has been provided by FTC regarding the preferred approach for the FNP.

4.41 Using the AECOM appraisal and ranking, we have applied a score (tallied the ranking) for each of the five options

| Option | Score |
|---|---|
| A | 9 |
| B | 22 |
| C | 18 |

| | |
|---|---|
| D | 20 |
| E | 23 |

4.42 Option A is the preferred site for the FNP Steering Committee for the following reasons:

- The concentration of the allocation on a single site, rather than spread over several smaller sites, makes the provision of affordable housing, self-build houses and community facilities (playgrounds, landscaping, e-charging points etc) more viable. Also if the allocation is spread over several sites, there will be a number of different constraints to overcome for the different sites.
- The NPPF (2021) requires Local Planning to steer development away from areas with higher flood risk towards areas with a lower probability of flooding. Option A has enough land of low flood risk to accommodate the housing requirement.
- Option A (new site 5) is not in any water supply Source Protection Zone (SPZ).
- The development of Option A includes the provision in the layout for a future link road from Hatherop Road to Leafield Road.
- Finally, the ranking by AECOM of the options clearly shows Option A to be by far the most preferable option.
- Finally, the ranking by AECOM of the options clearly shows Option A to be by far the most preferable option. Scoring the sites using AECOM's ranking, Option A scores 9 compared to 18 to 23 for the other options.

## Preliminary appraisal of the FNP

4.43 In June 2020 AECOM assessed an initial draft of the Pre-Submission Regulation 14 Neighbourhood Plan, providing the following recommendations:

- Part of 'land between Leafield Road and Hatherop Road' site allocation falls within a SSSI IRZ for Cotswold Water Park SSSI. It is considered that there is the potential to strengthen Policy FNP14 by including a reference to the Cotswold Water Park SSSI IRZ and requiring early consultation with NE as part of any proposal.
- To strengthen the FNP's climate change focus, the FNP could seek to incentivise a shift away from petrol/diesel vehicles, including ensuring development proposals, where possible, realise opportunities for integrated vehicle electric charging points and associated infrastructure.

4.44 FTC subsequently updated the draft Neighbourhood Plan in response to the recommendations proposed through the SA Report, updated evidence, and in light of responses received to Regulation 14 consultation.

## Development of Neighbourhood Plan policies

4.45 To support the implementation of the vision for the FNP, discussed in **Section 2.8**, the FNP puts forward 18 policies to guide development in the neighbourhood area.

4.46 The policies, which were developed following extensive community consultation and evidence gathering, are set out below in **Table 4.5** overleaf.

### Table 4.5: Fairford Neighbourhood Plan policies

| Policy Number | Policy Title |
|---|---|
| FNP01 | The Fairford and Horcott Development Boundaries |
| FNP02 | Providing a New Burial Ground |
| FNP03 | Maintaining Viable Community Facilities |
| FNP04 | Managing Flood Risk |
| FNP05 | Investing in Utilities and Infrastructure Improvements |
| FNP06 | Managing Traffic in the Town |
| FNP07 | Improving Access to Visitor Attractions |
| FNP08 | Protecting Local Green Spaces |
| FNP09 | Protecting the Fairford-Horcott Local Gap |
| FNP10 | River Coln Valued Landscape |
| FNP11 | Valuing Hedgerows and Trees |
| FNP12 | Achieving High Standards of Design |
| FNP13 | Conserving Non-Designated Heritage Assets |
| FNP14 | A new Low Carbon Community In Fairford |
| FNP15 | Sustainable Homes and Housing Need |
| FNP16 | Growing our Local Economy |
| FNP17 | Sustaining a Successful Town Centre |
| FNP18 | New Visitor Accommodation |

# 5. Appraisal findings at this current stage?

## Introduction

5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current version of the FNP. This chapter presents:

- An appraisal of the current version of the FNP under the eight SA theme headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

## Appraisal method

5.2 The appraisal is structured under the eight SA themes taken forward for the purposes of the SA and that are linked to the SA objectives, see **Table 3.2**.

5.3 For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

5.4 Every effort is made to identify/ evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

## Appraisal of the Neighbourhood Plan

## Biodiversity

5.5 There are no internationally designated sites for biodiversity within the neighbourhood area ; however, the neighbourhood area lies approx. 5.5km from the North Meadow & Clattinger Farm Special Area of Conservation (SAC), which is within, albeit on the outer edge, of a typical Zone of Influence (ZoI) for inland Habitats (European) sites. It was therefore concluded at the Habitats Regulations Assessment (HRA) 'Screening' stage that without mitigation, Appropriate Assessment (AA) was required to further consider whether the FNP, alone or in-combination with other plans and projects, would adversely affect the integrity of internationally designated sites. Specifically, the 'recreational disturbance' and 'water quantity, level and flow' impact pathways were screened in for further assessment.

5.6 In applying the integrity test at AA stage – the HRA considered that *"the additional growth in the Neighbourhood Plan would not result in an adverse effect on the integrity of the SAC. This is based on the package of visitor management measures already devised by Natural England, the relative distance of Fairford town from the SAC (8km) and comparative difficulty accessing the SAC compared to other closer areas of attractive semi-natural greenspace, and the overarching policy framework in the Local Plan and Neighbourhood Plan including a Local Plan commitment to develop strategic mitigation for the district."*

5.7 Policies that help prevent adverse effects on the integrity of European Sites are also included in the Cotswold District Local Plan (CDLP), and the protection of European Sites is further strengthened in FNP Policy EN9 (Biodiversity and Geodiversity: Designated Sites), which clarifies that *'1. Internationally designated wildlife sites… will be safeguarded from development that could cause a significant effect that would adversely affect their integrity.'* Overall, these

policies ensure that residential development which would result in unsustainable, adverse recreation impacts will not be permitted.

5.8 In consultation with Cotswold District Council (CDC), it was suggested that, notwithstanding the conclusion above, reference should be made in both the HRA and Fairford Neighbourhood Plan to the need for any developer of a housing site in Fairford to comply with the emerging Interim Mitigation Strategy for North Meadow that is currently being prepared by a consultant on behalf of Swindon Borough Council for their Local Plan Review.

5.9 In line with advice from CDC it was recommended through the HRA that *"for the avoidance of doubt a reference to the emerging Interim Mitigation Strategy and the need for developers to comply with it should be added to Policy FNP14." Overall, it is determined that, with this addition to policy text, there will be no adverse 'in combination' effects of the Fairford NP. No policy recommendations are made."* Policy FNP14 has subsequently been updated in light of this recommendation, stating in relation to 'land between Leafield Road and Hatherop Road', that "*The development of this site will be required to mitigate its impact on the Special Area of Conservation (SAC) at North Meadow near Cricklade, in accordance with the mitigation strategy being developed by Swindon Borough Council.*"

5.10 In terms of the 'water quantity, level and flow' pathway, the HRA highlights that 'Thames Water's WRMP does not involve water resource options that are hydrologically linked to the North Meadow & Clattinger Farm SAC. Furthermore, the CDLP contains a policy framework that protects the hydrological conditions in European Sites. Therefore, the HRA concludes that *"the Fairford NP will not result in adverse effects on the SAC regarding water level, flow and volume 'in-combination' with other plans and projects. No additional policy recommendations for inclusion in the Fairford NP are made."*

5.11 In terms of nationally designated sites, the Cotswold Water Park Site of Special Scientific Interest (SSSIs) now covers most of the southern part of the Parish (in light of the extension to the SSSI January 2021)[13], including Horcott. Additionally, adjacent to the neighbourhood area is Whelford Meadow SSSI to the south. Consequently, the entirety of the falls within a SSSI Impact Risk Zone (IRZs) for these SSSIs.[14] The IRZ varies depending on the proximity to the SSSI, and as such the south/ south eastern extent of the neighbourhood area is within a SSSI IRZ for *'all development proposals*, i.e. an application for any type or scale of development, while areas north of the settlement are within an IRZ for *'any residential development of 50 or more houses outside existing settlements/ urban areas'.*

5.12 In terms of the Neighbourhood Plan site allocation (Policy FNP14 (A New Low Carbon Community in Fairford)), part of the site, to the south east, falls within the Cotswold Water Park SSSI IRZ for 50 residential units. Policy FNP14 supports proposals for housing developments of *"around 80 homes",* and as such, development has the potential to impact upon the SSSI, for example through recreational disturbance and indirectly through pollution. The Cotswold Local Plan (2018) provides protection to nationally designated sites, in particular Policy EN9 (Biodiversity and Geodiversity: Designated Sites) states that any development likely to have an adverse effect upon a nationally designated site will not be permitted. Furthermore, Policy EN9 requires that any permitted development provides appropriate mitigation or compensation.

5.13 Policy FNP14 (A New Low Carbon Community in Fairford) supports the development of around 80 homes subject to a number of criteria. Two of these criteria will help to reduce the impacts of any development at this site on the Cotswolds Water Park SSSI. Firstly, in terms of water pollution, Policy FNP14 requires that development is not commenced until the necessary upgrade and improvements to the local utilities infrastructure are completed, as provided for by Policy FNP05. Secondly, in terms of recreational disturbance, Policy FNP14 requires that *"the scheme provides one or more areas of publicly accessible open space, including a children's play area and a community garden or allotments."* It is considered that the protection and policy mitigation provided through Cotswold Local Plan Policy EN9 and Neighbourhood Plan Policy FNP14 should be sufficient to ensure that there are residual neutral effects on nationally

[13] Natural England (2021) Cotswold Water Park [online] available at: https://www.gov.uk/government/news/cotswold-water-park-given-greater-protection-by-natural-england

[14] IRZs are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location

designated sites as a result of development at Land between Leafield Road and Hatherop Road.

5.14 Policy FNP11 (Valuing Hedgerows and Trees) requires that *"Development proposals that require the removal of trees should make provision for their replacement with trees of (wherever possible) native species within the site boundary. Where appropriate each tree removed should be replaced with at least two new trees."* Policy FNP14 subsequently states that *"the form of development would need to incorporate appropriate measures, including tree planting to mitigate the visual effects of the development on the countryside to the west, north and east of the site, with provision for this to be maintained in perpetuity"*. This will contribute positively towards ensuring no net loss of biodiversity, with the potential for net-gain, supporting the integrity and connectivity of ecological networks in the neighbourhood area .

5.15 Policy FNP14 also makes provision for a link road to the east of the town, to be delivered in accordance with the emerging Gloucestershire Local Transport Plan (2020).[15] Given the exact location of the link road is not currently known, it is noted that there is potential for development to lead to negative effects on the local biodiversity resource through habitat loss and disturbance. However, it is assumed that the location of the link road and impacts on biodiversity will be considered through a planning application for the site. In light of the requirements of the wider FNP policy framework, the Local Plan (2018), and NPPF (2021), any residual effects are unlikely to be significant.

5.16 The delivery of a 'New Low Carbon Community' at Land between Leafield Road and Hatherop Road has the potential to realise opportunities on site such that the net effect is positive for biodiversity. This approach is known as securing biodiversity 'net gain', with the emerging Environment Bill set to mandate that all qualifying schemes secure a 10% net gain. This is likely to be achieved through the delivery of *"one or more areas of publicly accessible open space" alongside housing development, "including a community garden/allotments."* Green infrastructure within the development delivers a net enhancement of biodiversity quality by avoiding, mitigating, and compensating for impacts on existing biodiversity, and restoring, creating and enhancing biodiversity, where possible within the boundary of the scheme. Given the requirement that *"development satisfies, as a minimum, the Building with Nature – Design level",* on-going monitoring and remediation of green infrastructure assets is likely to be required, leading to positive effects on the local biodiversity resource in the long term.[16]

5.17 The delivery of natural spaces and biodiverse allotments will further support ecological connectivity throughout the neighbourhood area . A wider commitment to biodiversity enhancements is seen through Policy FNP12 (Achieving High Standards of Design), which requires development proposals to be of the *highest design standards, in accordance with the Cotswold Design Code".* As set out in the Design Code, *"opportunities should be taken within all areas of GI (and the built environment) to enhance biodiversity through species choice, creation of new habitats, land management etc. There should be linkages with existing biodiversity assets and networks, and increasing access to nature for people."* Requiring high standards of design in line with CDC's key design principles is likely to lead to minor long-term positive effects for biodiversity, improving resilience to current and future pressures; as identified through the NPPF (2021), and the Governments 25-year Environment Plan (2018).

5.18 A number of FNP policies seek to more broadly support the overall biodiversity value of the neighbourhood area , placing focus on the protection and enhancement of local features and networks. In this context Policy FNP09 (Protecting the Fairford-Horcott Local Gap) and Policy FNP10 (River Coln Valued Landscape) provide protection to open landscape within the neighbourhood area . Notably, the Local Gap includes fields and paddocks which may hold a level of biodiversity value. It is also considered that Policy FNP08 (Protecting Local Green Spaces) will deliver positive effects in this regard; preventing development of valued green spaces such as the Walnut Tree Field.

[15] Gloucestershire Local Transport Plan (2020 – 2031) [online] available at: https://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2020-2041/gloucestershire-ltp-2020-2041/
[16] Building with Nature (2019) Building with Nature User Guide https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/5df1fad773bd391193145473/1576139482317/Building+with+Nature+User+Guide+v1.4_new.pdf

5.19 In summary, once the above recommendation has been adopted, it is considered that the Neighbourhood Plan and Local Plan policies provide sufficient protection, as well as mitigation, to ensure that there are no residual significant negative effects as a result of proposed development. Overall, the Fairford Neighbourhood Plan is predicted to have a residual **uncertain long-term minor positive effect** on biodiversity given the biodiversity net-gain likely to be secured through development.

## Climate Change

5.20 The Neighbourhood Plan proposes Land between Leafield Road and Hatherop Road for a low, or zero, carbon residential development. Policy FNP14 (A New Low Carbon Community in Fairford) proposes that the new development should only be delivered using low and zero carbon housing in line with Policy FNP15 (Sustainable Homes and Housing Need). This will lead to long-term positive effects in terms of supporting national and local emissions reduction targets to achieve carbon neutrality by 2050 and 2045, respectively.[17,18] Policy FNP15 provides support for *"innovative approaches to the construction of low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported."* Examples listed include earth sheltered, rammed earth, or straw bale construction, construction to Passivhaus standards, and conversion to EnerPHit standards.

5.21 The FNP recognises that non-residential development must also respond to the need for energy efficient, low carbon development and that the BREEAM standard provides a benchmark for this. Therefore in line with Policy FNP16 (Growing Our Local Economy) "*All new non-residential buildings should achieve the BREEAM Excellent standard".*

5.22 While promoting sustainable development, Policy FNP15 also seeks to capitalise upon Fairford's rich historic environment; encouraging *"the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings".* While listed buildings generally represent a greater challenge in terms of retrofitting for carbon reduction, it is possible in most cases to avoid causing harm to the special architectural character or historic interest of the building.[19] Positive effects are therefore anticipated in terms of delivering energy efficiency in homes; in line with the NPPF (2021), and the Cotswold Local Plan (2018). Notably, Policy INFO10 (Renewable and Low Carbon Energy Development) of the Local Plan seeks positively to encourage renewable and low carbon energy development while ensuring any adverse impact is satisfactorily addressed.

5.23 Adapting to the effects of climate change is a key challenge for the Neighbourhood Plan. Situated in a river basin within the Cotswold Water Park, Fairford has historically suffered many flooding incidents, from overspill from the River Coln but also groundwater, surface water and sewage flooding. The hydrology of the area is therefore complex, and as such detailed work was commissioned by FTC and produced in 2018 (WRA, 'Groundwater Monitoring and Review of Flood Risk at Fairford'), which provided FTC with a better understanding of the groundwater levels and flood risk around prospective housing development sites.[20] In terms of the 80 dwellings allocated at Land between Leafield Road and Hatherop Road (Policy FNP14), the Hydrology Report indicates that parts of the site (southern parts of Land north of Crabtree Park and Land off Leafield Road, as well as an area around the ditch between these), are subject to high ground water levels and surface water flooding at times.[21] This has therefore been a key consideration for the FNP policy framework.

5.24 The FNP highlights that hydrological constraints favour larger sites with space to place housing away from flow routes and to provide attenuation ponds. To this effect, Policy FNP14 (A New Low Carbon Community in Fairford) states that development at the site will only be supported where *"The scheme keeps housing away from areas prone to surface or ground water flooding and incorporates measures to contain and attenuate surface water either in low lying areas*

[17] In June 2019 legislation passed to commit the UK to a legally binding target of net zero emissions by 2050 https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law
[18] In July 2019 Cotswold District Council resolved to acknowledge that there is a climate emergency and will work towards being a carbon neutral organisation by 2045 https://www.climateemergency.uk/blog/cotswold/
[19] Historic England (2015) Planning Responsible Retrofit of Listed Buildings https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/responsible-retrofit-trad-bldgs/
[20] Water Resource Associates (2018) Groundwater Monitoring and Review of Flood Risk at Fairford
[21] Ibid.

*within the site boundary or on other land within the control of the applicant in accordance with Policy FNP4".* This seeks to alleviate the potential for adverse effects, addressing recommendations made by the Cotswold District Strategic Flood Risk Assessment (SFRA) Update (2016), in addition to the findings of the Hydrology Report (2018).[22]

5.25 Policy FNP04 (Managing Flood Risk) builds upon the provisions of the NPPF (2021), and Local Plan Policy EN14 (Managing Flood Risk) in terms of addressing the wider flood risk issues in the neighbourhood area . Policy FNP04 identifies a number of principles for development within the neighbourhood area , stating that *"Proposals to develop land defined by the Environment Agency as lying within either Flood Zone 2 or 3, or in areas of Flood Zone that have flooding from sources other than fluvial e.g. groundwater or surface water, will be resisted."* Further to this, *"Land in Flood Zone 1 that has high groundwater levels or holds large amounts of water in wet seasons will be safeguarded for flood storage purposes."* This is anticipated to positively address flood risk in the area, ensuring that appropriate measures are put in place to deal with flooding from all sources, and diverting development to more sustainable sites.

5.26 The FNP takes a green infrastructure approach to development, recognising that that there can be opportunities for targeted development to deliver flood risk enhancement benefits. Policy FNP14 (Delivering a New Low Carbon Community in Fairford) requires that that development *"satisfies, as a minimum, the standards required for the "Building with Nature – Design" level. Developments that meet the higher levels ("Good", "Excellent") of the standard would be strongly supported."* To be eligible for either level ("Good", "Excellent"), the user guide states that an applicant must demonstrate that they have met all five core standards; multifunctional network, environmental context, policy context, environmental impact and climate change, management and maintenance. The standard requires green infrastructure to be designed in light of the local context, to ensure features effectively meet local priorities and needs.[23] In this way, the development's green infrastructure can contribute to strategic objectives relating to ecological constraints and opportunities, priorities relating to natural water management, and the social and cultural benefits of green infrastructure, as well as opportunities to enhance quality of life.[24]

5.27 The wider FNP policy framework will also deliver positive effects supporting the ongoing development of high quality multifunctional green infrastructure networks throughout Fairford. Policies of specific relevance include Policy FNP08 (Protecting Local Green Spaces), Policy FNP09 (Protecting the Fairford - Horcott Local Gap), and Policy FNP11 (Valuing Hedgerows and Trees).

5.28 Sustainable travel is discussed in depth under the Transportation SA theme; however, it is noted that Policy FNP12 (Achieving High Standards of Design) requires development proposals to be of the *highest design standards, in accordance with the Cotswold Design Code".* As set out in the Design Code, *"the walking and cycling network, should encourage "active travel", in line with the highway user hierarchy principle. On-site routes should link to off-site non-vehicular routes, particularly those that lead to key destinations such as shops, schools and railway stations. These routes should be designed so that they are also available to the existing residents and businesses in the locality, and they should be implemented early in the delivery of the development."* Requiring high standards of design in line with CDC's key design principles is likely to lead to minor long-term positive effects in relation to the Climate Change SA theme. Improvements to the local footpath network are also supported through at a site-specific scale through FNP14 (Delivering a New Low Carbon Community in Fairford).

5.29 The FNP will further contribute towards an emissions reduction (and addressing congestion in the town), through Policy FNP15 (Sustainable Homes and Housing Need), which supports a modal shift away from high emission vehicles. Policy FNP15 states that *"in residential developments all garage and off-street parking must include provision for the safe charging of electrical vehicles. Schemes including communal parking areas must include a scheme for*

[22] Cotswold District Council (2016) Strategic Flood Risk Assessment (SFRA) Update [online] available at: http://consult.cotswold.gov.uk/portal/fp/sfra_l2/sfra_l2
[23] CIWEM, 2010
[24] Building with Nature (2019) Building with Nature User Guide https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/5df1fad773bd391193145473/1576139482317/Building+with+Nature+User+Guide+v1.4_new.pdf

*communal charging points."* Requiring new development to deliver electric vehicle charging points will contribute positively towards delivering the 'low carbon community' proposed through the FNP, and meeting the UK and Cotswolds' net zero commitments. Furthermore, it is noted that a ban on selling new petrol, diesel or hybrid cars in the UK will be brought forward from 2040 to 2035 at the latest, under government plans.[25]

5.30 Overall, assuming the above recommendation is reflected through the FNP policy framework, it is considered that the delivery of a new low carbon community in Fairford will lead to positive effects on climate change. Policy FNP14 includes numerous requirements for new development which support national and local mitigation and adaptation objectives, implementing the climate emergency declared by CDC. Notably this includes requiring low or zero carbon residential development, meeting the standards required for the "Building with Nature – Design" level, and providing new publicly accessible green space. While it is recognised that Land between Leafield Road and Hatherop Road is partially at high risk of ground water flooding, it is considered that there is sufficient space within the site for development to avoid those areas at highest risk from groundwater flooding. Furthermore, it is important to note that groundwater flooding is a key issue throughout the neighbourhood area , with very few locations not at risk. As such it the requirements of Policy FNP14 (A New Low Carbon Community in Fairford and Policy FNP04 (Managing Flood Risk) are considered to sufficiently mitigate against adverse effects. This is in accordance with paragraph 155 of the NPPF (2021), which states that *"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)."*

5.31 Taking the above into account, it is predicted that the FNP will have a **minor positive effect** on climate change.

## Landscape and Historic Environment

5.32 The neighbourhood area has a valued landscape and a rich historic environment. The town is characterised by the countryside and parkland interwoven into the built area, situated in in the setting of the Special Landscape Area (SLA), and the Coln Valley river basin. The FNP therefore requires that consideration is given to the landscape when locating development within the town; notably Policy FNP01 (The Fairford and Horcott Development Boundaries) seeks to ensure the delivery of *"appropriate development within the built-up area and in the countryside".* Policy FNP01 will have the effect of focussing future housing and economic development on the existing urban area, where there will continue to be opportunities for appropriate infill and redevelopment over the plan period. This will provide protection to the sensitive landscape character areas surrounding the settlement, while also protecting the identity of the town itself.

5.33 The characteristic landscape features and visual integrity of the town is further protected through Policies FNP09 (Protecting the Fairford-Horcott Local Gap) and FNP10 (River Coln Valued Landscape). The designation (Policy FNP10) complements the proposed Local Gap (Policy FNP09) to its west and together they are intended to appropriately manage development proposals that may risk undermining the special character of the landscape. In this context, Policy FNP09 seeks to prevent the visual coalescence of Fairford and Horcott, requiring that *"development proposals within the Local Gap will only be supported if they do not harm, individually or cumulatively, its open character."* Similarly, through Policy FNP10, proposals on land between the River Coln and Fieldway (i.e. the River Coln Valued Landscape), that may otherwise be suited to a countryside location, will only be supported if *"they will maintain the essential open character of the land".* This local designation complements the wider FNP growth strategy and higher level policy designations through Preserving the wider countryside setting, and limiting housing development in undesirable locations. Positive effects may also be delivered in terms of planning for green infrastructure.

5.34 The site allocation proposed through Policy FNP14 (A New Low Carbon Community in Fairford) seeks to deliver around 80 new homes to the north of the settlement. Given its size, there is

[25] Department for Transport and Office for Low Emission Vehicles (2020) Consultation on ending the sale of new petrol, diesel and hybrid cars and vans [online] available at: <https://www.gov.uk/government/consultations/consulting-on-ending-the-sale-of-new-petrol-diesel-and-hybrid-cars-and-vans> last accessed [23/03/20]

the potential for development at this location to adversely impact upon the SLA northwest of the site, and to impact upon the setting and character of the town; including views from the PRoW. Policy FNP14 therefore sets out criteria to ensure adverse effects in relation to landscape are mitigated against where possible. Notably, Policy FNP14 requires that *"The layout and landscape scheme incorporate appropriate measures, including tree planting, to mitigate the visual effects of the development on the countryside to the west, north and east of the site, with provision for this to be maintained in perpetuity."* This will contribute positively towards reducing potential adverse effects on the characteristics of the SLA, local townscape, and setting.

5.35 Further to the site-specific requirements of FNP14 (A New Low Carbon Community in Fairford), Policy FNP12 (Achieving High Standards of Design) states that *"Proposals for new development, including extensions to existing buildings, should be of the highest design standards, in accordance with the relevant policies of the Cotswold Local Plan and the Cotswold Design Code".* The Cotswold Design Code (2018) seeks to ensure the highest standards of new development, respecting the Cotswolds as *"an outstandingly beautiful area, rich in built and natural heritage."*[26] Further to this, Policy FNP12 provides specific protection to the SLA, stating that *"proposals should have specific regard to enhancing key views, particularly to the […] Special Landscape Area to the surrounding countryside"* and *"maintaining key views listed in Appendix 3".* Policy FNP12 reinforces the higher-level policies of the Local Plan (2018) (Policy EN2 (Design of the Built and Natural Environment) and Policy EN6 (Special Landscape Areas)), providing an additional level of protection for the area's sensitive landscape.

5.36 In terms of the local historic environment, there is a variety of historical features within the neighbourhood area , including Grade I, II* and II Listed Buildings, two Scheduled Monuments, Fairford Conservation Area, and numerous non-designated heritage assets (see Appendix A). Policy FNP13 (Conserving Non-Designated Heritage Assets) seeks to protect and enhance significant non-designated heritage assets in the town, while Policy FNP12 (Achieving High Standards of Design) requiring development *"to be of the highest design standards, in accordance with the Cotswold Design Code".* Further to this, Policy FNP12 sets out the requirement for development to have specific regard for *"key views, particularly to the [Grade I Listed] Church of St Mary, across Upper and Lower Green, and from within the Fairford Conservation Area".* This recognises the contribution local heritage assets make to the character of the town and the wider environment; and seek to ensure their protection and enhancement through development proposals where possible. Supporting the protection and enhancement of the intrinsic qualities and setting of heritage assets is of particular importance for the neighbourhood area given the absence of a Conservation Area Character Appraisal/ Management Plan. This will also reinforce higher level policies of the NPPF (2021) and Local Plan (2018) (notably Policy EN1 (Designated Heritage Assets - Conservation Areas)).

5.37 As discussed above, the policies of the FNP perform positively in terms of protecting and enhancing the special qualities of the public realm, supporting local distinctiveness and protecting townscape character. In this context, Policy FNP08 (Protecting Local Green Spaces) seeks to preserve the distinct character of the town, protecting open spaces which contribute to the character and appearance of Fairford Conservation Area. Notably, The Walnut Tree Field is located within the Conservation Area and has been identified through community consultation (questionnaire responses) as *"the most highly valued community green space".* The designation of the Field as Local Green Space will therefore provide an additional level of protection and enhancement for the Conservation Area.

5.38 Looking specifically at the housing site allocation (Policy FNP14 (A New Low Carbon Community in Fairford)), it is noted that the site is approximately 160m north east of the Fairford Conservation Area, which covers the centre of the village, extending up along Leafield Road. Development of the site therefore has the potential to impact upon the setting of the asset, however the site is screened almost entirely from the Conservation Area by dense belts of trees, which will likely reduce the potential for adverse effects. To further ensure adverse effects are avoided, Policy FNP14 requires that *"The design and landscaping have regard for the setting of the Fairford Conservation Area"*, and *"The layout and landscape scheme*

[26] Cotswold District Council (2018) Cotswold Design Code [online] available at: https://www.cotswold.gov.uk/cotswold-design-guidance/cotswold-design-code/

*incorporate appropriate measures, including tree planting, to mitigate the visual effects of the development on the countryside to the west, north and east of the site, with provision for this to be maintained in perpetuity".* The layout and landscape scheme also *"includes provision of a link road to the A417".* While the exact location of the road is not currently known, it is considered that criteria set out within Policy FNP14 will ensure any residual adverse effects on the landscape and historic environment are not significant. It is noted that a Conservation Area Management Plan/ Appraisal does not currently exist for Fairford Conservation Area.

5.39 Policy FNP15 (Sustainable Homes and Housing Need) supports *"the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings".* Historic England acknowledges the importance of making reasonable alterations to the existing building stock to mitigate climate change and states that often the energy efficiency of the historic buildings can be increased in ways sympathetic to their historic character.[27] Policy FNP15 further highlights the importance of "*safeguarding the special characteristics of these heritage assets for the future."*

5.40 Overall, in light of the criteria set out in Policy FNP12 (Achieving High Standards of Design), FNP14 (A New Low Carbon Community in Fairford), and the higher level policy provisions (Cotswold Local Plan (2018) and NPPF (2021)), in addition to the requirements set out in the Cotswold Design Codes (2018); it is considered that development proposed through the Neighbourhood Plan will not significantly impact upon the landscape and the historic environment. Further to this, it is considered that the FNP policies provide a robust basis for the conservation and enhancement of landscape and townscape character through the protection of the Fairford-Horcott Gap and identification of settlement boundaries. **Residual neutral effects** are predicted overall against this SA theme.

## Land, Soil and Water Resources

5.41 The FNP highlights that growth of facilities has not kept pace with the increase in population and there is now an infrastructure deficit within the town. Sewage and waste water disposal in particular is a key issue for the neighbourhood area . Policy FNP05 (Investing in Utilities Infrastructure Improvements) seeks to address this, stating that *"New homes must not be occupied until it can be demonstrated that the sewage system has adequate capacity to accommodate the additional flow generated by the development."* Thames Water prioritises long-term drainage interventions and does not have any planned for Fairford in the next Business Plan period, 2020 to 2025. However, Thames Water has stated that *"the capacity of the sewage treatment works is being reviewed due to the amount of new development now proposed within the catchment. Assessments will be undertaken to understand the phasing of the proposed future development and growth, and the operational implications for the existing sewage works."* It is considered that this will contribute positively towards ensuring that there is capacity for infrastructure to accommodate growth in the long term, and that the issue is not exacerbated by future development in the neighbourhood area . The FNP also notes that Thames Water have worked with FTC to resolve several drainage issues and set out plans for further intervention in their "Fairford Drainage Strategy v3". The delivery of the Strategy will likely lead to long term positive effects in this regard.

5.42 In terms of the local soil resource, it is recognised that the site allocation at Land between Leafield Road and Hatherop Road (Policy FNP14 (A New Low Carbon Community in Fairford) is located on Grade 4 agricultural land, and therefore avoids development of best and most versatile agricultural land. While this will protect the area's highest quality land, development will nonetheless lead to the loss of greenfield and poorer quality agricultural land. Minor negative effects are therefore anticipated in relation to the land, soil and water resources SA theme.

5.43 The Neighbourhood Plan's focus on protecting and supporting habitats and species and facilitating enhancements to Green Infrastructure will support the quality of land and water resources. This will promote the ability of natural processes to support soil and water quality. Key policies in this regard include Policies FNP08 - FNP11, and the site allocation at Land

[27] Historic England (2020) Climate Change https://historicengland.org.uk/whats-new/statements/climate-change/

between Leafield Road and Hatherop Road (Policy FNP14 (A New Low Carbon Community in Fairford).

5.44 Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. As of February 2018, SPZ 1, 2 and 3 are present within the Neighbourhood plan.[28] There is a small SPZ 1 (Inner zone) area located from Fairford town centre to the southern boundary of the plan area. There is a larger SPZ 2 (Outer zone) area covering the area from the town centre to the northern boundary of the plan area. Finally, the remaining western section of the neighbourhood area region is an SPZ 3 (Total Catchment) area. The site allocated through FNP14 lies outside of an SPZ, and the FNP is therefore considered to perform positively in terms of ensuring new development is not constrained in this respect. No specific policy is included in this respect within the FNP as it is considered that sufficient policy is provided through the higher level policy suite (i.e. Local Plan and NPPF (2021).

5.45 Nonetheless, overall, as a result of the permanent loss of greenfield land and poorer quality agricultural land, it is considered that the Fairford Neighbourhood Plan has the potential to lead to **long term minor negative effects** in relation to the Land, Soil and Water Resources SA Theme.

## Population and Community

5.46 Policy FNP14 (A New Low Carbon Community in Fairford) seeks to deliver around 80 dwellings to the north of the neighbourhood area . This will contribute positively towards meeting local housing needs, with the potential for significant long-term positive effects on this SA theme.

5.47 It is highlighted through the FNP that the population of Fairford will have increased by around 1/3 since 2012 which has created a strain on all aspects of local infrastructure including schools and health services, which will need addressing by increasing school places, developing the right housing mix and protecting community facilities. In terms of the mix of housing to be delivered, Policy FNP15 (Sustainable Homes and Housing Need) requires that *"Proposals for housing development should provide a mix of housing types that have an emphasis on two and three-bedroom houses."* This will contribute positively towards ensuring local housing supply maintains a wide variety of stock in the town, addressing local issues such as the considerable number of younger people living in Fairford who are unable to buy a house.

5.48 In terms of local infrastructure, public consultation carried out in 2016 highlighted that the *"town has grown too quickly and infrastructure has not kept up causing pressure on public services e.g. schools and GP surgery."* Policy FNP03 (Maintaining Viable Community Facilities) seeks to address this through setting out a list of nine key community facilities in the town, and stating that *"Proposals that will result in either the loss of, or significant harm to a facility will not be supported unless it can be clearly demonstrated that the operation of the facility, or the ongoing delivery of the community value of the facility, is no longer financially viable."* This will contribute positively towards maintaining and enhancing the vitality of the town, restricting further loss of local facilities.

5.49 Policy FNP03 is anticipated to lead to further positive effects against the Population and Community SA Theme through stating that *"Proposals to improve the viability of a community facility, by way of the extension or partial redevelopment of existing buildings, will be supported".* In this context, it is recognised that the protection of existing, and support for new/ improved community infrastructure is a key focus of the FNP.

5.50 Policy FNP14 (A New Low Carbon Community in Fairford) seeks to, alongside housing development, deliver "one or more areas of publicly accessible open space, including a children's play area and a community garden or allotments". Policy FNP14 also includes provision for *"a link* road *to give access between the schools and the A417 to the east of the town, for a dropping-off point away from the school and a safe walking route to the schools*".

[28] Environment Agency (2018): 'Groundwater Source Protection Zones Map', [online] available to access via <http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

Policy FNP14 is therefore likely to lead to long term positive effects for this SA theme by improving access to key services and facilities in the neighbourhood area , and increasing open space/ green infrastructure provision to improve the public realm.

5.51 The FNP further seeks to deliver community benefits through Policy FNP02 (Providing a New Burial Ground). Policy FNP02 supports proposals for a new burial ground in the town, recognising that this has been a local community request for some time now; as identified by the Fairford Community Plan and the Local Plan (2018). The delivery of a new burial ground will further improve the local facilities offer of the town, and increase levels of neighbourhood satisfaction.

5.52 Positive effects for the community are also anticipated through the designation of Fairford-Horcott Local Gap. Policy FNP09 (Protecting the Fairford-Horcott Local Gap), will reduce the potential for coalescence between Fairford and Horcott and conserve the countryside surrounding the town, providing long-term protection of Fairford's identity, and positive effects for the health of the local community.

5.53 Overall, it is considered that the FNP is likely to deliver significant positive effects in terms of delivering housing to meet local needs; and that the type of housing being developed is likely to support the various needs of the local community. Further to this the FNP seeks to improve accessibility in and around the town centre; delivering local green space to support community cohesion. **Significant long-term positive effects** are therefore predicted in relation to this SA theme.

## Health and Wellbeing

5.54 As discussed above, there is a strong focus within the FNP on the protection, enhancement, and provision of accessible open/ green space. In this context, Policy FNP12 (Achieving High Standards of Design) requires that development proposals should be of the "*highest design standards, in accordance with the Cotswold Design Code".* As set out in the Design Code, *"High quality, well integrated and carefully designed green infrastructure (GI) and landscape provision is crucial to the long-term success of developments, ensuring that the maximum multi-functional benefits are achieved for those that live in, work at and visit new developments".* Requiring high standards of design in line with CDC's key design principles is likely to lead to minor long-term positive effects, supporting healthy, integrated communities and high quality public realm.

5.55 Site specific green/ community infrastructure is proposed predominately through Policy FNP14 (A New Low Carbon Community in Fairford). Policy FNP14 requires that *"the scheme provides one or more areas of publicly accessible open space, including a children's play area (LEAP) and a community garden or allotments".* Green infrastructure is further embedded in Policy FNP15 through the requirement for development to *"satisfy, as a minimum, the standards required for the "Building with Nature – Design" level".* Notably, six 'wellbeing' standards are set out to secure health and wellbeing outcomes through green infrastructure delivery:[29]

- Accessible: Ensure that all people can use, enjoy and positively contribute to green infrastructure.
- Inclusive: Ensure that green infrastructure is designed to recognise the needs and strengths of local people, and how these may change over time.
- Seasonal enjoyment: Ensure that green infrastructure features can be used and enjoyed at all times of year.
- Reducing health inequalities: Ensure that green infrastructure features are designed and located to reduce and/or prevent health inequalities in existing and new communities.

[29] Building with Nature (2019) Building with Nature User Guide https://static1.squarespace.com/static/5c45e569c3c16a9eac56d244/t/5df1fad773bd391193145473/1576139482317/Building+with+Nature+User+Guide+v1.4_new.pdf

- Socially sustainable: Ensure that green infrastructure creates a sense of social cohesion and inclusion, thereby improving community wellbeing and increasing the likelihood of social sustainability.
- Distinctive: Ensure that green infrastructure contributes to place distinctiveness, with the aim of creating a place where people feel a sense of belonging and pride in their neighbourhood.

5.56 The delivery of FNP14 (A new Low Carbon Community in Fairford) will therefore lead to significant long-term positive effects for health and wellbeing in terms of providing for healthy lifestyles and promoting community engagement. This supports higher level policies of the NPPF (2021) and the Local Plan (2018), notably Policy INF2 (Social and Community Infrastructure).

5.57 Consideration is also given in this respect to the wider FNP policy framework. Notably Policy FNP08 (Protecting Local Green Spaces) will further protect and enhance the green infrastructure offer, stating that *"New development will not be permitted on land designated as Local Green Space except in very special circumstances."* Policy FNP08 designates three new Local Green Spaces and will further ensure that the community continues to have access to a wide range of open space, including natural green space; for recreation and relaxation.

5.58 Healthy lifestyles are further promoted through the delivery of new housing of differing types and tenures (Policy FNP14 and Policy FNP15) to meet local needs and protect health through access to decent and affordable homes.

5.59 Positive effects on health and wellbeing are also anticipated through the FNP policies which support the uptake of sustainable and active travel. In this context, Policy FNP12 (Achieving High Standards of Design) is of relevance again, recognising that the Cotswold Design Codes supports accessibility and requires that proposals have specific regard to *"improving footpath and cycle links from the town to the countryside and within the town".* Improvements to the local footpath network are further supported at a site-specific scale through Policy FNP14 (A New Low Carbon Community in Fairford). This may increase journeys in and around the town by healthier, more environmentally-friendly modes; providing numerous physical and mental health benefits.

5.60 Overall, **significant long-term positive effects** are predicted for the health and wellbeing SA theme. This is primarily through the protection and enhancement of the town's high-quality environment, local facilities, and public ream. Notably Policy FNP14 (A New Low Carbon Community in Fairford) prioritises the delivery of green infrastructure; recognising that it is valued for its multifunctionality and connectedness; delivering improved community cohesion, and providing leisure and recreation opportunities.

## Economy and Employment

5.61 The FNP recognises that while Fairford has increased in size, it must offer better employment opportunities, as well as enhancing the attractiveness of the town centre shops and services to encourage use by current residents and visitors and remain sustainable. Policy FNP16 (Growing our Local Economy) sets out support for *"proposals to intensify the existing business uses on the Whelford Lane Industrial Estate",* and *"B1 business use"* at Coln House School, which would provide increased local employment opportunities and support self-containment. Positive effects on the local economy are also anticipated through Policy FNP17 (Sustaining a Successful Town Centre) which seeks to positively manage retail and non-retail space and development in the town centre. The strategy set out in FNP17 seeks to improve the long-term self-sufficiency of Fairford particularly in relation to the provision of services.

5.62 Conversion of many former shops to residential use over the years has greatly reduced the number of premises available for retail use in the town centre, and most of those that remain are of small size, limiting the range of products that they can hold. Policy FNP17 therefore seeks to ensure this conversion trend does not continue, stating that *"proposals for the conversion of A1 retail or B1 business premises in the town centre to residential use will not be supported."* Protecting and enhancing the retail and employment offer of the town centre will contribute positively towards enabling Fairford to perform its role as District Centre effectively.

5.63 Enabling the town to be more self-sufficient in provision of services will also likely reduce competition from other centres. Policy FNP17 highlights the importance of improvements to the Market Place *"to create a more attractive environment for shoppers and visitors",* which will further promote Fairford as a high-quality centre, encouraging both business and tourism investment.

5.64 The growth of the tourism economy is further supported through Policy FNP07 (Improving Access to Visitor Attractions) and Policy FNP18 (New Visitor Accommodation). While it is recognised that there is currently limited provision of publicly advertised visitor accommodation in Fairford, Policy FNP18 encourages proposals to create new visitor accommodation in and around the town. In line with Policy FNP18 *"Proposals for the development of new visitor accommodation or for a change of use to such accommodation will be supported, provided they are located either within the defined Fairford Development Boundary or comprise the appropriate and sustainable reuse of a redundant agricultural building in the countryside."* It is considered that improvements in the local tourism offer will contribute positively towards the growth of the local economy through increasing visitor footfall, providing a level of employment, and supporting self-containment.

5.65 Overall, the FNP is predicted to lead to **significant long-term positive effects** in relation to the Economy and Enterprise SA theme. The FNP supports the vitality and viability of the neighbourhood area through supporting intensification of existing employment sites, protecting and enhancing town centre uses, and facilitating the growth of the existing tourism offer. This will contribute positively towards improving the long-term self-sufficiency of Fairford.

## Transportation

5.66 High car reliance is likely to continue as a key issue for the neighbourhood area , given its rural nature and lack of sustainable transport connections to larger settlements in terms of bus and rail. Policy FNP14 (A New Low Carbon Community in Fairford) allocates around 80 homes to the north of the settlement, which would likely exacerbate existing issues on the road network (notably the A417). To mitigate against adverse effects, Policy FNP14 requires that *"The scheme includes provision for a link road between the schools and the A417."* This will provide access to the schools and Air base from the east of the town, which would relieve congestion in the historic town centre, in accordance with Gloucestershire Local Transport Plan (2020). Given the number of constrained and hazardous junctions currently seen to the east of the town, it is considered that the link road would contribute positively towards easing highway capacity issues and better facilitating integration with the town centre. It is therefore expected that the delivery of housing at land between Leafield Road and Hatherop Road will lead to positive effects on the existing road network.

5.67 Local transport issues are further addressed through Policies FNP12 (Achieving High Standards of Design) and FNP06 (Managing Traffic in the Town). In this context, Policy FNP12 requires that proposals support "*"active travel", in line with the highway user hierarchy principle"* (See Section 5.20). Improved access to the local footpath network is further supported at a site specific scale; key reasons for allocating Land between Leafield Road and Hatherop Road (Policy FNP14) is its *"ability to include provision of significant public open space, links to other footpaths and a drop-off/pick-up facility away from the schools but within easy walking distance, helping to relieve traffic on Lower Croft and Leafield Road in particular".* In addition to reducing congestion levels, Policy FNP14 will likely limit the need for on-street parking; improving road safety which in turn may encourage modal shift.

5.68 Additionally it is considered that an improved public realm (through the commitment for development to meet *"the standards required for the "Building with Nature – Design" level")* will enhance walking and cycling throughout the neighbourhood area , encouraging residents and visitors to utilise active travel links between accessible green infrastructure features.[30]

5.69 Policy FNP01 (The Fairford and Horcott Development Boundaries) supports new dwellings within the defined settlement boundaries of Fairford and Horcott, restricting development in the open countryside with poor accessibility to the town's local amenities. Policy FNP01 will

[30] Natural England (2010); BRE (2012)

therefore lead to a minor positive effect in relation to this SA theme by supporting development in areas with good accessibility to local services/ facilities and discouraging the use of the private vehicle. However, as set out under the 'Climate Change' SA theme, it is recommended that the FNP could seek to incentivise a shift away from petrol/ diesel vehicles, in order to further support sustainable travel in the FNP area in line with national and local climate change commitments.

5.70 Overall, it is considered likely that high car reliance will continue throughout the Neighbourhood Plan during the Neighbourhood Plan period. However, it is recognised that Policy FNP14 (A New Low Carbon Community in Fairford) seeks to deliver significant improvements in this respect, considering the existing capacity issues of the local transport network and the benefits provided by the enhanced road capacity stimulated by new development. This link road is anticipated to provide appropriate transport capacity for the new homes at Land between Leafield Road and Hatherop Road, provide connectivity for the allocated site to the services and facilities in the town and also provide link to the existing road network within the eastern side of the town. The significance of effects will however be dependent on the phasing of development and associated infrastructure delivery. Residual **uncertain significant positive effects** are therefore predicted.

5.71 Additionally, establishing a suite of design principles and defining settlement boundaries is considered likely to lead to long term improvements in accessibility for the majority of residents.

# Conclusions at this stage

5.72 **Table 5.1** below provides a summary of the Fairford Neighbourhood Plan appraisal.

**Table 5.1 Summary of FNP appraisal**

| Summary by SA Theme |
|---|
| **Biodiversity** |
| • Policy FNP11 (Valuing Hedgerows and Trees) will likely lead to significant positive effects on biodiversity.<br>• The site allocation policy FNP14 (A New Low Carbon Community at Fairford) will likely lead to minor positive effects, however there is a level of uncertainty at this stage.<br>• Policy FNP12 (Achieving High Standards of Design), Policy FNP09 (Protecting the Fairford-Horcott Local Gap) and Policy FNP10 (River Coln Valued Landscape) are predicted to lead to minor positive effects.<br>• All other policies are not predicted to impact upon biodiversity.<br><br>Overall, the Fairford Neighbourhood Plan is predicted to have a residual **uncertain long-term minor positive** effect on the Biodiversity SA theme. |
| **Climate Change** |
| • Policy FNP04 (Managing Flood Risk), Policy FNP14 (A New Low Carbon Community in Fairford) and Policy FNP15 (Sustainable Homes and Housing Need) will lead to significant effects on climate change.<br>• Policy FNP08 (Protecting Local Green Spaces), Policy FNP09 (Protecting the Fairford - Horcott Local Gap), Policy FNP12 (Achieving High Standards of Design), and Policy FNP11 (Valuing Hedgerows and Trees) are predicted to lead to minor positive effects.<br>• All other policies are not predicted to impact upon climate change.<br><br>Overall, the Fairford Neighbourhood Plan is predicted to have residual **minor positive effects** on the Climate Change SA theme. |
| **Landscape and Historic Environment** |
| • Policies FNP09 (Protecting the Fairford-Horcott Local Gap), FNP10 (River Coln Valued Landscape), and Policy FNP13 (Conserving Non-Designated Heritage Assets) will lead to significant positive effects on landscape and the historic environment.<br>• Policy FNP12 (Achieving High Standards of Design) and Policy FNP08 (Protecting Local Green Spaces) will lead to minor positive effects.<br>• The site allocation policy FNP14 (A New Low Carbon Community in Fairford) will lead to residual neutral effects on landscape and the historic environment.<br>• All other policies are not predicted to impact upon the landscape and historic environment. |

## Summary by SA Theme

Overall, the Fairford Neighbourhood Plan is predicted to have residual **neutral effects** on the Landscape and Historic Environment SA theme.

### Land, Soil and Water Resources

- Policy FNP05 (Investing in Utilities and Infrastructure Improvements) will lead to significant positive effects on land, soil and water resources.
- Policies FNP08 (Protecting Local Green Spaces), FNP09 (Protecting the Fairford-Horcott Local Gap), FNP10 (River Coln Valued Landscape) and FNP11 (Valuing Hedgerows and Trees) will lead to minor positive effects.
- The site allocation Policy FNP14 (A New Low Carbon Community in Fairford) will lead to minor negative effects on land, soil and water resources.
- All other policies are not predicted to impact upon land, soil and water.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **minor negative effects** on the Land, Soil and Water SA theme.

### Population and Community

- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP15 (Sustainable Homes and Housing Needs) and Policy FNP03 (Maintaining Viable Community Facilities), will lead to significant positive effects on the population and community.
- Policy FNP02 (Providing a New Burial Ground), Policy FNP09 (Protecting the Fairford-Horcott Local Gap), and Policy FNP12 (Achieving High Standards of Design) will lead to minor positive effects.
- All other policies are not predicted to lead to significant effects, however there is the potential for indirect minor positive effects on population and community

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Population and Community SA theme.

### Health and Wellbeing

- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP15 (Providing the Right of Homes), Policy FNP03 (Maintaining Viable Community Facilities), and Policy FNP08 (Protecting Local Green Spaces), will lead to significant positive effects on health and wellbeing.
- Policy FNP12 (Achieving High Standards of Design) and Policy FNP15 (Providing the Right Homes) will lead to minor positive effects.
- All other policies are not predicted to lead to significant effects, however there is the potential for indirect minor positive effects on health and wellbeing.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Health and Wellbeing SA theme.

### Economy and Employment

- Policy FNP17 (Growing our Local Economy), Policy FNP18 (Sustaining a Successful Town Centre) and Policy FNP18 (New Visitor Accommodation) will lead to significant positive effects on economy and employment.
- The site allocation policy FNP14 (A New Low Carbon Community in Fairford), in addition to Policy FNP07 (Improving Access to Visitor Attractions), will lead to minor positive effects.
- All other policies are not predicted to impact upon economy and employment.

Overall, the Fairford Neighbourhood Plan is predicted to have residual **significant positive effects** on the Economy and Employment SA theme.

### Transportation

- The site allocation policy FNP14 (A New Low Carbon Community in Fairford) will lead to significant positive effects on transportation.
- Policy FNP12 (Achieving High Standards of Design), Policy FNP06 (Managing Traffic in the Town) and Policy FNP01 (The Fairford and Horcott Development Boundaries) will lead to minor positive effects.
- All other policies are not predicted to impact upon transportation.

Overall the Fairford Neighbourhood Plan is predicted to have residual **uncertain significant positive effects** on the Transportation SA theme.

5.73 The assessment has concluded that the current version of the Fairford Neighbourhood Plan is likely to lead to **significant long-term positive effects** in relation to the Population and Community, Health and Wellbeing, and Economy and Enterprise SA themes. These benefits largely relate to the delivery of new housing to meet local needs; the support for employment and tourism growth to develop the local economy; the protection of the public realm and of settlement identities; and the provision of new and protection of existing green/ open spaces. This is also expected to lead to **minor positive effects** in terms of the 'biodiversity' SEA theme, improving connectivity and supporting net-gain in new development; however, there remains some uncertainty relating to potential effects on nationally designated sites and the biodiversity value of Horcott Lakes. It is however recognised that biodiversity net gain is likely to be secured through development, leading to positive effects in this regard.

5.74 **Minor positive effects** are also predicted in relation to the Climate Change SA theme given the delivery of a New Low Carbon Community in Fairford. Policy FNP14 includes numerous requirements for new development which support national and local mitigation and adaptation objectives, implementing the climate emergency declared by CDC. While it is recognised that land between Leafield Road and Hatherop Road is partially at high risk of ground water flooding, it is considered that there is sufficient space within the Leafield Road site for development to avoid those areas at highest risk from groundwater flooding; with neutral effects anticipated in this regard once mitigation has been adopted.

5.75 **Uncertain significant positive effects** are predicted in relation to the Transportation SA theme, and will depend on the phasing of development and associated infrastructure delivery at land between Leafield Road and Hatherop Road.

5.76 **Neutral effects** are anticipated in relation to the Landscape and Historic Environment SA theme given the criteria set out in the FNP policies and the higher-level policy framework of the Local Plan (2018) and NPPF (2021).

5.77 **Minor long term negative effects** are predicted in relation to the Land, Soil and Water SA theme due to the loss of greenfield land at land between Leafield Road and Hatherop Road; however, given this is not best and most versatile agricultural land, effects are not anticipated to be significant.

# Recommendations

5.78 To improve the sustainability performance of the Fairford Neighbourhood Plan two recommendations were made in relation to the pre submission version of the FNP in June 2020 (See **Section 4.15**). **Table 5.2** below sets out where recommendations have been taken into consideration within the current, submission version of the FNP:

**Table 5.2 FNP recommendations**

| Recommendation June 2020 | Addressed in FNP? |
|---|---|
| Part of 'land between Leafield Road and Hatherop Road' site allocation falls within a SSSI IRZ for Cotswold Water Park SSSI. It is considered that there is the potential to strengthen Policy FNP14 by including a reference to the Cotswold Water Park SSSI IRZ and requiring early consultation with NE as part of any proposal. | Yes – supporting text of Policy FNP14 states that *"Any development of this site should take account of the Cotswold Water Park SSSI IRZ and should consult Natural England at an early stage."*. Furthermore, requirements set within Policy FNP14 (i.e. required improvements to the local utilities infrastructure and open space/ recreation provision) will provide a level of mitigation, recognising key issues for the SSSI relate to water quality and recreation. |
| To strengthen the FNP's climate change focus, the FNP could seek to incentivise a shift away from petrol/diesel vehicles, | Yes - Policy FNP15 (Sustainable Homes and Housing Needs) has been revised to state that *"in residential developments all garage and off-* |

| | |
|---|---|
| including ensuring development proposals, where possible, realise opportunities for integrated vehicle electric charging points and associated infrastructure. | *street parking must include provision for the safe charging of electrical vehicles. Schemes including communal parking areas must include a scheme for communal charging points."* |

# 6. What are the next steps?

6.1 The Neighbourhood Plan and Environmental Report will be submitted to CDC for their consideration. CDC will consider whether the plan is suitable to go forward to Independent Examination in terms of the Fairford Neighbourhood Plan meeting legal requirements and its compatibility with the Local Plan (2018).

6.2 If the subsequent Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by CDC. If more than 50% of those who vote agree with the Neighbourhood Plan, then the Neighbourhood Plan will be 'made'. Once made, the Neighbourhood Plan will become part of the Development Plan for Fairford.

# Appendix A Context review and baseline

## Biodiversity

### Context Review

At the European level, the EU Biodiversity Strategy was adopted in May 2011 in order to deliver an established new Europe-wide target to *'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.[31]

The NPPF (2021) highlights that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity.[32] This includes utilising a strategic approach to maintaining and enhancing networks of habitats and green infrastructure at the wider catchment or landscape scale.

The Natural Environment White Paper (NEWP) sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to: [33]

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'.[34]

The South West Biodiversity Implementation Plan (BIP) highlights key policies and actions to protect biodiversity in the South West. Biodiversity South West also identifies target habitats and species, which are prioritised for conservation within the region.[35]

The Cotswold District Local Plan 2011-2031 aims to 'Conserve and enhance the high-quality, local distinctness and diversity of the natural and historic environment'. The local plan policies provide protection for national and local designated sites (policy EN7) and Trees, woodlands and hedgerows (policy EN5). Policy SP5 (Cotswold Water Park Post-Mineral Extraction after Use) specifically protects and enhances biodiversity at the Cotswold Water Park nature area. Finally, policy EN6

[31] European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf>
[32] Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available https://www.gov.uk/government/publications/national-planning-policy-framework--2
[33] Defra (2012): 'The Natural Choice: securing the value of nature (Natural Environment White Paper)', [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>
[34] DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] available to download from: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>
[35] Biodiversity South West (2004): ' South West Biodiversity Implementation Plan', [online] available to download from: <http://www.biodiversitysouthwest.org.uk/hom_abo_bip.html>

(Biodiversity and Geodiversity: Features, Habitats and Species) aims to ensure that development does not result in a net loss of biodiversity and/or nature conservation value.

# Summary of Current Baseline

There are two nationally designated sites located adjacent to the neighbourhood area ; Cotswold Water Park Site of Special Scientific Interest (SSSI) and Whelford Meadow SSSI. There are also two Strategic Nature Areas (SNAs) located within the neighbourhood area , and a variety of BAP Priority Habitats and Species present. These are discussed below.

## Nationally Designated Sites

### *Grove and Lea Ancient Woodland*

Ancient woodland takes hundreds of years to establish and is important for its:

- wildlife (which include rare and threatened species)
- soils
- recreational value
- cultural, historical and landscape value

It's any area that's been wooded continuously since at least 1600 AD. It includes:

- ancient semi-natural woodland mainly made up of trees and shrubs native to the site, usually arising from natural regeneration; and
- plantations on ancient woodland sites - replanted with conifer and broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi.

### *Cotswold Water Park SSSI*

The Cotswold Water Park (CWP)consists of 177 current and former gravel workings, making it the most extensive marl lake system in Britain.

There are two principal blocks of lakes: a larger one in the west centred on Ashton Keynes and a smaller eastern one centred on Fairford, with stepping-stones formed by recent workings in between.

Just 10 lakes covering 135 hectares within CWP were designated as being of Special Scientific Interest for their aquatic plants back in 1994. The park has since become of national importance for its bird and plant populations. The new designation (January 2021) covers all 177 lakes, protecting the large populations of breeding and wintering birds that live there, as well as the aquatic plants. Most of the southern part of the Parish, including Horcott, lies within the Cotswold Water Park. The citation for the SSSI states:[36]

*"The site is of special interest for its non-breeding populations of eight species: shoveler Spatula clypeata; gadwall Mareca strepera; pochard Aythya ferina; tufted duck A. fuligula; great crested grebe Podiceps cristatus; coot Fulica atra; green sandpiper Tringa ochropus; lesser black-backed gull Larus fuscus and an assemblage of over 20,000 non-breeding waterbirds […]*

*In recent years several rare wetland bird species have summered in the Cotswold Water Park, with some now breeding. Bittern Botaurus stellaris is now established as a breeding species, and great white egret Ardea alba bred successfully for the first time in 2020. Other species now regular visitors in summer include cattle egret Bubulcus ibis, crane Grus and marsh harrier Circus aeruginosus.*

*Eleven species of stonewort (charophyte) are present within the lakes of the Cotswold Water Park. One of these starry stonewort Nitellopsis obtusa is Vulnerable and Nationally Rare. ".*

[36] Natural England (2021): Cotswold Water Park SSSI', [online] available to access via: < https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1006005.pdf >

Based on the most recent condition assessments undertaken in 2021, 100% of the SSSI is classified as 'Favourable'.[37]

### *Whelford Meadow SSSI*

The Whelford Meadow SSSI was notified in 1985 under Section 28 of the Wildlife and Countryside Act 1981 and is 1.86 ha in size. The SSSI is situated just outside the southern border of the neighbourhood area . This site is a meadow habitat which contains uncommon and rare plant spices. Additionally, scrubs located on the margins, enable passerines such as Warblers to breed. The citation for the SSSI states:[38]

*'The meadow is dominated by meadowsweet Filipendula ulmaria and common couch Agropyron repens and contains a wide range of other plants. Nine species of sedge have been recorded including the nationally rare downy-fruited sedge Carex tomentosa with distant sedge C. distans, false fox sedge C. otrubae and carnation sedge C. panicea. Other plants of interest are the southern marsh orchid Dactylorhiza praetermissa and large numbers of adder's tongue Ophioglossum vulgatum. A good population of fritillary Fritillaria meleagris, the other nationally rare plant species, is present on part of the site.'*

Based on the most recent condition assessment undertaken in 2015, 100% of the SSSI is classified as 'Unfavourable - No change'.

The entirety of the neighbourhood area is located within a SSSI Impact Risk Zone (IRZ) for one or more of the SSSIs for the type of development likely to be promoted through the Neighbourhood Plan. SSSI IRZs are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs.

## Locally Designated Sites

Strategic Nature Areas (SNAs) are landscape-scale areas defined by the Gloucestershire Nature Partnership where there is opportunity for both the maintenance of and the restoration/expansion of Priority Habitat. There are two SNA's located in the neighbourhood area and these are discussed below.[39, 40]

### *Coln Corridor SNA*

Coln Corridor SNA sits within the Cotswold Water Park. Located along the south west border of the neighbourhood area , the Cotswold Water Park SNA is a low-lying area, within the Thames floodplain. It is characterised by very shallow slopes and mineral restoration has resulted in a wetland landscape. Being the most extensive marl lake system in Britain, Cotswold Water Park SNA creates a biodiversity-rich habitat.

### *Bibury SNA*

Bibury SNA sits within the Cotswold high Wold Plateau. Extending from the centre to the northern border of the Neighbourhood Plan, Cotswold high Wold Plateau SNA is a generally open landscape, with blocks of woodland and arable farmland. These habitats contrast the narrow, enclosed valleys which are also present within the SNA.

### *Key Wildlife Sites*

The Gloucestershire County Council environmental map identifies numerous Key Wildlife Sites (which are Biodiversity Opportunity Areas) within and surrounding the neighbourhood area .[41] One Key Wildlife Site is located to the north of Fairford, four are located to the south west of Horcott, and there

[37] Ibid.
[38] Natural England (no date): Whelford Meadow SSSI', [online] available to access via: <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1003804>
[39] Gloucestershire's Natural Environment: 'Strategic Nature Areas', available to access via: <http://www.gloucestershirenature.org.uk/actionplan/imap.php>
[40] Gloucestershire Centre for Environmental Records: 'Local Features in Gloucestershire Map', available to access via: <http://www.gcer.co.uk/doublemap3.html>
[41] Gloucestershire County Council (2018) Environmental Constraints Map [online] available at: <https://gis.gloucestershire.gov.uk/LocalViewPub/Sites/MINWASTE3/>

is a larger series of Key Wildlife Sites located to east of the main town area, partially coinciding with the Cotswold Water Park.

## Biodiversity Action Plan habitats

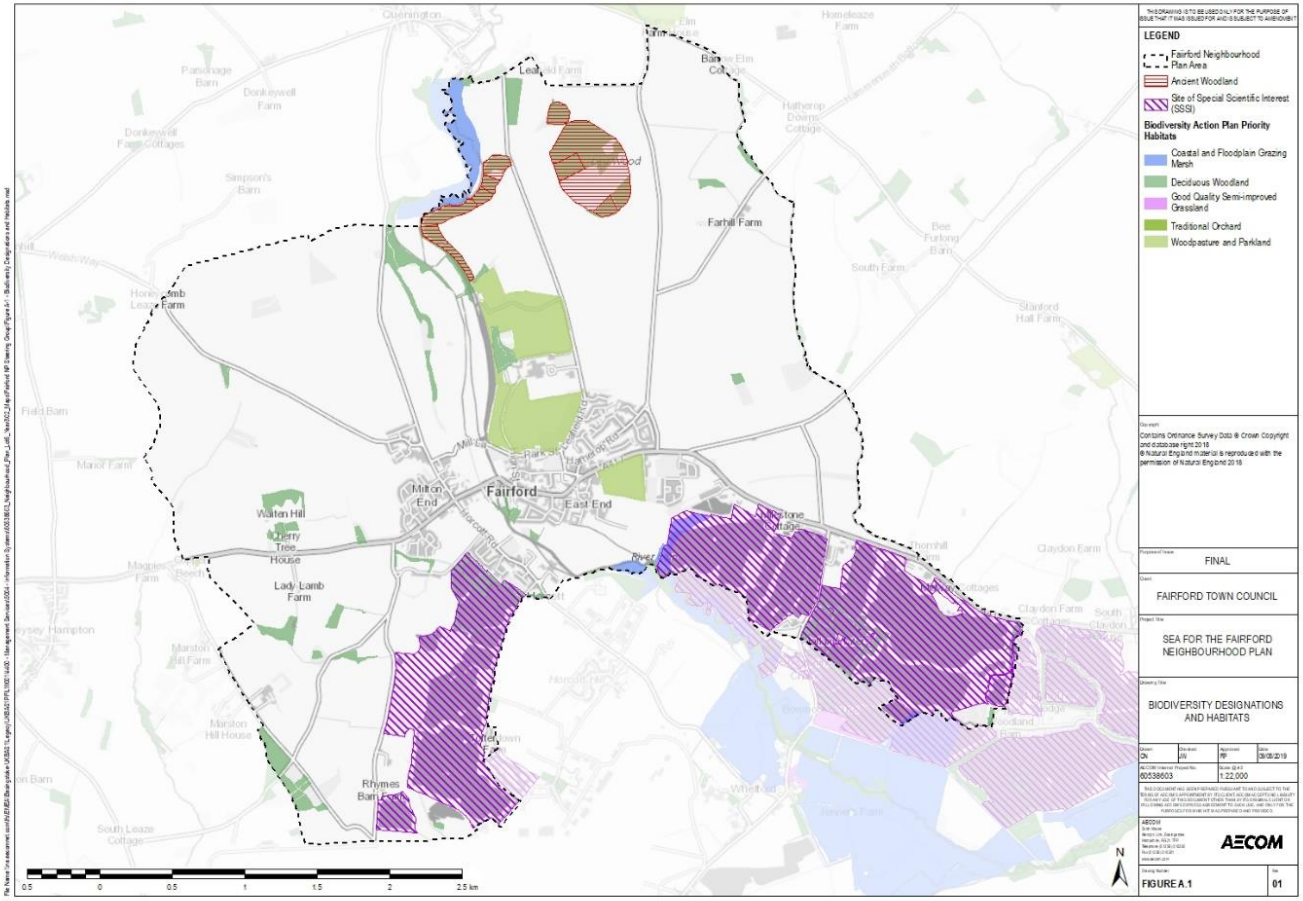
The Biodiversity Action Plan (BAP) habitats present within the neighbourhood area include: [42]

- Coastal and Floodplain Grazing Marsh: There is a small area of this habitat type on the north border of the neighbourhood area near Obelisk and near the south border close to Cotswold Water Park SNA.
- Deciduous Woodland: There is a network of Deciduous Woodland patches located throughout the neighbourhood area .
- Wood pasture and Parkland: There is a large section of this habitat situated in the centre of the neighbourhood area . Notably there are two areas at Fairford Park and Morgan Hall.

**Figure A.1** (overleaf) shows the designated biodiversity sites located within the neighbourhood area .

[42] MAGIC (2017): 'Interactive Map – Habitats and Species' [online database] available to access via: <http://www.magic.gov.uk/MagicMap.aspx>

## Figure A.1 Biodiversity designations



## Summary of Future Baseline

Habitats and species will possibly face increasing pressures from future development within the neighbourhood area , with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats. Benefits for biodiversity have the potential to arise from the increasing integration of biodiversity considerations within decision making, as observed in a number of policies outlined in the emerging Cotswold District Local Plan 2011-2031.

# Climate Change

## Context Review

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report to achieve the following:

*'Based on the latest understanding of current, and future, climate risks and opportunities, vulnerability and adaptation, what should the priorities be for the next UK National Adaptation Programme?'*[43]

The evidence report contains six priority risk areas requiring additional action in the next five years, see below:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals

The UK Climate Change Act was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.[44]

The Climate Change Act includes the following:

- 2050 Target. The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
- Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.

[43] GOV UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

[44] GOV.UK (2008): 'Climate Change Act 2008', [online] available to access via <http://www.legislation.gov.uk/ukpga/2008/27/contents>

The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.

The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page.[45]

The NPPF (2021) requires proactive planning to both mitigate and adapt to climate change.[46] Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that contribute to radical reductions in greenhouse gas emissions, and deliver long-term resilience, including through reuse, regeneration and conversion.

Notably, access to a network of high-quality open spaces can deliver wider benefits for nature, supporting efforts to address climate change, while improvements in green and other infrastructure can reduce the causes and impacts of flooding.

There is a key role for planning in securing radical reductions in greenhouse gas (GHG) emissions, including in terms of meeting the targets set out in the Climate Change Act 2008.[47] Specifically, planning policy should support the move to a low carbon future through:

- Planning for new development in locations and ways which reduce GHG emissions;
- Actively supporting energy efficiency improvements to existing buildings;
- Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
- Positively promoting renewable energy technologies and considering identifying suitable areas for their construction;
- Encouraging those transport solutions that support reductions in GHG emissions and reduce congestion;
- Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act highlights that alternatives to traditional engineering approaches to flood risk management include: [48]

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and

[45] Committee on Climate Change (2017): 'UK Adaptation Policy' [online] available to access via <https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/>
[46] Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available https://www.gov.uk/government/publications/national-planning-policy-framework--2
[47] The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in $CO_2$ emissions of at least 26% by 2020, against a 1990 baseline.

[48] Flood and Water Management Act (2010) [online] available to access via <http://www.legislation.gov.uk/ukpga/2010/29/contents>

- Creating sustainable drainage systems (SuDS)[49]

Further guidance is provided in the document 'Planning for SuDS'.[50] This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'. Note that SuDS systems are likely to be ineffective in areas with a high water table.

At the regional level, Gloucestershire County Council's Local Flood Risk Management Strategy (LFRMS) aims to work with the local community and local organisations, to understand and manage flood risk, support flood recovery and increase public awareness toward flooding.[51]

Released in 2014, the most recent Cotswold District Council Strategic Flood Risk Assessment (SFRA) aims to provide an assessment of the impact of all potential sources of flooding within the region in order to provide recommendations of suitable mitigation measures. Furthermore, at the local level, the Cotswold District Local Plan 2011-2031, policy EN14 (Managing Flood Risk), aims to minimise flood risk and provide resilience to flooding. Policy ING8 (Water Management Infrastructure), and INF19 (Renewable and Low Carbon Energy Development) also directly relate to the Climate Change SA theme.[52]

# Summary of Current Baseline

## *Contributions to Climate Change*

In relation to GHG emissions, source data from the Department of Energy and Climate Change suggests that the Cotswold District has had consistently higher per capita emissions total than that of both the South West of England and England as a whole since 2005. Cotswold District has also seen an 11% reduction in the percentage of total emissions per capita between 2005 and 2012, lower than the reductions for the South West (16.4%) and England (16.7%).

## *Potential Effects of Climate Change*

The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team.[53] UKCP09 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the South West by 2050 for a medium emissions scenario are likely to be as follows: [54]

- The central estimate of increase in winter mean temperature is 2.1ºC and an increase in summer mean temperature of 2.7ºC; and
- The central estimate of change in winter mean precipitation is 17% and summer mean precipitation is - 20%.

Resulting from these changes, a range of risks may exist for the neighbourhood area . These include:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;

[49] N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDS.
[50] CIRIA (2010) 'Planning for SuDS – making it happen' [online] available to access via <http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx>
[51] Cotswold District Council (2014), 'Cotswold District Council Strategic Flood Risk Assessment' [online] available to access via: <http://www.cotswold.gov.uk/media/1346820/Strategic-Flood-Risk-Assessment-SFRA-Level-2-June-2014.pdf>

[53] The data was released on 18th June 2009: Available to access via: <http://ukclimateprojections.metoffice.gov.uk/>
[54] UK Climate Projections (2009) South West 2050s Medium Emissions Scenario [online] available to access via: <http://ukclimateprojections.metoffice.gov.uk/23687?emission=medium>

- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

### *Flood Risk*

The areas at highest risk of flooding in the neighbourhood area are those near the River Coln, specifically near the slow-moving wide section called the Broad Water, near Cotswold Water Park SNA, areas around lakes 103 and 104, and areas around Horcott Lakes. These areas are mainly in Flood Zone 3, indicating that there is a 1% (1 in 100) or greater chance of flooding happening each year. Some areas surrounding Cotswold Water Park SNA are in Flood Zone 2, showing that the chance of flooding each year is between 0.1% (1in 1000) and 1% (1 in 100). There are many residential properties within Fairford which lie within or in close proximity to areas of Flood Zone 2 and 3, and surface water flooding occurs in Flood Zone 1 areas at times.

It is noted that parts of Fairford have suffered frequent flooding in areas of Flood Zone 1. A flood alleviation scheme for river flooding was carried out in 2013/14, but this has not solved the problem as there has been flooding from other sources.

Surface water drainage and sewer flooding is also a risk for some parts of the neighbourhood area . There is low-medium flood risk along the highways network and land adjacent to water bodies and drainage ditches. Additionally, the following areas are at high-risk from surface water drainage and sewer flooding within the plan area:

- East End and London Road in Fairford;
- Coronation Street and Milton Street in west Fairford;
- Totterdown lane and the land surrounding Rhymes Barn Farm; and
- Sections of the A417 between Fairford town centre and Clayhill Cottages.

Fairford has been identified by Thames Water as subject to sewer and drain flooding. The water table is high in wet seasons, which means that SuDS drainage systems may be ineffective and inappropriate. Emphasis could be placed on utilising the environment to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water; and identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere.

The complex and multi-faceted nature of flood risk at Fairford is shown by the number of projects and studies conducted over the past few years. These include:

- The report on the 2007 Floods (Environment Agency, 2008) and the resultant Environment Agency Fairford Flood Alleviation Scheme (2008–2013) (Environment Agency, 2013?) which reduced the risk of “riparian” (main river) flooding.
- The “GCC Groundwater Intermediate Assessment” (Atkins, April 2015) for South Cotswold District concluded that Fairford has now been identified as subject to groundwater flooding and that further housing development on sites with high groundwater level is likely to exacerbate the problem.

The drainage strategy (Thames Water, 2018) reports on “intervention” works already done on:

- clearing the Court Brook stream;

- diverting surface water on Quenington Road; and
- fixing sewer defect at East End.

The drainage strategy concludes that sustainable drainage solutions (SuDS) using infiltration are unlikely to be effective in the low-lying areas to the south of the town because of frequent high groundwater levels.

CDC's Strategic Flood Risk Assessment Report (JBA, 2014) also suggests that SuDS drainage using infiltration is unlikely to be feasible for those areas to the south and southeast of Fairford with high groundwater levels.

To supplement this existing body of work, FTC commissioned a study by Water Research Associates' (WRA) to monitor groundwater levels around Fairford and to review the overall flood risk.

Their report "Groundwater Monitoring and Review of Flood Risk at Fairford" (WRA, 2018) described Fairford's geology as characterised by superficial deposits of alluvium, "Northmoor" sand and gravel and "Cornbrash" overlying the solid Oxford and Kellaway clays and Forest Marble clay and limestone. The groundwater levels were found to rise quickly in winter and fall similarly quickly in summer. Water levels in Fairford wells and boreholes varied by 1.0 to 2.5 metres during the 2018 monitoring period. The report concluded:

- Development should avoid the several spring lines along the Cornbrash / Northmoor boundary (for example just south of Beaumoor Place in East End)
- Development should avoid the area south of Cornbrash / Kellaway boundary (for example south of Cinder Lane).
- There is no scope for SuDS drainage using infiltration in the low-lying areas associated with alluvial deposits of the Coln valley due to frequent high groundwater levels" (Section 6-2-3).
- Ideally development should be directed away from the Coln and Court Brook corridor" (Section 6-2-5).

## Summary of Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Fairford neighbourhood area , with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. More importantly, climate change will increase the intensity of precipitation events throughout the year. This is likely to increase the risks associated with climate change, recognising that fluvial, surface water, and/or sewer flooding are risks for a significant part of the neighbourhood area . As such there is an increased need for resilience and adaptation.

In terms of climate change contribution, per capita GhG emissions generated in the neighbourhood area may decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the neighbourhood area (following the trend of significant new housing delivery since 2011) would contribute to increases in overall levels of GhG emissions. It is noted that the new residential development delivered since 2011 has not been accompanied by the delivery of new employment land. The continued mismatch in delivery of housing and of employment in the neighbourhood area has the potential to lead to increased emissions, primarily through increased vehicular use.

A number of policies within the emerging Cotswold District Local Plan seek to increase the uptake of renewable energy and improve the provision of public and sustainable transport. The effective implementation of such policies has the potential to reduce future emissions within the neighbourhood area.

# Landscape and Historic Environment

## Context Review

The National Planning Policy Framework (NPPF) (2021) requires the protection and enhancement of valued landscapes, giving particular weight to those identified as being of national importance.[55] The scale and extent of development within designated landscape areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

The NPPF also seeks to conserve and enhance historic environment assets in a manner appropriate to their significance. The NPPF seeks planning policies and decisions which are sympathetic to local character and history without preventing or discouraging appropriate innovation of change. The NPPF supports the use of area-based character assessments, design guides and codes and masterplans to help ensure that land is used efficiently while also creating beautiful and sustainable places.

As set out in the NPPF, it should be ensured that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code. Design Codes can set out a necessary level of detail in sensitive locations, for example, with heritage considerations, and they can set out specific ways to maintain local character.

The 25-year Environment Plan (2018) and National Design Guide (2019) complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats.[5657] Design is focused on beautiful, enduring and successful places, which respond to local character and provide a network of high quality green open spaces.

The Government's Statement on the Historic Environment for England sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.[58]

Areas of Outstanding Natural Beauty (AONBs) aim primarily to conserve and enhance the natural beautify of the landscape. They are aim to 'meet the need for quite enjoyment of the countryside, and to have regard for the interests of those who live and work there. The Cotswold AONB Management Plan 2013-2018 sets out the following 20-year vision for the AONB: [59]

"*A landscape which retains its remarkable visual unity and scenic diversity; is richer in nature, and where the historic heritage is conserved; is home to vibrant communities supported by a sustainable local economy; provides a warm welcome and high-quality experience for everyone seeking inspiration, tranquillity and to be active outdoors; and is adapting successfully to a changing climate and economic conditions."*

The Cotswold District Local Plan 2011-2031 aims to conserve the historic environment in the area. The following policies from the local plan directly relate to the landscape and historic environment SA theme:

- EN3 – Cotswolds Area of Outstanding Natural Beauty (AONB)
- EN10 – Designated Heritage Sites
- EN11 – Designated Heritage Assets – Conservation Areas
- EN12 – Non-designated Heritage Assets

[55] Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available https://www.gov.uk/government/publications/national-planning-policy-framework--2
[56] The 25 Year Environment Plan (2018) [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
[57] The National Design Guide (2019) [online] available at: https://www.gov.uk/government/publications/national-design-guide
[58] HM Government (2010): 'The Government's Statement on the Historic Environment for England', [online] available to download via: <http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx>
[59] Cotswold Area of Outstanding Natural Beauty (no date): 'Cotswold AONB Management Plan', [online] available to download via: <http://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/>

- EN4 – The Wider Natural and Historic Landscape
- EN6 – Special Landscape Areas

# Summary of Current Baseline

## Landscape

### *Cotswold Area of Outstanding Natural Beauty (AONB)*

The Cotswold AONB, designated in 1966, is located adjacent to the northern boundary of the neighbourhood area. At 2,038 km$^2$, it is the largest AONB in England and is made up off hills of Jurassic Limestone. The Cotswold AONB is managed by an independent statutory body called the Cotswold Conservation Board, which is made up by local authorities and community representatives.[60]

### *National Character Areas (NCA)*

NCAs are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The neighbourhood area is located within NCA Profile: 108 Upper Thames Clay Vales.[61] The Upper Thames Clay Vales NCA is described as lowland farmland on Jurassic and Cretaceous clays. The area consists of livestock farming, meadows and wetland habitats.

It is recognised that there is considerable variation within this area, as documented in the various sub-area character assessments for the Local Plan and previous draft Neighbourhood Plan.

### *Area of Special Landscape Value*

The Special Landscape Area (SLA) designation protects locally significant landscapes that, although not nationally designated, are of comparable quality to, and abut, the AONB. Their designation is based on a formal assessment of the landscape qualities of the area. SLAs were introduced in Gloucestershire in 1982. They are attractive landscapes in their own right, but may also provide important foreground settings and effective buffers for the AONB.

There are nine SLAs in Gloucestershire, six of which lie wholly or partly in the Cotswold District, with one covering much of the land to the north of the town. Coln Valley north of Fairford SLA is in a gentle transitional landscape between the Cotswolds dip slope to the north and the Thames Valley to the south. The northern part of the SLA lies within the Cotswold NCA107. The southern part lies in the Upper Thames Clay Vales NCA108 (discussed above).[62]

The 2017 SLA Review concluded that this SLA remains valid as a locally designated area and that its boundaries should remain the same.[63]

It is noted that the landscape to the south of the town also plays an important role in defining its character. Additionally, the 'gap' between the main town and Horcott is also becoming of increasing local importance given the recent growth of the town.

### *Historic Environment*

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The neighbourhood area contains the Grade I listed 'Church of St Mary', four Grade II* listed buildings, and 117 Grade II listed buildings.

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England, there are two

[60] Cotswold Area of Outstanding Natural Beauty (no date): 'Cotswold Conservation Board', [online] available to download via: <http://www.cotswoldsaonb.org.uk/about-us/boards-role/>
[61] Natural England (2014): 'National Character Area – Upper Thames Clay Vales', [Online] Available to access via: <http://publications.naturalengland.org.uk/publication/1911063?category=587130>
[62] White Consultants (2017) Cotswold District Special Landscape Area Review: Landscape context and physical changes: Final Report [online] available at: <http://www.cotswold.gov.uk/residents/planning-building/planning-policy/emerging-local-plan/local-plan-examination/ >
[63] Ibid.

scheduled monuments located within, and one scheduled monument located adjacent to, the neighbourhood area: [64]

- Fairford Saxon cemetery (North West of Fairford Town Centre, off Coronation Street);
- Hengiform Barrow and associated ring ditch south of Burdocks (South West of the plan Area, situated to the West of Horcott); and
- Burrow Elm round barrow (South of Hatherop – adjacent to Northern boundary of the neighbourhood area).

A large amount of General Archaeological Records and Archaeological Events are recorded within and around Fairford, through the Gloucestershire Historic Environment Record.[65] These are located throughout the neighbourhood area, with many focused along the A417. Records range from Neolithic flint axes to Romano-British Finds, through to Roman buildings and enclosures, Iron Age to Roman Age settlements, and a variety of monuments.

Conservation areas are designated because of their special architectural and historic interest.[66] Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area, and can be developed into a management plan. The Fairford Conservation area is located within the neighbourhood area, covering the historic core of the town centre. As of May 2020 an associated appraisal or management plan has not been prepared by CDC for the Fairford Conservation area, but a full character appraisal has been carried out for the Neighbourhood Plan.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I, Grade II and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. The 2016 Heritage at Risk Register for South West England revealed that there are no historic features within or adjacent to the neighbourhood area that are at risk. [67]

Whilst there are no historic features listed on the Heritage at Risk Register, heritage assets face risk of damage from high levels of HGVs passing through the town. The Fairford Volume Class Traffic Survey (2017) shows that along the A417, East of Whelford Turn, the percentage of traffic attributed to HGV's is 10.8%.[68] It is recognised that HGV movement can have a damaging effect on the fabric of listed buildings and Conservation Areas through increased noise and dirt pollution. Local knowledge suggests this may be a particular issue along London Street, Bridge Street and Milton Street.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life - whether at home, work or leisure. Although not designated, the following buildings and areas are of historic interest and are seen as important by the local community:

- Palmer Hall
- Fayre Court
- Fairford Cottage Hospital
- Library / Old School
- Hyperion House
- The Old Piggery
- Yells Yard

[64] Historic England (2018): 'National Heritage List for England': Available to access via: <http://list.historicengland.org.uk>
[65] Gloucestershire County Council (2016) Gloucestershire Historic Environment Record
[66] Historic England (2018): 'Conservation Areas', [online] available to access via: <https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>
[67] Historic England (2016): 'Heritage at Risk 2016 Register – South West', [online] available to download via: <https://www.historicengland.org.uk/images-books/publications/har-2016-registers/>
[68] A417 Fairford Volume Class Traffic Survey 2017

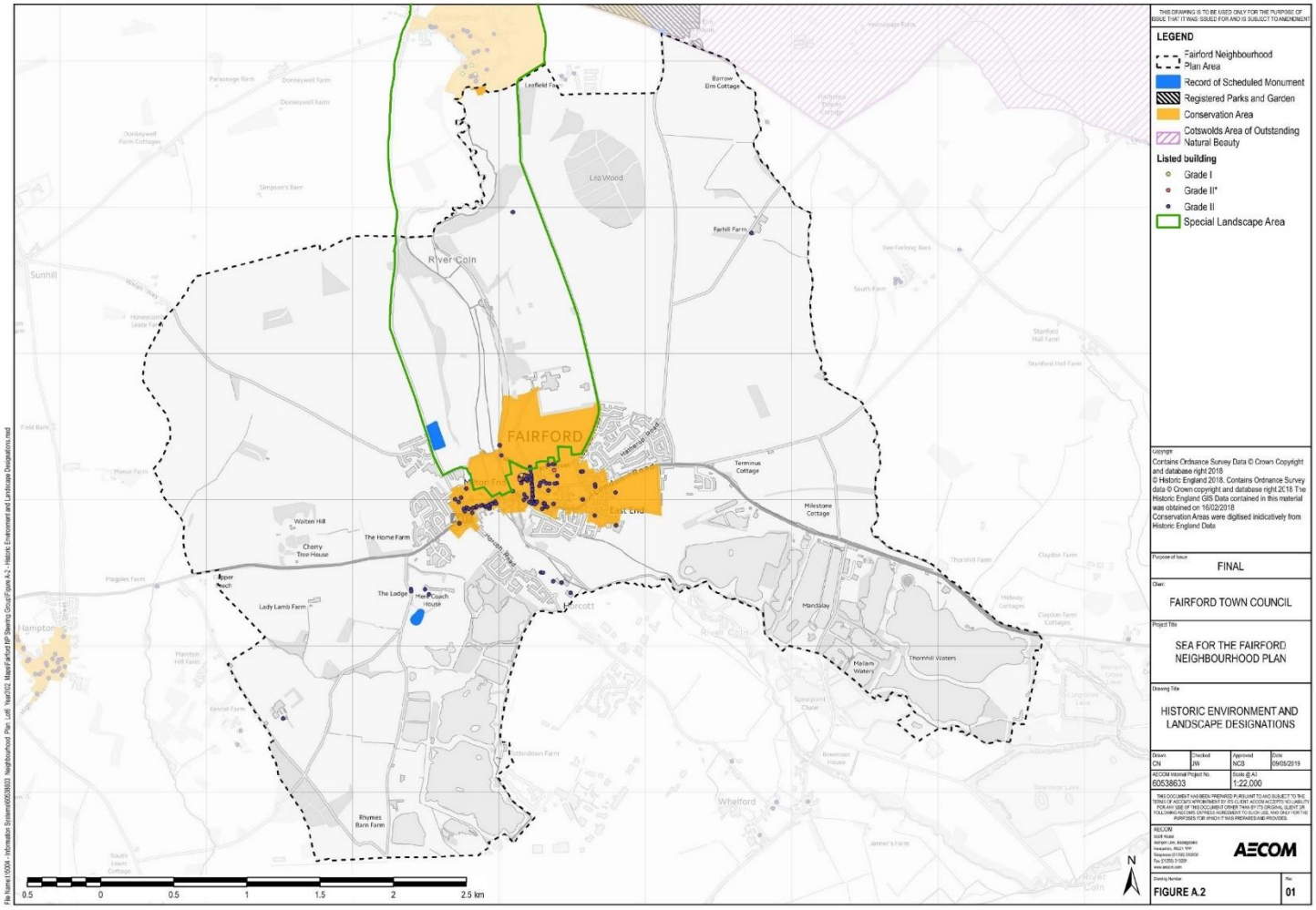
- Park Farm House
- Waiten Hill Farm House
- Milton Farm House
- Milton Farm Stone Barns
- The Swedish Houses in The Plies
- Bridge over disused railway
- Gable Cottages
- Dynevor Terrace
- Eastbourne Terrace
- Vines Row
- Terrace of Houses between Mr Ernest in the Market Place and The Plough, London Street: 7A, Tynedale, The Plough Inn
- Terrace of Cottages on Milton Street backing onto Lower and Upper Green
- 2, 3, 3a High Street
- 9 High Street
- 29, 30, 33 London Street
- 35 London Street
- 5-9 Coronation Street
- Park Villas
- Linden Cottage
- Glebe Court canopy
- The Oxpens
- Mill Lane
- Cotswold Stone Field Shelter
- Cattle Trough in Carters Ground
- Cattle Trough by Track in Field East of Polish Camp Site
- Fairford Gate South Stile
- The Short Piece Stile
- Virgills Stile
- Milton Street Stile
- Upper Green Stile
- Oxpens Stile
- Gassons Field Stile
- Garretts Stile
- Waiten Hill Stile
- Gassons Field Water Tower
- Milestone
- Red Pillar Box, Market Place
- Telephone Box: Queensfield
- Telephone Box:  The Green, Coronation Street

- Iron Railings on Mill Bridge
- Iron Gates to Waterloo Cottage
- Stone Gate Pillar – Hatherop Lane
- Stone Gate Pillar – Lovers Walk
- Stone Gate Pillar – Leafield Road
- Entrance arch and Ernest Cook Estate Yard
- The Boathouse
- Pump House by The Cascades
- The Cascades
- Fairford Park
- Reservoir – East
- Reservoir - West
- Paddock on Coronation Street
- Morgan Hall Park including Jones' Field Fieldway

It is noted that this is not an exhaustive list and further non-designated heritage assets may be identified in the future that meet the criteria provided in the Cotswold District Local Plan 2011-2013.

**Figure A.2** overleaf shows the designated landscapes and historical sites within the neighbourhood area.

## Figure A.2 Designated landscape and historic sites



## Summary of Future Baseline

New development in the neighbourhood area has the potential to impact on the fabric and setting of cultural heritage assets; for example through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to cultural heritage assets and their settings.

New development has the potential to lead to incremental but small changes in landscape and townscape character and quality in and around the neighbourhood area. This includes from the loss of landscape features and visual impact. However, new development need not be harmful to the significance of a heritage asset, and in the context of the neighbourhood area there is opportunity for new development to enhance the historic setting of the town and better reveal assets' cultural heritage significance, educating both local residents and visitors.

# Land, Soil and Water Resources

## Context Review

The EU's Soil Thematic Strategy presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.[69]

The EU Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

The National Planning Policy Framework (NPPF) (2021) seeks to protect high quality soil resources, and improve the water environment; recognising the wider benefits of natural capital and derived from ecosystem services.[70] Furthermore, the NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains.

The 25-year Environment Plan (2018) presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, clean and plentiful water, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts. This leads on from and supports the soil strategy for England (Safeguarding our soils) which seeks to ensure that all England's soils will be managed sustainably and degradation threats tackled successfully by 2030, as well as the national water strategies which seek to secure sustainable and resilient water resources and improve the quality of waterbodies, and the national waste plan which seeks to identify measures being taken to move towards a zero waste economy.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England, which sets out a vision for soil use in England, and the Water White Paper, which sets out the

[69] European Commission (2006): 'Soil Thematic Policy', [online] available to access via: <http://ec.europa.eu/environment/soil/index_en.htm>

[70] Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available https://www.gov.uk/government/publications/national-planning-policy-framework--2

Government's vision for a more resilient water sector.[71,72] It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.[73]

The Cotswold District Local Plan 2011-2031 policy EN11 (Pollution, Contaminated Land and Hazardous Substances) supports development that does not result in unacceptable pollution levels, seeking to safeguard human health and the environment.

# Summary of Current Baseline

## *Land Quality*

Whilst the neighbourhood area does not have a history of heavy industrial land use, former minerals workings have the potential for localised soil or groundwater contamination to be present. There has been one recorded significant pollution incident by the Environment Agency under the EC Integrated Pollution Prevention and Control Directive (IPCC), detailed below: [74]

- Date: 28th July 2004; Pollutant: Not Identified; Impact to water: significant.

## *Quality of Agricultural Land*

The Agricultural Land Classification categorises land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 are of poorer quality. In terms of the location of the best and most versatile agricultural land, there is Grade 2, Grade 3a and Grade 3b agricultural land within the neighbourhood area.[75] Grade 2 areas are identified mainly south of the A417 and there is a section of Grade 3a land located near the river, in the south east corner of the neighbourhood area. There are also patches of Grade 3a and 3b agricultural land near Fairford town centre, close to the neighbourhood area's southern boundary and in the south west of the plan. It is however noted that this is based on Pre-1988 provisional agricultural classification data.

## *Recycling centres*

There is no Household Waste and Recycling Centre (HWRC) located within the neighbourhood area. The nearest HWRC is Fosse Cross located approximately 15km north-west of Fairford.[76]

There is a clothing and tetrapak recycling centre at the Fire Station, Hatherop Road, Fairford.

## *Watercourses*

The main watercourse flowing through the neighbourhood area is The River Coln, which flows through the centre of the neighbourhood area.

A major road, A417, crosses the River Coln in the middle of the neighbourhood area and is a potential source of river pollution from accidental hazardous load spillage.

Thames Water operate a sewage works for properties in and around the neighbourhood area which discharges into the River Coln within the neighbourhood area; when the load on the sewage works exceeds six times the 'dry weather flow', then Thames Water are entitled to discharge untreated effluent into the River Coln. The Environment Agency reports annually on the environmental performance of the nine water and sewerage companies. The 2020 data shows 1138 storm overflows/

[71] Defra (2009): 'Safeguarding our Soils: A strategy for England', [online] available to download from: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>
[72] Defra (2011): 'Water for life (The Water White Paper)', [online] available to access via: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>
[73] Defra (2011) Government Review of Waste Policy in England [online] available at: <http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>
[74] Environment Agency Interactive Map: 'Pollution Incidents', [online] available to access via: <http://apps.environment-agency.gov.uk/wiyby/default.aspx>
[75] MAGIC Interactive Map (2018): 'Landscape; Post 1988 Agricultural Land Classification (England)' [online] layer available to view using the following mapping tool: <http://www.magic.gov.uk/MagicMap.aspx>

[76] Gloucestershire County Council (no date): 'Household recycling centres (HRCs)', [online] available to access via: <http://www.recycleforgloucestershire.com/household-recycling-centres-hrcs/>

spills by Thames Water during 2020, for a total duration of 2491.52 hours.[77] This is also a source of pollution potentially affecting the downstream SSSIs and may be the cause of the recorded decline in their condition.

Pollution of minor watercourses such as the Court Brook and the ditch along the A417 east of Fairford could/would also affect the downstream SSSIs.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. As of February 2018, SPZ 1, 2 and 3 are present within the Neighbourhood plan.[78] There is a small SPZ 1 (Inner zone) area located from Fairford town centre to the Southern boundary of the plan area. There is a larger SPZ 2 (Outer zone) area covering the area from the town centre to the northern boundary of the plan area. Finally, the remaining western section of the neighbourhood area region is an SPZ 3 (Total Catchment) area.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs), and as such, they are recognised as being at risk from agricultural nitrate pollution. Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. NVZs for 2017-2020 started on January 1st 2017, including new areas of NVZs and excluding areas that have been de-designated. [79] As of February 2018, there are two NVZs within the neighbourhood area. A Groundwater NVZ Area is located along the northern border of the plan area, extending down to the Broad Water section of the River Coln. There is also a surface water NVZ area located along the western boundary of the neighbourhood area.

## Summary of Future Baseline

Due to increasing legislative and regulatory requirements, there are increasing pressures to improving recycling and composting rates.

In terms of water quality, the requirements of the Water Framework Directive (and its replacement) are likely to lead to continued improvements to water quality in watercourses in the wider area. Water quality has the potential to be affected by pollution incidents in the area, the presence of non-native species and future physical modifications to water bodies.

# Population and Community

## Context Review

The National Planning Policy Framework (NPPF) (2021) seeks to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.[80]

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the*

[77] Environment Agency (2021) Water and sewerage companies in England: environmental performance for 2020 [online] available at: https://www.gov.uk/government/publications/water-and-sewerage-companies-in-england-environmental-performance-report-2020
[78] Environment Agency (2018): 'Groundwater Source Protection Zones Map', [online] available to access via <http://apps.environment-agency.gov.uk/wiyby/37833.aspx>
[79] GOV.UK (2017): 'Nutrient Management: Nitrate Vulnerable Zones' [online] available to access via: <https://www.gov.uk/guidance/nutrient-management-nitrate-vulnerable-zones>
[80] Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available https://www.gov.uk/government/publications/national-planning-policy-framework--2

*implications and without urgent action this great boon could turn into a series of miserable crises'*. [81] The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

The Cotswold District Local Plan 2011-2031 has a range of policies which are related to Population and Community, these are as follows:

- H1 – Housing Mix and Tenure to Meet Local Needs
- H2 – Affordable Housing in Principle Settlement
- H3 – Affordable Housing Outside Principle Settlements
- H4 – Specialist Accommodation for Older People
- H5 – Dwellings for Rural Workers Outside Settlement
- EC7 – Retail Hierarchy
- EC8 – Main Town Centre Uses

# Summary of Current Baseline

## *Population*

The population of Fairford has slightly increased between 2001 and 2011. This is similar to that of Cotswold, which has also seen a small population growth between these years. In comparison, the South West of England and England have seen a greater increase in population over the same period.

While the 2011 census data provides an insight into the population change in Fairford between 2001 and 2011, it is recognised that this data may not accurately reflect the current situation at this stage.

GRCC calculated population figure at August 2018 was 4,411 an estimated population increase of 1,193 (27%) since 2013.[82]

According to the census data, there were 1,375 households in the FNP area in 2011.[83] The housing growth that has occurred since 2011, demonstrating a 39% household increase in the area (when considering total built, committed and Local Plan site allocations). The high delivery rates are partly caused by the strong local housing market, which provides a great incentive to build housing quickly once planning permission is granted.

It is recognised that a 39% increase in housing will have an impact upon Fairford's population.

According to the census data the population of Fairford was 3,236 in 2011, comprising 1,375 households. This equates to an average of 2.35 persons per household (which is identical to the average of 2.35 for Gloucestershire County as a whole). Based on this information we are able to calculate the expected population growth of the area using 536 as an indicative net housing number.

It is therefore estimated that there an additional 1,259 new residents in the FNP area since 2011. This translates to a 38.9% percent increase on the 2011 figure.

## *Age Structure*

Generally, there are a greater number of residents within the 60+ age category within the neighbourhood area (33.1%) in comparison to the totals for the South West (26.4%) and England (22.3%). However, the values for the neighbourhood area broadly align with the value for Cotswold

[81] Select Committee on Public Service and Demographic Change (2013): 'Ready for Ageing?', [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

[82] Gloucestershire Rural Community Council (2018) Fairford Neighbourhood Plan Infrastructure Report

[83] Gloucestershire Rural Community Council (2015) Fairford Neighbourhood Plan Housing Report [online] available at: <http://www.fairfordneighbourhoodplan.org.uk/>

(30.0%), indicating a district-wide trend. In contrast there are fewer residents within the working age categories (25-44 and 45-59) in the neighbourhood area (40.8%) in comparison to the totals for Cotswold (44.2%), the South West of England (44.7%) and England (46.9%). Additionally, there are fewer younger residents (0-15 and 16-24) in the neighbourhood area (26.1%) compared with the totals for the South West of England (28.9%) and England (30.8%). However, the number of younger residents (0-15 and 16-24) in the neighbourhood area is consistent with the total for Cotswold (25.9%).

## *Household Deprivation*

6.3 Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment**: Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long-term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

6.4 A larger proportion of households are deprived in 1 or more dimensions within the neighbourhood area (51.8%) in comparison to Cotswold (48.9%). However, a lower percentage of households are deprived in 1 or more dimension within the neighbourhood area compared to the South West (55.2%) and England (57.4%). Out of the 51.8% of households which are deprived in the neighbourhood area, the majority are deprived in one or two dimensions, which is similar to the regional and national trends.

## *Index of Multiple Deprivation*

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

**Income**: The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).

**Employment**: The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.

**Education, Skills and Training**: The lack of attainment and skills in the local population.

**Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation**.**

**Crime**: The risk of personal and material victimisation at local level.

**Barriers to Housing and Services**: The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains:

- 'Geographical Barriers': relating to the physical proximity of local services
- 'Wider Barriers': relating to access to housing, such as affordability.

**Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.

- 'Indoors Living Environment' measures the quality of housing.
- 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

**Income Deprivation Affecting Children Index**: The proportion of all children aged 0 to 15 living in income deprived families.

**Income Deprivation Affecting Older People Index**: The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

There are three LSOAs that are either fully or partially in the neighbourhood area. Analysis of the data reveals the following trends set out below.

**General Trends**

E01022202: Cotswold 009A covers approximately 45% of the neighbourhood area, covering the east of the area. There are notable contrasts between the IMD categories for this LSOA. The LSOA is within the top 10% least deprived deciles for the Income domain, the Employment domain, the Income Deprivation Affecting Children Index, and the Wider Barriers sub-domain. Comparatively, the LSOA is within the top 10% most deprived deciles for the Geographical Barriers sub-domain and within the top 30% most deprived deciles for the Barriers to Housing and Services domain, and the Indoor sub-domain. Overall, this LSOA is one of the top 20% least deprived in England.

E01022203: Cotswold 009B covers approximately 50% of the neighbourhood area, covering the west of the area. The LSOA is within the top 40% least deprived decile for all of the IMD categories, with the exception of the Children and Young People sub-domain and the Geographical Barriers sub-domain which are in the 50% most deprived decile. Overall, the LSOA is one of the top 10% least deprived in England.

E01022204: Cotswold 009C covers approximately 5% of the neighbourhood area, containing the majority of the Fairford Town centre. There are some contrasts between the IMD categories for this LSOA. The LSOA is within the top 10% least deprived deciles for the Living Environment domain and the Outdoors sub-domain, and within the top 20% least deprived deciles for the Crime and Wider-Barriers sub-domain. Overall, this LSAO is within the top 20% least deprived in England.

**Similarities between the LSOAs**

- All three of the LSOAs within the neighbourhood area are within the top 20% least deprived decile for the outdoors sub-domain.
- All three of the LSOAs within the neighbourhood area are within the top 30% least deprived decile for the Crime domain, Wider Barriers sub-domain and Income Deprivation Affecting Children Index.

**Contrasts between the LSOAs**

- E01022202: Cotswold 009A is within the top 30% most deprived decile for Barriers to Housing or Services. Comparatively, E01022203: Cotswold 009B and E01022204: Cotswold 009C are within the top 30% least deprived deciles for the same IMD category.
- E01022202: Cotswold 009A is within the top 30% most deprived decile for the Indoors sub-domain. Comparatively, E01022203: Cotswold 009B and E01022204: Cotswold 009C are within the 40% least deprived deciles for the same IMD category.

## *Housing Tenure*

Within the neighbourhood area, the 2011 Census data shows that 73.2% of residents either own their home outright or with a mortgage, compared to 65.7% for Cotswold, 67.4% for the South West and 63.3% for England. There are also fewer residents within socially rented accommodation in the neighbourhood area (13.2%) in comparison to the District (14.9%) and national totals (17.7%). However, the percentage of Fairford residents in socially rented accommodation aligns with the South West regional percentage (13.3%).

In terms of the live affordable housing stock in Fairford and current numbers of home seekers, **Table A.1** and **Table A.2** demonstrate what we understand to be the existing situation, based on information provided by Cotswold District Council.

In terms of home seekers, **Table 7.7** includes those with a local connection to Cotswold District and a preference for Fairford. It is noted that the emergency figures in the Fairford area are likely to be higher at present, due to applicants being served Demolition Notices in Kempsford (while they live in Kempsford now, they may want to move to Fairford and see this as an opportunity to do so).

**Table A.1 Current housing stock in Fairford[84]**

| ***Rented*** | **1 bed** | **2 bed** | **3 bed** | **4 bed** |
|---|---|---|---|---|
| **Flat** | 65 | 27 | 0 | 0 |
| **House** | 0 | 72 | 78 | 133 |
| **Bungalow** | 3 | 40 | 0 | 0 |
| ***Shared Ownership*** | **1 bed** | **2 bed** | **3 bed** | **4 bed** |
| **Flat** | 3 | 0 | 0 | 0 |
| **House** | 0 | 4 | 4 | 2 |
| **Bungalow** | 0 | 0 | 0 | 0 |
| ***Discounted Sale Homes*** | **1 bed** | **2 bed** | **3 bed** | **4 bed** |
| **Flat** | 0 | 0 | 0 | 0 |
| **House** | 0 | 4 | 4 | 2 |
| **Bungalow** | 0 | 0 | 0 | 0 |

**Table A.2 Current number of households on Home seeker Plus[85]**

| | **1 bed** | **2 bed** | **3 bed** | **4 bed** |
|---|---|---|---|---|
| **Emergency** | 2 | 6 | 3 | 0 |
| **Gold** | 0 | 1 | 0 | 0 |
| **Silver** | 10 | 8 | 4 | 1 |
| **Bronze** | 74 | 37 | 8 | 5 |

[84] Cotswold District Council (2018)
[85] Cotswold District Council (2018)

## Summary of Future Baseline

The population of the neighbourhood area slightly increased between the years 2001-2011. Since 2011, a considerable increase in new housing development in Fairford is predicted to result in a significant growth in the area's population (39%). This recent trend of growth is expected to continue, and will likely place strain on local services and facilities.

33.1% of residents are aged 60+, indicating the presence of an older population within the neighbourhood area. In common with other areas, the population of the neighbourhood area is ageing.

There are notable contrasts in the levels of deprivation between the three LSOAs in the neighbourhood area, particularly between the barriers to housing and services domain and the indoor sub-domain. The suitability of housing for local requirements depends in part on the successful implementation of policies outlined in the emerging Cotswold District Local Plan 2011-2031.

# Health and Wellbeing

## Context Review

The NPPF (2021) seeks to enable and support healthy lifestyles through provision of appropriate infrastructure, services and facilities, including; green infrastructure, access to healthier food, allotments and the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas.[86]

The NPPF recognises the role of development plans in helping to deliver access to high quality open spaces and opportunities for sport and physical activity which contribute to the health and wellbeing of communities, and can deliver wider benefits for nature and support efforts to address climate change. The health benefits of access to nature, green spaces and green infrastructure is further reiterated through the 25-year Environment Plan.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them.[87] Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that that there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The Joint Strategic Needs Assessment (JSNA) for Gloucestershire identifies key features of interest within the area and raises important issues for discussion. The main challenges in Gloucestershire are linked to population, equality and diversity, deprivation, children and young people, adults and older people, health, the economy, the environment, accessibility, community and community safety.[88]

By 2031, the Cotswold District Local Plan 2011-2031, aims to have '*helped to create more healthy, sustainable and mixed communities*'. Policy EN11 (Pollution and Contaminated Land) ensures that public health and safety are protected against new development.

[86] Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available https://www.gov.uk/government/publications/national-planning-policy-framework--2

[87] The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <http://www.apho.org.uk/resource/item.aspx?RID=106106>

[88] Gloucestershire County Council (2017): 'Understanding Gloucestershire - A Joint Strategic Needs Assessment', [online] available to download via: < https://inform.gloucestershire.gov.uk/MainMenu.aspx?page=UnderstandingGloucestershire-JSNA>

## Summary of Current Baseline

### *Health Indicators and Deprivation*

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail. 82.5% of residents in the neighbourhood area consider themselves as having 'very good health' or 'good health', lower than the totals for the South West of England (81.4%) and England (81.4%), however higher than the total for Cotswold (83.9%). The number of residents in the neighbourhood area considering themselves to have 'bad health' or 'very bad health' is 4.5%, compared with 3.8% in Cotswold, 5.2% in the South West of England and 5.4% in England.

The percentages of 'very good health' and 'good health' in Fairford are lower than the District level but higher than regional and national levels. 7.4% of residents in Fairford report that their daily activities are limited 'a lot', compared to 6.5% for Cotswold, 8.3% for the South West of England, and 8.3% for England.

## Summary of Future Baseline

Health and wellbeing levels within the neighbourhood area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low percentage of residents reporting that their activities are limited in some way. While the percentages for the neighbourhood area are higher than the regional and national trends, they are less favourable than the local trend in Cotswold.

An ageing population within the neighbourhood area is likely to place future pressures on health services in the area. Similarly, ongoing cuts to community services and an increase in housing development in the FNP area has the potential to lead to effects on health and wellbeing over the long term.

In addition to the main challenges outlined in the JSNA for Gloucestershire, obesity is seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

# Economy and Enterprise

## Context Review

The National Planning Policy Framework (NPPF) (2021) supports competitive town centre environments and sets out policies for the management and growth of centres over the plan period.[89] Focus is placed on the need to have a clear understanding of business needs within the economic markets operating in and across the local areas – work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability. Furthermore, plan-making should be proactive to meet the development needs of business and support an economy fit for the 21st century. Economic growth in rural areas should be supported in order to create jobs and prosperity. Specifically, support should be given to sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centre.

The Cotswold District Local Plan 2011-2031 has a range of policies which are related to Population and Community, these are as follows:

- EC1 – Employment Development
- EC2 – Safeguarding Employment Sites

[89] Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available https://www.gov.uk/government/publications/national-planning-policy-framework--2

- EC3 –Proposals for Employment-Generating Uses
- EC5 – Rural Diversification
- EC6 – Conversion of Rural Buildings
- EC7 – Retail Hierarchy
- EC8 – Main Town Centre Uses
- EC9 – Retail Impact Assessments
- EC10 – Development of Tourist Facilities and Visitor Attractions
- EC11 – Tourist Accommodation

# Summary of Current Baseline

## *Local Economy*

Fairford is designated through the Local Plan as a 'Principal Settlement', serving as a Local Service Centre for a wider rural area including the villages of Kempsford, Whelford, Meysey Hampton, Quenington, Coln St Aldwyns, Southrop and Eastleach. The slightly smaller town of Lechlade is about 5 miles to the East, with the towns of Cirencester, Burford, Carterton, Farringdon, Highworth, Cricklade and Swindon also within 17 miles.

Cotswold District as a whole has no City Centres, and as such, market towns such as Fairford play a vital role in supporting its communities, and other nearby settlements, including the nearby RAF airbase. **Table A.3** provides a breakdown of the existing businesses in Fairford.

**Table A.3** identifies that Fairford has a range of shops and services, sufficient to meet day-to day needs of local residents. However, it has been identified through local consultation that most of the town centre 'retail' premises are small, which means that although Fairford appears to have a wide range of shops and services, these do not meet the needs of existing (and therefore forthcoming) residents in total capacity terms. **Table A.3** also shows that Fairford has a relatively large number of take-aways and hair/beauty service businesses, which consultation has shown seem to be generally regarded as a negative indicator for vitality in the town.

The Fairford Neighbourhood Plan Input to Cotswold District Retail Update (2016) identifies that the most frequently used facility in the town is convenience stores, being used once a week or more by 86% of residents. Following this, 39% of residents using the Post Office once a week or more, and 31% using the Chemist once a week or more. However, local opinion is that the capacity of some services fall short of that in other centres.

As discussed above, the town has seen significant levels of housing development since 2011. Local experience has found that infrastructure, including community services and facilities, has not been sufficiently invested in to meet the needs of new (and existing) residents. In some cases, the town has experienced a decline in services. The town's mix of shops and services are currently under strong competitive/viability pressures, with many shops lost to residential conversions. Significant recent changes include the Cotswold Volunteers Charity Shop closing April 2017 and (in August 2016) Lloyds Bank announcing (without prior consultation) their decision to close the town's only Bank branch in November 2016. This is a considerable loss for the town considering the results of the Retail Update (2016) discussed above, which highlight the frequent use of the bank by residents.[90]

Further business closures in the town include Josh Hair, Blenheim Antiques, and C B Slade. Additionally Cotswold Volunteers has been replaced by Lynwood, and Orient food takeaway has been replaced by Peter Vallance Foundation charity shop.

The Housing Land Supply Report (2017) identifies that there are issues of achieving the timely implementation of infrastructure and enabling these developments to 'bed in' before further growth

[90] Fairford Town Council (2016) Fairford Neighbourhood Plan Input to Cotswold District Retail Update 2016

occurs.[91] This highlights the importance of safeguarding, protecting, and where possible expanding provisions (particularly A1 class premises) in the town.

**Table A.3 Businesses in Fairford[92]**

| Location | Business | Description |
|---|---|---|
| **High Street / Market Place** | | |
| 1 | Cotswold Volunteers | Charity |
| 4-5 | Coln Bookshop/Gallery | Bookshop |
| 8 | Purely Divine body & beauty | Service |
| 10 | Kim Sutton Gallery | Gallery/Shop |
| 11 | Fairford Opticians | Medical/Service |
| | Family Osteopath | Medical/Service |
| | AMM bookkeeping | Financial service |
| | Flying Start Nursery | Nursery |
| (14) | Boots | Chemist |
| | Blenheim Antiques | Antiques |
| | Josh Hair | Hairdresser |
| 4A | Barbury | Barber's Shop |
| 4 | Cooperative Food | Convenience store |
| | Andrew Butler | Butcher |
| | Ridgeway | Estate Agent |
| | Mitchell & Sarjent | Financial service |
| | Fairford Fish Bar | Takeaway |
| | Mister Ernest | Hairdresser |
| | Bull Hotel | Hotel |
| | Coffee Post | Post Office/Cafe |
| | Colosseo | Restaurant |
| **London Street** | | |
| | Curry King | Takeaway |
| | Fairford Kebab & Pizza | Takeaway |
| | 7A | Cafe |
| | Fairford Therapy Centre | Medical/Service |
| | Plough Inn | Pub |
| | White Cottage | Dentist |
| | Enntwine | Gifts |
| | Orient | Takeaway |
| | New Peking House | Takeaway |
| | Londis | Convenience store |
| | Inspirations | Hairdresser |
| | Row Electrical | Electrician |
| **Outside Official Town Centre:** | | |
| **London Road** | | |
| | Eight Bells | Pub |
| | Railway Inn | Pub |
| **Milton Street** | | |

[91] Cotswold District Council (2017) Housing Land Supply [online] available at: http://www.cotswold.gov.uk/residents/planning-building/planning-policy/emerging-local-plan/local-plan-examination/local-plan-examination-documents/ > last accessed 16/04/18

[92] Fairford Town Council (2018)

| | | |
|---|---|---|
| | Vet Surgery | Vet |
| | Marlborough Arms | Pub |
| **Other** | | |
| | Park Close Stores | Convenience store |
| | Thornhill Filling Station | |
| | Lechlade Garden Centre | |

## *Employment*

Fairford has a reasonable employment base with a higher than average proportion of those jobs in growth sectors. The following three occupation categories support the most residents:

- Professional occupations (16.9%)
- Skilled trades occupations (15.8%)
- Managers, directors, senior officials (12.0%)

Overall, 44.7% of residents within the neighbourhood area are employed in one of the above three occupation categories, compared with 41.0% in the South West and 39.7% in England. This suggests that the neighbourhood area has a highly skilled workforce compared to regional and national percentages. However, Fairford has fewer residents residing in these skilled occupations than Cotswolds District total (47.0%). This finding is also supported by the trends in number of residents with a Level 4 qualification (previously discussed). Generally, there are fewer residents within the neighbourhood area employed within the sales and customer service occupation categories, and the caring, leisure and other service occupations categories compared to the regional and national percentages.

Fairford's employment role, however, is in danger of decreasing as there is a poor balance of jobs to workers. In this context, given the close proximity of Swindon (12 miles), Fairford's self-containment (the percentage of travel to work journeys that start and finish in the ward) is lower than some of the District's other larger settlements.

## *Education*

Based on the 2011 census data, 21.4% of residents in the neighbourhood area have no qualifications, higher than the percentages for Cotswold (18.5%), the South West (20.7%) but aligning with the national total (22.5%). Comparatively, there are a higher number of residents with Level 4 qualifications within the neighbourhood area (29.9%), compared with the totals for the South West (27.4%) and England (27.4%). However there are a lower percentage of Fairford residents with Level 4 qualifications compared to the Cotswold District (33.7%). The number of residents in the neighbourhood area with either a Level 1 or Level 3 qualification broadly aligns with the regional and national trends.

## *Tourism*

Tourism is important to Fairford's economy. The Cotswold Water Park is the largest area of man-made lakes in the UK; covering an area of 40 sq. miles (33 sq. miles in Cotswold District). Restoration programmes in the area provide a major resource for tourism, notably water recreation and wildlife, promoting the town's commercial role in the District.

The emerging Local Plan identifies that future development will play an important role in managing proposals for hotel and other types of accommodation and the development of visitor attractions.

## *Broadband*

Cotswold District is a primarily rural area, and therefore the telecommunications infrastructure often has poor capacity and coverage. Significant parts of the District experience slow broadband speed and poor telecommunication signals.

The emerging Local Plan seeks to deliver improvements to the telecommunications infrastructure to address this problem and thereby help to combat social exclusion of residents, improve access to services (including emergency services), and reduce the need to travel.

Broadband improvements are taking place as part of the 'Fastershire' scheme across Gloucestershire. It is expected that all homes and businesses in the identified 'exchange' areas for the

Cotswolds will have the capability to receive a minimum of 2Mbps. Further improvements are planned, subject to funding availability.[93]

## Summary of Future Baseline

Fairford has a good range of services and facilities in the town, supporting local residents through providing local employment and meeting the day-to-day needs of Fairford residents and those from surrounding settlements. However, the capacity of existing services and facilities is an issue for the town. New housing development is likely to place pressure on the town's mix of shops and services. There is still pressure for further housing growth and this could exacerbate the existing trend of the loss of local shop closures for alternative (residential) use.

The neighbourhood area has a highly skilled and qualified workforce compared to regional and national percentages. Self-containment in the town is low, with a high level of out commuting to Swindon.

Tourism is important to Fairford's economy, and the wider Cotswold Water Park.

# Transportation

## Context Review

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

Notably, the NPPF (2021) seeks the consideration of transport issues from the earliest stages of plan-making and development proposals to address any known issues and maximise opportunities to increase accessibility, particularly by walking, cycling and public transport.[94] Larger developments are expected to be delivered in areas which are or can be made sustainable by limiting the need to travel and offering a genuine choice of transport modes. However, it is recognised that sustainable transport solutions will vary between urban and rural environments.

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. Gloucestershire's Local Transport Plan (2015-2031) aims to deliver '*a resilient transport network that enables sustainable economic growth by providing door to door travel choices*'. To achieve this, the strategy has four overarching objectives: [95]

- Support sustainable economic growth
- Enable community connectivity
- Conserve the environment
- Improve community health and wellbeing

The Cotswold District Local Plan 2011-2031, Policy INF3 (Sustainable Transport) allows development which enables the Gloucestershire's Local Transport Plan 2020-2041, particularly focusing on the following areas:

- Travel choice
- Cyclist and pedestrian priority

[93] Cotswold District Council (2017) Cotswold District Local Plan 2011-2031: Submission Draft Reg. 19 Tracked Changes with Focussed Changes and Minor Mods [online] available at:< http://www.cotswold.gov.uk/residents/planning-building/planning-policy/emerging-local-plan/local-plan-examination/ >

[94] Ministry of Housing Communities and Local Government (MHCLG) (2021) National Planning Policy Framework (NPPF) [online] available https://www.gov.uk/government/publications/national-planning-policy-framework--2

[95] Gloucestershire County Council (2020) Gloucestershire's Local Transport Plan 2020-2041'. [online] available to download via: < https://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2020-2041/

- Unacceptable noise, vibration or air pollution
- Green infrastructure
- Restoration of former railways
- Secure bicycle parking and charging plug-in for electric vehicles
- Efficient delivery of goods and supplies
- Needs of citizens with disabilities

Additionally Policy S5 ensures that the Fairford to Lechlade multi-use path is protected and aims to improve footpath and cycle links in the area.

# Summary of Current Baseline

## *Rail Network*

There are no local railway stations within the neighbourhood area. The nearest Railway station is Kemble, which is approximately 17km to the east of Fairford. Kemble train station provides frequent services to a variety of destinations. These include Swindon, London Paddington, Gloucester and Cheltenham Spa.

## *Bus Network*

There are three bus routes through the neighbourhood area. The 76/77 runs throughout the day connecting residents to Highworth, Lechlade, Quenington, and Cirencester. The 855 morning bus service terminates in Fairford (at the school) and the afternoon service (from the school) runs to Cirencester at the same time as the 77. It is recognised that services are infrequent and finish early in the day, reducing potential usability for commuters.

The 72F is a demand responsive service, running on Thursday mornings, providing access to Fairford shops.

## *Road Network and Congestion*

There is one 'A' road passing through the neighbourhood area, the A417 which goes through the centre to the east and west boundaries. The A417 links Fairford to the neighbouring towns of Cirencester (approximately 9 miles east of the neighbourhood area) and Lechlade on Thames (Approximately 5 miles west of the neighbourhood area). At Lechlade on Thames, the A417 connects residents to the A361.

The A417 is reduced to one-way traffic at narrow points, which due to the high levels of HGVs on the road (10.8%), leads to considerable congestion at peak times. [96]

The majority of the neighbourhood area is accessible via 'C' roads or country lanes, including (but not limited to) Coronation street and Leafield Road in the northern section, Leafield Road and Hatherop Road in the central section, and Horcott Road in the southern section.

## *Cycle and Footpath Network*

There are no National Cycle network routes within the neighbourhood area. However, a branch of the Cotswold District Council Cycle Route 4 goes through the Fairford neighbourhood area. These are a network of safe, quiet, country lanes, connecting Fairford residents to Cirencester and Northleach There are also a range of footpaths in the area.

## *Availability of Cars and Vans*

Based on the 2011 census data 87.78% of households in the neighbourhood area have access to at least one car or van, which is in line with the percentage for Cotswold (87.38), but higher than the percentages for the South West (81.1%) and England (74.0%). This reflects the poor public transport facilities in this rural area.

## *Travel to Work*

The most popular method of travelling to work in the neighbourhood area is via driving a car or van (47.1%), which is higher than the totals for Cotswold (40.4%), the South West of England (41.4), and

[96] A417 Fairford Volume Class Traffic Survey 2017

England (37.0%). This may be attributed to the high level of residents out-commuting for employment.

Additionally, 7.8% of Fairford residents chose to walk to work. This is slightly higher than the national average (7.0%), however lower than local (9.6%) and regional (9.0%) averages. A higher percentage of the neighbourhood area work mainly at or from home (5.1%), compared to averages for the South West of England (4.6%) and England (3.0%). However, the percentage of Fairford residents working at or from home is lower than Cotswold averages (7.8%).

## Summary of Future Baseline

New development has the potential to increase traffic and cause congestion within the neighbourhood area, particularly along the A417. Additionally, public transport use has the potential to remain low compared with private car use; likely to due to the infrequent nature of the bus services, the lack of railway stations and the rural setting of the parish.

There is likely to be an increase in the amount of people working from home due to an increase in modern working patterns, including agile and flexible working. Nonetheless, there will be a continuing need for development to be situated in accessible locations to further limit the need to travel by private car.

# Appendix B Site options appraisal

This appendix presents the detailed findings of the appraisal of six individual site options within the neighbourhood area, as established within Section 4.38 - 4.39 of the main report. These are set out below:

- New Site 5: The southern half of Site 5: Land between Leafield Rd. and Hatherop Rd. (SHELAA Ref F_51B & F_51C)
- Site 7: Jones' Field (SHELAA Ref F_15);
- Site 8: Land east of Beaumoor Place (SHELAA Ref F_38);
- Site 10: F_39C Field south east of granted planning permission at London Road; and
- Site 11: Land west of Terminus Cottage and Station (F_52)
- Site 12: Yells Yard

The locations of these sites are presented in Figure 4.1 of this SA Report.

## Methodology

Each of the site options listed above were considered against the SA Framework of objectives and decision-making appraisal questions developed during SA scoping (Section 3.3) and the baseline information.

It should be noted that when considering access to community facilities and services, walking distances have been calculated from the edge of the site using google maps.

Tables AB.1 - AB.6 overleaf present this appraisal and provide an indication of each site's sustainability performance in relation to the nine SA themes.

Summary findings are presented in Section 4.40 of the main report.

## Table AB.1 New Site 5: Land between Leafield Road and Hatherop Road' (The southern half of SHELAA Ref F_51B & F_51C)

| SA theme | Commentary, New Site 5: Land between Leafield Road and Hatherop Road' (The southern half of SHELAA Ref F_51B & F_51C) | |
|---|---|---|
| Biodiversity | There are no significant biodiversity constraints present on the site.<br>In terms of European designated sites, North Meadow & Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area . New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.<br>In terms of nationally designated biodiversity sites, the site is located approximately 800m north west of the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07th January 2021) and within a SSSI Impact Risk Zone (IRZ) for 50 residential units. Given the site is being promoted for around 80 dwellings, development has the potential to impact upon the SSSI, for example through recreational disturbance and indirectly through pollution. Notably, significant development at this site could lead to increased sewage pollution issues in/from the Coln downstream of the Sewage Treatment Works, and improved sewage provision on a timely basis would be a pre-requisite for development at this site. This may affect the Cotswold Water Park SSSI (via overflow or groundwater feed from river).<br>The site is not located within close proximity to any locally designated biodiversity sites.<br>In terms of habitats, no Biodiversity Action Plan Priority Habitats are present on or adjacent to the site. The site however has a level of biodiversity value given the thick mature hedgerows which run along its boundary, and trees and hedgerows sporadically located throughout the site itself. It is noted that hedgerows present are likely to hold ecological value through providing habitat corridors and aiding connectivity, and will need to be retained.<br>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, **Figure A.1**. | |
| Climate Change | Development of the site will not significantly increase greenhouse gas emissions because the proposal is for a low-carbon development.<br>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of fluvial flooding. The site however contains areas of medium/ high surface water flood risk along the southern site boundary and around the ditch running north-south through the site.<br>Groundwater flooding is a key issue for the town. The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"at this site, groundwater levels are artesian and close to the surface during winter at several locations. The low-lying parts of this area do not achieve the desired freeboard; and would be subject to groundwater flooding."* Part of the site, to the south, is therefore at high risk of groundwater flooding.<br>It is noted that development of the site will avoid the high surface flood risk area, avoiding adverse effects in this respect. | |
| Landscape and Historic Environment | The site consists of agricultural land, located immediately north of the existing settlement, adjacent to Farmor's School to the west, and open landscape to the north and east. The proposed landscape buffer means that development of the site would not extend the built form into the open countryside to the north, and minimises the potential to impact upon the Special Landscape Area (SLA) northwest of the site. Screening proposals would limit the impact upon landscape character and the setting of the town, including views (notably from the Public Right of Way (PRoW) along the southern site boundary).<br>The site is approximately 160m north east of the Fairford Conservation Area, which covers the centre of the village, extending up along Leafield Road. Development of the site therefore has the potential to impact upon the setting of the asset, although it is recognised that the site is screened almost entirely from the Conservation Area by dense belts of trees which may limit the potential for adverse effects. Ultimately, the nature and significance of effects are dependent on the design and layout of development.<br>The historical sites located within the neighbourhood area can be seen within Appendix A, **Figure A.2**. | |

| SA theme | Commentary, New Site 5: Land between Leafield Road and Hatherop Road' (The southern half of SHELAA Ref F_51B & F_51C) | |
|---|---|---|
| Land, Soil and Water Resources | Development of the site would not result in the loss of best and most versatile agricultural land (Grades 1 – 3a). However the site is wholly greenfield, and therefore would lead to loss of greenfield land. The site is not within a Source Protection Zone (SPZ), although SPZ2 is adjacent to the site. | |
| Population and Community | The proposed capacity for this site is around 80 dwellings. However, development is only anticipated to cover 2.7ha of the 5.1ha site, with part of the site allocated for screening and public open space (children's playground, community allotments or orchard. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area , residential development would nonetheless contribute positively towards the growth and vitality of the town.<br>Given the level of development proposed, it is considered that development at the site would contribute to the improvement of existing or provision of new services/ facilities. This would be facilitated through Community Infrastructure Levy (CIL) charges. In this context a link road is expected to be delivered as part of the proposal,, improving access between the schools and the A417 to the east of the town. This will provide a drop-off point away from the school and a safe<br>walking route to the schools. Further details are to be provided by the site promoter.<br>While the southern extent of the site is located adjacent to existing residential development within Fairford, and is therefore likely to positively integrate with the local community, the northern extent of the site is not so well connected. In terms of access to local facilities and services, the site is not particularly well located, being over 800m from the town centre and shops, a GP surgery and local employment. However, it is noted that a level of community infrastructure will be provided alongside development, including new footpath links, which will improve accessibility for new residents. Specific details of this are uncertain at this stage.<br>The site has good access to public transport links; in addition to the PRoW running along the site boundary the site is within 400m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.<br>Given the community benefits anticipated as a result of development, residual positive effects are predicted. | |
| Health and Wellbeing | The site has limited access to local health services, being over 800m from the nearest GP surgery (Fairford Surgery). The site however has suitable access to health facilities located at Fairford Hospital in the centre of the town.<br>The site has good access to open space, given Farmor's sports centre is located to the west of the site. Additionally the southern boundary of the site coincides with a PRoW which will provide access to the surrounding countryside.<br>The site has good access to public transport links; in addition to the adjacent PRoW the site is within 400m of a bus stop. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford.<br>It is also noted that a link road is expected to be delivered as part of development proposals, supporting active, safe travel throughout the town. Further details are to be provided by the site promoter. | |
| Economy and Employment | The site has good access to the A417 via Hatherop Road, although the site is over 800m from the town's existing employment offer.. Given the recent business closures in the town and the site's location on the outskirts of the settlement with easy access to the A417, it is considered that residents would likely out commute for employment to Swindon and Oxford.<br>Local opinion indicates the capacity of services in Fairford falls short of surrounding towns. Therefore given the capacity of the site it is more likely to provide a greater CIL contribution and therefore have a greater positive effect on the local economy, for example through attracting more residents/ visitors and supporting the overall growth of Fairford..<br>It is also considered that the delivery of a link road alongside development, together with footpath links, will provide improved accessibility for new and existing residents within the town. This may also encourage new businesses in the town. Further details are to be provided by the site promoter. | |

| SA theme | Commentary, New Site 5: Land between Leafield Road and Hatherop Road' (The southern half of SHELAA Ref F_51B & F_51C) | |
|---|---|---|
| Transportation | The site has reasonable access to public transport links; there is a PRoW along the southern boundary of the site and the site is within 400m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford. The site also benefits from being within walking distance to schools, which enables and encourages sustainable travel use (walking/ cycling) for parents and children.<br>In light of the above, private car use is anticipated to remain high in the neighbourhood area , leading to increased levels of congestion. Given the level of housing proposed, development seeks to alleviate pressure on the road network through delivering a link road. This will provide improved accessibility for new and existing residents within the town, with further details to be provided by the site promoter. | |

| Key | | | |
|---|---|---|---|
| Likely adverse effect (without mitigation measures) | | Likely positive effect | |
| Neutral/no effect | | Uncertain effects | |

### Table 4.3 Site 7: Jones' Field (SHELAA Ref F_15)

| SA theme | Commentary, Site 7: Jones' Field (SHELAA Ref F_15) | |
|---|---|---|
| Biodiversity | There are no significant biodiversity constraints present on the site.<br>In terms of European designated sites, North Meadow & Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area . New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.<br>In terms of nationally designated biodiversity sites, the site is located approximately 200m from the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07th January 2021), and within a SSSI Impact Risk Zone (IRZ) for Cotswold Water Park SSSI for 50 residential units. The site has a capacity of 47 dwellings, which just falls short of the 50 dwellings threshold. Development is therefore not anticipated to lead to significant adverse effects. Notably, significant development at this site could lead to increased sewage pollution issues in/from the Coln downstream of the Sewage Treatment Works, unless the appropriate uprating is provided for on a timely basis. This may affect the Cotswold Water Park (via overflow or groundwater feed from river) and Whelford Meadow SSSIs. It is also considered that pollution of the Court Brook or ditch along the A417 could affect the Lake 116 SSSI nearer Lechlade.<br>The site is not located within close proximity to any locally designated biodiversity sites.<br>In terms of habitats, the site contains Woodpasture and Parkland BAP Priority Habitat. A number of mature trees are protected by a blanket Tree Protection Order (TPO). These trees form part of, and are protected by, Fairford's Conservation Area. The trees, and other vegetation present are likely to provide valuable habitats for species, providing wildlife corridors, and aiding connectivity.<br>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, **Figure A.1**. | |
| Climate Change | Development of the site will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, although these are unlikely to be significant.<br>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of fluvial flooding.<br>Groundwater flooding is a key issue for the town. However, the Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"data suggests that [the site] satisfies requirements and the development area could be larger."* The site is therefore considered to be at low risk of groundwater flooding. | |
| Landscape and Historic Environment | This site is predominately a rural grassed field to the south of London Road. The site is adjacent to the built form north of London Road; however, it is enclosed to some extent by areas of mature trees and hedgerows to the east and south, and Cotswold stone wall to the north. There is a Public Right of Way (PRoW) along the east of the site, views from which are likely to be protected by vegetative screening. The site joins the grounds of Morgan Hall to the west; however, it is noted that there is dense vegetation lining the site at this location, which may reduce potential adverse effects.<br>The site is located within Fairford Conservation Area and adjoins the grounds of Grade II listed Morgan Hall (discussed above) to the west. The site also contains part of the historic ha-ha which was part of Morgan Hall. Development therefore has potential to impact on the setting of Morgan Hall and of the Conservation Area. However, it is noted that the site is well screened by vegetation and mature trees, limiting adverse effects on setting and character.<br>It is noted that access is a constraint for this site (particularly on to the A417). Creating a new access point or widening the existing one would likely require demolition of part of a Cotswold stone wall which is located within the Conservation Area. This may lead to adverse effects. Ultimately, the nature and significance of effects are dependent on the design and layout of development.<br>The historical sites located within the neighbourhood area can be seen within Appendix A, **Figure A.2.** | |
| Land, Soil and Water Resources | The site is located within best and most versatile agricultural land (Grades 1 – 3a). Development at the site would therefore result in the loss of this high-quality soil resource.<br>The site is not located in a Groundwater Source Protection Zone. | |

| SA theme | Commentary, Site 7: Jones' Field (SHELAA Ref F_15) | |
|---|---|---|
| Population and Community | The site is being promoted for 20 lifetime home houses, public realm improvements, and a social hub pavilion. This will contribute positively towards specialist housing needs of the area. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area , residential development would nonetheless contribute positively towards the growth and vitality of the town. Particularly, Lifetime homes offer a level of flexibility that can contribute positively to the creation of stable and popular neighbourhoods and communities. The delivery of a social hub and public realm improvements would also lead to positive effects in terms of community cohesion and overall neighbourhood satisfaction.<br>The site is located adjacent to existing residential development along London Road, and is therefore expected to positively integrate with the local community. In terms of access to the town centre and its facilities, the nearest shop and local employment site is over 800m; however, Fairford GP Surgery is approximately 350m from the site to the west. Access to these services would involve crossing the A417. Local knowledge suggests that access onto the A417 is not straightforward, with restricted visibility likely to cause safety concerns.<br>The site has good access to public transport links; in addition to the PRoW extending along the eastern boundary, the site is within 400m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.<br>Given the community infrastructure provision to be delivered alongside development, positive effects are predicted. | |
| Health and Wellbeing | The site has good access to local health services, being within 350m from the nearest GP surgery (Fairford Surgery). The site is also well located in relation to health facilities located at Fairford Hospital in the centre of the town. It is however noted that access is limited to some extent by the A417 (visibility concerns).<br>The site has good access to open space, being adjacent Fairford Football Club on Cinder Lane. It is however noted that the football pitches are not public access. Additionally, it is recognised that the site itself is promoted for public realm improvements and a social hub pavilion. This will lead to positive effects in terms of health and wellbeing through providing opportunity for sport and recreation, promoting community cohesion, and delivering a high-quality living environment.<br>The site has good access to public transport links; in addition to the adjacent PRoW the site is within 400m of a bus stop. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford. | |
| Economy and Employment | The site is not well connected to the existing employment offer of the town, being located over 800m from the nearest employment site. Given the recent business closures in the town and the site's location adjacent to the A417, it is considered that residents are more likely to commute for employment in Swindon and Oxford. Additionally, given local opinion indicates the capacity of services in Fairford falls short of surrounding towns, it is uncertain whether new residents would utilise the service offer of Fairford or travel elsewhere for day-to-day needs. As such the residual effect of new housing development on the local economy is uncertain at this stage. | |
| Transportation | The site has good access to public transport links; there is a PRoW along the eastern boundary of the site and the site is within 400m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.<br>Private car use is therefore anticipated to remain high in the neighbourhood area , and development may exacerbate localised traffic/ congestion, notably along the A417. However, given the capacity of the site this is not anticipated to be significant. | |

| Key | | | |
|---|---|---|---|
| Likely adverse effect (without mitigation measures) | | Likely positive effect | |
| Neutral/no effect | | Uncertain effects | |

## Table 4.4 Site 8: Land east of Beaumoor Place (SHELAA Ref F_38)

| SA theme | Commentary, Site 8: Land east of Beaumoor Place (SHELAA Ref F_38) | |
|---|---|---|
| Biodiversity | There are no significant biodiversity constraints present on the site.<br>In terms of European designated sites, North Meadow & Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area . New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.<br>In terms of nationally designated biodiversity sites, the site is located approximately 450m west of the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07th January 2021), and within a SSSI Impact Risk Zone (IRZ) for Cotswold Water Park SSSI for 50 residential units. The site has a capacity of 10 dwellings and therefore does not reach the IRZ threshold. Development is therefore not anticipated to lead to significant adverse effects. Development at this site could lead to increased sewage pollution issues in/from the Coln downstream of the Sewage Treatment Works, unless the appropriate uprating is provided for on a timely basis. This may affect the Cotswold Water Park (via overflow or groundwater feed from river) and Whelford Meadow SSSIs. However given the low capacity of the site (10 dwellings) any adverse effects in this respect are unlikely to be significant.<br>The site is not located within close proximity to any locally designated biodiversity sites.<br>In terms of habitats, the site is bordered on the south and east by thick hedgerows and trees, which provide a natural habitat for nesting birds, insects, rabbits and other wildlife. These biodiversity features may also provide connectivity with the wider area.<br>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, **Figure A.1**. | |
| Climate Change | Development of the site will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, although these are unlikely to be significant.<br>In relation to adapting to the effects of climate change, the site is located partially within Flood Zone 2 (south of site). There are also small areas of low risk of surface water flooding within the site.<br>Groundwater flooding is a key issue for the town and the site. Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that the site is close to a "monitoring well at Riverdale which showed a risk of groundwater flooding in T200 conditions" and that ground water levels show a rising trend. The site is therefore considered to at risk of groundwater flooding. | |
| Landscape and Historic Environment | The site is in a rural grassed field, relatively enclosed by a Cotswold stone wall to the south, hedgerows to the east, hedgerows backing onto three bungalows on the South and Beaumoor retirement home to the west. Development would likely impact views from the bungalows on the south side of the site and Beaumoor Place retirement homes adjacent to the west side of the site, as well as from the PRoW through the north of the site. It is noted that there is a level of screening provided by vegetation, which would likely reduce potential adverse effects to some extent.<br><br>The site is located within Fairford Conservation Area. The Grade II listed Moor Farmhouse is 100m south of the site and the Grade II listed Morgan Hall is 120m north of the site. Development of the site may impact upon the integrity of the Conservation Area, and the overall setting of these heritage assets. However, screening provided by vegetation could limit adverse effects, in addition to the proposed demolition of the bungalow on site to create vehicular access. The inspector at the previous Regulation 14 consultation on the FNP concluded that the bungalow's demolition *"has the clear potential to enhance the character and appearance of the Conservation Area".* Furthermore, a Heritage Feasibility Study has been carried out for the site (2020) which concludes that the site makes very small contribution to the character and appearance of the Conservation Area. Residual effects in this respect are uncertain at this stage, and will depend on the design and layout of proposed development.<br>The historical sites located within the neighbourhood area can be seen within Appendix A, **Figure A.2.** | |
| Land, Soil and Water Resources | The site is located within best and most versatile agricultural land (Grades 1 – 3a). Development at the site would therefore result in the loss of this high-quality soil resource.<br>The site is not located in a Groundwater Source Protection Zone. | |

| SA theme | Commentary, Site 8: Land east of Beaumoor Place (SHELAA Ref F_38) | |
|---|---|---|
| Population and Community | The site is being promoted for 10 new homes including 5 retirement homes and space for surgery parking. This will lead to positive effects, contributing positively towards specialist housing needs of the area. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area, residential development would nonetheless contribute positively towards the growth and vitality of the town. Particularly, retirement homes offer a level of flexibility that can contribute positively to the creation of stable and popular neighbourhoods and communities. The delivery of surgery parking will likely lead to positive effects in terms of addressing infrastructure capacity needs; supporting accessible communities and increasing overall neighbourhood satisfaction.<br>The site is located adjacent to existing residential development along Beaumoor Road, and is well connected in terms of access to the GP surgery (particularly given parking provision proposed), and is therefore expected to positively integrate with the local community. However to access the town centre and its facilities, residents would need to cross the A417. Local knowledge suggests that access onto the A417 is not straightforward, with restricted visibility likely to cause safety concerns. Furthermore the nearest local employment site is over 800m.<br>The site has good access to public transport links; in addition to the PRoW which runs through the north of site providing community value (recreation/dog walking), the site is within 800m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.<br>Given the community infrastructure provision to be delivered alongside development, positive effects are predicted. | |
| Health and Wellbeing | The site is being promoted for ten new homes including five retirement homes and space for surgery parking. This will lead to positive effects, delivering viable and feasible solution to the long-term parking needs of the health facility, while also providing excellent access for new residents to the adjacent surgery.<br>The site has good access to local health services, being in close proximity to, and providing parking which could increase access to, Fairford Surgery. The site is also well located in relation to health facilities located at Fairford Hospital in the centre of the town. It is however noted that access is limited to some extent by the A417 (visibility concerns).<br>The site has good access to open space, being within 400m of Fairford Bowling Club at East End and 800m from Fairford Football Club on Cinder Lane. It is however noted that the football pitches are not public access.<br>The site has good access to public transport links; in addition to the adjacent PRoW the site is within 400m of a bus stop. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford. | |
| Economy and Employment | The site is not well connected to the existing employment offer of the town, being located over 800m from the nearest employment site. Given the recent business closures in the town and the site's location adjacent to the A417, it is considered that residents are more likely to commute for employment in Swindon and Oxford. Additionally, given local opinion indicates the capacity of services in Fairford falls short of surrounding towns, it is uncertain whether new residents would utilise the service offer of Fairford or travel elsewhere for day-to-day needs. As such the residual effect of new housing development on the local economy is uncertain at this stage. | |
| Transportation | The site has good access to public transport links; there is a PRoW along the eastern boundary of the site and the site is within 800m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.<br>Private car use is therefore anticipated to remain high in the neighbourhood area, and development may exacerbate localised traffic/ congestion, notably along the A417. However, given the capacity of the site this is not anticipated to be significant. | |

| Key | | | |
|---|---|---|---|
| Likely adverse effect (without mitigation measures) | | Likely positive effect | |
| Neutral/no effect | | Uncertain effects | |

## Table 4.5 Site 10: Field south east of granted planning permission at London Road (SHELAA Ref F_39C)

| SA theme | Commentary, Site 10: Field south east of granted planning permission at London Road (SHELAA Ref F_39C) | |
|---|---|---|
| Biodiversity | There are no significant biodiversity constraints present on the site.<br>In terms of European designated sites, North Meadow & Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area. New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.<br>In terms of nationally designated biodiversity sites, the site is located approximately 70m north of the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07th January 2021) and 1.1km northwest of Whelford Meadow SSSI. The site is within a SSSI Impact Risk Zone (IRZ) for Cotswold Water Park SSSI for 10 residential units. Given the indicative capacity of the site is 31 residential units, development has the potential to adversely impact upon the SSSI. As the adjacent industrial site has historically experienced sewage capacity and water run-off issues, it is highlighted that development may impact upon the biodiversity value of the SSSI through disturbance and indirectly through pollution. There is also potential impact on SSSIs downstream (via overflow or groundwater feed from river). Additionally, pollution of the Court Brook or ditch along the A417 could affect the Lake 116 SSSI nearer Lechlade.<br>In terms of locally designated biodiversity sites, there is a Key Wildlife Site (KWS) located 60m south of the site. Development has the potential to adversely impact upon these designated sites through habitat fragmentation and/or loss, and possible pollution during construction. However, considering the existing development surrounding the site it is thought that any adverse effects would be localised, and not significant.<br>In terms of habitats, no Biodiversity Action Plan Priority Habitats are present on or adjacent to the site. The site however has a level of biodiversity value given the mature hedgerows/ trees surrounding the site, and the presence of the old railway embankment. This likely to be rich in biodiversity, including hedgerows, birds, rabbits and insects. The railway embankment and hedgerows are likely to hold ecological value through providing habitat corridors and aiding connectivity.<br>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, **Figure A.1**. | |
| Climate Change | Development of the site will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, although these are unlikely to be significant.<br>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of fluvial flooding. There are however small areas of low risk of surface water flooding within the site.<br>Groundwater flooding is a key issue for the town. The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"part of the site is likely not to have sufficient freeboard"*[97]. Part of the site is therefore at high risk of groundwater flooding. It is considered that development could avoid the high flood risk area, resulting in residual neutral effects. | |
| Landscape and Historic Environment | Currently, the site is in agricultural use (fallow field formally used for crop production), and is located adjacent to the settlement boundary, to the south east of the town.<br>Development of the site may lead to adverse effects on landscape due to visual impact and impact on setting, particularly from surrounding residential dwellings to the north and west on Cinder Lane and London Road. However, the site is adjacent to an industrial area to the east with no views in or out. The site is well screened by dense hedgerows along the north, east and southern boundaries. Any adverse effects on the landscape are therefore likely to be minor, given the openness of the wider landscape has already been compromised by the industrial estate and adjacent housing development. Ultimately, the nature and significance of effects are dependent on the design and layout of development.<br>The site is not located, within, or within close proximity to, any designated or non-designated heritage assets. | |

[97] Freeboard is the distance from the water level to the ground level. Negative freeboard indicates water level above ground level.

| SA theme | Commentary, Site 10: Field south east of granted planning permission at London Road (SHELAA Ref F_39C) | |
|---|---|---|
| Land, Soil and Water Resources | The site is located within best and most versatile agricultural land (Grades 1 - 3a). Development at the site would therefore result in the loss of this high-quality soil resource.<br>The site is not located in a Groundwater Source Protection Zone. | |
| Population and Community | The site has capacity for 31 dwellings or B-Class employment use. Developing the site for residential use will contribute positively towards the local housing needs of the area. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area, residential development at the site would nonetheless contribute positively towards the growth and vitality of the town.<br>However, it is noted that allocating the site for housing would likely lead to negative effects in terms of the local economy, as the potential to deliver local employment at this site would be lost. The site is however well located in terms of local employment, being adjacent to the London Road employment site. However, it is noted that suitable access to the employment site cannot be assumed. Without this, access would be via the incomplete footpath along the A417; which is recognised by local residents as 'hazardous', being a fast trunk road with no footpaths outside of town.<br>If the site were to be delivered for employment uses then there is also the potential for a positive effect through improved access to employment opportunities for residents.<br>The site is located on the edge of the settlement, and is not considered to be well connected to the town or local community. Additionally, the site is over 800m from the local shop and GP surgery.<br>It is assumed that any proposal for development at this site could contribute to the improvement of existing or provision of new services/ facilities. At this stage the level of improvements or provision that could be delivered is not known.<br>The site has good access to public transport links; there is a Public Right of Way (PRoW) just south of the site, it is within 400m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north east of the site. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.<br>While development of the site for housing would result in the loss of a potential employment site, residual positive effects are anticipated given 32 new homes in the town will contribute positively towards meeting local needs. | |
| Health and Wellbeing | The site has limited access to local health services, being over 800m from the nearest GP surgery (Fairford Surgery). The site however is with 1km of Fairford Hospital located in the centre of the town.<br>The site has good access to open space, being within 800m of Fairford Football and Social Club, and the small playground on the Keble Fields estate. Fairford Bowling Club is also nearby, although access would be via the A417. Additionally, just south of the site is a PRoW which will provide access to the surrounding countryside. This will provide residents with opportunities for sport and recreation, leading to positive effects in terms of overall health and wellbeing.<br>The site has good access to public transport links; in addition to the nearby PRoW the site is within 400m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north east of the site. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford.<br>While positive effects are anticipated in relation to the above, it is noted that the site is located adjacent to the London Road industrial estate, which currently includes two timber merchants (Timber Paul Engineering and Howarth Timber Engineered Solutions Ltd), a plumber's merchant (Fairford Plumbase) and electronics manufacturer (New Chapel Electronics). It is considered that residents' health may be adversely affected by noise and dust disturbance, and/or air quality pollution. Residual uncertain effects are therefore anticipated in relation to this SA theme. | |

| SA theme | Commentary, Site 10: Field south east of granted planning permission at London Road (SHELAA Ref F_39C) | |
|---|---|---|
| Economy and Employment | The site is well connected to the existing employment offer of the town, being located adjacent to the London Road employment site. However, it is noted that suitable access to the employment site cannot be assumed from this site if housing to be delivered. Without this, access would be via the incomplete footpath along the A417; which is recognised by local residents as 'hazardous'.<br>It is noted that the site is suitable for the delivery of residential (32 dwellings) or B-class employment. Therefore, allocating the site for housing would likely lead to negative effects in terms of the local economy, as it would lead to the loss or partial loss of a potentially suitable employment site within the neighbourhood area. However, if the site were to deliver new employment then there is the potential for a long term positive effects against this theme. As a result, the residual effect at this stage is uncertain. | |
| Transportation | The site has good access to public transport links; there is a PRoW just south of the site, the site is within 400m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north east of the site. However, bus services are infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.<br>Private car use is anticipated to remain high in the neighbourhood area, and development may exacerbate localised traffic/congestion, notably along the A417. However, given the capacity of the site this is not anticipated to be significant.<br>If the site were to deliver housing then access would be through the existing industrial estate and this could result in potential issues, as the entrance is currently locked off at weekends. However, it is assumed that this issue could be resolved at the planning application stage. | |

| Key | | | |
|---|---|---|---|
| Likely adverse effect (without mitigation measures) | | Likely positive effect | |
| Neutral/no effect | | Uncertain effects | |

## Table 4.6 Site 11: Land west of Terminus Cottage and Station (SHELAA Ref F_52)

| SA theme | Commentary, Site 11: Land west of Terminus Cottage and Station (SHELAA Ref F_52) | |
|---|---|---|
| Biodiversity | There are no significant biodiversity constraints present on the site.<br>In terms of European designated sites, North Meadow & Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area. New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.<br>In terms of nationally designated biodiversity sites, the site is located approximately 200m north of the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07th January 2021), and 1.2km northwest of Whelford Meadow SSSI. The site is predominately within a SSSI Impact Risk Zone (IRZ) for 50 residential units, with a small area to the south of the site within an IRZ for 10 units. Given the indicative capacity of the site is 34 residential units, overall, development is not likely to lead to significant adverse impacts on the SSSI. However, as the adjacent industrial site has historically experienced sewage capacity and water run-off issues, it is highlighted that development may impact upon the SSSI downstream (via overflow or groundwater feed from river).<br>In terms of locally designated biodiversity sites, there is a Key Wildlife Site (KWS) located 200m south of the site. Development has the potential to adversely impact upon this designated site through habitat fragmentation and /or loss, and possible pollution during construction. However, considering the existing development surrounding the site it is thought that any adverse effects would be localised, and not significant.<br>In terms of habitats, no Biodiversity Action Plan Priority Habitats are present on or adjacent to the site. The site however has a level of biodiversity value given the rough pasture present on the site itself, and trees and hedgerows extending along the field boundaries particularly to the north, east, and west. These biodiversity features are likely to hold ecological value through providing habitat corridors and aiding connectivity.<br>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, **Figure A.1**. | |
| Climate Change | Development of the site will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, although these are unlikely to be significant.<br>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of fluvial flooding. There is, however, an area of medium surface water flood risk to the north of the site.<br>Groundwater flooding is a key issue for the town. The Groundwater Monitoring and Review of Flood Risk at Fairford (WRA, 2018) concludes that *"part of the site is likely not to have sufficient freeboard."*[98] Part of the site is therefore at high risk of groundwater flooding. It is considered that development could avoid the high flood risk area, resulting in residual neutral effects. | |
| Landscape and Historic Environment | This site is currently in use as a horse paddock with some rough pasture and several outbuildings. The site is located adjacent to the settlement boundary, to the south east of the town. The site is neighboured by an employment estate to the south, new housing to the west and open countryside to the north and south-west. The site is well screened by vegetation with no views in or out; and it is considered that new development would be in keeping with the built form to the south and west. However, the site currently acts as a green buffer between the A417 and the new housing, and is valued by local residents for its contribution to the character of the town, acting as a highly utilised green space Development of the site would likely lead to the loss of this buffer, resulting in adverse effects on the local landscape and setting. Ultimately, the nature and significance of effects are dependent on the design and layout of development.<br>The site is not located in, or within close proximity to, any designated or non-designated heritage assets. | |
| Land, Soil and Water Resources | The site is located within best and most versatile agricultural land (Grades 1 – 3a). Development at the site would therefore result in the loss of this high-quality soil resource.<br>The site is not located in a Groundwater Source Protection Zone. | |

[98] Freeboard is the distance from the water level to the ground level. Negative freeboard indicates water level above ground level.

| SA theme | Commentary, Site 11: Land west of Terminus Cottage and Station (SHELAA Ref F_52) | |
|---|---|---|
| Population and Community | With a proposed capacity of 34 dwellings, development of the site will contribute positively towards the local housing needs of the area. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area, residential development would nonetheless contribute positively towards the growth and vitality of the town.<br>The site is located on the edge of the settlement and is distant from the town centre and facilities. Additionally, the site is over 800m from the local shop and GP surgery. The site is recognised as having limited access on to the A417, with restricted visibility likely to cause safety concerns.<br>It is assumed that any proposal for development at this site could contribute to the improvement of existing or provision of new services/ facilities. At this stage the level of improvements or provision that could be delivered is not known.<br>The site is well located in terms of local employment, being adjacent to the London Road employment site. This will provide residents with access to local employment opportunities and may improve levels of self-containment in the town.<br>The site has good access to public transport links; there are Public Rights of Way (PRoW) 200m south and 400m west of the site, it is within 800m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north of the site. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford. | |
| Health and Wellbeing | The site has limited access to local health services, being over 800m from the nearest GP surgery (Fairford Surgery). The site however is with 1km of Fairford Hospital located in the centre of the town. It is however noted that access is limited to some extent by the A417 (visibility concerns).<br>The site has good access to open space, being within 800m of Fairford Football and Social Club. Additionally, there are PRoW 200m south and 400m west of the site, providing access to the surrounding countryside. This will provide residents with opportunities for sport and recreation, leading to positive effects in terms of overall health and wellbeing.<br>It is however noted that access to the facilities mentioned above would likely be via the incomplete footpath along the A417, unless Site 10 was also developed. Local knowledge suggests this footpath is 'hazardous', and therefore may preclude safe access to the town centre. This is uncertain at this stage.<br>The site has good access to public transport links; there are PRoW 200m south and 400m west of the site, the site is within 800m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north of the site. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford.<br>While positive effects are anticipated in relation to the above, it is noted that the site is located adjacent to the London Road industrial estate, which currently includes two timber merchants (Timber Paul Engineering and Howarth Timber Engineered Solutions Ltd), a plumber's merchant (Fairford Plumbase) and electronics manufacturer (New Chapel Electronics). It is considered that residents' health may be adversely affected by noise and dust disturbance, and/or air quality pollution.<br>Residual uncertain effects are therefore anticipated in relation to this SA theme given the uncertain access from the site, and the potential for noise and dust disturbance. | |
| Economy and Employment | The site is well connected to the existing employment offer of the town, being located adjacent to the London Road employment site. This may provide employment opportunities for new residents. However, it is noted that suitable access to the employment site cannot be assumed. Without this, access would be via the incomplete footpath along the A417; which is recognised by local residents as 'hazardous'. Nonetheless, levels of levels of self-containment in the town are likely to be encouraged.<br>Given the recent business closures in the town and the site's location close on the settlement edge, residents may out commute for employment to Swindon and Oxford. Additionally, given local opinion indicates the capacity of services in Fairford falls short of surrounding towns, it is uncertain whether new residents would utilise the service offer of Fairford or travel elsewhere for day-to-day needs. Nonetheless, given the sites location adjacent to London Road employment site, residual minor positive effects are predicted. | |

| SA theme | Commentary, Site 11: Land west of Terminus Cottage and Station (SHELAA Ref F_52) | |
|---|---|---|
| Transportation | The site has good access to public transport links; there are PRoW 200m south and 400m west of the site, the site is within 800m of a bus stop, and a branch of the Cotswold District Council Cycle Route 4 runs to the north of the site. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.<br>As discussed above, access to facilities in the town centre would likely be via the incomplete footpath, which is identified by local residents as 'hazardous'. This however is uncertain at this stage.<br>Private car use is therefore anticipated to remain high in the neighbourhood area , and development may exacerbate localised traffic/ congestion, notably along the A417. However given the capacity of the site, this is not anticipated to be significant. | |

| Key | | | |
|---|---|---|---|
| Likely adverse effect (without mitigation measures) | | Likely positive effect | |
| Neutral/no effect | | Uncertain effects | |

## Table 4.7 Site 12: Yells Yard

| SA theme | Commentary, Site 12: Yells Yard | |
|---|---|---|
| Biodiversity | There are no significant biodiversity constraints present on the site.<br>In terms of European designated sites, North Meadow & Clattinger Farm Special Area of Conservation (SAC) is located approx.. 5.5km to the south-west of the neighbourhood area . New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given the level of growth proposed at the site, and that an existing appropriate management plan exists, residual effects are not likely to be significant.<br>In terms of nationally designated biodiversity sites, the site is located approximately 200m north east of the Cotswold Water Park Site of Special Scientific Interest (SSSI) (extension notified 07th January 2021), and within a SSSI Impact Risk Zone (IRZ) for ten residential units. Given the site is being promoted for ten residential units, development has the potential to adversely impact upon the SSSI through disturbance and indirectly through pollution. In terms of locally designated biodiversity sites, there is a Key Wildlife Site (KWS) located 200m from site, which coincides with the recently notified SSSI extension. Development has the potential to adversely impact upon this designated site as identified above.<br>In terms of habitats, no Biodiversity Action Plan Priority Habitats are present on or adjacent to the site. There are mature hedgerows along the southwest boundary of the southeast field, which may hold ecological value through providing habitat corridors and aiding connectivity. However it is noted that these are identified as 'gappy' and mostly dominated by hawthorn.<br>Biodiversity constraints in and around the neighbourhood area can be seen within Appendix A, **Figure A.1**. | |
| Climate Change | Development of the site will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, although these are unlikely to be significant.<br>In relation to adapting to the effects of climate change, the site is located within Flood Zone 1, which is of low risk of fluvial flooding.<br>Groundwater flooding is a key issue for the town. Within the Groundwater<br>Monitoring and Review of Flood Risk at Fairford (2018), Yells Yard falls partially with area $01. The Report concludes that "*area $01 is partially susceptible to groundwater flooding (i.e. freeboard to a 200 year high groundwater level less than 1.0m).*" The northern section covering Yells Yard is not susceptible. The nearby borehole indicates a freeboard of 1.2m for a 200 year high which is acceptable for development. The site is therefore not considered to be at high risk of groundwater flooding. | |

| SA theme | Commentary, Site 12: Yells Yard | |
|---|---|---|
| Landscape and Historic Environment | The site lies on the south-western edge of Fairford along Cirencester Road, mostly surrounded by housing and commercial buildings, with small grassland fields to the southwest and southeast.<br>The site includes a yard, part of a residential property and garden, and grassland field to the southeast with few notable features. While the site is well contained there is relatively open countryside to the south. Site boundary features screen the site to some extent from neighbouring properties along Cirencester Road and the rear of properties along Horcott Road; however, visibility remains with the potential for adverse effects on long and short distance views. The open countryside to the south is locally distinctive and valued; notably given the footpath crossing the southern extent of the paddock extending into the countryside south of the site. The landscape assessment carried out for the site (2020) concludes that *"the change of view from the PRoW to be most important, with sensitivity of receptors considered high due to the nature of their activity, their attention being focussed on the landscape and their susceptibility to changes in the view."*<br>Furthermore, the assessment states that development proposals would *"introduce built form to an undeveloped portion of the site which is outside of the development boundary and would alter views of the conservation area to the north west. The duration of this effect would be permanent and generally irreversible."*<br>Overall the landscape assessment concludes that, *"having a high sensitivity to visual change combined with a medium magnitude of change is likely to result in a moderate adverse significance of effect ('degree of significance' if using the parlance of the submitted LVIA). This means the change in view has the potential to be a significant change."*<br>In terms of heritage assets, some of the Buildings in Yells Yard are considered 'curtilage listed' with Ivy Villa and hence treated as Designated Heritage Assets as part of Ivy Villa. Additionally the front portion of the site is within the Fairford Conservation Area. These Buildings, together with the Old Piggery Buildings, are identified as Non-Designated Local Heritage Assets, holding great significance locally in recent years as they mark an increasingly fragile boundary between 'old and new', and 'town and countryside'.<br>The Heritage Assessment carried out alongside the planning application for the site (2020) states proposed that development *"by virtue of the erosion of the rural, edge-of-settlement character of the site, would neither preserve nor enhance the character and appearance of the Fairford Conservation Area, nor sustain its significance as a designated heritage asset. The harm would be less-than-substantial albeit considerable, but not be outweighed by any resultant public benefits."*<br>The paddock to the rear of Yells Yard forms part of the green corridor referred to as the 'Horcott Gap' which lies within the setting of the Fairford Conservation Area. The Heritage Assessment further states, in regards to the application for 18 new dwellings, that "*the encroachment of residential development into this important, green space, would harm aspects of the setting of the Fairford Conservation Area that contribute positively to its significance as a designated heritage asset. The harm would be less-than-substantial albeit considerable, but not be outweighed by any resultant public benefits."*<br>It is therefore concluded that there would be some impact to the setting of the listed and curtilage buildings in Yells Yard and the character and appearance of Fairford Conservation Area. There is also high potential for archaeological deposits at the site.<br>The historical sites located within the neighbourhood area can be seen within Appendix A, **Figure A.2**. | |
| Land, Soil and Water Resources | The site is located on Grade 3 agricultural land. Given recent land classification has not taken place at this location, it is not possible to establish whether this land is Grade 3a land (which is land classified as the Best and Most Versatile Agricultural Land) or Grade 3b land (which is land not classified as such). If found to be Grade 3a, development would result in the loss of the area's high-quality soil resource. | |

| SA theme | Commentary, Site 12: Yells Yard | |
|---|---|---|
| Population and Community | With a proposed capacity of 25 dwellings, development of the site will contribute positively towards the local housing needs of the area. While it is noted that CDC has not set a level of housing 'need' to be met in the neighbourhood area, residential development would nonetheless contribute positively towards the growth and vitality of the town.<br>The site is located adjacent to existing residential development within Fairford and is therefore expected to positively integrate with the local community. However, the site lies on the south-western edge of Fairford along Cirencester Road with only reasonable access to the town's services and facilities, being approximately 600m from the town centre and shops, and over 800m from a GP surgery. The site is however within 400m of local employment at Horcott Industrial Estate.<br>It is assumed that any proposal for development at this site could contribute to the improvement of existing or provision of new services/ facilities. At this stage the level of improvements or provision that could be delivered is not known.<br>The site has reasonable access to public transport links; being within 400m of a bus stop and there is a PRoW within the undeveloped south of the site. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford. | |
| Health and Wellbeing | The site has limited access to local health services, being over 800m from the nearest GP surgery (Fairford Surgery). The site however has suitable access to health facilities located at Fairford Hospital in the centre of the town.<br>The site has good access to open space, being within 400m of Coln House playing field. Additionally, there is PRoW present within the undeveloped south of the site which will provide access to the surrounding countryside. This will provide residents with opportunities for sport and recreation, leading to positive effects in terms of overall health and wellbeing.<br>The site has good access to public transport links; in addition to the adjacent PRoW the site is within 400m of a bus stop. The nearest railway station however is at Kemble, located approximately 17km to the east of Fairford. | |
| Economy and Employment | The site is well connected to the existing employment offer of the town, being located within 400m of Horcott Industrial Estate. This may provide employment opportunities for new residents. However, given the recent business closures in the town and the site's location close on the settlement edge, residents may out commute for employment to Swindon and Oxford. Additionally, given local opinion indicates the capacity of services in Fairford falls short of surrounding towns, it is uncertain whether new residents would utilise the service offer of Fairford or travel elsewhere for day-to-day needs. Nonetheless, given the sites location in close proximity to Horcott Industrial Estate, residual minor positive effects are predicted. | |
| Transportation | There are concerns regarding the suitability of providing access to the site. A new vehicular access into the site would be required off the Cirencester Road requiring the removal of an existing wall. The site has reasonable access to public transport links; there is a PRoW present within the undeveloped south of the site, and the site is within 400m of a bus stop. Bus services are however infrequent and finish early in the day, reducing potential usability for commuters. The nearest railway station is Kemble, which is approximately 17km to the east of Fairford.<br>Private car use is therefore anticipated to remain high in the neighbourhood area, and development may exacerbate localised traffic/ congestion, notably along the A417. However, given the capacity of the site this is not anticipated to be significant. | |

| Key | | | |
|---|---|---|---|
| Likely adverse effect (without mitigation measures) | | Likely positive effect | |
| Neutral/no effect | | Uncertain effects | |

# Appendix C Reasonable alternatives appraisal

This appendix presents the detailed findings of the appraisal of alternative spatial strategy options within Fairford, as established within Section 4.37 of this SA Report. These are set out below:

| Site | Option A | Option B | Option C | Option D | Option E |
|---|---|---|---|---|---|
| Site 5: Land north of Crabtree Park & Land off Leafield Road (SHELAA Ref F_51B & F_51C) | 80 | | | | |
| Site 7: Jones' Field (SHELAA Ref F_15) | | 52 | 52 | 52 | |
| Site 8: Land east of Beaumoor Place (SHELAA Ref F_38) | | | | 12 | 12 |
| Site 10: F_39C Field south east of granted planning permission at London Road | | 31 | | | 31 |
| Site 11: Land west of Terminus Cottage and Station (F_52) | | | 34 | | 34 |
| Site 12: Yells Yard | | | | 10 | 10 |
| **TOTAL** | **80** | **83** | **86** | **74** | **87** |

The locations of these spatial options are presented in **Figure 4.2** of this SA Report.

## Methodology

For each of the options, the appraisal examines likely significant effects on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). Considering this, there is a need to make considerable assumptions regarding how options will be implemented 'on the ground' and what the effect on certain receptors would be. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SA perspective with 1 performing the best.

Finally, it is important to note that effects are predicted considering the criteria presented within Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects.

## Appraisal findings

**Table AB.1** overleaf presents the findings for the SA of the spatial options.

The summary findings of this detailed appraisal are presented in **Section 4.38** of the main report.

| Biodiversity | | | | | |
|---|---|---|---|---|---|
| **Options** | **A (New Site 5)** | **B (Sites 7 & 10)** | **C (Sites 7 & 11)** | **D (Sites 7, 8 & 12)** | **E (Sites 7, 8, 11, & 12)** |
| **Rank** | **2** | **4** | **1** | **3** | **4** |
| **Significant effect?** | **Uncertain** | **Uncertain** | **Uncertain** | **Uncertain** | **Uncertain** |
| **Discussion** | In terms of European designated sites, North Meadow & Clattinger Farm Special Area of Conservation (SAC) is located approx. 5.5km to the south-west of the neighbourhood area. New development in the Plan area has the potential to adversely impact upon the SAC through recreational pressure and changes to water quantity, level and flow in the site. Given all options are anticipated to deliver a similar level of growth, at a similar distance from the SAC, effects are considered to be broadly consistent under all options.<br><br>All options are constrained to some extent by nationally designated biodiversity sites, specifically the recently notified Cotswold Water Park Site of Special Scientific Interest (SSSI) extension. However only New Site 5 (Option A), Site 10 (Option B) and Site 12 (Option D and E) fall within Impact Risk Zones (IRZ) and propose a level of growth likely to have impacts on the SSSI according to NE. Notably, significant development at Option A could lead to increased sewage pollution issues in/ from the Coln downstream of the Sewage Treatment Works, and improved sewage provision on a timely basis would be a pre-requisite for development at this site. This may affect the Cotswold Water Park SSSI (via overflow or groundwater feed from river). Sewage capacity and water run-off issues are also a constraint for Site 7 (Option B-E), Site 8 (Option D & E), and Site 11 (Option C & E), with development possibly impacting upon SSSIs downstream.<br><br>Site 10 (Option B) and Site 11 (Option C & E) are constrained by a Key Wildlife Site (KWS) located 60m and 200m south of the sites, respectively. While there is the potential for adverse effects, considering the existing development surrounding the KWS, any adverse effects would likely be localised, and not significant. Site 7 (Options B-E) notably contains Woodpasture and Parkland BAP Priority Habitat, and a number of mature trees are protected by a blanket Tree Protection Order (TPO).<br><br>Features such as hedgerows, trees, and rough pasture are present at site 5 (Option A), Site 8 (Option D & E), Site 10 (Option B) and Site 11 (Option C & E) which may hold ecological value, providing habitat corridors and aiding connectivity.<br><br>It is noted that proposals for New Site 5 (Option A) indicate that the hedgerow present is to be retained. Proposals for new Site 5 (Option A) also include the future provision of a link road to improve access between the schools and the A417 to the east of the town. Given any further details of the link road (i.e. exact location) are unknown at this stage, potential effects on biodiversity are uncertain, although it is assumed that the location of the link road and impacts on biodiversity will be considered through a planning application for the site. Furthermore, given the distance to designated sites and the absence of BAP priority habitat/ species in and around Site 5 (Option A) significant adverse effects are not anticipated. Additionally, a level of net-gain in biodiversity is being explored. However, this is uncertain at this stage, and it is recognised that development at all options have the potential to deliver biodiversity net-gain, albeit opportunities may be greater at New Site 5 (Option A) given the scale of development proposed.<br><br>Overall, it is considered that all options have the potential to lead to negative impact on biodiversity assets if development is located inappropriately with poor design and layout. However, it is likely that development schemes would be landscape led, comprising green infrastructure where possible; with the potential for positive effects through enhancing the local biodiversity resource and supporting wider connectivity. In terms of ranking the options, Option C is best performing as it does not fall within | | | | |

| | |
|---|---|
| | a SSSI IRZ, and Site 7 does not hold any notable ecological value. Although it is noted that there is potential for Option C to impact upon SSSIs downstream, and that Option C is also constrained by priority habitat and a KWS in the town.<br><br>Option B and E are worst performing of the options given both options include sites that are constrained by nationally and locally designated sites, include priority habitat and ecological features on site. Options A and D are ranked more positively than Options B and E given they are less constrained overall. Option A performs more positively than Option D as development is proposed at one single site, and therefore has the greatest potential for biodiversity improvements/enhancement/ connectivity on site. However a level of uncertainty remains, as it is considered that the potential effects on biodiversity will depend on elements such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features. |

| Climate change | | | | | |
|---|---|---|---|---|---|
| **Options** | **A (New Site 5)** | **B (Sites 7 & 10)** | **C (Sites 7 & 11)** | **D (Sites 7, 8 & 12)** | **E (Sites 7, 8, 11, & 12)** |
| **Rank** | **1** | **2** | **2** | **3** | **3** |
| **Significant effect?** | **Yes - Positive** | **No** | **No** | **Yes - Negative** | **Yes - Negative** |
| **Discussion** | Development under all options will lead to increases in greenhouse gas emissions from an increase in the built footprint of the town, however New Site 5 (Option A) seeks to utilise opportunities associated with increased scale, and a 'low or no carbon development' is proposed.<br><br>In terms of access to services/ facilities/ employment in the town, all sites are equally constrained, being located either on the edge of the town/ built up area, or presented with difficulty crossing the A417 (with restricted visibility likely to cause safety concerns). It is therefore difficult to make any meaningful conclusions in terms of where options may help to reduce contributions from per capita emissions, with the exception of Option A given proposals for New Site 5 include the delivery of a link road. While further details of the link road are unknown at this stage, it is considered that helping to reduce road congestion at this location will likely lead to positive effects in terms of climate change mitigation; in turn reducing the level of greenhouse gas emissions. It is also noted that Site 7 (Options B-E) and Site 8 (Options D & E) have been promoted for the delivery of community benefits, which will improve accessibility for residents and may reduce travel.<br><br>In relation to adapting to the effects of climate change, Site 8 (Options D & E) is worst performing as it is located partially within Flood Zone 2 (south of site). There are also small areas of low risk of surface water flooding within the site. All other sites are located within Flood Zone 1, which is of low risk of flooding.<br><br>Site 5 (Option A), Site 8 (Option C, D and E), Site 10 (Option B) and Site 11 (Option C & E) include areas of high risk of groundwater flooding; however, the Groundwater Monitoring and Review of Flood Risk at Fairford (2018) concludes that development could avoid the high flood risk areas. Nonetheless, Option D performs most positively in this respect, given most of its component sites are not constrained by groundwater flooding.<br><br>Overall, it is considered that Option A performs most positively through the delivery of low carbon development and a link road. Options B and C also positively as they are not constrained by fluvial flood risk and are include sites being promoted for community benefits. Option D and Option E are worst performing given the presence of Site 8 which falls partially within Flood Zone 2. | | | | |

| Landscape & historic environment | | | | | |
|---|---|---|---|---|---|
| **Options** | **A (New Site 5)** | **B (Sites 7 & 10)** | **C (Sites 7 & 11)** | **D (Sites 7, 8 & 12)** | **E (Sites 7, 8, 11, & 12)** |
| **Rank** | **1** | **2** | **3** | **4** | **5** |
| **Significant effect?** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** |
| **Discussion** | All options perform negatively against the SA theme as all have the potential to adversely impact upon Fairford's rural, characteristic landscape. Site 11 (Option C & E) and Site 12 (Option D & E) are likely to lead to negative effects of greatest significance given the sites' potential to impact upon open landscape, local views and the rural setting of the town. Site 11 (Option C & E) currently acts as a green buffer between the A417 and the new housing, and is valued by local residents for its contribution to the character of the town. Development of the site would likely lead to the loss of this buffer, which could result in adverse effects on the local landscape and setting; depending on design and layout of development. There is open countryside to the south of Site 12 (Option D & E) which is locally distinctive and valued, particularly given the footpath present. Development would introduce built form to an undeveloped portion of the site which is outside of the development boundary and would likely alter views of the conservation area to the north west. The Landscape Assessment has been carried out for Site 12 which concludes *"landscape having a high sensitivity to visual change combined with a medium magnitude of change is likely to result in a moderate adverse significance of effect ('degree of significance' if using the parlance of the submitted LVIA). This means the change in view has the potential to be a significant change."* There is also high potential for archaeological deposits at Site 12.<br><br>Views also have the potential to be impacted by extending built form into the open countryside on one large, singe site under Option A (Site 5). This may impact upon the setting of the Special Landscape Area (SLA) to the northwest. Additionally, the link road proposed through Site 5 (Option A) has the potential to impact upon locally distinctive views, although the potential significance of effects cannot yet be determined as the location of the link road is currently unknown. It is considered that all options have the potential to utilise existing screening provided by hedgerows, woodland, and other vegetation present at the sites to reduce adverse effects on the landscape. Additionally schemes may seek to incorporate appropriate measures, including tree planting, to mitigate the visual effects of the development on the wider countryside.<br><br>Site 7 (Options B-E), Site 10 (Option B) and Site 12 (Option D & E) also have the potential to lead to negative effects due to impact on the SLA and/ or designated heritage assets (notably Fairford Conservation Area and Grade II Listed buildings). Site 5 (Option A) is adjacent to Fairford Conservation Area to the south-west. Site 7 (Options B-E) is located within Fairford Conservation Area, adjoins the grounds of Grade II listed Morgan Hall to the west, and also contains part of the historic ha-ha which was part of Morgan Hall; with potential for adverse effects. Site 10 (Option B) currently provides a visual, rural and green space corridor for the SLA. The Heritage Assessment carried out for Site 12 (Option D & E) concludes that development would lead to some impact to the setting of listed and curtilage buildings in Yells Yard and the character and appearance of Fairford Conservation Area. Specifically, *"the harm would be less-than-substantial albeit considerable, but not be outweighed by any resultant public benefits."* | | | | |

| | |
|---|---|
| | Uncertain effects are predicted for Site 8 (Options D & E) and Site 10 (Option B) given the potential for development to enhance the character and appearance of sites, particularly given the landscape and heritage setting at these locations has already been compromised by employment and residential development. Site 11 (Option C & E) is not constrained by heritage assets.<br><br>Overall, Option E is worst performing given it includes the most constrained sites in relation to both heritage and landscape. This is followed by Option D, which also includes Site 12 and Site 7 which are identified as having potential to lead to adverse effects on heritage assets. Option C also performs negatively due to constraints at Site 7 and Site 11; however, effects are not likely to be as significant as those identified at Site 12 (Option D & E). Option A is best performing as it is not constrained by the setting of the Conservation Area, compared to Option B which falls within Fairford Conservation Area, and is constrained by further assets present at Site 8. It is considered that effects on the setting of the Conservation Area and SLA through development of Option A are could be mitigated, particularly given development is focussed on one larger site which has the potential for the design and layout of the scheme to be landscape led. However, it is recognised that uncertainties exist for Option A in relation to the location of the link road, and specific details relating to design and layout of the scheme. |

| Land, soil and water resources | | | | | |
|---|---|---|---|---|---|
| **Options** | **A (New Site 5)** | **B (Sites 7 & 10)** | **C (Sites 7 & 11)** | **D (Sites 7, 8 & 12)** | **E (Sites 7, 8, 11, & 12)** |
| **Rank** | **1** | **4** | **4** | **2** | **3** |
| **Significant effect?** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** | **Yes - Negative** |
| **Discussion** | Option A is the only option which does not contain best and most versatile (BMV) agricultural land (Grades 1 – 3a), with surveys indicating the site is Grade 3b. Site 7 (Option B-E) Site 8 (Option D & E), Site 10 (Option B) and Site 11 (Option C & E) are all constrained in this respect, and development has the potential to lead to the loss of this natural resource. Site 12 (Options D & E) is uncertain as it is located on Grade 3 agricultural land, which could be BMV (if found to be Grade 3a).<br><br>Option A although not constrained by BMV land, will however also lead to long term negative effects through the loss of greenfield and agricultural land. New Site 5 (Option A) is the only site located close to a Source Protection Zone (SPZ), being on the edge of SPZ II. However, it is recognised that if there were the potential for negative effects in this regard, there is mitigation available through national policy and the WCS to ensure that there are no residual significant effects.<br><br>Overall, Option A is best performing as it will not lead to the loss of high quality agricultural land, however it will result in the loss of greenfield and agricultural land and therefore also leads to negative effects in the long term. In terms of ranking the remaining options, Option D, followed by Option E are next best performing as it is currently uncertain if high quality agricultural land is present at Site 12. Options B and C are ranked equally as the worst performing options as all component sites within the options would result in the loss of BMV agricultural land. | | | | |

| Population and communities | | | | | |
|---|---|---|---|---|---|
| **Options** | **A (New Site 5)** | **B (Sites 7 & 10)** | **C (Sites 7 & 11)** | **D (Sites 7, 8 & 12)** | **E (Sites 7, 8, 11, & 12)** |
| **Rank** | **1** | **3** | **3** | **3** | **2** |
| **Significant effect?** | **Yes - Positive** | **Yes - Positive** | **Yes - Positive** | **Yes - Positive** | **Yes - Positive** |
| **Discussion** | A key consideration for this SA Theme is the delivery of new homes to meet identified housing needs within the community. As all options are proposing a similar level of growth, it is considered that all options perform equally with the potential for significant long term positive effects.<br><br>In terms of access to services/ facilities/ employment in the town, all sites are equally constrained, being located either on the edge of the town/ built up area, or presented with difficulty crossing the A417 (with restricted visibility likely to cause safety concerns). It is therefore difficult to make any meaningful conclusions in terms of where options may help to reduce contributions from per capita emissions, with the exception of Option A which as discussed above will deliver a link road with the potential for long term positive effects. Site 7 (Options B-E) and Site 8 (Options D & E) are also notably promoted for the delivery of community benefits, which will improve accessibility for residents and may also reduce travel.<br><br>Delivering growth on one single site (Option A) also notably presents an opportunity for coordinated, landscape led development which can include infrastructure delivery, and support connectivity, delivering net gains in green infrastructure through new development and public realm enhancements. This will likely support social inclusion and integrated communities.<br><br>Overall, Option A is best performing given the opportunities presented by delivering growth at scale on one single site, including the delivery of a link road; followed by Option E given it includes two sites likely to include additional community benefits to support the town. Given Options B-D will deliver a similar level of growth on sites reasonably located to the town centre, options are ranked equally. | | | | |

| Health and wellbeing | | | | | |
|---|---|---|---|---|---|
| **Options** | **A (New Site 5)** | **B (Sites 7 & 10)** | **C (Sites 7 & 11)** | **D (Sites 7, 8 & 12)** | **E (Sites 7, 8, 11, & 12)** |
| **Rank** | **1** | **3** | **3** | **2** | **3** |
| **Significant effect?** | **Yes - Positive** | **No** | **No** | **No** | **No** |
| **Discussion** | All sites, with the exception of Site 10 (Option B) and Site 11 (Option C & E) have good access to open space and recreation. Option A (New Site 5), through the delivery of growth on one single site may present opportunities for development to be landscape led, incorporating open spaces and green infrastructure to support connected, healthy communities. However, this is uncertain at this stage. Site 10 (Option B) and Site 11 (Option C & E) perform less positively being located further from open space, recreation and transport connectivity.<br><br>Uncertain effects are also predicted for Site 10 (Option B) and Site 11 (Option C & E) given the adjacent employment uses at London Road industrial estate. It is considered that residents' health may be adversely affected by noise and dust disturbance, and/or air quality pollution. The delivery of the link road under Option A (Site 5) has the potential to improve safety by reducing congestion, traffic and flow and the risk of accidents. While the details of this are not yet confirmed, it is considered that there is the potential for long-term positive effects.<br><br>Overall Option A is best performing, given the potential opportunities presented through delivering growth at scale in one location, including the proposed link road. Option D is next best performing given component sites have good access to open space and are not constrained by adjacent employment uses. Option B, C and E perform equally as all include either Site 10 or Site 11. | | | | |

| Economy and employment | | | | | |
|---|---|---|---|---|---|
| **Options** | **A (Site 5)** | **B (Sites 7 & 10)** | **C (Sites 7 & 11)** | **D (Sites 7, 8 & 12)** | **E (Sites 7, 8, 11, & 12)** |
| **Rank** | **1** | **4** | **2** | **3** | **3** |
| **Significant effect?** | **No** | **Uncertain** | **No** | **No** | **No** |
| **Discussion** | Uncertain effects are predicted against the Economy and Enterprise SA Theme for Option B as it is recognised that Site 10 was promoted for either housing or employment. For the purposes of this assessment the site is assumed to be delivering housing and therefore could result in the loss of a potentially suitable employment site within the neighbourhood area.<br><br>Site 7 (Option B-E) and Site 8 (Option D & E) are assessed as uncertain for the Economy and Employment SA Theme given they are not well located in terms of local employment sites, and there is uncertainty around the extent to which local services will be/ can be utilised. Site 5 (Option A), Site 11 (Option C & E) and Site 12 (Option D & E) perform positively against this SA Theme as they are located in close proximity to employment sites, providing access to local jobs.<br><br>Overall, Option B is the worst performing option as the development of housing at Site 10 would lead to the loss of a potential employment site for the town. Option A is best performing as focussing growth at Site 5 would provide good access to the local employment offer. Options D and E perform equally as both contain Site 7 and Site 8 which are less well connected to local employment. Option C performs reasonably, given it contains one site with good access to employment (Site 11) and one less accessible site (Site 7). | | | | |

| Transportation | | | | | |
|---|---|---|---|---|---|
| **Options** | **A (Site 5)** | **B (Sites 7 & 10)** | **C (Sites 7 & 11)** | **D (Sites 7, 8 & 12)** | **E (Sites 7, 8, 11, & 12)** |
| **Rank** | **1** | **2** | **3** | **3** | **4** |
| **Significant effect?** | **Yes - Positive** | **No** | **Uncertain** | **Uncertain** | **Uncertain** |
| **Discussion** | Sustainable transport opportunities in Fairford are limited, and therefore it is difficult to make a meaningful distinction between options based on their ability to support sustainable, and active travel use - i.e. while all sites are located in reasonable proximity to bus stops, local knowledge suggests these services are relatively unreliable, and there is not an easily accessible train station in or in close proximity to the town. All options are located within close proximity to, or contain, a Public Right of Way (PRoW):<br>• Site 12 has a PRoW within the south of the site;<br>• There is a PRoW across the eastern boundary of Site 7 and Site 8;<br>• There is a PRoW across the southern boundary of New Site 5;<br>• A PRoW is located just south of Site 10; and<br>• There is a PRoW 200m south and 400m west of Site 11.<br>However as discussed above, all options have less than satisfactory access to the town's facilities and services, and therefore high car use and local congestion is likely to continue under all options. The exception to this is Option A, as focusing all growth at New Site 5 will enable the delivery of a link road. The development of 80 homes at Site 5 seeks to alleviate pressure on the road network through the future provision of a link road, put forward alongside development, and will also provide improved accessibility for new and existing residents within the town. Further details are to be provided by the site promoter.<br>Consideration is also given to access routes for options, with Site 11 (Option C & E) and Site 12 (Option D & E) currently facing accessibility issues. Site 12 (Option D & E) would require a new vehicular access into the site off the Cirencester Road via the removal of an existing wall. At Site 11 (Option C & E), pedestrian access from the site would likely be via the incomplete footpath, which is identified by local residents as 'hazardous'.<br>Overall, Option A is best performing given the opportunity to deliver a link road through developing at scale at Site 5. Option E is worst performing given it includes both Site 11 and Site 12 which have accessibility issues. Option B performs more positively than Option C and Option D as it does not include Site 11 or Site 12. | | | | |

**Summary of appraisal**

The appraisal has explored the relative sustainability merits and constraints of delivering each of the spatial options through the FNP. The appraisal has highlighted the potential for a number of **positive effects** as a result of development at individual options, which are summarised as follows:

- **All options** will deliver housing to address local need. This includes providing access to high-quality and affordable housing, in line with the objectives of the FNP. **All options** perform equally in this respect given all will deliver a similar level of growth.
- **Option A (Site 5)** sets out provision for a future link road to be delivered as part of the development. While further details of the link road are unknown at this stage, it is considered that its delivery would likely provide improved accessibility in and around the town, and reduce potential adverse effects on the local environment.
- The potential for positive effects are also considered for Sites 7 and 8 **(Options B-E)** under the population and community SA theme, given sites have been promoted for the delivery of community benefits alongside housing growth.

The appraisal has highlighted the potential for **negative effects** as a result of development at individual options, which are summarised as follows:

- **Options D** and **E** have the potential to lead to negative effects in relation to the climate change SA theme given the presence of Site 8 which falls partially within Flood Zone 2.
- **Options B to E** will result in the permeant loss of BMV agricultural land, delivering long term negative effects against the land, soil and water resources SA theme. **Option A** although not constrained by BMV land, will also lead to long term negative effects through the loss of greenfield land.
- **All options** have the potential to lead to long term negative effects on the local townscape and setting of Fairford, and the important heritage offer (including Fairford Conservation area and Listed Buildings). Site 12 is notable in this respect, recognising that the conclusions of the sites' Heritage and Landscape Assessments anticipating a "*moderate adverse significance of effect*".

Alongside this, further option specific constraints are identified including:

- **All options** may increase recreational and disturbance pressures related to designated biodiversity sites and include ecological features on site, with Option B and Option E identified as worst performing in this respect. It is however recognised that the design and layout of development, including potential mitigation, retention, enhancement, and net-gain opportunities will determine the overall significance of effects.
- **All options** will likely lead to continued high car use, however Options B to E are less likely to encourage modal shift than Option A given the delivery of new transport infrastructure, and the opportunities presented when delivering growth at scale on a single site (i.e. delivering connected, green, active communities). This is similarly the case for the population and community SA theme.
- **Options C-E** perform less positively in relation to for transport given road access routes for Site 11 and 12 are currently undetermined.

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COTSWOLD DISTRICT COUNCIL

# Fairford
## Neighbourhood Development Plan

## Habitat Regulation Assessment

**September 2022**



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Conclusion

Annex A: HRA Report

Annex B: Cover letter

Annex C: Consultation Response

## Conclusion

1. Cotswold District Council (CDC) carried out an HRA screening on the Fairford Neighbourhood Development Plan (FNDP) in January 2021. In March 2021 Natural England (NE) advised that an Appropriate Assessment (AA) would be required.

2. Through the national Neighbourhood Planning support package managed by Locality, Fairford Town Council (FTC) commissioned AECOM Ltd to prepare an evidence report to allow CDC to carry out the AA, in accordance with the statutory requirements.

3. CDC consulted on an AA with NE at the start of 2022, but received a response that additional traffic modelling was required to provide assurance on the possible impact. Accordingly, AECOM Ltd updated their report, which was shared with CDC (Annex A), and a second iteration of the AA was consulted upon from 4 May 2022 (see Annex B).

4. Natural England responded on 6th May, advising that it concurred with the conclusions reached by CDC.

5. Following this consultation, our conclusion is that there are no likely significant effects, either alone or in combination, based on the findings of the enclosed report, prepared by AECOM through the national support package for Neighbourhood Planning. We find their assessment to be a robust and proportionate assessment on which to base our conclusion.

James Brain,

Forward Planning Manager

# Report to Inform Habitats Regulations Assessment of the Fairford Neighbourhood Plan

Fairford Town Council

Project number: 60571087

April 2022

## Quality information

| Prepared by | Checked by | Verified by | Approved by |
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## Revision History

| Revision | Revision date | Details | Authorized | Name | Position |
|---|---|---|---|---|---|
| 0 | 01/06/21 | Initial Draft | JR | James Riley | Technical Director |
| 1 | 20/08/21 | Final reviewed by group (Roz Morton) | JR | James Riley | Technical Director |
| 2 | 22/11/21 | Update following review by Cotswold District Council | JR | James Riley | Technical Director |
| 3 | 10/01/22 | Minor further presentational updates | JR | James Riley | Technical Director |
| 4 | 13/4/22 | Further updates regarding traffic and air quality in response to Natural England comments | JR | James Riley | Technical Director |

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# 1. Introduction

## Scope of project

1.1 AECOM was appointed by Fairford Town Council to undertake a Report to Inform the Habitats Regulations Assessment (HRA) of the Fairford Neighbourhood Plan (NP). This is to inform the client and Cotswold District Council (CDC) of the potential effects of NP development on European Sites and how they are being, or should be, addressed in the draft plan document. The NP is a statutory document that will be incorporated into the Local Planning Framework and is to be used by CDC to determine the outcome of planning applications. While NPs must adhere to higher-level planning policy at the level of local authorities, they are designed to enable local communities to help shape their own future development.

1.2 As 'competent authority', the legal responsibility for ensuring that a decision of 'likely significant effects' is made, for ensuring an 'appropriate assessment' (where required) is undertaken, and for ensuring Natural England are consulted, falls on the local planning authority. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.

1.3 Development in the geographic area covered by the Fairford NP is also set out in the Cotswold District Local Plan (CDLP, adopted August 2018). The CDLP covers the period between 2011 to 2031 and set an indicative number of 61 homes to be built in Fairford. The Fairford NP covers the same period and establishes its own development quantum in Policy FNP14 (A New Low Carbon Community in Fairford) of around 80 homes.

1.4 The primary aim of the Fairford NP is to develop a sustainable future for the area, which must address several issues. Fairford is a Cotswold market town in south-east Gloucestershire and borders the Cotswold Area of Outstanding National Beauty (AONB). The River Coln runs through the neighbourhood plan area on a north-south axis before meeting the R. Thames at Lechlade. The R. Thames itself flows adjacent to the North Meadow & Clattinger Farm SAC, resulting in seasonal flooding of the meadows. Fairford town comprises several retail and accommodation facilities (e.g. pubs, shops and community facilities). The vision for the Fairford NP is to provide the required level of housing need, while acknowledging its environmental impacts. The Fairford NP provides policies that cover all aspects of development, including detail on infrastructure provision and nature conservation. The NP is explicitly in adherence with the overarching CDLP and its HRA. Therefore, due regard will be given to that HRA in all relevant sections of this report.

1.5 The CDLP was subject to HRA in April 2017, which covered a wide range of impact pathways in relation to growth delivered across the authority, including effects on the water table, toxic contamination and non-physical disturbance. For example, the HRA undertook Appropriate Assessment of potential recreational pressure effects in the North Meadow & Clattinger Farm SAC, identifying that its lowland hay meadows are vulnerable to impacts from recreation. The CDLP HRA assessed a much larger quantum of housing growth (8,400 dwellings across Cotswold District) and is therefore a useful starting point for assessing the impact pathway recreational pressure in the context of the Fairford NP.

1.6 An HRA is required under the terms of the Conservation of Habitats & Species Regulations 2017 (as amended). It assesses if any NP policies or site allocations have the potential to cause Likely Significant Effects or adverse effects on the integrity of European Sites (Special Areas of Conservation, SACs; Special Protection Areas, SPAs; and Ramsar sites, designated under the Ramsar convention), either alone or 'in combination' with other plans and projects, and to determine whether policy- or site-specific mitigation measures are required.

## Legislation

1.7 The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). This established a transition period, which ended on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic law and this continues to apply in the UK.

1.8 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (as amended) and concerns the protection of European sites (Figure 1). European sites can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.

1.9 The HRA process applies the precautionary principle to protected areas. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

**Conservation of Habitats and Species Regulations 2017 (as amended)**

With specific reference to Neighbourhood Plans, Regulation 106(1) states that:

"*A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority* [the Local Planning Authority] *may reasonably require for the purpose of the assessment under regulation 105…* [which sets out the formal process for determination of 'likely significant effects' and the appropriate assessment']."

**Figure 1: The legislative basis for HRA**

1.10 It is therefore important to note that this report has two purposes:

- To assist the Qualifying Body (Fairford Town Council) in preparing their plan by recommending (where necessary) any adjustments required to protect European sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
- On behalf of the Qualifying Body, to assist the Local Planning Authority (Cotswold District Council) to discharge their duty under Regulation 105 (in their role as 'plan-making authority' within the meaning of that regulation) and Regulation 106 (in their role as 'competent authority').

1.11 Over the years, 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of "Appropriate Assessment". Throughout this Report the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

# 2. Methodology

## Introduction

2.1 Figure 2 below outlines the stages of HRA according to current Ministry of Housing, Communities and Local Government guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan until no significant adverse effects remain.

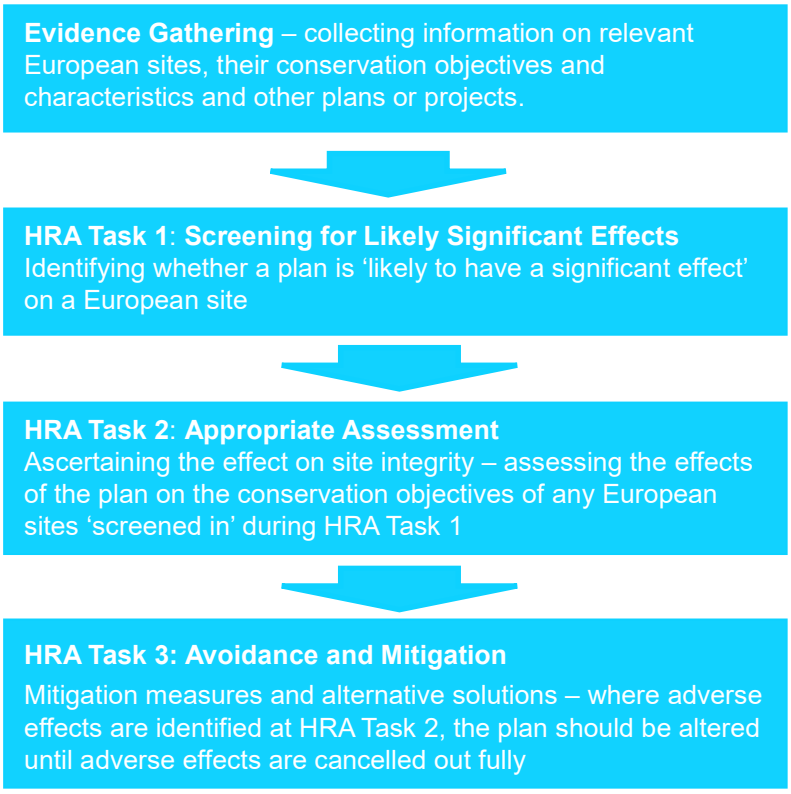


**Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source GOV.UK, 2019.**

## HRA Task 1 – Likely Significant Effects (LSE)

2.2 Following evidence gathering, the first stage of any Habitats Regulations Assessment (and thus of this Report to Inform Cotswold District Councils HRA) is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"*Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?*"

2.3 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage of the Report to Inform HRA is undertaken in Chapter 5 of this report.

## HRA Task 2 – Appropriate Assessment (AA)

2.4 Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn in the view of the report authors, the analysis in this Report to Inform HRA has proceeded to the next stage known as Appropriate Assessment. Case law has clarified that 'appropriate assessment' is

not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects.

2.5 During July 2019 the Ministry of Housing, Communities and Local Government published guidance for Appropriate assessment[1]. Paragraph: 001 Reference ID: 65-001-20190722m explains: '*Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured*'.

2.6 As this analysis follows on from the screening process, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment takes any policies or allocations that could not be dismissed following the high-level screening analysis and analyses the potential for an effect in more detail, with a view to concluding whether there would be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).

2.7 A decision by the European Court of Justice[2] concluded that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. The UK is no longer part of the European Union. However, as a precaution, it is assumed for the purposes of this HRA that EU case law regarding Habitat Regulations Assessment will still be considered informative jurisprudence by the UK courts. That ruling has therefore been considered in producing this Report to Inform HRA.

2.8 Also, in 2018 the Holohan ruling[3] was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that '*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, … typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*' [emphasis added]. However, the North Meadow & Clattinger Farm SAC is not designated for mobile species that would use functionally linked habitats beyond the designated site boundary.

# HRA Task 3 – Avoidance and Mitigation

2.9 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites subject to the agreement of Cotswold District Council as competent authority. There is considerable precedent concerning the level of detail that a Neighbourhood Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.

2.10 In evaluating significance, AECOM has relied on professional judgement and the LP HRA regarding development impacts on the European sites considered within this assessment.

2.11 When discussing 'mitigation' for a Neighbourhood Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since such planning documents are high-level policy documents. A Neighbourhood Plan is a lower level constituent of a Local Development Plan.

[1] https://www.gov.uk/guidance/appropriate-assessment#what-are-the-implications-of-the-people-over-wind-judgment-for-habitats-regulations-assessments [Accessed: 07/01/2020].
[2] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)
[3] Case C-461/17

# Confirming Other Plans and Projects That May Act 'In Combination'

2.12 It is a requirement of the Regulations that the impacts of any development plans are not only considered in isolation but in-combination with other plans and projects that may also be affecting the European site(s) in question. In combination effects have therefore been considered in this Report to Inform HRA.

2.13 For example, when considering the potential for combined regional housing development across multiple local authorities to impact on European sites, a key emphasis must be on the cumulative impact of visitor numbers (i.e. recreational pressure). While one parish might only contribute a minor portion of recreational pressure (with no or little negative impact on a European site), other adjacent parishes may also each contribute minor 'amounts' of recreation. Cumulatively, especially across multiple authorities, this could result in detectable disturbance effects on designated species.

2.14 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans (which in themselves may have minor impacts) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in-combination assessment is therefore of greatest relevance when the plan or policy would otherwise be screened out because its individual contribution is negligible.

# 3. European Sites

## North Meadow and Clattinger Farm SAC

### Introduction

3.1 The North Meadow and Clattinger Farm SAC is a 105.23ha large site that is situated in south-west England, comprising humid grassland (71%), dry grassland (15%), improved grassland (12%) and inland waterbodies (2%). The qualifying habitat is lowland hay meadows, representing one of two sites near the centre of its UK range. The site exhibits exceptional survival of traditional hay meadow management with high degree of conservation of structure and function. The SAC supports over 90% of the extant UK population of fritillary *Fritillaria meleagris*, which is a characteristic but rare species of damp lowland meadows.

3.2 Both parts of the SAC lie within the Cotswold Water Park, a manmade wetland created by the restoration of sand and gravel pits. The site sits within the floodplain of the River Thames and experiences great seasonal variation in water levels, giving rise to its characteristic flora. In recent years, both component SSSIs of the SAC have experienced prolonged flooding periods, threatening future hay meadow management. The SAC is also a National Nature Reserve that experiences high visitor levels and management is in place to protect its fritillary population.

### Qualifying Features[4]

3.3 Annex I habitats that are a primary reason for selection of this site:

- Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)

### Conservation Objectives[5]

3.4 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

3.5 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

### Threats / Pressures to Site Integrity[6]

3.6 The following threats and pressures to the integrity of the North Meadow and Clattinger Farm SAC have been identified in Natural England's Site Improvement Plan:

- Inappropriate water levels
- Habitat fragmentation
- Commons management
- Public access / disturbance
- Water pollution

[4] https://sac.jncc.gov.uk/site/UK0016372 [Accessed on the 16/04/2021]
[5] http://publications.naturalengland.org.uk/publication/6299293463871488 [Accessed on the 16/04/2021]
[6] http://publications.naturalengland.org.uk/publication/4565167836758016 [Accessed on the 16/04/2021]

3.7 Reference to the Supplementary Advice on the Conservation Objectives[7] underlines the importance of inappropriate water levels and water pollution. It states that '*For this Annex I feature, the deposition of nutrients, particularly phosphate ('P'), as sediment in floodwaters have the potential to impact the site, Further site-specific investigation on the site's nutrient budget/balance is required to establish more precise water quality standards for the SAC'* and that '*A series of summer floods at North Meadow have caused a decline in the area of MG4 grassland, which corresponds to H6510, since an extensive survey carried out in 1995 and 1996. The consequences of recent floods at North Meadow e.g. elevated phosphorous levels in the soil are still in evidence and will be exacerbated by potential further flooding in the future. Excessive and unseasonal flooding presents the most significant risk to the H6510 feature at North Meadow'*. The advice references air quality and the fact that nitrogen and ammonia are below their critical loads or levels but that the habitat is considered vulnerable to atmospheric pollution. It also underlines the importance of the precise management regime in maintaining the botanical structure and diversity of the sward stating that '*The H6510 feature is the product of longterm management of both sites as lowland hay meadows with a late summer hay cut followed by aftermath grazing. This continued management is essential to the maintenance of the qualifying feature'*.

[7] http://publications.naturalengland.org.uk/publication/6209293463074488

# 4. Impact Pathways

## Recreational Pressure

4.1 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels and impacts on European protected sites[8] [9]. This applies to any habitat, but the additional recreational pressure from housing growth on destinations designated for bird species can be especially strong and some qualifying species are known to be susceptible to disturbance. Studies across a range of species have shown that the effects from recreation can be complex. HRAs of planning documents tend to focus on recreational sources of disturbance as a result of new residents[10].

## Trampling Damage, Nutrient Enrichment and Substrate Disturbance

4.2 Most terrestrial habitats (including grassland, heathland, dune habitat and woodland) can be affected by trampling and other mechanical damage, which in turn dislodges or damages individual plants and leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with recreational activities in different habitats:

- Wilson & Seney)[11] examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.

- Cole et al[12] conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of regular disturbance cycles.

[8] Liley D, Clarke R.T., Mallord J.W., Bullock J.M. 2006a. The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.
[9] Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. 2006b. Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.
[10] The RTPI report 'Planning for an Ageing Population'(2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.
[11] Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* **14**:77-88
[12] Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* **32**: 203-214
Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* **32**: 215-224

- Cole [13] conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier tramplers caused a greater reduction in vegetation height than lighter tramplers, but there was no difference in the effect on cover.

- Cole & Spildie[14] experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.

- In heathland sites, trampling damage can affect the value of a site to wildlife. For example, heavy use of sandy tracks loosens and continuously disturbs sand particles, reducing the habitat's suitability for invertebrates[15]. Species that burrow into flat surfaces such as the centres of paths, are likely to be particularly vulnerable, as the loose sediment can no longer maintain their burrow. In some instances, nature conservation bodies and local authorities resort to hardening paths to prevent further erosion. However, this is concomitant with the loss of habitat used by wildlife, such as sand lizards and burrowing invertebrates.

4.3 Prolonged or repeated excessive trampling and erosion may, over time, lead to soil compaction, widening of paths / trails and damage to individual plants and their roots. For example, it has been demonstrated that recreational trails with high usage are subject to significantly more erosion and root exposure[16]. Soil compaction leads to a loss of space for air and water molecules, both of which are integral to plant health, due to processes such as nutrient uptake and hydration[17]. Due to their high ecological value, this can be a particular issue for lowland hay meadows and associated rare fritillaries.

4.4 A major concern for many habitats is nutrient enrichment associated with dog fouling, which has been addressed in various reviews (e.g.[18]). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more spread out distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually[19]. While there is little information on the chemical constituents of dog faeces, nitrogen is one of the main components[20]. Nutrient levels are one of the major determinants of plant community composition and the effect of dog defecation in sensitive habitats may be comparable to a high-level application of fertiliser, potentially resulting in the shift to plant communities that are more typical for improved grasslands. While it is noted that the North Meadow & Clattinger Farm SAC is a relatively nutrient-rich environment due to its seasonal flooding from the Thames, excessive additional nutrient input from dog faeces may exacerbate any effects of nutrient loading from treated sewage effluent.

[13] Cole, D.N. 1995c. Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.
[14] Cole, D.N., Spildie, D.R. 1998. Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* **53**: 61-71
[15] Taylor K., Anderson P., Liley D. & Underhill-Day J.C. 2006. Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.
[16] Leung Y.-F. & Marion J. F. (2000). Recreation impacts and management in wilderness: A state-of-knowledge review. USDA Forest Service Proceedings 5: 23-48.
[17] Natural England Site Conservation Objectives Supplementary Advice Note for the Windsor Forest & Great Park SAC. Available at: http://publications.naturalengland.org.uk/publication/5175000009015296 [Accessed on the 14/10/2019].
[18] Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. 2005. Dogs, access and nature conservation. English Nature Research Report, Peterborough.
[19] Barnard A. 2003. Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. Countryside Recreation 11:16-19.
[20] Taylor K., Anderson P., Liley D. & Underhill-Day J.C. 2006. Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

## Typical Mitigation Measures

4.5 Mitigation measures to avoid recreational pressure effects usually involve a combination of access management, habitat management and provision of alternative recreational space. Access management (restricting access to some or all of a European site) is not typically within the remit of Town and Parish Councils and restriction of access may contravene a range of Government policies on access to open space and objectives for increasing exercise, improving health etc. However, active management of access may be possible, such as that practised on nature reserves. Habitat management also does not lie within the direct remit of Town and Parish Councils. However, the Councils can help to set a framework for improved habitat management by promoting collaboration with neighbouring Parishes and Local Planning Authorities. For example, provision of alternative recreational space can help to attract recreational users away from sensitive European Sites and reduce recreational pressure effects. However, the location and type of alternative space must be carefully tailored to site users for this to be effective.

## Summary

4.6 Overall, the following European Site within 10km of Fairford neighbourhood plan area is sensitive to recreational pressure as a result of NP development (the site in bold is taken forward into the following chapters):

- **North Meadow & Clattinger Farm SAC (located approx. 5.5km to the south-west of Fairford Neighbourhood Plan area)**

# Water Quality

4.7 The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.
- Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing bioavailable nitrogen.
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

4.8 The most significant issue in relation to the Fairford NP is the discharge of treated sewage effluent, which is likely to increase nutrient concentrations in local watercourses such as the River Thames. Phosphate is the main limiting nutrient in freshwater ecosystems and is likely to cause eutrophication if it increases significantly. The North Meadow & Clattinger Farm SAC is designated for lowland hay meadows and while this habitat depends on nutrient input from seasonal flooding events, a significant increase in the nutrient loading of the R. Thames may lead to changes in the plant community composition of the SAC. The Site Improvement Plan (SIP) for the SAC[21] highlights water pollution as a threat to the site. For example, it states that increased nutrient levels could lead to soil enrichment, with potential negative impacts on the species richness of the meadows.

4.9 The NP assessed in this Report to Inform HRA provides for development in the geographic area covered by Thames Water, responsible for the public water supply and wastewater treatment

[21] Available at: http://publications.naturalengland.org.uk/publication/6283453993582592 [Accessed on the 26/03/2021]

within this part of Cotswolds District. The potential implications of this development are outlined in Table 1.

**Table 1: Wastewater Treatment Works (WwTWs) serving development allocated in Fairford with potential hydrological continuity with the North Meadow & Clattinger Farm SAC.**

| WwTW Catchment | Residential development quantum allocated in the Fairford Neighbourhood Plan | HRA implications |
|---|---|---|
| Fairford WwTW (operated by Thames Water and located in the adjoining Kempsford parish) | Up to 80 dwellings | Discharge of treated sewage effluent into local watercourses, such as the River Thames. This is hydrologically connected to the North Meadow & Clattinger Farm SAC and could lead to water quality changes during the wet season. |

4.10 Overall, the following European Site within 10km of Fairford neighbourhood plan area s sensitive to changes in water quality as a result of NP development (the site in bold is taken forward into the following chapters):

- **North Meadow & Clattinger Farm SAC (located approx. 5.5km to the south-west of Fairford Neighbourhood Plan Area)**

# Water Quantity, Level and Flow

4.11 The water level, its flow rates and the mixing conditions are important determinants of the condition of European Sites and their qualifying features. Hydrological processes are critical in influencing habitat characteristics in freshwater habitats, including supplied water volume, water level, water temperature and dissolved oxygen concentrations. In turn these parameters determine the short- and long-term viability of plant and animal species, as well as overall ecosystem composition.

4.12 A highly cited review paper summarises the ecological effects of reduced flow in rivers. Droughts (ranging in their magnitude from flow reduction to a complete loss of surface water) have both direct and indirect effects on river communities and connected habitats. For example, a marked direct effect is the loss of water and habitat for aquatic species. Indirect effects include a deterioration in water quality, changes to nutrient concentrations and alterations in community composition.

4.13 There are two mechanisms through which urban development might negatively affect the water level in water-dependent SACs:

- The supply of new housing with potable water may require an increase in the abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this is likely to reduce the water level in SACs sharing the same catchment.
- The expansion of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. Often this pluvial flooding results in excessive downstream inundation of watercourses and the potential flooding of wetland habitats.

4.14 The North Meadow & Clattinger Farm SAC is designated for lowland hay meadows, which are sensitive to changes in water level. The primary mechanism by which the Fairford NP could affect this would be via a change in the volume of freshwater supplied by the River Thames – most likely a reduction in freshwater input due to water abstraction for the water supply of new residential development. For example, Natural England's Site Improvement highlights inappropriate water levels as the primary pressure / threat to the integrity of the SAC, leading to potential changes in the community composition of the sward.

4.15 Generally, waterbodies within and downstream of urban areas are likely to have only limited capacity to take up some of the surface- water runoff from pavement and buildings. If this capacity is exceeded and there is excessive freshwater input from impermeable surfaces, this may result in exacerbated flooding of designated sites in hydrological connectivity with affected surface waterbodies. The SIP establishes that more frequent and prolonged flooding events are causing changes to the vegetation communities in the SAC. However, in the case of the Fairford NP, direct water surface runoff is unlikely to be an issue, given that the North Meadow & Clattinger Farm SAC lies at a distance of approx. 5.5km from the neighbourhood plan area.

4.16 The following European Site within 10km of Fairford neighbourhood plan area is sensitive to changes in the water quantity, level and flow as a result of NP development (the site in bold is taken forward into the following chapters):

- **North Meadow & Clattinger Farm SAC (located approx. 5.5km to the south-west of Fairford Neighbourhood Plan Area)**

# Atmospheric Pollution (through Nitrogen Deposition)

4.17 The main pollutants of concern for European sites are oxides of nitrogen (NOx), ammonia ($NH_3$) and sulphur dioxide ($SO_2$) and are summarised in Table 2. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges[22]. NOx can also be toxic at very high concentrations (far above the annual average critical level). However, in particular, high levels of NOx and $NH_3$ are likely to increase the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere is widely known to enhance soil fertility and to lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats[23] [24].

**Table 2: Main sources and effects of air pollutants on habitats and species**[25]

| Pollutant | Source | Effects on habitats and species |
|---|---|---|
| Sulphur Dioxide ($SO_2$) | The main sources of $SO_2$ are electricity generation, and industrial and domestic fuel combustion. However, total $SO_2$ emissions in the UK have decreased substantially since the 1980's.<br><br>Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of $SO_2$ have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to $SO_2$ emissions in the UK. | Wet and dry deposition of $SO_2$ acidifies soils and freshwater and may alter the composition of plant and animal communities.<br><br>The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species.<br><br>However, $SO_2$ background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London. |
| Acid deposition | Leads to acidification of soils and freshwater via atmospheric deposition of $SO_2$, NOx, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.<br><br>Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will | Gaseous precursors (e.g. $SO_2$) can cause direct damage to sensitive vegetation, such as lichen, upon deposition.<br><br>Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, |

[22] http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm, accessed 01/04/2020.
[23] Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. **2006.** Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. Lichenologist 38: 161-176
[24] Dijk, N. **2011.** Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation Global Change Biology 17: 3589-3607
[25] Information summarised from the Air Pollution Information System (http://www.apis.ac.uk/)

| Pollutant | Source | Effects on habitats and species |
|---|---|---|
| | continue to decline, increased N emissions may cancel out any gains produced by reduced S levels. | reduced decomposition rates, and compromised reproduction in birds / plants.<br><br>Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible. |
| Ammonia ($NH_3$) | Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock.<br><br>Ammonia reacts with acid pollutants such as the products of $SO_2$ and $NO_X$ emissions to produce fine ammonium ($NH_4$+) - containing aerosol. Due to its significantly longer lifetime, $NH_4$+ may be transferred much longer distances (and can therefore be a significant trans-boundary issue).<br><br>While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type. | The negative effect of $NH_4$+ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation.<br><br>Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen.<br><br>As emissions mostly occur at ground level in the rural environment and $NH_3$ is rapidly deposited, some of the most acute problems of $NH_3$ deposition are for small relict nature reserves located in intensive agricultural landscapes. |
| Nitrogen oxides ($NO_x$) | Nitrogen oxides are mostly produced in combustion processes. Half of $NO_X$ emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes.<br><br>In contrast to the steep decline in Sulphur dioxide emissions, nitrogen oxides are falling slowly due to control strategies being offset by increasing numbers of vehicles. | Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NOx for all vegetation types has been set to 30 ug/m3.<br><br>Deposition of nitrogen compounds (nitrates ($NO_3$), nitrogen dioxide ($NO_2$) and nitric acid ($HNO_3$)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification.<br><br>In addition, $NO_x$ contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species. |
| Nitrogen deposition | The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. $NO_X$) or reduced (e.g. $NH_3$) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices.<br><br>The N pollutants together are a large contributor to acidification (see above). | All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally.<br><br>Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species.<br><br>N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost. |
| Ozone ($O_3$) | A secondary pollutant generated by photochemical reactions involving NOx, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above).<br><br>Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when | Concentrations of $O_3$ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings.<br><br>High $O_3$ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production |

| Pollutant | Source | Effects on habitats and species |
|---|---|---|
| | ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone. | and altered species composition in semi-natural plant communities. |

4.18 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping[26]. Ammonia emissions originate from agricultural practices[27], with some chemical processes also making notable contributions. As such, it is unlikely that material increases in $SO_2$ or $NH_3$ emissions will be associated with the Fairford NP.

4.19 NOx emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion to its overall NOx footprint (92%) through the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison[28]. Emissions of NOx could therefore be reasonably expected to increase because of a higher number of vehicles due to implementation of the Fairford NP.

4.20 According to the World Health Organisation, the critical NOx concentration (critical threshold) for the protection of vegetation is 30 $\mu gm^{-3}$; the threshold for sulphur dioxide is 20 $\mu gm^{-3}$. In addition, ecological studies have determined 'critical loads'[29] of atmospheric nitrogen deposition (that is, NOx combined with ammonia $NH_3$).

4.21 The Department of Transport's Transport Analysis Guidance stipulates that, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant[30] (Figure 3). This is therefore the distance that has been used throughout this Report to Inform HRA in order to determine whether the North Meadow & Clattinger Farm SAC is likely to be significantly affected by development outlined in the Fairford NP.

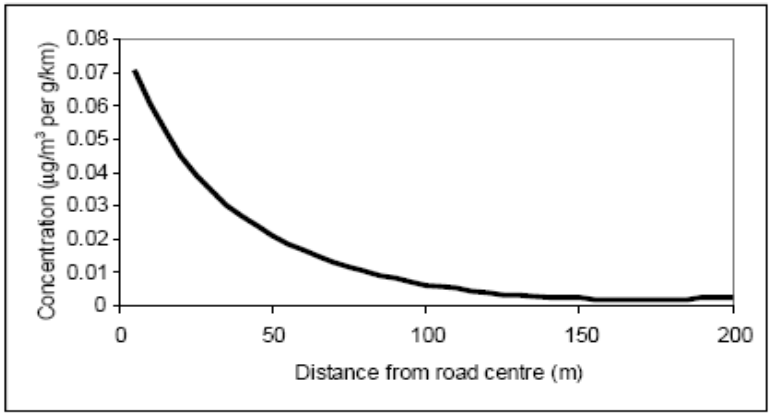


**Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT[31])**

4.22 Exhaust emissions from vehicles are capable of adversely affecting most plants and their community composition. Considering this, an increase in the net local population associated with the Fairford NP could result in increased traffic alongside the North Meadow & Clattinger Farm SAC, if likely to be affected by commuter journeys from / to the Fairford NP area.

4.23 Air quality and European sites is an 'in combination' issue and therefore traffic growth across the whole of Cotswold District must be considered in context. Overall, the following European Site

[26] http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.
[27] Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. 1998. A new inventory for ammonia emissions from U.K. agriculture. Atmospheric Environment 32: 309-313
[28] Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. http://www.airquality.co.uk/archive/index.php
[29] The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.
[30] http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013 [Accessed on the 01/04/2020]
[31] http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf [Accessed on the 01/04/2020]

lies within 10km (the average commuting distance of a UK resident) of Fairford NP area and is sensitive to atmospheric pollution (the site in bold is taken forward into the following chapters):

- **North Meadow & Clattinger Farm SAC (located approx. 5.5km to the south-west of Fairford Neighbourhood Plan area)**

# 5. Test of Likely Significant Effects

## Introduction

5.1 The initial scoping of impact pathways and the relevant European Site identified that the following require consideration:

**Recreational Pressure**

- North Meadow & Clattinger Farm SAC

**Water Quality**

- North Meadow & Clattinger Farm SAC

**Water Level**

- North Meadow & Clattinger Farm SAC

**Atmospheric Pollution**

- North Meadow & Clattinger Farm SAC

5.2 The policies contained within the Fairford NP are screened for their Likely Significant Effects (LSEs) on European Sites in Appendix A. Figure 4 below shows Fairford NP area in relation to the North Meadow & Clattinger Farm SAC, the only European Site within 10km of the Neighbourhood Plan area.

**Figure 4: The Fairford NP area in relation to the North Meadow & Clattinger Farm SAC, the only European Site within 10km of the Neighbourhood Plan Area. The residential community allocated in the NP is also displayed.**

# Recreational Pressure

5.3 The overall amount of residential growth to be delivered in Fairford equates to 80 dwellings. The following policies in the NP have the potential to result LSEs regarding the impact pathway recreational pressure:

- **Policy FNP7 – Improving Access to Visitor Attractions** (improves pedestrian and cycle access to key visitor attractions, such as Cotswold Water Park and the Thames Path; these measures may also lead to an increase in the volume of visitors to the North Meadow & Clattinger Farm SAC)
- **Policy FNP14 – A new Low Carbon Community in Fairford** (provides for 80 dwellings in Fairford)
- **Policy FNP18 – New Visitor Accommodation** (supports potential new visitor accommodation in Fairford)

## North Meadow & Clattinger Farm SAC

5.4 The residential development outlined in the Fairford NP allocates up to 80 dwellings, which will result in a net increase of recreational visits to nearby outdoor areas, including both recreational greenspaces and designated sites. The distances that local residents travel to undertake recreational activities are likely to vary greatly and depend on the type of activity undertaken. For example, dog walkers often tend to undertake frequent and short walks near their home, whereas people on family outings or wildlife watchers are likely to travel further and spend more time at their destinations. This is partly because the desired features of interest (e.g. specific sceneries or wildlife attractions) are limited to relatively few locations.

5.5 The primary method to assess the 'draw' of a European Site is to establish its core recreational catchment, which is based on the 75$^{th}$ percentile of the distances travelled by visitors using postcode data. While the catchment of most inland European Sites equates to roughly 5km, many sites with particular attractions may have much larger Zones of Influence (ZoIs). Sometimes ZoIs may change seasonally, for example due to the annual flowering of plants. Fairford lies approx. 5.5km from the North Meadow & Clattinger Farm SAC and thus towards the outer edge of typical ZoIs for inland sites.

5.6 The SAC is designated for lowland hay meadows (including the rare fritillaries), which are sensitive to trampling damage resulting from recreational activities, particularly where visitors venture off waymarked paths. Furthermore, during the wet season the ground is sensitive to soil compaction, potentially changing the soil conditions for vulnerable seedlings. Nutrient enrichment arising from dog fouling may influence sward composition by favouring more competitive grass species, potentially resulting in a decline in species diversity. Natural England's SIP mentions recreational pressure as a threat / pressure to the SAC, stating that current visitor levels are exceeding site capacity.

5.7 Overall, due to the sensitivity of the North Meadow & Clattinger Farm SAC to recreational pressure, Likely Significant Effects cannot be excluded in the opinion of the report authors, and the site is screened in for Appropriate Assessment.

# Water Quality

## North Meadow & Clattinger Farm SAC

5.8 The overall amount of residential growth to be delivered in Fairford equates to 80 dwellings. The following policies in the NP have the potential to result LSEs regarding the impact pathway water quality:

- **Policy FNP14 – A new Low Carbon Community in Fairford** (provides for 80 dwellings in Fairford)

- **Policy FNP18 – New Visitor Accommodation** (supports potential new visitor accommodation in Fairford)

5.9 The North Meadow & Clattinger Farm SAC is designated for lowland hay meadows, which typically lie on river and tributary floodplains. These meadows rely on seasonal flooding for the input of nutrients and are therefore sensitive to negative changes in water quality. NE's Site Improvement Plan highlights water pollution as a threat to the SAC, primarily as a result of flood water carrying diffuse pollutants onto the water meadows and potentially causing nutrient enrichment and a decline in species diversity. While WwTWs are not specifically mentioned as a concern, treated sewage effluent may significantly contribute to the overall nutrient loading in the SAC.

5.10 A review of mapping on MAGIC indicates that Fairford WwTW (located in the adjoining Kempsford parish) will process the sewage produced by the 80 dwellings allocated in Fairford. This WwTW discharges into a drain that joins the River Coln. The R. Coln is a tributary to the R. Thames, with the confluence at Inglesham, approx. 17.2km downstream from the North Meadow & Clattinger Farm SAC. Therefore, while the R. Thames seasonally floods the SAC, there is no connecting pathway between treated sewage effluent (and nutrients) from Fairford and the qualifying lowland hay meadows. Overall, this impact pathway is screened out from Appropriate Assessment.

# Water Quantity, Level and Flow

## North Meadow & Clattinger Farm SAC

5.11 The overall amount of residential growth to be delivered in Fairford equates to 80 dwellings. The following policies in the NP have the potential to result LSEs regarding the impact pathway water quality:

- **Policy FNP14 – A new Low Carbon Community in Fairford** (provides for 80 dwellings in Fairford)
- **Policy FNP18 – New Visitor Accommodation** (supports potential new visitor accommodation in Fairford)

5.12 The North Meadow & Clattinger Farm SAC is designated for lowland hay meadows, which depend on adequate water levels for the seasonal replenishment of nutrients. NE's Site Improvement Plan indicates that inappropriate water levels are the primary pressure / threat to the SAC. In recent years, more frequent flooding has led to changes in the botanical composition of the site and its boundaries. A Water Level Management Plan is needed to reduce impacts of increased flooding events.

5.13 Excessive changes in the water level of European Sites are most likely to be caused by increased abstraction rates for the potable water supply (potentially leading to a general reduction in water level / volume) and surface water run-off from impermeable surfaces (potentially leading to increased flooding and water levels). Due to the relatively long distance between Fairford Neighbourhood Plan Area and the North Meadow & Clattinger Farm SAC (approx. 5.5km), it is unlikely that increased surface runoff from developed brownfield sites would directly impact the volume of freshwater supplied to the site. Additionally, any flood water is most likely expected to contribute to the R. Thames downstream from the SAC and would thus not be affecting its water level.

5.14 However, while not specifically mentioned in the SIP, increased abstraction (particularly from streams or rivers) to supply water to new households in Fairford could lead to reduced freshwater input to the SAC, with potential concomitant decreases in nutrient concentrations. Due to the relatively small quantum of residential growth allocated in Fairford, this impact pathway is considered to be most relevant 'in-combination' with growth delivered across Cotswold District. Overall, Likely Significant Effects of the Fairford NP on the North Meadow & Clattinger Farm SAC regarding the impact pathway water quantity, level and flow, cannot be excluded in the opinion of the report authors. Therefore, the site is screened in for Appropriate Assessment.

# Atmospheric Pollution

5.15 The overall amount of residential growth to be delivered in Fairford equates to 80 dwellings. The following policies in the NP have the potential to result LSEs regarding the impact pathway water quality:

- **Policy FNP14 – A new Low Carbon Community in Fairford** (provides for 80 dwellings in Fairford)
- **Policy FNP18 – New Visitor Accommodation** (supports potential new visitor accommodation in Fairford)

5.16 The Fairford NP is a development plan that must be in compliance with the overarching Cotswold District Local Plan, adopted in August 2018. While the overall quantum of residential development allocated in Fairford is relatively small (a maximum of 80 dwellings), atmospheric pollution is an impact pathway where 'in combination' assessment is required.

## North Meadow & Clattinger Farm SAC

5.17 The North Meadow & Clattinger Farm SAC is designated for lowland hay meadows, which comprise grass swards of high biodiversity, including its population of rare fritillaries. The Air Pollution Information System (APIS) identifies this habitat feature as being sensitive to atmospheric nitrogen deposition with a nitrogen Critical Load of 20-30 kg N/ha/yr. A significant increase in nitrogen deposition may induce a fertilisation effect, resulting in an increase of tall grasses and a decrease of species diversity.

5.18 In 2018 Natural England published its guidance to local authorities on considering traffic related air quality impacts in HRA[32]. Having established that a sensitive site lies within 200m of a relevant road, that guidance then recommends mathematical screening criteria are applied to determine whether a likely significant effect will arise either from a plan/project alone, or from a plan/project in combination with other plans and projects. These criteria can be based on traffic flows (whether or not the plan/project will result in an increase of 1000 AADT on the road either alone or in combination with other plans and projects) or on the forecast change in pollution (whether or not the plan/project will result in an increase in pollution equivalent to 1% of the critical level or load at the SAC either alone or in combination with other plans and projects).

5.19 Expected traffic generation on the A419 within 200m of the SAC as a result of the allocation of 80 dwellings at Fairford has been modelled by the AECOM traffic team. Informed by 2011 Census data (WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)), the traffic associated with the proposed development has been distributed onto the surrounding local highway network. The majority of residents living in Fairford (MSOA Cotswold 009) commute within the Cotswolds, or to Swindon, West Oxfordshire and Wiltshire. Drivers will travel north of the SAC to reach the Cotswolds and West Oxfordshire whilst drivers travelling to Swindon and Wiltshire are likely to route through Meysey Hampton and Marston Meysey before joining the A419 south of the SAC.

5.20 Based on the likely origins / destinations mentioned above, it has therefore been modelled that the development of 80 dwellings at Fairford would result in 3-4 two-way AADT past the SAC (i.e. one to two vehicles making return journeys) and this is considered a precautionary estimate. Manual traffic count data accessed from The Department for Transport Road Traffic Statistics for 2019 identifies that the annual average daily two-way flow on the A419 400m south of the SAC (manual count point 27119, the nearest count location) is 42,566 AADT. A change in AADT of 3-4 AADT is therefore a change of 0.009% and well within the daily variation in traffic flows already seen on this stretch of highway. Clearly, the predicted flows due to the Neighbourhood Plan allocation will have a negligible effect on the SAC by themselves, but in accordance with Natural England guidance need discussing 'in combination' with other plans and projects. 'In combination' effects on the relevant section of the A419 were modelled in 2021 for the A417 Missing Link Development Consent Order[33]. Paragraphs 185 to 194 and Tables E-1 and F-1 of the associated Habitats Regulations Assessment Screening Report discuss the results. Table E-1 shows that

[32] http://publications.naturalengland.org.uk/publication/4720542048845824
[33] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010056/TR010056-000618-6.5%20Environmental%20Statement%20-%20Habitats%20Regulations%20Assessment%20Screening%20Report.pdf

the change in flows on the A419 within 200m of the SAC due to the Missing Link scheme alone would be 2,259 AADT by 2026. Therefore, there will be in an 'in combination' increase in traffic flows exceeding 1,000 AADT by 2031.

5.21 The report goes on to model the air quality implications of the forecast increase in traffic. The data in Table F-1 show that nitrogen deposition throughout the 200m modelled transect at the closest point of the road to the SAC (receptor locations EN1 to EN21) is below the minimum part of the critical load range (20 kgN/ha/yr) ranging from 19.1 kgN/ha/yr (at location EN21) to 19.5 kgN/ha/yr (at EN1, the closest part of the SAC to the road) and is forecast to remain below the critical load even when 'in combination' traffic growth is taken into consideration[34]. Comparison between Do Something and Baseline scenarios in Table F-1 also shows that the total 'in combination' *effect* from all forecast traffic growth to 2026 and the Missing Link scheme at the closest part of the SAC to the road is 0.1 kgN/ha/yr which equates to 0.5% of the lowest part of the critical load range (well below the 1% of the critical load threshold for dismissing pollution as mathematically imperceptible according to Natural England guidance). This is notwithstanding the fact that the contribution of the Missing Link scheme alone to traffic flows on the A419 will be a maximum of 2,259 AADT according to Table E-1 of the Missing Link HRA, far more than the 3-4 AADT that will be contributed through the allocation of 80 dwellings in the Fairford Neighbourhood Plan.

5.22 Ammonia and NOx concentrations in atmosphere were not specifically modelled for the Missing Link DCO but APIS indicates that concentrations throughout the SAC are below the critical levels of 3 $\mu gm^{-3}$ for ammonia and 3 $\mu gm^{-3}$ for NOx, being reported as a maximum 2.78 $\mu gm^{-3}$ for ammonia and 21.6 $\mu gm^{-3}$ for NOx.

5.23 Since traffic growth of several thousand AADT's has been calculated not to result in a nitrogen dose exceeding 1% of the critical load at the closest part of the SAC to the A419, the contribution of a further 3-4 AADT due to Fairford Neighbourhood Plan would be imperceptible in modelling results. This is particularly true since case law has also been clear that a plan or project can make a contribution to flows that is nonetheless too small to be of significance even in combination with other projects and plans:

- Advocate-General Sharpston's Opinion in European Court of Justice Case C-258/11 in Paragraph 48 specified that '*the requirement for an effect to be 'significant' exists in order to lay down a de minimis threshold. Plans and projects that have no appreciable effect on the site can therefore be excluded. If all plans and projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.*'

- In Wealden v SSCLG [2017] EWHC 351 (Admin) (2017), Mr. Justice Jay accepted that if the contribution of an individual plan or project to traffic growth or resulting air quality effects was 'very small indeed' (quoting a notional 20 AADT), it could be legitimately and legally excluded from 'in combination' assessment. This view is in agreement with that of Advocate-General Sharpston.

5.24 Therefore, Likely Significant Effects of the Fairford NP on the North Meadows & Clattinger Farm SAC 'in-combination' can be excluded in the opinion of the report authors. The site is screened out from Appropriate Assessment in relation to this impact pathway.

[34] The baseline nitrogen deposition rates reported in the Missing Link HRA are lower than the maximum rates reported for the SAC on APIS. However, the data reported on APIS are based on the 5km grid square within which the SAC is situated and therefore do not account for variation in deposition rates across the SAC area.

# 6. Appropriate Assessment

## Introduction

6.1 The law does not prescribe how an Appropriate Assessment (AA) should be undertaken or presented but the AA must consider all impact pathways that have been screened in, whether they are due to policies alone or to impact pathways that arise in-combination with other projects and plans. That analysis is the purpose of this section. The law does not require the 'alone' and 'in combination' effects to be examined separately provided all effects are discussed. This section of the Report to Inform HRA is intended to provide the necessary technical analysis to enable the competent authority (Cotswold District Council) to reach a conclusion regarding adverse effects of the NP on the integrity of internationally important wildlife sites, in accordance with Regulation 105 and 106 of the Conservation of Habitats and Species Regulations 2017 (as amended).

6.2 The Fairford NP allocates up to 80 dwellings and this extent of growth is not considered large enough to have the potential for adverse effects on site integrity alone. However, LSEs must also be discussed in-combination, taking account of the growth in parishes adjoining Fairford. The Cotswold District Local Plan (CDLP) provides for 8,400 new dwellings in the period up to 2031. Therefore, the CDLP provides an appropriate starting point to assess in-combination effects of the Fairford NP on European Sites. Overall, the Fairford NP accounts for only approximately 1% of the development expected in the wider geographic area.

6.3 The HRA screening exercise undertaken in Chapter 5, Appendix A, Table 5 indicated one site allocation policy for which Likely Significant Effects on European Sites cannot be excluded, including the impact pathways recreational pressure and water quantity, level and flow.

## Recreational Pressure

### North Meadow and Clattinger Farm SAC

6.4 The North Meadow and Clattinger Farm SAC is designated for lowland hay meadows, which are sensitive to excessive trampling damage particularly when visitors venture off trails. Natural England's Site Improvement Plan indicates that visitor pressure is especially high in the flowering time of the snake's-head fritillary, leading to localised damage of plant communities. The SIP also specifies that a National Nature Reserve management plan is to be implemented to minimise the impact of trampling damage generated by recreational visitors. The closest component part of the SAC, the North Meadow SSSI, lies approx. 5.5km to the south-west of Fairford NP area.

6.5 The Cricklade North Meadow NNR is widely advertised as a recreation destination. For example, the VisitWiltshire website (www.visitwiltshire.co.uk) describes the background to the site, praises the famous fritillaries and their beautiful colours, and promotes the guided walking tours provided by Natural England (NE). NE has also produced an information leaflet for the NNR, discussing the importance of the site, how to get there, its main attractions and management measures. The active promotion of the site is likely to further increase visitor numbers at the site and may also attract future residents of Fairford. Without active mitigation measures this could exacerbate the impact of trampling damage on the SAC's fritillaries. Lowland hay meadows comprise species-rich swards with plants differing in their sensitivity to trampling damage. Trampling may reduce species diversity, with more hardy herbs being more likely to survive.

6.6 It is important to note that the Fairford NP allocates a relatively small amount of residential growth of 80 dwellings, equating to 192 additional residents. Generally, this modest housing growth would not be expected to lead adverse effects on site integrity on its own. However, the HRA process needs to consider the 'in-combination' effects with growth delivered in adjoining parishes. The overarching Cotswold District Local Plan (CDLP) provides for at least 8,400 dwellings in the period to 2031 (at least 20,160 new residents), some of which may also fall within the catchment of the SAC. Furthermore, the 'in-combination' approach is particularly relevant in this instance, because visitor numbers in the SAC are at or above capacity according to references to a Natural England consultation response in the Cotswold Local Plan HRA.

6.7 However, Natural England, who own and manage the site, have put measures in place to protect its conservation interest. For example, during winter flooding Natural England ask the public to stay off the site, because heavy footfall in wet conditions leads to ground compaction and damage to young fritillary shoots. Furthermore, the site also comprises waymarked routes (orange, blue and yellow) that direct visitors along established tracks, while being able to enjoy the site's main features. The public is asked to stay on the advertised routes and avoid having a closer look at flowers. It is also mandatory to keep dogs on leads to protect the fritillaries and ground-nesting birds. A full list of the management measures deployed in the SAC can be found at https://crickladecourtleet.org.uk/.

6.8 Moreover, while the Fairford administrative boundary lies 5.5km from the SAC, the settlement of Fairford lies 8km from the SAC and is separated from it by the A419. At a distance of 8km from the SAC, new Fairford residents may fall within the visitor catchment of the site but if so they will be on the fringes i.e. it is unlikely a significant number of residents regularly visit the SAC. Due to the presence of the A419, driving to the SAC from Fairford is not straightforward, requiring one to join the A419 at Wharf Farm, drive south one junction to the Calcutt junction and then double back through Cricklade. In contrast, Cotswold Water Park SSSI and Welford Meadows SSSI are both adjacent to Fairford and will provide a similar recreational experience on much larger parcels of land. It is unlikely Fairford residents would regularly visit North Meadow in significant numbers in contrast to these larger and closer wildlife sites.

6.9 Finally, the HRA of the Cotswold Local Plan concluded that *'North Meadow and Clattinger Farm SAC* [is] *located a long way from much of the housing proposed in parts of the District other than the south, and therefore it is likely that more conveniently accessible areas of open space closer to where people live will be used for most recreational activities. Any residual increase in visitor numbers that might occur from additional housing development in Cotswold District at the European sites would be likely to be dispersed across different locations, diluting the effects of recreation activities. Therefore, it is unlikely that any one European site would see a significant increase in visitor numbers as a result of the development proposed through the Local Plan'*. Nonetheless, a commitment was made in Local Plan policy INF7 (Green Infrastructure) for '*Cotswold District Council to work with key stakeholders including Natural England to develop appropriate mitigation'.* On this basis, a conclusion was drawn that delivery of 8,400 dwellings in Cotswold District and any mitigation strategy for the Local Plan that is being devised by Cotswold Council with Natural England is very unlikely to be so finely calibrated that the addition of a further 80 dwellings (c. 1%) at a distance of 8km from the SAC would trigger the need for additional mitigation, particularly given the much closer proximity of other larger areas of publicly accessible semi-natural habitat that are much easier to access from Fairford and are likely to mean Fairford residents rarely visit the SAC.

6.10 The Fairford NP also contains several policies that are likely to minimise the residual likelihood of any new residents of Fairford travelling to the SAC for recreation. For example, the provision and protection of local greenspaces is an established mitigation tool that helps absorb recreation in less sensitive sites. Policy **FNP8 (Protecting Local Green Spaces)** designates the Walnut Tree Field, Upper Green and Coln House Playing Field as protected outdoor spaces, which are likely to attract at least some of Fairford's new residents. **Policy FNP14 (A New Low Carbon Community In Fairford)** establishes that development proposals contributing to Fairford's allocation of 80 new dwellings will be required to deliver one or more areas of publicly accessible open spaces, which should include a children's play area and community gardens / allotments. Again, this policy will help to engage residents locally, rather than visiting the North Meadow & Clattinger Farm SAC.

6.11 Overall, it is therefore considered that the additional growth in the Neighbourhood Plan would not result in an adverse effect on the integrity of the SAC. This is based on the package of visitor management measures already devised by Natural England, the relative distance of Fairford town from the SAC (8km) and comparative difficulty accessing the SAC compared to other closer areas of attractive semi-natural greenspace, and the overarching policy framework in the Local Plan and Neighbourhood Plan including a Local Plan commitment to develop strategic mitigation for the district.

6.12 Policies that help prevent adverse effects on the integrity of European Sites are also included in the Cotswold District Local Plan (CDLP), the planning document guiding development in Fairford NP area. **Policy EN8 (Biodiversity and Geodiversity: Features, Habitats and Species)** of the

CDLP states that '*4. Proposals that would result in the loss or deterioration of irreplaceable habitats and resources, or which are likely to have an adverse effect on internationally protected species, will not be permitted.*' The protection of European Sites is further strengthened in **Policy EN9 (Biodiversity and Geodiversity: Designated Sites)**, which clarifies that '*1. Internationally designated wildlife sites… will be safeguarded from development that could cause a significant effect that would adversely affect their integrity.*' Overall, these policies ensure that residential development which would result in unsustainable, adverse recreation impacts will not be permitted.

6.13 In consultation with Cotswold Council, it was suggested that, notwithstanding the conclusion above, reference should be made in both the HRA and Fairford Neighbourhood Development Plan to the need for any developer of a housing site in Fairford to comply with the emerging Interim Mitigation Strategy for North Meadow that is currently being prepared by a consultant on behalf of Swindon Borough Council for their Local Plan Review.

6.14 AECOM has requested a copy of the interim Mitigation Strategy but it is not available to the authors at the time of writing. However, in line with advice from Cotswold District Council **it is recommended that for the avoidance of doubt a reference to the emerging Interim Mitigation Strategy and the need for developers to comply with it should be added to Policy FNP14.**

6.15 Overall, it is determined that, with this addition to policy text, there will be no adverse 'in-combination' effects of the Fairford NP. No policy recommendations are made.

# Water Quantity, Level and Flow

## North Meadow & Clattinger Farm SAC

6.16 The water level in any European site can be negatively impacted in two ways. A proliferation of impermeable surfaces near a European site or its tributaries might result in faster runoff rates and / or flash floods, leading to higher water levels than normal. However, due to the long distance between the SAC and Fairford, an increased flood risk due to the NP was considered unlikely and screened out from Appropriate Assessment. In contrast, water abstraction for potable water supply may lead to reduced baseline water levels in tributaries and European Sites themselves. An increased abstraction of water for the supply to residential dwellings is the main pathway in which the Fairford NP could affect the North Meadow & Clattinger Farm SAC. NE's Site Improvement Plan identifies inappropriate water levels as the main pressure / threat to the lowland hay meadows in the SAC, which could lead to a reduction in the nutrient replenishment of the site.

6.17 The company that is responsible for the potable water supply in the area comprising Fairford is Thames Water. A new Water Resources Management Plan (WRMP) was published by the company in 2019, outlining the balance between supply and demand for water for a minimum planning period of 25 years. Thames Water's supply area extends from Cirencester in the west to Dartford in the east, and from Banbury in the north to Guildford in the south. The company supplies approx. 2,600 million litres of water to 10 million people and 250,000 businesses daily. A large portion of the water supply is fulfilled through large storage reservoirs served by the River Thames and River Lee. For purposes of resource planning, the Thames Water's WRMP divides the water supply area into six Water Resource Zones (WRZs). Fairford lies in the Swindon and Oxfordshire (SWOX) WRZ. WRZs are geographic areas in which abstraction and distribution of water is largely self-contained and therefore resource development options outside the SWOX WRZ are unlikely to materially affect the water level in the North Meadow & Clattinger Farm SAC.

6.18 An assessment of the baseline supply-demand balance is typically undertaken to determine whether a WRMP may result in adverse effects on the integrity of European Sites. Thames Water's WRMP highlights that the supply-demand balance for the SWOX WRZ will remain in surplus throughout the entire plan period under dry year annual average conditions. Therefore, under dry conditions, modelled as a precautionary measure, no further water resources will need to be developed or abstraction licenses increased to meet the growing demand in Cotswold District. However, the WRMP stipulates that a deficit in the supply-demand balance will occur under peak week utilisation conditions, amounting to 11.3 Ml/d in 2044 and rising to 31.2 Ml/d in

2099. Peak week conditions are therefore seen as the main investment driver. The water resource options employed to address these deficits must next be assessed to determine whether they may have implications for the water level in the North Meadow & Clattinger Farm SAC.

6.19 Water resource options cover a range of different elements, including changes to the use of resources (e.g. increased water abstraction from rivers and groundwater), changes to raw water systems (e.g. adaptations of storage reservoirs) and network elements (e.g. upgrades to distribution piping and leakage reductions). The development of new water resources and increases of consented abstractions from surface waterbodies are most likely to affect the water level / volume in water-dependent European Sites. Thames Water developed an initial unconstrained options list, which was then slimmed down to a package of feasible constrained options. As a statutory requirement, the WRMP also underwent HRA to assess potential adverse effects on designated sites.

6.20 Three options were assessed for their potential impacts on water levels in the North Meadow & Clattinger Farm SAC, including the Radcot Water Treatment Works (WTWs) increased treatment capacity (24 Ml/d), increased abstractions at the Ashton Keynes borehole pumps (2.5 Ml/d) and the Wessex to SWOX inter-company water conveyance asset. The following conclusions on adverse effects of these options were reached:

- Due to the relatively long distance of Radcot WTW to the SAC (approx. 6.2km) no effects on the hydrological integrity of the site were predicted
- Abstraction from the Ashton Keynes borehole pumps is derived from the aquifer that is not in continuity with the overlying impermeable Oxford Clay formation (which is hydrologically linked to the North Meadows & Clattinger Farm SAC)
- The inter-conveyance system lies at 4.3km from the SAC and no hydrological impacts are expected from its operational use

6.21 One of the main purposes of the HRA process is to ensure that an adequate policy framework is in place to protect the integrity of European Sites. While the Fairford NP does not contain specific policy wording that addresses the need to protect water levels in designated sites, the overarching Cotswold District Local Plan (CDLP) has inbuilt policy safeguards. For example, Policy EN9 (Biodiversity and Geodiversity: Designated Sites) specifies that '*1. Internationally designated wildlife sites… will be safeguarded from development that could cause a significant effect that would adversely affect their integrity.*' By definition, this would also apply to housing development that has the potential to reduce the volume of freshwater supplied to and the frequency of flooding of the North Meadow & Clattinger Farm SAC. Furthermore, Policy INF8 (Water Management Infrastructure) states that '*1. Proposals will be permitted that: a. take into account the capacity of existing off-site water and wastewater infrastructure and the impact of development on it, and make satisfactory provision for improvement where a need is identified that is related to the proposal.*' Effectively this ensures that the water provision infrastructure will need to be reviewed and, where necessary, improved to ensure that a sustainable water supply to new housing development can be provided. This is positive because the review of the water supply will be required to be set into the context of designated sites, in turn ensuring that water levels in the SAC are protected.

6.22 Overall, Thames Water's WRMP does not involve water resource options that are hydrologically linked to the North Meadow & Clattinger Farm SAC and the CDLP contains a policy framework that protects the hydrological conditions in European Sites. Therefore, it is concluded that the Fairford NP will not result in adverse effects on the SAC regarding water level, flow and volume 'in-combination' with other plans and projects. No additional policy recommendations for inclusion in the Fairford NP are made.

# 7. Conclusions

7.1 This Report to Inform Cotswold District Council's formal HRA of the Fairford NP has assessed the potential implications of the plan on the North Meadow & Clattinger Farm SAC relating to the impact pathways recreational pressure, water quality, water quantity, level and flow, and atmospheric pollution.

7.2 An initial screening assessment determined that the Council would be able to exclude LSEs in relation to water quality and atmospheric pollution. While the lowland hay meadows in the North Meadow & Clattinger Farm SAC is sensitive to water quality changes, it was determined that there is no hydrological connectivity between the point of discharge of the WwTW processing sewage from Fairford and the section of the R. Thames that seasonally floods the SAC. Regarding atmospheric pollution the screening for LSEs section highlighted that the section of sensitive habitat closest to a potential commuter route linked with Fairford (the A419), lies at a distance of approx. 180m. At this distance, motorised traffic is likely to be a minor contributor to nitrogen deposition compared to agriculture. Furthermore, the habitat structure and sward composition of hay meadows is predominantly determined by management practices.

## North Meadow & Clattinger Farm SAC

### Recreational Pressure

7.3 This report considered that Cotswold District Council would need to undertake an Appropriate Assessment regarding recreational pressure due to the NPs allocation of 80 dwellings, especially 'in-combination' with the housing growth set out for the district in the CDLP (8,400 dwellings). According to Natural England, the North Meadow & Clattinger Farm SAC is a popular recreation destination. However, an appropriate management plan already exists. For example, in winter and early spring, the public is asked to stay off the site in order to prevent soil compaction and damage to sensitive fritillary shoots. Furthermore, visitors to the SAC are asked to stick to the three waymarked routes (comprising different interest features), enabling them to enjoy the wildlife while protecting the site's conservation interest. Dogs are required to be kept on the lead. Moreover, the settlement of Fairford is 8km from the SAC, the SAC is not straightforward to reach from Fairford and there are larger areas of attractive open space immediately adjacent to Fairford. In addition, Cotswold District Council has a commitment to develop a strategic mitigation solution for the whole district very unlikely to be so finely calibrated that the addition of a further 80 dwellings (c. 1%) at a distance of 8km from the SAC would trigger the need for additional mitigation. Finally, the Fairford NP also contains several policies that are likely to minimise the residual likelihood of any new residents of Fairford travelling to the SAC for recreation, notably requiring the delivery of recreational greenspace as part of the new allocation.

7.4 In consultation with Cotswold Council, it was suggested that, notwithstanding the above, reference should be made in both this Report to Inform HRA and Fairford Neighbourhood Development Plan to the need for any developer of a housing site in Fairford to comply with the emerging Interim Mitigation Strategy for North Meadow that is currently being prepared by a consultant on behalf of Swindon Borough Council for their Local Plan Review.

7.5 AECOM has requested a copy of the interim Mitigation Strategy but it is not available to the authors at the time of writing. However, in line with advice from Cotswold District Council as competent authority **it is recommended that for the avoidance of doubt a reference to the emerging Interim Mitigation Strategy and the need for developers to comply with it should be added to Policy FNP14.**

7.6 **Overall, with this amendment to policy included, it is the view of the authors that Cotswold District Council would be able to conclude that the Fairford NP will not result in 'in-combination' adverse effects on the integrity of the SAC regarding recreational pressure.**

### Water Quantity, Level and Flow

7.7 The lowland hay meadows in the SAC are sensitive to changes in the water quantity, level and flow in the site. The housing allocated in the Fairford NP will be connected to the potable water

supply, which may reduce the volume of freshwater (and nutrient) input to the site. Fairford lies within Thames Water's Swindon and Oxfordshire (SWOX) Water Resource Zone (WRZ). The current WRMP indicates that the supply-demand balance in the WRZ is forecast to be in a deficit of 11.3 Ml/d by 2044. However, the Appropriate Assessment demonstrated that the water resource options investigated by Thames Water will not lead to water level changes in the North Meadow & Clattinger Farm SAC. The WRMP has a strong focus on leakage reduction, increasing water efficiency and reducing water consumption. Any resource options that would involve increases to abstraction volumes are not hydrologically connected to the SAC. For example, the Ashton Keynes borehole pumps extract water from an aquifer that is separated from the aquifer supplying the SAC (i.e. the Oxford Clay Formation). **Overall, it was concluded that Cotswold District Council would be able to conclude that the Fairford NP will not result in 'in-combination' adverse effects on the integrity of the SAC regarding water quantity, level and flow.**

# Appendix A

**Table 3. Screening table showing the Test of Likely Significant Effects (LSEs) results of policies contained within the Fairford Neighbourhood Plan. Where a screening result is shaded in green there will be no LSEs on European sites. Orange shading means that there is a potential for LSEs on European sites from the impact pathways identified in the box.**

| Policy | Description | Test of Likely Significant Effects (LSEs) |
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| **Policy FNP1 – The Fairford and Horcott Development Boundaries** | The Neighbourhood Plan redefines Development Boundaries at Fairford and Horcott, as shown on the Policies Map (Plan B, **Error! Reference source not found.**), for the purpose of applying other development plan policies relating to appropriate development within the built-up area and in the countryside. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that redefines the development boundaries at Fairford and Horcott.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP1 is therefore screened out from Appropriate Assessment. |
| **Policy FNP2 – Providing a New Burial Ground** | Proposals for a new burial ground will be supported, provided:<br><br>• ancillary buildings and structures are kept to a minimum for the operations of the use and are designed to minimise their effects on the landscape;<br>• they provide sufficient off-street car parking spaces; and<br>• The location is appropriate in terms of ground condition and flood risk | There are no Likely Significant Effects of this policy on European sites.<br><br>This policy supports proposals for a new burial ground in Fairford.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP2 is therefore screened out from Appropriate Assessment. |
| **Policy FNP3 – Maintaining Viable Community Facilities** | The Neighbourhood Plan identifies the following land and buildings as community facilities for the purpose of applying Local Plan policies in relation to their protection and improvement:<br><br>• Fairford Community Centre<br>• Palmer Hall | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that identifies and protects community facilities, such as Fairford Community Centre and several sports grounds. |

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| | • Fairford Library<br>• The Fairford Town Football Club ground and adjacent practice playing field<br>• Fairford Bowling Club<br>• Fairford Cricket Club Ground<br>• The Fairford Junior Rugby Club pitches<br>• The Fairford Rugby Club pitches (at Coln House School)<br>• Fairford Youth Football Club pitches<br>• Fairford Tennis Club<br>• Farmor's Sports Centre<br>• Riverside Garden | The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP3 is therefore screened out from Appropriate Assessment. |
| **Policy FNP4 – Managing Flood Risk** | All sources of flood risk[35] must be considered at both the site selection and application stages, and the sequential test used to divert development to areas with lower probability of flooding, in accordance with NPPF guidance. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.<br><br>In addition to meeting national and strategic planning policy requirements, proposals for development on land identified by the Environment Agency as lying within either Flood Zone 2 or 3, or in areas of Flood Zone 1 where there is evidence of flood risk from sources other than fluvial, will require a site-specific Flood Risk Assessment (FRA) , using appropriate calculations based on the highest expected groundwater levels for the area (200 year maximum), at the first application stage. Proposals will only be supported where it can be demonstrated in the Assessment that:<br>a. They include appropriate site-specific measures to address effectively all the identified surface and ground water issues.<br>b. Any residual flood risks can be managed on the site and will not increase flood risk beyond the site.<br><br>Where this is not demonstrated satisfactorily permission will be refused. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a positive policy that aims at managing flood risk. For example, a site-specific Flood Risk Assessment will be required in Flood Zones 1, 2 and 3. Furthermore, site-specific measures will be required to address any surface and groundwater issues. These measures will reduce potential washout of organic and inorganic water quality contaminants into the River Thames.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP4 is therefore screened out from Appropriate Assessment. |

[35] "Flood risk" means risk from all sources of flooding - including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources, as stated in NPPF guidance.

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| | Land identified by the Environment Agency as lying within Flood Zone 1 but that is subject to high groundwater levels such that adequate and effective[36] SuDS drainage systems cannot be provided should be preserved as green space to provide for flood water storage/attenuation. | |
| **Policy FNP5 – Investing in Utilities' Infrastructure Improvements** | By "Utilities Infrastructure" this policy means not only sewerage and water supply (as set out in INF1 and INF8 of the CDC Local Plan) but also broadband. Flood protection is covered in FNP4.<br><br>Planning permission will only be granted to a development intending to connect to the sewer network if the sewer network can accommodate the additional demand for sewage disposal either in its existing form or through planned improvements to the system in advance of the construction of the development, to ensure that the environment and the amenity of local residents are not adversely affected.<br><br>Such "planned improvements to the system" may take the form of reduced surface and ground water inflow into the sewers, increased pumping station capacity or increased sewage treatment works capacity. This plan does not stipulate which, but the effect must be to accommodate fully the additional demand.<br><br>Where a need for new or improved off-site utility, infrastructure has been identified in order to support new development, any resulting proposals will only be supported where the proposed utility infrastructure will be delivered in line with an agreed phased timescale.<br><br>Development proposals will be required to make either satisfactory arrangements for the direct implementation of the off-site infrastructure, and/or an agreed financial contribution towards its provision by another party within the agreed timescale.<br><br>Planning permission for a development intending to connect to the sewer network must include conditions that require that new homes must not be occupied until it is demonstrated that the sewerage system has adequate capacity to accommodate the additional flow generated by the | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that ensures that appropriate infrastructure is in place to accommodate new development. For example, sufficient capacity at Wastewater Treatment Works (WwTWs) will need to be in place prior to planning consent being given to development proposals. This will protect the water quality in surface waterbodies such as the R. Thames, which frequently floods the North Meadow & Clattinger Farm SAC. Consequently, it will also ensure that no adverse water quality effects will occur in its lowland hay meadows.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP5 is therefore screened out from Appropriate Assessment. |

[36] In accordance with EA and CIRIA guidance, and National Standards for sustainable drainage **Invalid source specified.**

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| | development. The condition may allow that the physical connection of new homes to the sewage treatment works may be delayed until enough homes are occupied to achieve sufficient flow through the sewerage system to avoid issues of septicity, during which time approved environmentally acceptable alternative arrangements (e.g. tankering) may be used, subject to Council agreement.<br><br>All new development must have sufficient infrastructure to provide electric vehicle charging points to meet future demand. | |
| **Policy FNP6 – Managing Traffic in the Town** | Proposals for a residential scheme of 10 or more homes or for a commercial scheme of more than 1000 sq.m. gross internal area must identify and quantify in their transport assessments the effects of traffic generated by the scheme on its own, and in combination with other consented and allocated schemes, on the Fairford Conservation Area and on other heritage assets in the Town Centre. Where the potential for harm has been identified then the proposals must make provision for the necessary mitigation measures to avoid contributing to the harm caused to those assets. Transport Assessments must demonstrate that adequate electric vehicle charging points will be provided. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a policy that manages traffic in Fairford town, such as through the provision of Transport Assessments. Furthermore, for residential schemes of 10 or more homes, adequate electric vehicle charging points will be required. This may help reduce the volume of fossil-fuelled cars in Fairford and nitrogen deposition in the North Meadow & Clattinger Farm SAC, which is sensitive to atmospheric pollution.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Overall, Policy FNP6 is therefore screened out from Appropriate Assessment. |
| **Policy FNP7 – Improving Access to Visitor Attractions** | Proposals within the Plan area to improve pedestrian and cycle access between Fairford and attractions within the Cotswold Water Park, Lechlade, the Thames and Severn Canal route and the Thames Path will be supported. | Likely Significant Effects of this policy on European Sites cannot be excluded.<br><br>This policy promotes pedestrian and cycle access between Fairford and several attractions in Fairford (e.g. Cotswold Water Park). While facilitating access to non-designated sites is generally considered to be positive, the North Meadow & Clattinger Farm SAC is situated to the west and east of the water park and could also experience an increase in visitor numbers as a result of this policy. |

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| | | The following potential impact pathway is associated with this policy:<br><br>• Recreational pressure<br><br>Therefore, Policy FNP7 is screened in for Appropriate Assessment 'in-combination'. |
| **Policy FNP8 – Protecting Local Green Spaces** | The Neighbourhood Plan designates the following land as Local Green Spaces, as shown on the Policies Map:<br><br>a) The Walnut Tree Field;<br>b) Upper Green;<br>c) Coln House Playing Field.<br><br>In accordance with Policy EN3 of the Cotswold District Local Plan (CDLP) para.10.3.1 the FNP identifies these green areas as being of particular importance, where development will not be permitted except in very special circumstances. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a positive policy that protects local greenspaces in Fairford. Enabling access to outdoor spaces is considered to be a key mitigation approach to absorb recreation locally and reduce recreational pressure in sites designated for their conservation interest.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP8 is therefore screened out from Appropriate Assessment. |
| **Policy FNP9 – Protecting the Fairford Horcott Local Gap** | The Neighbourhood Plan defines the Fairford to Horcott Local Gap on the Policies Map.<br><br>Development proposals within the Local Gap will only be supported if they do not harm, individually or cumulatively, its open character. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that defines and protects the open character of the Fairford to Horcott Local Gap.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP9 is therefore screened out from Appropriate Assessment. |
| **Policy FNP10 – River Coln Valued Landscape** | The FNP identifies land between the River Coln and Fieldway, as shown on the Policies Map, as a valued landscape. | There are no Likely Significant Effects of this policy on European sites. |

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| | Development proposals in the River Coln Valued Landscape, that may otherwise be suited to a countryside location, will only be supported if they will maintain the essential open character of the land. | This is a development management policy that defines and protects the open character of the River Coln and Fieldway Valued Landscape.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP10 is therefore screened out from Appropriate Assessment. |
| **Policy FNP11 – Valuing Hedgerows and Trees** | Development proposals that require the removal of trees should make provision for their replacement with trees of (wherever possible) native species within the site boundary. Where appropriate each tree removed should be replaced with at least two new trees.<br><br>Development proposals that require the removal of all or part of a hedgerow should make provision in the landscape scheme:<br>a) either for its replacement within the site of hedgerow of a similar length, height and form, and of similar or greater density of native species to match existing or nearby hedging;<br>b) or to deliver biodiversity value of the equivalent to that lost with additional hedgerow or other shrub or tree planting elsewhere;<br>c) or to deliver a replacement boundary treatment of a different type which is more appropriate to the site and its surroundings and which respects and complements the wider development proposal.<br><br>Proposals for new planting should link, where appropriate, existing landscape features such as patches of woodland to watercourses or ponds. Hedgerows should be integrated into the development boundary features or be part of the open space provision to ensure their long-term management and retention. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that protects hedgerows and trees in Fairford. There are no European Sites designated for animal species that rely on such functionally linked habitats linked to the Fairford Neighbourhood Plan. However, this policy is positive for the environment as it provides and / or protects wildlife corridors in Fairford.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP11 is therefore screened out from Appropriate Assessment. |
| **Policy FNP12 – Achieving High Standards of Design** | Proposals for new development, including extensions to existing buildings, should be of the highest design standards, in accordance with the Cotswold Design Code given effect by the relevant policies of the | There are no Likely Significant Effects of this policy on European sites. |

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| | CDLP and should have regard to the key design principles set out **Error! Reference source not found.**.<br><br>The proposals should have specific regard to:<br>a) enhancing key views, particularly to the Church of St Mary's, across Upper and Lower Green, and from within the Fairford Conservation Area and Special Landscape Area to the surrounding countryside;<br>b) maintaining key views listed in **Error! Reference source not found.**;<br>c) Any conservation area appraisal or conservation area management plan. | This is a development management policy that sets out design standards for new developments. All planning proposals will have to adhere to the Cotswold Design Code and have specific regard to enhancing / maintaining key views.<br><br>However, design standards have no relevance to European Sites. The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP12 is therefore screened out from Appropriate Assessment. |
| **Policy FNP13 – Conserving Non-Designated Heritage Assets** | The FNP identifies the Local Heritage Assets as listed below for the purpose of applying CDLP in relation to sustaining and enhancing non-designated heritage assets. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that provides for the conservation of non-designated heritage assets.<br><br>However, the protection of heritage assets has no direct relevance to European Sites. The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP13 is therefore screened out from Appropriate Assessment. |
| **Policy FNP14 – A new Low Carbon Community in Fairford** | The Neighbourhood Plan proposes land between Leafield Road and Hatherop Road (north of John Tame Close and St. Mary's Drive, as shown on the Policies Map) for a low, or zero, carbon residential development.<br><br>Proposals for housing development of around 80 homes will be supported, subject to delivery of a comprehensive proposal satisfying the following criteria:<br>• Development is not commenced until the necessary upgrade and improvements to the local utilities infrastructure are as provided for by Policy; | Likely Significant Effects of this policy on European Sites cannot be excluded.<br><br>This policy provides for a new low carbon residential development comprising 80 homes on land between Leafield Road and Hatherop Road. It further sets out specific development criteria, including the provision of adequate utilities infrastructure, design standards and accessible open space, and the avoidance of flood risk areas.<br><br>The following potential impact pathways are associated with this policy: |

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| | • Development conforms with the requirements of FNP15 to deliver sustainable housing;<br>• The layout and landscape scheme incorporate appropriate measures, including tree planting, to mitigate the visual effects of the development on the countryside to the west, north and east of the site, with provision for this to be maintained in perpetuity;<br>• Development satisfies, as a minimum, the standards required for the "Building with Nature[37] – Design" level. Developments that meet the higher levels ("Good", "Excellent") of the standard would be strongly supported.<br>• The design and landscaping have regard for the setting of the Fairford Conservation Area;<br>• Provision is made for a link road to give access between the schools and the A417 to the east of the town, for a dropping-off point away from the school and a safe walking route to the schools;<br>• The scheme provides one or more areas of publicly accessible open space, including a children's play area (LEAP) and a community garden or allotments;<br>• Provision is made for the delivery of self or custom build plots in line with CDLP policy H1;<br>• The scheme keeps housing away from areas prone to surface or ground water flooding and incorporates measures to contain and attenuate surface water either in low lying areas within the site boundary or on other land within the control of the applicant in accordance with FNP4; and<br>• Provision is to be made for affordable housing in accordance with CDLP policy H2. | • Recreational pressure<br>• Water quality<br>• Water quantity, level and flow<br>• Atmospheric pollution<br><br>Overall, Policy FNP14 is screened in for Appropriate Assessment 'in-combination'. |
| **Policy FNP15 – Sustainable Homes and Housing Need** | Subject to the development being found to be acceptable when judged against other policies in the FNP, innovative approaches to the construction of low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported. Examples | There are no Likely Significant Effects of this policy on European sites. |

[37] https://www.buildingwithnature.org.uk/how-it-works

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| | would include, but would not be limited to earth sheltered, rammed earth, or straw bale construction, construction to Passivhaus standards, conversion to EnerPHit standards.<br><br>The sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings will be encouraged, including the retrofitting of listed buildings, buildings of solid wall or traditional construction and buildings within conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future.<br><br>Proposals for housing development should provide a mix of housing types that have an emphasis on two and three-bedroom houses.<br><br>Proposals for new housing that go beyond the requirements of Building Regulations and implement the design criteria set out in "The Lifetime Homes Design Guide" will be supported.<br><br>In residential developments all garage and off-street parking must include provision for the safe charging of electrical vehicles. Schemes including communal parking areas must include a scheme for communal charging points. | This is a development management policy that stipulates the provision of sustainable homes and an adequate housing mix. Sustainable features to be provided include construction to Passivhaus standards and conversion to EnerPHit standards.<br><br>While this is a positive policy for the environment, there are no direct implications for European Sites. The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP15 is therefore screened out from Appropriate Assessment. |
| **Policy FNP16 – Growing Our Local Economy** | All new non-residential buildings should achieve the BREEAM Excellent standard.<br><br>Insofar as planning permission is required proposals to intensify the existing business uses on the Whelford Lane Industrial Estate, as shown on the Policies Map, will be supported, provided they use the existing access to the A417.<br><br>Proposals for a change of use of Coln House School, as shown on the Policies Map, from its established C2 (residential institutions) use will only be supported if they comprise the reuse and/or conversion of the site to include B1 business and/or community uses. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that addresses economic growth in Fairford. However, the policy mainly proposes the intensification of existing business uses, rather than promoting additional employment development.<br><br>The policy does not provide for a location and / or quantum of new residential or employment development.<br><br>Policy FNP16 is therefore screened out from Appropriate Assessment. |

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| **Policy FNP17 – Sustaining a Successful Town Centre** | The Neighbourhood Plan identifies the Town Centre, as shown on the Policies Map, for the purpose of applying other development plan policies relating to retail development.<br><br>Insofar as planning permission is required proposals for the conversion of A1 retail or B1 business premises in the town centre to residential use will not be supported. The loss of main town centre uses on the ground floor within the Town Centre boundary identified on the Policies Map will be supported provided the development does not harm the vitality and viability of the Town Centre and evidence has been submitted to demonstrate that the property has been continually, actively and effectively marketed for at least 12 months and that the use is no longer of commercial interest.<br><br>Proposals for conversion to residential use will be supported on the upper floors of business premises in the Town Centre, provided that the conversion would not adversely affect the viability of the premises for commercial use.<br><br>Proposals to improve the Market Place to create a more attractive environment for shoppers and visitors, including expanding the pedestrian area in front of the Bull Hotel, will be supported, provided any loss of existing car parking spaces is compensated for by new spaces within or on the edge of the Town Centre. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that sustains Fairford's town centre. For example, the conversion of existing business premises to residential development will be resisted. Furthermore, improvements to the Market Place to create a more attractive environment will be supported.<br><br>The policy does not provide for a location and / or quantum of new residential or employment development, other than the quantum of housing allocated in Fairford in the overarching Cotswold District Local Plan.<br><br>Policy FNP17 is therefore screened out from Appropriate Assessment. |
| **Policy FNP18 – New Visitor Accommodation** | Proposals for the development of new visitor accommodation or for a change of use to such accommodation will be supported, provided they are located either within the defined Fairford Development Boundary or comprise the appropriate and sustainable reuse of a redundant agricultural building in the countryside. | Likely Significant Effects of this policy on European Sites cannot be excluded.<br><br>This is a development management policy that supports the development of new visitor accommodation in the defined Fairford Development Boundary. Such accommodation may increase the overall tourism activity in Fairford and increase the number of visitors in the North Meadow and Clattinger Farm SAC, particularly when viewed in context with Policy FNP7.<br><br>The following potential impact pathways are associated with this policy: |

| | |
|---|---|
| | • Recreational pressure<br><br>Overall, Policy FNP18 is therefore screened in for Appropriate Assessment. |

COTSWOLD DISTRICT COUNCIL

consultations@naturalengland.org.uk

28 September, 2022

cc Gillian Driver
Gillian.Driver@naturalengland.org.uk

*Our ref:* Fairford Neighbourhood Plan
*Your reference*: 343956

*When calling please ask for*
James Brain
Tel: 01285 623000
E-mail: neighbourhood.planning
@cotswold.gov.uk

Dear colleague

**Appropriate Assessment of the Fairford Neighbourhood Development Plan**

Further to Natural England's feedback on our Appropriate Assessment, issued on the 18 February 2022, the District Council submits this letter and enclosed revised evidence report for your consideration. We would be grateful if you could respond by **25th May 2022** at the latest.

Our conclusion is that there are no likely significant effects, either alone or in combination, based on the findings of the enclosed report, prepared by AECOM through the national support package for Neighbourhood Planning. We find their assessment to be a robust and proportionate assessment on which to base our conclusion.

This report was previously shared with Natural England, and feedback was received on 18 February from Gillian Driver. The error identified in that feedback has been addressed, as have the other points raised. We firmly believe that the analysis of traffic is appropriate, and proportionate, given its less than appreciable impact upon the North Meadow SAC, and wholly consistent with the assessed impact of other development that may have an effect upon this site.

We enclose the report in both its full version and as a track changes document, to facilitate your swift review.

We look forward to hearing your observations as soon as possible. We request that if there is a likelihood that further assessment work or amendments to the emerging neighbourhood plan are likely to be required, that this is communicated as soon as practicable.

Yours faithfully,

James Brain
Forward Planning Manager, Cotswold District Council.



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Date: 06 May 2022
Our ref: 390625
Your ref: Fairford NDP: HRA AA

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**BY EMAIL ONLY**

Dear James Brain

**Re: Fairford Neighbourhood Development Plan: HRA Appropriate Assessment**

Thank you for your consultation on the above dated 04 May 2022 .

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England notes that the Report to Inform Habitats Regulations Assessment of the Fairford Neighbourhood Plan dated April 2022 concludes that Cotswold District Council, as the competent authority, would be able to conclude that Fairford Neighbourhood Plan will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, Natural England advises that we concur with the assessment conclusions.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Gillian Driver

Ms Gillian Driver
Lead Adviser
Land use planning – West Midlands Area Team

# Report to Inform Habitats Regulations Assessment of the Fairford Neighbourhood Plan

Fairford Town Council

Project number: 60571087

April 2022

## Quality information

| Prepared by | Checked by | Verified by | Approved by |
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| Dr Damiano Weitowitz<br>Senior Ecologist | Dr James Riley<br>Technical Director | Dr Max Wade<br>Technical Director | Dr James Riley<br>Technical Director |

## Revision History

| Revision | Revision date | Details | Authorized | Name | Position |
|---|---|---|---|---|---|
| 0 | 01/06/21 | Initial Draft | JR | James Riley | Technical Director |
| 1 | 20/08/21 | Final reviewed by group (Roz Morton) | JR | James Riley | Technical Director |
| 2 | 22/11/21 | Update following review by Cotswold District Council | JR | James Riley | Technical Director |
| 3 | 10/01/22 | Minor further presentational updates | JR | James Riley | Technical Director |
| 4 | 13/4/22 | Further updates regarding traffic and air quality in response to Natural England comments | JR | James Riley | Technical Director |

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# 1. Introduction

## Scope of project

1.1 AECOM was appointed by Fairford Town Council to undertake a Report to Inform the Habitats Regulations Assessment (HRA) of the Fairford Neighbourhood Plan (NP). This is to inform the client and Cotswold District Council (CDC) of the potential effects of NP development on European Sites and how they are being, or should be, addressed in the draft plan document. The NP is a statutory document that will be incorporated into the Local Planning Framework and is to be used by CDC to determine the outcome of planning applications. While NPs must adhere to higher-level planning policy at the level of local authorities, they are designed to enable local communities to help shape their own future development.

1.2 As 'competent authority', the legal responsibility for ensuring that a decision of 'likely significant effects' is made, for ensuring an 'appropriate assessment' (where required) is undertaken, and for ensuring Natural England are consulted, falls on the local planning authority. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.

1.3 Development in the geographic area covered by the Fairford NP is also set out in the Cotswold District Local Plan (CDLP, adopted August 2018). The CDLP covers the period between 2011 to 2031 and set an indicative number of 61 homes to be built in Fairford. The Fairford NP covers the same period and establishes its own development quantum in Policy FNP14 (A New Low Carbon Community in Fairford) of around 80 homes.

1.4 The primary aim of the Fairford NP is to develop a sustainable future for the area, which must address several issues. Fairford is a Cotswold market town in south-east Gloucestershire and borders the Cotswold Area of Outstanding National Beauty (AONB). The River Coln runs through the neighbourhood plan area on a north-south axis before meeting the R. Thames at Lechlade. The R. Thames itself flows adjacent to the North Meadow & Clattinger Farm SAC, resulting in seasonal flooding of the meadows. Fairford town comprises several retail and accommodation facilities (e.g. pubs, shops and community facilities). The vision for the Fairford NP is to provide the required level of housing need, while acknowledging its environmental impacts. The Fairford NP provides policies that cover all aspects of development, including detail on infrastructure provision and nature conservation. The NP is explicitly in adherence with the overarching CDLP and its HRA. Therefore, due regard will be given to that HRA in all relevant sections of this report.

1.5 The CDLP was subject to HRA in April 2017, which covered a wide range of impact pathways in relation to growth delivered across the authority, including effects on the water table, toxic contamination and non-physical disturbance. For example, the HRA undertook Appropriate Assessment of potential recreational pressure effects in the North Meadow & Clattinger Farm SAC, identifying that its lowland hay meadows are vulnerable to impacts from recreation. The CDLP HRA assessed a much larger quantum of housing growth (8,400 dwellings across Cotswold District) and is therefore a useful starting point for assessing the impact pathway recreational pressure in the context of the Fairford NP.

1.6 An HRA is required under the terms of the Conservation of Habitats & Species Regulations 2017 (as amended). It assesses if any NP policies or site allocations have the potential to cause Likely Significant Effects or adverse effects on the integrity of European Sites (Special Areas of Conservation, SACs; Special Protection Areas, SPAs; and Ramsar sites, designated under the Ramsar convention), either alone or 'in combination' with other plans and projects, and to determine whether policy- or site-specific mitigation measures are required.

## Legislation

1.7 The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). This established a transition period, which ended on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic law and this continues to apply in the UK.

1.8 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (as amended) and concerns the protection of European sites (Figure 1). European sites can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.

1.9 The HRA process applies the precautionary principle to protected areas. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

**Conservation of Habitats and Species Regulations 2017 (as amended)**

With specific reference to Neighbourhood Plans, Regulation 106(1) states that:

"*A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority* [the Local Planning Authority] *may reasonably require for the purpose of the assessment under regulation 105…* [which sets out the formal process for determination of 'likely significant effects' and the appropriate assessment']*."*

**Figure 1: The legislative basis for HRA**

1.10 It is therefore important to note that this report has two purposes:

- To assist the Qualifying Body (Fairford Town Council) in preparing their plan by recommending (where necessary) any adjustments required to protect European sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
- On behalf of the Qualifying Body, to assist the Local Planning Authority (Cotswold District Council) to discharge their duty under Regulation 105 (in their role as 'plan-making authority' within the meaning of that regulation) and Regulation 106 (in their role as 'competent authority').

1.11 Over the years, 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of "Appropriate Assessment". Throughout this Report the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

# 2. Methodology

## Introduction

2.1 Figure 2 below outlines the stages of HRA according to current Ministry of Housing, Communities and Local Government guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan until no significant adverse effects remain.

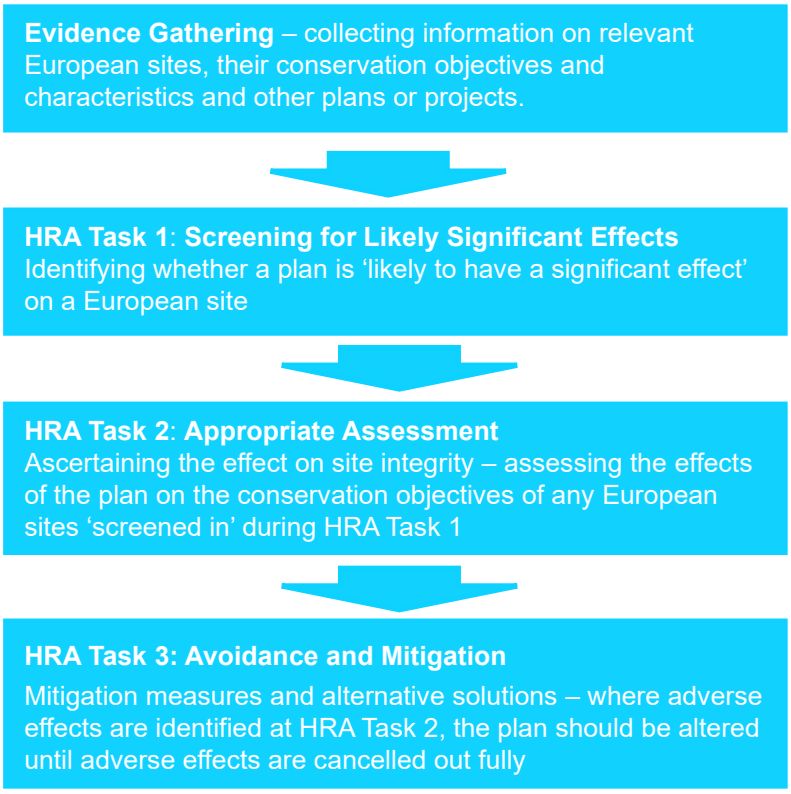


**Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source GOV.UK, 2019.**

## HRA Task 1 – Likely Significant Effects (LSE)

2.2 Following evidence gathering, the first stage of any Habitats Regulations Assessment (and thus of this Report to Inform Cotswold District Councils HRA) is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"*Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?*"

2.3 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage of the Report to Inform HRA is undertaken in Chapter 5 of this report.

## HRA Task 2 – Appropriate Assessment (AA)

2.4 Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn in the view of the report authors, the analysis in this Report to Inform HRA has proceeded to the next stage known as Appropriate Assessment. Case law has clarified that 'appropriate assessment' is

not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects.

2.5 During July 2019 the Ministry of Housing, Communities and Local Government published guidance for Appropriate assessment[1]. Paragraph: 001 Reference ID: 65-001-20190722m explains: '*Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured*'.

2.6 As this analysis follows on from the screening process, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment takes any policies or allocations that could not be dismissed following the high-level screening analysis and analyses the potential for an effect in more detail, with a view to concluding whether there would be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).

2.7 A decision by the European Court of Justice[2] concluded that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. The UK is no longer part of the European Union. However, as a precaution, it is assumed for the purposes of this HRA that EU case law regarding Habitat Regulations Assessment will still be considered informative jurisprudence by the UK courts. That ruling has therefore been considered in producing this Report to Inform HRA.

2.8 Also, in 2018 the Holohan ruling[3] was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that '*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, … typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*' [emphasis added]. However, the North Meadow & Clattinger Farm SAC is not designated for mobile species that would use functionally linked habitats beyond the designated site boundary.

# HRA Task 3 – Avoidance and Mitigation

2.9 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites subject to the agreement of Cotswold District Council as competent authority. There is considerable precedent concerning the level of detail that a Neighbourhood Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.

2.10 In evaluating significance, AECOM has relied on professional judgement and the LP HRA regarding development impacts on the European sites considered within this assessment.

2.11 When discussing 'mitigation' for a Neighbourhood Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since such planning documents are high-level policy documents. A Neighbourhood Plan is a lower level constituent of a Local Development Plan.

[1] https://www.gov.uk/guidance/appropriate-assessment#what-are-the-implications-of-the-people-over-wind-judgment-for-habitats-regulations-assessments [Accessed: 07/01/2020].
[2] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)
[3] Case C-461/17

# Confirming Other Plans and Projects That May Act 'In Combination'

2.12 It is a requirement of the Regulations that the impacts of any development plans are not only considered in isolation but in-combination with other plans and projects that may also be affecting the European site(s) in question. In combination effects have therefore been considered in this Report to Inform HRA.

2.13 For example, when considering the potential for combined regional housing development across multiple local authorities to impact on European sites, a key emphasis must be on the cumulative impact of visitor numbers (i.e. recreational pressure). While one parish might only contribute a minor portion of recreational pressure (with no or little negative impact on a European site), other adjacent parishes may also each contribute minor 'amounts' of recreation. Cumulatively, especially across multiple authorities, this could result in detectable disturbance effects on designated species.

2.14 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans (which in themselves may have minor impacts) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in-combination assessment is therefore of greatest relevance when the plan or policy would otherwise be screened out because its individual contribution is negligible.

# 3. European Sites

## North Meadow and Clattinger Farm SAC

### Introduction

3.1 The North Meadow and Clattinger Farm SAC is a 105.23ha large site that is situated in south-west England, comprising humid grassland (71%), dry grassland (15%), improved grassland (12%) and inland waterbodies (2%). The qualifying habitat is lowland hay meadows, representing one of two sites near the centre of its UK range. The site exhibits exceptional survival of traditional hay meadow management with high degree of conservation of structure and function. The SAC supports over 90% of the extant UK population of fritillary *Fritillaria meleagris*, which is a characteristic but rare species of damp lowland meadows.

3.2 Both parts of the SAC lie within the Cotswold Water Park, a manmade wetland created by the restoration of sand and gravel pits. The site sits within the floodplain of the River Thames and experiences great seasonal variation in water levels, giving rise to its characteristic flora. In recent years, both component SSSIs of the SAC have experienced prolonged flooding periods, threatening future hay meadow management. The SAC is also a National Nature Reserve that experiences high visitor levels and management is in place to protect its fritillary population.

### Qualifying Features[4]

3.3 Annex I habitats that are a primary reason for selection of this site:

- Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)

### Conservation Objectives[5]

3.4 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

3.5 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

### Threats / Pressures to Site Integrity[6]

3.6 The following threats and pressures to the integrity of the North Meadow and Clattinger Farm SAC have been identified in Natural England's Site Improvement Plan:

- Inappropriate water levels
- Habitat fragmentation
- Commons management
- Public access / disturbance
- Water pollution

[4] https://sac.jncc.gov.uk/site/UK0016372 [Accessed on the 16/04/2021]
[5] http://publications.naturalengland.org.uk/publication/6299293463871488 [Accessed on the 16/04/2021]
[6] http://publications.naturalengland.org.uk/publication/4566167836758016 [Accessed on the 16/04/2021]

3.7 Reference to the Supplementary Advice on the Conservation Objectives[7] underlines the importance of inappropriate water levels and water pollution. It states that '*For this Annex I feature, the deposition of nutrients, particularly phosphate ('P'), as sediment in floodwaters have the potential to impact the site, Further site-specific investigation on the site's nutrient budget/balance is required to establish more precise water quality standards for the SAC'* and that '*A series of summer floods at North Meadow have caused a decline in the area of MG4 grassland, which corresponds to H6510, since an extensive survey carried out in 1995 and 1996. The consequences of recent floods at North Meadow e.g. elevated phosphorous levels in the soil are still in evidence and will be exacerbated by potential further flooding in the future. Excessive and unseasonal flooding presents the most significant risk to the H6510 feature at North Meadow'*. The advice references air quality and the fact that nitrogen and ammonia are below their critical loads or levels but that the habitat is considered vulnerable to atmospheric pollution. It also underlines the importance of the precise management regime in maintaining the botanical structure and diversity of the sward stating that '*The H6510 feature is the product of longterm management of both sites as lowland hay meadows with a late summer hay cut followed by aftermath grazing. This continued management is essential to the maintenance of the qualifying feature'*.

[7] http://publications.naturalengland.org.uk/publication/6209293463074488

# 4. Impact Pathways

## Recreational Pressure

4.1 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels and impacts on European protected sites[8] [9]. This applies to any habitat, but the additional recreational pressure from housing growth on destinations designated for bird species can be especially strong and some qualifying species are known to be susceptible to disturbance. Studies across a range of species have shown that the effects from recreation can be complex. HRAs of planning documents tend to focus on recreational sources of disturbance as a result of new residents[10].

## Trampling Damage, Nutrient Enrichment and Substrate Disturbance

4.2 Most terrestrial habitats (including grassland, heathland, dune habitat and woodland) can be affected by trampling and other mechanical damage, which in turn dislodges or damages individual plants and leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with recreational activities in different habitats:

- Wilson & Seney)[11] examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.

- Cole et al[12] conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of regular disturbance cycles.

[8] Liley D, Clarke R.T., Mallord J.W., Bullock J.M. 2006a. The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.
[9] Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. 2006b. Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.
[10] The RTPI report 'Planning for an Ageing Population'(2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.
[11] Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* **14**:77-88
[12] Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* **32**: 203-214
Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* **32**: 215-224

- Cole [13] conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier tramplers caused a greater reduction in vegetation height than lighter tramplers, but there was no difference in the effect on cover.

- Cole & Spildie[14] experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.

- In heathland sites, trampling damage can affect the value of a site to wildlife. For example, heavy use of sandy tracks loosens and continuously disturbs sand particles, reducing the habitat's suitability for invertebrates[15]. Species that burrow into flat surfaces such as the centres of paths, are likely to be particularly vulnerable, as the loose sediment can no longer maintain their burrow. In some instances, nature conservation bodies and local authorities resort to hardening paths to prevent further erosion. However, this is concomitant with the loss of habitat used by wildlife, such as sand lizards and burrowing invertebrates.

4.3 Prolonged or repeated excessive trampling and erosion may, over time, lead to soil compaction, widening of paths / trails and damage to individual plants and their roots. For example, it has been demonstrated that recreational trails with high usage are subject to significantly more erosion and root exposure[16]. Soil compaction leads to a loss of space for air and water molecules, both of which are integral to plant health, due to processes such as nutrient uptake and hydration[17]. Due to their high ecological value, this can be a particular issue for lowland hay meadows and associated rare fritillaries.

4.4 A major concern for many habitats is nutrient enrichment associated with dog fouling, which has been addressed in various reviews (e.g.[18]). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more spread out distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually[19]. While there is little information on the chemical constituents of dog faeces, nitrogen is one of the main components[20]. Nutrient levels are one of the major determinants of plant community composition and the effect of dog defecation in sensitive habitats may be comparable to a high-level application of fertiliser, potentially resulting in the shift to plant communities that are more typical for improved grasslands. While it is noted that the North Meadow & Clattinger Farm SAC is a relatively nutrient-rich environment due to its seasonal flooding from the Thames, excessive additional nutrient input from dog faeces may exacerbate any effects of nutrient loading from treated sewage effluent.

[13] Cole, D.N. 1995c. Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.
[14] Cole, D.N., Spildie, D.R. 1998. Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* **53**: 61-71
[15] Taylor K., Anderson P., Liley D. & Underhill-Day J.C. 2006. Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.
[16] Leung Y.-F. & Marion J. F. (2000). Recreation impacts and management in wilderness: A state-of-knowledge review. USDA Forest Service Proceedings 5: 23-48.
[17] Natural England Site Conservation Objectives Supplementary Advice Note for the Windsor Forest & Great Park SAC. Available at: http://publications.naturalengland.org.uk/publication/5175000009015296 [Accessed on the 14/10/2019].
[18] Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. 2005. Dogs, access and nature conservation. English Nature Research Report, Peterborough.
[19] Barnard A. 2003. Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. Countryside Recreation 11:16-19.
[20] Taylor K., Anderson P., Liley D. & Underhill-Day J.C. 2006. Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

## Typical Mitigation Measures

4.5 Mitigation measures to avoid recreational pressure effects usually involve a combination of access management, habitat management and provision of alternative recreational space. Access management (restricting access to some or all of a European site) is not typically within the remit of Town and Parish Councils and restriction of access may contravene a range of Government policies on access to open space and objectives for increasing exercise, improving health etc. However, active management of access may be possible, such as that practised on nature reserves. Habitat management also does not lie within the direct remit of Town and Parish Councils. However, the Councils can help to set a framework for improved habitat management by promoting collaboration with neighbouring Parishes and Local Planning Authorities. For example, provision of alternative recreational space can help to attract recreational users away from sensitive European Sites and reduce recreational pressure effects. However, the location and type of alternative space must be carefully tailored to site users for this to be effective.

## Summary

4.6 Overall, the following European Site within 10km of Fairford neighbourhood plan area is sensitive to recreational pressure as a result of NP development (the site in bold is taken forward into the following chapters):

- **North Meadow & Clattinger Farm SAC (located approx. 5.5km to the south-west of Fairford Neighbourhood Plan area)**

# Water Quality

4.7 The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.
- Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing bioavailable nitrogen.
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

4.8 The most significant issue in relation to the Fairford NP is the discharge of treated sewage effluent, which is likely to increase nutrient concentrations in local watercourses such as the River Thames. Phosphate is the main limiting nutrient in freshwater ecosystems and is likely to cause eutrophication if it increases significantly. The North Meadow & Clattinger Farm SAC is designated for lowland hay meadows and while this habitat depends on nutrient input from seasonal flooding events, a significant increase in the nutrient loading of the R. Thames may lead to changes in the plant community composition of the SAC. The Site Improvement Plan (SIP) for the SAC[21] highlights water pollution as a threat to the site. For example, it states that increased nutrient levels could lead to soil enrichment, with potential negative impacts on the species richness of the meadows.

4.9 The NP assessed in this Report to Inform HRA provides for development in the geographic area covered by Thames Water, responsible for the public water supply and wastewater treatment

[21] Available at: http://publications.naturalengland.org.uk/publication/6283453993582592 [Accessed on the 26/03/2021]

within this part of Cotswolds District. The potential implications of this development are outlined in Table 1.

**Table 1: Wastewater Treatment Works (WwTWs) serving development allocated in Fairford with potential hydrological continuity with the North Meadow & Clattinger Farm SAC.**

| WwTW Catchment | Residential development quantum allocated in the Fairford Neighbourhood Plan | HRA implications |
|---|---|---|
| Fairford WwTW (operated by Thames Water and located in the adjoining Kempsford parish) | Up to 80 dwellings | Discharge of treated sewage effluent into local watercourses, such as the River Thames. This is hydrologically connected to the North Meadow & Clattinger Farm SAC and could lead to water quality changes during the wet season. |

4.10 Overall, the following European Site within 10km of Fairford neighbourhood plan area s sensitive to changes in water quality as a result of NP development (the site in bold is taken forward into the following chapters):

- **North Meadow & Clattinger Farm SAC (located approx. 5.5km to the south-west of Fairford Neighbourhood Plan Area)**

# Water Quantity, Level and Flow

4.11 The water level, its flow rates and the mixing conditions are important determinants of the condition of European Sites and their qualifying features. Hydrological processes are critical in influencing habitat characteristics in freshwater habitats, including supplied water volume, water level, water temperature and dissolved oxygen concentrations. In turn these parameters determine the short- and long-term viability of plant and animal species, as well as overall ecosystem composition.

4.12 A highly cited review paper summarises the ecological effects of reduced flow in rivers. Droughts (ranging in their magnitude from flow reduction to a complete loss of surface water) have both direct and indirect effects on river communities and connected habitats. For example, a marked direct effect is the loss of water and habitat for aquatic species. Indirect effects include a deterioration in water quality, changes to nutrient concentrations and alterations in community composition.

4.13 There are two mechanisms through which urban development might negatively affect the water level in water-dependent SACs:

- The supply of new housing with potable water may require an increase in the abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this is likely to reduce the water level in SACs sharing the same catchment.
- The expansion of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. Often this pluvial flooding results in excessive downstream inundation of watercourses and the potential flooding of wetland habitats.

4.14 The North Meadow & Clattinger Farm SAC is designated for lowland hay meadows, which are sensitive to changes in water level. The primary mechanism by which the Fairford NP could affect this would be via a change in the volume of freshwater supplied by the River Thames – most likely a reduction in freshwater input due to water abstraction for the water supply of new residential development. For example, Natural England's Site Improvement highlights inappropriate water levels as the primary pressure / threat to the integrity of the SAC, leading to potential changes in the community composition of the sward.

4.15 Generally, waterbodies within and downstream of urban areas are likely to have only limited capacity to take up some of the surface- water runoff from pavement and buildings. If this capacity is exceeded and there is excessive freshwater input from impermeable surfaces, this may result in exacerbated flooding of designated sites in hydrological connectivity with affected surface waterbodies. The SIP establishes that more frequent and prolonged flooding events are causing changes to the vegetation communities in the SAC. However, in the case of the Fairford NP, direct water surface runoff is unlikely to be an issue, given that the North Meadow & Clattinger Farm SAC lies at a distance of approx. 5.5km from the neighbourhood plan area.

4.16 The following European Site within 10km of Fairford neighbourhood plan area is sensitive to changes in the water quantity, level and flow as a result of NP development (the site in bold is taken forward into the following chapters):

- **North Meadow & Clattinger Farm SAC (located approx. 5.5km to the south-west of Fairford Neighbourhood Plan Area)**

# Atmospheric Pollution (through Nitrogen Deposition)

4.17 The main pollutants of concern for European sites are oxides of nitrogen (NOx), ammonia ($NH_3$) and sulphur dioxide ($SO_2$) and are summarised in Table 2. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges[22]. NOx can also be toxic at very high concentrations (far above the annual average critical level). However, in particular, high levels of NOx and $NH_3$ are likely to increase the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere is widely known to enhance soil fertility and to lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats[23] [24].

**Table 2: Main sources and effects of air pollutants on habitats and species**[25]

| Pollutant | Source | Effects on habitats and species |
|---|---|---|
| Sulphur Dioxide ($SO_2$) | The main sources of $SO_2$ are electricity generation, and industrial and domestic fuel combustion. However, total $SO_2$ emissions in the UK have decreased substantially since the 1980's.<br><br>Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of $SO_2$ have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to $SO_2$ emissions in the UK. | Wet and dry deposition of $SO_2$ acidifies soils and freshwater and may alter the composition of plant and animal communities.<br><br>The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species.<br><br>However, $SO_2$ background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London. |
| Acid deposition | Leads to acidification of soils and freshwater via atmospheric deposition of $SO_2$, NOx, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.<br><br>Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will | Gaseous precursors (e.g. $SO_2$) can cause direct damage to sensitive vegetation, such as lichen, upon deposition.<br><br>Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, |

[22] http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm, accessed 01/04/2020.
[23] Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. **2006.** Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. Lichenologist 38: 161-176
[24] Dijk, N. **2011.** Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation Global Change Biology 17: 3589-3607
[25] Information summarised from the Air Pollution Information System (http://www.apis.ac.uk/)

| Pollutant | Source | Effects on habitats and species |
|---|---|---|
| | continue to decline, increased N emissions may cancel out any gains produced by reduced S levels. | reduced decomposition rates, and compromised reproduction in birds / plants.<br><br>Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible. |
| Ammonia ($NH_3$) | Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock.<br><br>Ammonia reacts with acid pollutants such as the products of $SO_2$ and $NO_X$ emissions to produce fine ammonium ($NH_4$+) - containing aerosol. Due to its significantly longer lifetime, $NH_4$+ may be transferred much longer distances (and can therefore be a significant trans-boundary issue).<br><br>While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type. | The negative effect of $NH_4$+ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation.<br><br>Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen.<br><br>As emissions mostly occur at ground level in the rural environment and $NH_3$ is rapidly deposited, some of the most acute problems of $NH_3$ deposition are for small relict nature reserves located in intensive agricultural landscapes. |
| Nitrogen oxides ($NO_x$) | Nitrogen oxides are mostly produced in combustion processes. Half of $NO_X$ emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes.<br><br>In contrast to the steep decline in Sulphur dioxide emissions, nitrogen oxides are falling slowly due to control strategies being offset by increasing numbers of vehicles. | Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NOx for all vegetation types has been set to 30 ug/m3.<br><br>Deposition of nitrogen compounds (nitrates ($NO_3$), nitrogen dioxide ($NO_2$) and nitric acid ($HNO_3$)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification.<br><br>In addition, $NO_x$ contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species. |
| Nitrogen deposition | The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. $NO_X$) or reduced (e.g. $NH_3$) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices.<br><br>The N pollutants together are a large contributor to acidification (see above). | All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally.<br><br>Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species.<br><br>N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost. |
| Ozone ($O_3$) | A secondary pollutant generated by photochemical reactions involving NOx, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above).<br><br>Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when | Concentrations of $O_3$ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings.<br><br>High $O_3$ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production |

| Pollutant | Source | Effects on habitats and species |
|---|---|---|
| | ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone. | and altered species composition in semi-natural plant communities. |

4.18 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping[26]. Ammonia emissions originate from agricultural practices[27], with some chemical processes also making notable contributions. As such, it is unlikely that material increases in $SO_2$ or $NH_3$ emissions will be associated with the Fairford NP.

4.19 NOx emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion to its overall NOx footprint (92%) through the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison[28]. Emissions of NOx could therefore be reasonably expected to increase because of a higher number of vehicles due to implementation of the Fairford NP.

4.20 According to the World Health Organisation, the critical NOx concentration (critical threshold) for the protection of vegetation is 30 $\mu gm^{-3}$; the threshold for sulphur dioxide is 20 $\mu gm^{-3}$. In addition, ecological studies have determined 'critical loads'[29] of atmospheric nitrogen deposition (that is, NOx combined with ammonia $NH_3$).

4.21 The Department of Transport's Transport Analysis Guidance stipulates that, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant[30] (Figure 3). This is therefore the distance that has been used throughout this Report to Inform HRA in order to determine whether the North Meadow & Clattinger Farm SAC is likely to be significantly affected by development outlined in the Fairford NP.

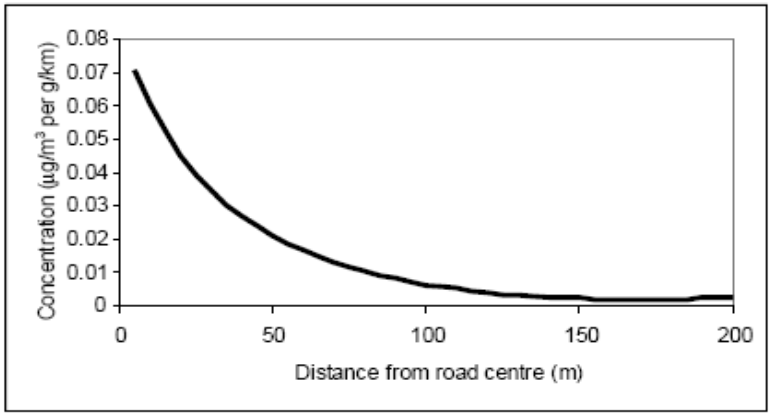


**Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT[31])**

4.22 Exhaust emissions from vehicles are capable of adversely affecting most plants and their community composition. Considering this, an increase in the net local population associated with the Fairford NP could result in increased traffic alongside the North Meadow & Clattinger Farm SAC, if likely to be affected by commuter journeys from / to the Fairford NP area.

4.23 Air quality and European sites is an 'in combination' issue and therefore traffic growth across the whole of Cotswold District must be considered in context. Overall, the following European Site

[26] http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.
[27] Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. 1998. A new inventory for ammonia emissions from U.K. agriculture. Atmospheric Environment 32: 309-313
[28] Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. http://www.airquality.co.uk/archive/index.php
[29] The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.
[30] http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013 [Accessed on the 01/04/2020]
[31] http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf [Accessed on the 01/04/2020]

lies within 10km (the average commuting distance of a UK resident) of Fairford NP area and is sensitive to atmospheric pollution (the site in bold is taken forward into the following chapters):

- **North Meadow & Clattinger Farm SAC (located approx. 5.5km to the south-west of Fairford Neighbourhood Plan area)**

# 5. Test of Likely Significant Effects

## Introduction

5.1 The initial scoping of impact pathways and the relevant European Site identified that the following require consideration:

**Recreational Pressure**

- North Meadow & Clattinger Farm SAC

**Water Quality**

- North Meadow & Clattinger Farm SAC

**Water Level**

- North Meadow & Clattinger Farm SAC

**Atmospheric Pollution**

- North Meadow & Clattinger Farm SAC

5.2 The policies contained within the Fairford NP are screened for their Likely Significant Effects (LSEs) on European Sites in Appendix A. Figure 4 below shows Fairford NP area in relation to the North Meadow & Clattinger Farm SAC, the only European Site within 10km of the Neighbourhood Plan area.

**Figure 4: The Fairford NP area in relation to the North Meadow & Clattinger Farm SAC, the only European Site within 10km of the Neighbourhood Plan Area. The residential community allocated in the NP is also displayed.**

# Recreational Pressure

5.3 The overall amount of residential growth to be delivered in Fairford equates to 80 dwellings. The following policies in the NP have the potential to result LSEs regarding the impact pathway recreational pressure:

- **Policy FNP7 – Improving Access to Visitor Attractions** (improves pedestrian and cycle access to key visitor attractions, such as Cotswold Water Park and the Thames Path; these measures may also lead to an increase in the volume of visitors to the North Meadow & Clattinger Farm SAC)
- **Policy FNP14 – A new Low Carbon Community in Fairford** (provides for 80 dwellings in Fairford)
- **Policy FNP18 – New Visitor Accommodation** (supports potential new visitor accommodation in Fairford)

## North Meadow & Clattinger Farm SAC

5.4 The residential development outlined in the Fairford NP allocates up to 80 dwellings, which will result in a net increase of recreational visits to nearby outdoor areas, including both recreational greenspaces and designated sites. The distances that local residents travel to undertake recreational activities are likely to vary greatly and depend on the type of activity undertaken. For example, dog walkers often tend to undertake frequent and short walks near their home, whereas people on family outings or wildlife watchers are likely to travel further and spend more time at their destinations. This is partly because the desired features of interest (e.g. specific sceneries or wildlife attractions) are limited to relatively few locations.

5.5 The primary method to assess the 'draw' of a European Site is to establish its core recreational catchment, which is based on the 75$^{th}$ percentile of the distances travelled by visitors using postcode data. While the catchment of most inland European Sites equates to roughly 5km, many sites with particular attractions may have much larger Zones of Influence (ZoIs). Sometimes ZoIs may change seasonally, for example due to the annual flowering of plants. Fairford lies approx. 5.5km from the North Meadow & Clattinger Farm SAC and thus towards the outer edge of typical ZoIs for inland sites.

5.6 The SAC is designated for lowland hay meadows (including the rare fritillaries), which are sensitive to trampling damage resulting from recreational activities, particularly where visitors venture off waymarked paths. Furthermore, during the wet season the ground is sensitive to soil compaction, potentially changing the soil conditions for vulnerable seedlings. Nutrient enrichment arising from dog fouling may influence sward composition by favouring more competitive grass species, potentially resulting in a decline in species diversity. Natural England's SIP mentions recreational pressure as a threat / pressure to the SAC, stating that current visitor levels are exceeding site capacity.

5.7 Overall, due to the sensitivity of the North Meadow & Clattinger Farm SAC to recreational pressure, Likely Significant Effects cannot be excluded in the opinion of the report authors, and the site is screened in for Appropriate Assessment.

# Water Quality

## North Meadow & Clattinger Farm SAC

5.8 The overall amount of residential growth to be delivered in Fairford equates to 80 dwellings. The following policies in the NP have the potential to result LSEs regarding the impact pathway water quality:

- **Policy FNP14 – A new Low Carbon Community in Fairford** (provides for 80 dwellings in Fairford)

- **Policy FNP18 – New Visitor Accommodation** (supports potential new visitor accommodation in Fairford)

5.9 The North Meadow & Clattinger Farm SAC is designated for lowland hay meadows, which typically lie on river and tributary floodplains. These meadows rely on seasonal flooding for the input of nutrients and are therefore sensitive to negative changes in water quality. NE's Site Improvement Plan highlights water pollution as a threat to the SAC, primarily as a result of flood water carrying diffuse pollutants onto the water meadows and potentially causing nutrient enrichment and a decline in species diversity. While WwTWs are not specifically mentioned as a concern, treated sewage effluent may significantly contribute to the overall nutrient loading in the SAC.

5.10 A review of mapping on MAGIC indicates that Fairford WwTW (located in the adjoining Kempsford parish) will process the sewage produced by the 80 dwellings allocated in Fairford. This WwTW discharges into a drain that joins the River Coln. The R. Coln is a tributary to the R. Thames, with the confluence at Inglesham, approx. 17.2km downstream from the North Meadow & Clattinger Farm SAC. Therefore, while the R. Thames seasonally floods the SAC, there is no connecting pathway between treated sewage effluent (and nutrients) from Fairford and the qualifying lowland hay meadows. Overall, this impact pathway is screened out from Appropriate Assessment.

# Water Quantity, Level and Flow

## North Meadow & Clattinger Farm SAC

5.11 The overall amount of residential growth to be delivered in Fairford equates to 80 dwellings. The following policies in the NP have the potential to result LSEs regarding the impact pathway water quality:

- **Policy FNP14 – A new Low Carbon Community in Fairford** (provides for 80 dwellings in Fairford)
- **Policy FNP18 – New Visitor Accommodation** (supports potential new visitor accommodation in Fairford)

5.12 The North Meadow & Clattinger Farm SAC is designated for lowland hay meadows, which depend on adequate water levels for the seasonal replenishment of nutrients. NE's Site Improvement Plan indicates that inappropriate water levels are the primary pressure / threat to the SAC. In recent years, more frequent flooding has led to changes in the botanical composition of the site and its boundaries. A Water Level Management Plan is needed to reduce impacts of increased flooding events.

5.13 Excessive changes in the water level of European Sites are most likely to be caused by increased abstraction rates for the potable water supply (potentially leading to a general reduction in water level / volume) and surface water run-off from impermeable surfaces (potentially leading to increased flooding and water levels). Due to the relatively long distance between Fairford Neighbourhood Plan Area and the North Meadow & Clattinger Farm SAC (approx. 5.5km), it is unlikely that increased surface runoff from developed brownfield sites would directly impact the volume of freshwater supplied to the site. Additionally, any flood water is most likely expected to contribute to the R. Thames downstream from the SAC and would thus not be affecting its water level.

5.14 However, while not specifically mentioned in the SIP, increased abstraction (particularly from streams or rivers) to supply water to new households in Fairford could lead to reduced freshwater input to the SAC, with potential concomitant decreases in nutrient concentrations. Due to the relatively small quantum of residential growth allocated in Fairford, this impact pathway is considered to be most relevant 'in-combination' with growth delivered across Cotswold District. Overall, Likely Significant Effects of the Fairford NP on the North Meadow & Clattinger Farm SAC regarding the impact pathway water quantity, level and flow, cannot be excluded in the opinion of the report authors. Therefore, the site is screened in for Appropriate Assessment.

# Atmospheric Pollution

5.15 The overall amount of residential growth to be delivered in Fairford equates to 80 dwellings. The following policies in the NP have the potential to result LSEs regarding the impact pathway water quality:

- **Policy FNP14 – A new Low Carbon Community in Fairford** (provides for 80 dwellings in Fairford)
- **Policy FNP18 – New Visitor Accommodation** (supports potential new visitor accommodation in Fairford)

5.16 The Fairford NP is a development plan that must be in compliance with the overarching Cotswold District Local Plan, adopted in August 2018. While the overall quantum of residential development allocated in Fairford is relatively small (a maximum of 80 dwellings), atmospheric pollution is an impact pathway where 'in combination' assessment is required.

## North Meadow & Clattinger Farm SAC

5.17 The North Meadow & Clattinger Farm SAC is designated for lowland hay meadows, which comprise grass swards of high biodiversity, including its population of rare fritillaries. The Air Pollution Information System (APIS) identifies this habitat feature as being sensitive to atmospheric nitrogen deposition with a nitrogen Critical Load of 20-30 kg N/ha/yr. A significant increase in nitrogen deposition may induce a fertilisation effect, resulting in an increase of tall grasses and a decrease of species diversity.

5.18 In 2018 Natural England published its guidance to local authorities on considering traffic related air quality impacts in HRA[32]. Having established that a sensitive site lies within 200m of a relevant road, that guidance then recommends mathematical screening criteria are applied to determine whether a likely significant effect will arise either from a plan/project alone, or from a plan/project in combination with other plans and projects. These criteria can be based on traffic flows (whether or not the plan/project will result in an increase of 1000 AADT on the road either alone or in combination with other plans and projects) or on the forecast change in pollution (whether or not the plan/project will result in an increase in pollution equivalent to 1% of the critical level or load at the SAC either alone or in combination with other plans and projects).

5.19 Expected traffic generation on the A419 within 200m of the SAC as a result of the allocation of 80 dwellings at Fairford has been modelled by the AECOM traffic team. Informed by 2011 Census data (WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)), the traffic associated with the proposed development has been distributed onto the surrounding local highway network. The majority of residents living in Fairford (MSOA Cotswold 009) commute within the Cotswolds, or to Swindon, West Oxfordshire and Wiltshire. Drivers will travel north of the SAC to reach the Cotswolds and West Oxfordshire whilst drivers travelling to Swindon and Wiltshire are likely to route through Meysey Hampton and Marston Meysey before joining the A419 south of the SAC.

5.20 Based on the likely origins / destinations mentioned above, it has therefore been modelled that the development of 80 dwellings at Fairford would result in 3-4 two-way AADT past the SAC (i.e. one to two vehicles making return journeys) and this is considered a precautionary estimate. Manual traffic count data accessed from The Department for Transport Road Traffic Statistics for 2019 identifies that the annual average daily two-way flow on the A419 400m south of the SAC (manual count point 27119, the nearest count location) is 42,566 AADT. A change in AADT of 3-4 AADT is therefore a change of 0.009% and well within the daily variation in traffic flows already seen on this stretch of highway. Clearly, the predicted flows due to the Neighbourhood Plan allocation will have a negligible effect on the SAC by themselves, but in accordance with Natural England guidance need discussing 'in combination' with other plans and projects. 'In combination' effects on the relevant section of the A419 were modelled in 2021 for the A417 Missing Link Development Consent Order[33]. Paragraphs 185 to 194 and Tables E-1 and F-1 of the associated Habitats Regulations Assessment Screening Report discuss the results. Table E-1 shows that

[32] http://publications.naturalengland.org.uk/publication/4720542048845824
[33] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010056/TR010056-000618-6.5%20Environmental%20Statement%20-%20Habitats%20Regulations%20Assessment%20Screening%20Report.pdf

the change in flows on the A419 within 200m of the SAC due to the Missing Link scheme alone would be 2,259 AADT by 2026. Therefore, there will be in an 'in combination' increase in traffic flows exceeding 1,000 AADT by 2031.

5.21 The report goes on to model the air quality implications of the forecast increase in traffic. The data in Table F-1 show that nitrogen deposition throughout the 200m modelled transect at the closest point of the road to the SAC (receptor locations EN1 to EN21) is below the minimum part of the critical load range (20 kgN/ha/yr) ranging from 19.1 kgN/ha/yr (at location EN21) to 19.5 kgN/ha/yr (at EN1, the closest part of the SAC to the road) and is forecast to remain below the critical load even when 'in combination' traffic growth is taken into consideration[34]. Comparison between Do Something and Baseline scenarios in Table F-1 also shows that the total 'in combination' *effect* from all forecast traffic growth to 2026 and the Missing Link scheme at the closest part of the SAC to the road is 0.1 kgN/ha/yr which equates to 0.5% of the lowest part of the critical load range (well below the 1% of the critical load threshold for dismissing pollution as mathematically imperceptible according to Natural England guidance). This is notwithstanding the fact that the contribution of the Missing Link scheme alone to traffic flows on the A419 will be a maximum of 2,259 AADT according to Table E-1 of the Missing Link HRA, far more than the 3-4 AADT that will be contributed through the allocation of 80 dwellings in the Fairford Neighbourhood Plan.

5.22 Ammonia and NOx concentrations in atmosphere were not specifically modelled for the Missing Link DCO but APIS indicates that concentrations throughout the SAC are below the critical levels of 3 $\mu gm^{-3}$ for ammonia and 3 $\mu gm^{-3}$ for NOx, being reported as a maximum 2.78 $\mu gm^{-3}$ for ammonia and 21.6 $\mu gm^{-3}$ for NOx.

5.23 Since traffic growth of several thousand AADT's has been calculated not to result in a nitrogen dose exceeding 1% of the critical load at the closest part of the SAC to the A419, the contribution of a further 3-4 AADT due to Fairford Neighbourhood Plan would be imperceptible in modelling results. This is particularly true since case law has also been clear that a plan or project can make a contribution to flows that is nonetheless too small to be of significance even in combination with other projects and plans:

- Advocate-General Sharpston's Opinion in European Court of Justice Case C-258/11 in Paragraph 48 specified that '*the requirement for an effect to be 'significant' exists in order to lay down a de minimis threshold. Plans and projects that have no appreciable effect on the site can therefore be excluded. If all plans and projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.*'
- In Wealden v SSCLG [2017] EWHC 351 (Admin) (2017), Mr. Justice Jay accepted that if the contribution of an individual plan or project to traffic growth or resulting air quality effects was 'very small indeed' (quoting a notional 20 AADT), it could be legitimately and legally excluded from 'in combination' assessment. This view is in agreement with that of Advocate-General Sharpston.

5.24 Therefore, Likely Significant Effects of the Fairford NP on the North Meadows & Clattinger Farm SAC 'in-combination' can be excluded in the opinion of the report authors. The site is screened out from Appropriate Assessment in relation to this impact pathway.

[34] The baseline nitrogen deposition rates reported in the Missing Link HRA are lower than the maximum rates reported for the SAC on APIS. However, the data reported on APIS are based on the 5km grid square within which the SAC is situated and therefore do not account for variation in deposition rates across the SAC area.

# 6. Appropriate Assessment

## Introduction

6.1 The law does not prescribe how an Appropriate Assessment (AA) should be undertaken or presented but the AA must consider all impact pathways that have been screened in, whether they are due to policies alone or to impact pathways that arise in-combination with other projects and plans. That analysis is the purpose of this section. The law does not require the 'alone' and 'in combination' effects to be examined separately provided all effects are discussed. This section of the Report to Inform HRA is intended to provide the necessary technical analysis to enable the competent authority (Cotswold District Council) to reach a conclusion regarding adverse effects of the NP on the integrity of internationally important wildlife sites, in accordance with Regulation 105 and 106 of the Conservation of Habitats and Species Regulations 2017 (as amended).

6.2 The Fairford NP allocates up to 80 dwellings and this extent of growth is not considered large enough to have the potential for adverse effects on site integrity alone. However, LSEs must also be discussed in-combination, taking account of the growth in parishes adjoining Fairford. The Cotswold District Local Plan (CDLP) provides for 8,400 new dwellings in the period up to 2031. Therefore, the CDLP provides an appropriate starting point to assess in-combination effects of the Fairford NP on European Sites. Overall, the Fairford NP accounts for only approximately 1% of the development expected in the wider geographic area.

6.3 The HRA screening exercise undertaken in Chapter 5, Appendix A, Table 5 indicated one site allocation policy for which Likely Significant Effects on European Sites cannot be excluded, including the impact pathways recreational pressure and water quantity, level and flow.

## Recreational Pressure

### North Meadow and Clattinger Farm SAC

6.4 The North Meadow and Clattinger Farm SAC is designated for lowland hay meadows, which are sensitive to excessive trampling damage particularly when visitors venture off trails. Natural England's Site Improvement Plan indicates that visitor pressure is especially high in the flowering time of the snake's-head fritillary, leading to localised damage of plant communities. The SIP also specifies that a National Nature Reserve management plan is to be implemented to minimise the impact of trampling damage generated by recreational visitors. The closest component part of the SAC, the North Meadow SSSI, lies approx. 5.5km to the south-west of Fairford NP area.

6.5 The Cricklade North Meadow NNR is widely advertised as a recreation destination. For example, the VisitWiltshire website (www.visitwiltshire.co.uk) describes the background to the site, praises the famous fritillaries and their beautiful colours, and promotes the guided walking tours provided by Natural England (NE). NE has also produced an information leaflet for the NNR, discussing the importance of the site, how to get there, its main attractions and management measures. The active promotion of the site is likely to further increase visitor numbers at the site and may also attract future residents of Fairford. Without active mitigation measures this could exacerbate the impact of trampling damage on the SAC's fritillaries. Lowland hay meadows comprise species-rich swards with plants differing in their sensitivity to trampling damage. Trampling may reduce species diversity, with more hardy herbs being more likely to survive.

6.6 It is important to note that the Fairford NP allocates a relatively small amount of residential growth of 80 dwellings, equating to 192 additional residents. Generally, this modest housing growth would not be expected to lead adverse effects on site integrity on its own. However, the HRA process needs to consider the 'in-combination' effects with growth delivered in adjoining parishes. The overarching Cotswold District Local Plan (CDLP) provides for at least 8,400 dwellings in the period to 2031 (at least 20,160 new residents), some of which may also fall within the catchment of the SAC. Furthermore, the 'in-combination' approach is particularly relevant in this instance, because visitor numbers in the SAC are at or above capacity according to references to a Natural England consultation response in the Cotswold Local Plan HRA.

6.7 However, Natural England, who own and manage the site, have put measures in place to protect its conservation interest. For example, during winter flooding Natural England ask the public to stay off the site, because heavy footfall in wet conditions leads to ground compaction and damage to young fritillary shoots. Furthermore, the site also comprises waymarked routes (orange, blue and yellow) that direct visitors along established tracks, while being able to enjoy the site's main features. The public is asked to stay on the advertised routes and avoid having a closer look at flowers. It is also mandatory to keep dogs on leads to protect the fritillaries and ground-nesting birds. A full list of the management measures deployed in the SAC can be found at https://crickladecourtleet.org.uk/.

6.8 Moreover, while the Fairford administrative boundary lies 5.5km from the SAC, the settlement of Fairford lies 8km from the SAC and is separated from it by the A419. At a distance of 8km from the SAC, new Fairford residents may fall within the visitor catchment of the site but if so they will be on the fringes i.e. it is unlikely a significant number of residents regularly visit the SAC. Due to the presence of the A419, driving to the SAC from Fairford is not straightforward, requiring one to join the A419 at Wharf Farm, drive south one junction to the Calcutt junction and then double back through Cricklade. In contrast, Cotswold Water Park SSSI and Welford Meadows SSSI are both adjacent to Fairford and will provide a similar recreational experience on much larger parcels of land. It is unlikely Fairford residents would regularly visit North Meadow in significant numbers in contrast to these larger and closer wildlife sites.

6.9 Finally, the HRA of the Cotswold Local Plan concluded that *'North Meadow and Clattinger Farm SAC* [is] *located a long way from much of the housing proposed in parts of the District other than the south, and therefore it is likely that more conveniently accessible areas of open space closer to where people live will be used for most recreational activities. Any residual increase in visitor numbers that might occur from additional housing development in Cotswold District at the European sites would be likely to be dispersed across different locations, diluting the effects of recreation activities. Therefore, it is unlikely that any one European site would see a significant increase in visitor numbers as a result of the development proposed through the Local Plan'*. Nonetheless, a commitment was made in Local Plan policy INF7 (Green Infrastructure) for '*Cotswold District Council to work with key stakeholders including Natural England to develop appropriate mitigation'.* On this basis, a conclusion was drawn that delivery of 8,400 dwellings in Cotswold District and any mitigation strategy for the Local Plan that is being devised by Cotswold Council with Natural England is very unlikely to be so finely calibrated that the addition of a further 80 dwellings (c. 1%) at a distance of 8km from the SAC would trigger the need for additional mitigation, particularly given the much closer proximity of other larger areas of publicly accessible semi-natural habitat that are much easier to access from Fairford and are likely to mean Fairford residents rarely visit the SAC.

6.10 The Fairford NP also contains several policies that are likely to minimise the residual likelihood of any new residents of Fairford travelling to the SAC for recreation. For example, the provision and protection of local greenspaces is an established mitigation tool that helps absorb recreation in less sensitive sites. Policy **FNP8 (Protecting Local Green Spaces)** designates the Walnut Tree Field, Upper Green and Coln House Playing Field as protected outdoor spaces, which are likely to attract at least some of Fairford's new residents. **Policy FNP14 (A New Low Carbon Community In Fairford)** establishes that development proposals contributing to Fairford's allocation of 80 new dwellings will be required to deliver one or more areas of publicly accessible open spaces, which should include a children's play area and community gardens / allotments. Again, this policy will help to engage residents locally, rather than visiting the North Meadow & Clattinger Farm SAC.

6.11 Overall, it is therefore considered that the additional growth in the Neighbourhood Plan would not result in an adverse effect on the integrity of the SAC. This is based on the package of visitor management measures already devised by Natural England, the relative distance of Fairford town from the SAC (8km) and comparative difficulty accessing the SAC compared to other closer areas of attractive semi-natural greenspace, and the overarching policy framework in the Local Plan and Neighbourhood Plan including a Local Plan commitment to develop strategic mitigation for the district.

6.12 Policies that help prevent adverse effects on the integrity of European Sites are also included in the Cotswold District Local Plan (CDLP), the planning document guiding development in Fairford NP area. **Policy EN8 (Biodiversity and Geodiversity: Features, Habitats and Species)** of the

CDLP states that '*4. Proposals that would result in the loss or deterioration of irreplaceable habitats and resources, or which are likely to have an adverse effect on internationally protected species, will not be permitted.*' The protection of European Sites is further strengthened in **Policy EN9 (Biodiversity and Geodiversity: Designated Sites)**, which clarifies that '*1. Internationally designated wildlife sites… will be safeguarded from development that could cause a significant effect that would adversely affect their integrity.*' Overall, these policies ensure that residential development which would result in unsustainable, adverse recreation impacts will not be permitted.

6.13 In consultation with Cotswold Council, it was suggested that, notwithstanding the conclusion above, reference should be made in both the HRA and Fairford Neighbourhood Development Plan to the need for any developer of a housing site in Fairford to comply with the emerging Interim Mitigation Strategy for North Meadow that is currently being prepared by a consultant on behalf of Swindon Borough Council for their Local Plan Review.

6.14 AECOM has requested a copy of the interim Mitigation Strategy but it is not available to the authors at the time of writing. However, in line with advice from Cotswold District Council **it is recommended that for the avoidance of doubt a reference to the emerging Interim Mitigation Strategy and the need for developers to comply with it should be added to Policy FNP14.**

6.15 Overall, it is determined that, with this addition to policy text, there will be no adverse 'in-combination' effects of the Fairford NP. No policy recommendations are made.

# Water Quantity, Level and Flow

## North Meadow & Clattinger Farm SAC

6.16 The water level in any European site can be negatively impacted in two ways. A proliferation of impermeable surfaces near a European site or its tributaries might result in faster runoff rates and / or flash floods, leading to higher water levels than normal. However, due to the long distance between the SAC and Fairford, an increased flood risk due to the NP was considered unlikely and screened out from Appropriate Assessment. In contrast, water abstraction for potable water supply may lead to reduced baseline water levels in tributaries and European Sites themselves. An increased abstraction of water for the supply to residential dwellings is the main pathway in which the Fairford NP could affect the North Meadow & Clattinger Farm SAC. NE's Site Improvement Plan identifies inappropriate water levels as the main pressure / threat to the lowland hay meadows in the SAC, which could lead to a reduction in the nutrient replenishment of the site.

6.17 The company that is responsible for the potable water supply in the area comprising Fairford is Thames Water. A new Water Resources Management Plan (WRMP) was published by the company in 2019, outlining the balance between supply and demand for water for a minimum planning period of 25 years. Thames Water's supply area extends from Cirencester in the west to Dartford in the east, and from Banbury in the north to Guildford in the south. The company supplies approx. 2,600 million litres of water to 10 million people and 250,000 businesses daily. A large portion of the water supply is fulfilled through large storage reservoirs served by the River Thames and River Lee. For purposes of resource planning, the Thames Water's WRMP divides the water supply area into six Water Resource Zones (WRZs). Fairford lies in the Swindon and Oxfordshire (SWOX) WRZ. WRZs are geographic areas in which abstraction and distribution of water is largely self-contained and therefore resource development options outside the SWOX WRZ are unlikely to materially affect the water level in the North Meadow & Clattinger Farm SAC.

6.18 An assessment of the baseline supply-demand balance is typically undertaken to determine whether a WRMP may result in adverse effects on the integrity of European Sites. Thames Water's WRMP highlights that the supply-demand balance for the SWOX WRZ will remain in surplus throughout the entire plan period under dry year annual average conditions. Therefore, under dry conditions, modelled as a precautionary measure, no further water resources will need to be developed or abstraction licenses increased to meet the growing demand in Cotswold District. However, the WRMP stipulates that a deficit in the supply-demand balance will occur under peak week utilisation conditions, amounting to 11.3 Ml/d in 2044 and rising to 31.2 Ml/d in

2099. Peak week conditions are therefore seen as the main investment driver. The water resource options employed to address these deficits must next be assessed to determine whether they may have implications for the water level in the North Meadow & Clattinger Farm SAC.

6.19 Water resource options cover a range of different elements, including changes to the use of resources (e.g. increased water abstraction from rivers and groundwater), changes to raw water systems (e.g. adaptations of storage reservoirs) and network elements (e.g. upgrades to distribution piping and leakage reductions). The development of new water resources and increases of consented abstractions from surface waterbodies are most likely to affect the water level / volume in water-dependent European Sites. Thames Water developed an initial unconstrained options list, which was then slimmed down to a package of feasible constrained options. As a statutory requirement, the WRMP also underwent HRA to assess potential adverse effects on designated sites.

6.20 Three options were assessed for their potential impacts on water levels in the North Meadow & Clattinger Farm SAC, including the Radcot Water Treatment Works (WTWs) increased treatment capacity (24 Ml/d), increased abstractions at the Ashton Keynes borehole pumps (2.5 Ml/d) and the Wessex to SWOX inter-company water conveyance asset. The following conclusions on adverse effects of these options were reached:

- Due to the relatively long distance of Radcot WTW to the SAC (approx. 6.2km) no effects on the hydrological integrity of the site were predicted
- Abstraction from the Ashton Keynes borehole pumps is derived from the aquifer that is not in continuity with the overlying impermeable Oxford Clay formation (which is hydrologically linked to the North Meadows & Clattinger Farm SAC)
- The inter-conveyance system lies at 4.3km from the SAC and no hydrological impacts are expected from its operational use

6.21 One of the main purposes of the HRA process is to ensure that an adequate policy framework is in place to protect the integrity of European Sites. While the Fairford NP does not contain specific policy wording that addresses the need to protect water levels in designated sites, the overarching Cotswold District Local Plan (CDLP) has inbuilt policy safeguards. For example, Policy EN9 (Biodiversity and Geodiversity: Designated Sites) specifies that '*1. Internationally designated wildlife sites… will be safeguarded from development that could cause a significant effect that would adversely affect their integrity.*' By definition, this would also apply to housing development that has the potential to reduce the volume of freshwater supplied to and the frequency of flooding of the North Meadow & Clattinger Farm SAC. Furthermore, Policy INF8 (Water Management Infrastructure) states that '*1. Proposals will be permitted that: a. take into account the capacity of existing off-site water and wastewater infrastructure and the impact of development on it, and make satisfactory provision for improvement where a need is identified that is related to the proposal.*' Effectively this ensures that the water provision infrastructure will need to be reviewed and, where necessary, improved to ensure that a sustainable water supply to new housing development can be provided. This is positive because the review of the water supply will be required to be set into the context of designated sites, in turn ensuring that water levels in the SAC are protected.

6.22 Overall, Thames Water's WRMP does not involve water resource options that are hydrologically linked to the North Meadow & Clattinger Farm SAC and the CDLP contains a policy framework that protects the hydrological conditions in European Sites. Therefore, it is concluded that the Fairford NP will not result in adverse effects on the SAC regarding water level, flow and volume 'in-combination' with other plans and projects. No additional policy recommendations for inclusion in the Fairford NP are made.

# 7. Conclusions

7.1 This Report to Inform Cotswold District Council's formal HRA of the Fairford NP has assessed the potential implications of the plan on the North Meadow & Clattinger Farm SAC relating to the impact pathways recreational pressure, water quality, water quantity, level and flow, and atmospheric pollution.

7.2 An initial screening assessment determined that the Council would be able to exclude LSEs in relation to water quality and atmospheric pollution. While the lowland hay meadows in the North Meadow & Clattinger Farm SAC is sensitive to water quality changes, it was determined that there is no hydrological connectivity between the point of discharge of the WwTW processing sewage from Fairford and the section of the R. Thames that seasonally floods the SAC. Regarding atmospheric pollution the screening for LSEs section highlighted that the section of sensitive habitat closest to a potential commuter route linked with Fairford (the A419), lies at a distance of approx. 180m. At this distance, motorised traffic is likely to be a minor contributor to nitrogen deposition compared to agriculture. Furthermore, the habitat structure and sward composition of hay meadows is predominantly determined by management practices.

## North Meadow & Clattinger Farm SAC

### Recreational Pressure

7.3 This report considered that Cotswold District Council would need to undertake an Appropriate Assessment regarding recreational pressure due to the NPs allocation of 80 dwellings, especially 'in-combination' with the housing growth set out for the district in the CDLP (8,400 dwellings). According to Natural England, the North Meadow & Clattinger Farm SAC is a popular recreation destination. However, an appropriate management plan already exists. For example, in winter and early spring, the public is asked to stay off the site in order to prevent soil compaction and damage to sensitive fritillary shoots. Furthermore, visitors to the SAC are asked to stick to the three waymarked routes (comprising different interest features), enabling them to enjoy the wildlife while protecting the site's conservation interest. Dogs are required to be kept on the lead. Moreover, the settlement of Fairford is 8km from the SAC, the SAC is not straightforward to reach from Fairford and there are larger areas of attractive open space immediately adjacent to Fairford. In addition, Cotswold District Council has a commitment to develop a strategic mitigation solution for the whole district very unlikely to be so finely calibrated that the addition of a further 80 dwellings (c. 1%) at a distance of 8km from the SAC would trigger the need for additional mitigation. Finally, the Fairford NP also contains several policies that are likely to minimise the residual likelihood of any new residents of Fairford travelling to the SAC for recreation, notably requiring the delivery of recreational greenspace as part of the new allocation.

7.4 In consultation with Cotswold Council, it was suggested that, notwithstanding the above, reference should be made in both this Report to Inform HRA and Fairford Neighbourhood Development Plan to the need for any developer of a housing site in Fairford to comply with the emerging Interim Mitigation Strategy for North Meadow that is currently being prepared by a consultant on behalf of Swindon Borough Council for their Local Plan Review.

7.5 AECOM has requested a copy of the interim Mitigation Strategy but it is not available to the authors at the time of writing. However, in line with advice from Cotswold District Council as competent authority **it is recommended that for the avoidance of doubt a reference to the emerging Interim Mitigation Strategy and the need for developers to comply with it should be added to Policy FNP14.**

7.6 **Overall, with this amendment to policy included, it is the view of the authors that Cotswold District Council would be able to conclude that the Fairford NP will not result in 'in-combination' adverse effects on the integrity of the SAC regarding recreational pressure.**

### Water Quantity, Level and Flow

7.7 The lowland hay meadows in the SAC are sensitive to changes in the water quantity, level and flow in the site. The housing allocated in the Fairford NP will be connected to the potable water

supply, which may reduce the volume of freshwater (and nutrient) input to the site. Fairford lies within Thames Water's Swindon and Oxfordshire (SWOX) Water Resource Zone (WRZ). The current WRMP indicates that the supply-demand balance in the WRZ is forecast to be in a deficit of 11.3 Ml/d by 2044. However, the Appropriate Assessment demonstrated that the water resource options investigated by Thames Water will not lead to water level changes in the North Meadow & Clattinger Farm SAC. The WRMP has a strong focus on leakage reduction, increasing water efficiency and reducing water consumption. Any resource options that would involve increases to abstraction volumes are not hydrologically connected to the SAC. For example, the Ashton Keynes borehole pumps extract water from an aquifer that is separated from the aquifer supplying the SAC (i.e. the Oxford Clay Formation). **Overall, it was concluded that Cotswold District Council would be able to conclude that the Fairford NP will not result in 'in-combination' adverse effects on the integrity of the SAC regarding water quantity, level and flow.**

# Appendix A

**Table 3. Screening table showing the Test of Likely Significant Effects (LSEs) results of policies contained within the Fairford Neighbourhood Plan. Where a screening result is shaded in green there will be no LSEs on European sites. Orange shading means that there is a potential for LSEs on European sites from the impact pathways identified in the box.**

| Policy | Description | Test of Likely Significant Effects (LSEs) |
|---|---|---|
| **Policy FNP1 – The Fairford and Horcott Development Boundaries** | The Neighbourhood Plan redefines Development Boundaries at Fairford and Horcott, as shown on the Policies Map (Plan B, **Error! Reference s ource not found.**), for the purpose of applying other development plan policies relating to appropriate development within the built-up area and in the countryside. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that redefines the development boundaries at Fairford and Horcott.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP1 is therefore screened out from Appropriate Assessment. |
| **Policy FNP2 – Providing a New Burial Ground** | Proposals for a new burial ground will be supported, provided:<br><br>• ancillary buildings and structures are kept to a minimum for the operations of the use and are designed to minimise their effects on the landscape;<br>• they provide sufficient off-street car parking spaces; and<br>• The location is appropriate in terms of ground condition and flood risk | There are no Likely Significant Effects of this policy on European sites.<br><br>This policy supports proposals for a new burial ground in Fairford.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP2 is therefore screened out from Appropriate Assessment. |
| **Policy FNP3 – Maintaining Viable Community Facilities** | The Neighbourhood Plan identifies the following land and buildings as community facilities for the purpose of applying Local Plan policies in relation to their protection and improvement:<br><br>• Fairford Community Centre<br>• Palmer Hall | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that identifies and protects community facilities, such as Fairford Community Centre and several sports grounds. |

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| | • Fairford Library<br>• The Fairford Town Football Club ground and adjacent practice playing field<br>• Fairford Bowling Club<br>• Fairford Cricket Club Ground<br>• The Fairford Junior Rugby Club pitches<br>• The Fairford Rugby Club pitches (at Coln House School)<br>• Fairford Youth Football Club pitches<br>• Fairford Tennis Club<br>• Farmor's Sports Centre<br>• Riverside Garden | The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP3 is therefore screened out from Appropriate Assessment. |
| **Policy FNP4 – Managing Flood Risk** | All sources of flood risk[35] must be considered at both the site selection and application stages, and the sequential test used to divert development to areas with lower probability of flooding, in accordance with NPPF guidance. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.<br><br>In addition to meeting national and strategic planning policy requirements, proposals for development on land identified by the Environment Agency as lying within either Flood Zone 2 or 3, or in areas of Flood Zone 1 where there is evidence of flood risk from sources other than fluvial, will require a site-specific Flood Risk Assessment (FRA) , using appropriate calculations based on the highest expected groundwater levels for the area (200 year maximum), at the first application stage. Proposals will only be supported where it can be demonstrated in the Assessment that:<br>a. They include appropriate site-specific measures to address effectively all the identified surface and ground water issues.<br>b. Any residual flood risks can be managed on the site and will not increase flood risk beyond the site.<br><br>Where this is not demonstrated satisfactorily permission will be refused. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a positive policy that aims at managing flood risk. For example, a site-specific Flood Risk Assessment will be required in Flood Zones 1, 2 and 3. Furthermore, site-specific measures will be required to address any surface and groundwater issues. These measures will reduce potential washout of organic and inorganic water quality contaminants into the River Thames.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP4 is therefore screened out from Appropriate Assessment. |

[35] "Flood risk" means risk from all sources of flooding - including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources, as stated in NPPF guidance.

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| | Land identified by the Environment Agency as lying within Flood Zone 1 but that is subject to high groundwater levels such that adequate and effective[36] SuDS drainage systems cannot be provided should be preserved as green space to provide for flood water storage/attenuation. | |
| **Policy FNP5 – Investing in Utilities' Infrastructure Improvements** | By "Utilities Infrastructure" this policy means not only sewerage and water supply (as set out in INF1 and INF8 of the CDC Local Plan) but also broadband. Flood protection is covered in FNP4.<br><br>Planning permission will only be granted to a development intending to connect to the sewer network if the sewer network can accommodate the additional demand for sewage disposal either in its existing form or through planned improvements to the system in advance of the construction of the development, to ensure that the environment and the amenity of local residents are not adversely affected.<br><br>Such "planned improvements to the system" may take the form of reduced surface and ground water inflow into the sewers, increased pumping station capacity or increased sewage treatment works capacity. This plan does not stipulate which, but the effect must be to accommodate fully the additional demand.<br><br>Where a need for new or improved off-site utility, infrastructure has been identified in order to support new development, any resulting proposals will only be supported where the proposed utility infrastructure will be delivered in line with an agreed phased timescale.<br><br>Development proposals will be required to make either satisfactory arrangements for the direct implementation of the off-site infrastructure, and/or an agreed financial contribution towards its provision by another party within the agreed timescale.<br><br>Planning permission for a development intending to connect to the sewer network must include conditions that require that new homes must not be occupied until it is demonstrated that the sewerage system has adequate capacity to accommodate the additional flow generated by the | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that ensures that appropriate infrastructure is in place to accommodate new development. For example, sufficient capacity at Wastewater Treatment Works (WwTWs) will need to be in place prior to planning consent being given to development proposals. This will protect the water quality in surface waterbodies such as the R. Thames, which frequently floods the North Meadow & Clattinger Farm SAC. Consequently, it will also ensure that no adverse water quality effects will occur in its lowland hay meadows.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP5 is therefore screened out from Appropriate Assessment. |

[36] In accordance with EA and CIRIA guidance, and National Standards for sustainable drainage **Invalid source specified.**

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| | development. The condition may allow that the physical connection of new homes to the sewage treatment works may be delayed until enough homes are occupied to achieve sufficient flow through the sewerage system to avoid issues of septicity, during which time approved environmentally acceptable alternative arrangements (e.g. tankering) may be used, subject to Council agreement.<br><br>All new development must have sufficient infrastructure to provide electric vehicle charging points to meet future demand. | |
| **Policy FNP6 – Managing Traffic in the Town** | Proposals for a residential scheme of 10 or more homes or for a commercial scheme of more than 1000 sq.m. gross internal area must identify and quantify in their transport assessments the effects of traffic generated by the scheme on its own, and in combination with other consented and allocated schemes, on the Fairford Conservation Area and on other heritage assets in the Town Centre. Where the potential for harm has been identified then the proposals must make provision for the necessary mitigation measures to avoid contributing to the harm caused to those assets. Transport Assessments must demonstrate that adequate electric vehicle charging points will be provided. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a policy that manages traffic in Fairford town, such as through the provision of Transport Assessments. Furthermore, for residential schemes of 10 or more homes, adequate electric vehicle charging points will be required. This may help reduce the volume of fossil-fuelled cars in Fairford and nitrogen deposition in the North Meadow & Clattinger Farm SAC, which is sensitive to atmospheric pollution.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Overall, Policy FNP6 is therefore screened out from Appropriate Assessment. |
| **Policy FNP7 – Improving Access to Visitor Attractions** | Proposals within the Plan area to improve pedestrian and cycle access between Fairford and attractions within the Cotswold Water Park, Lechlade, the Thames and Severn Canal route and the Thames Path will be supported. | Likely Significant Effects of this policy on European Sites cannot be excluded.<br><br>This policy promotes pedestrian and cycle access between Fairford and several attractions in Fairford (e.g. Cotswold Water Park). While facilitating access to non-designated sites is generally considered to be positive, the North Meadow & Clattinger Farm SAC is situated to the west and east of the water park and could also experience an increase in visitor numbers as a result of this policy. |

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| | | The following potential impact pathway is associated with this policy:<br><br>• Recreational pressure<br><br>Therefore, Policy FNP7 is screened in for Appropriate Assessment 'in-combination'. |
| **Policy FNP8 – Protecting Local Green Spaces** | The Neighbourhood Plan designates the following land as Local Green Spaces, as shown on the Policies Map:<br><br>a) The Walnut Tree Field;<br>b) Upper Green;<br>c) Coln House Playing Field.<br><br>In accordance with Policy EN3 of the Cotswold District Local Plan (CDLP) para.10.3.1 the FNP identifies these green areas as being of particular importance, where development will not be permitted except in very special circumstances. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a positive policy that protects local greenspaces in Fairford. Enabling access to outdoor spaces is considered to be a key mitigation approach to absorb recreation locally and reduce recreational pressure in sites designated for their conservation interest.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP8 is therefore screened out from Appropriate Assessment. |
| **Policy FNP9 – Protecting the Fairford Horcott Local Gap** | The Neighbourhood Plan defines the Fairford to Horcott Local Gap on the Policies Map.<br><br>Development proposals within the Local Gap will only be supported if they do not harm, individually or cumulatively, its open character. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that defines and protects the open character of the Fairford to Horcott Local Gap.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP9 is therefore screened out from Appropriate Assessment. |
| **Policy FNP10 – River Coln Valued Landscape** | The FNP identifies land between the River Coln and Fieldway, as shown on the Policies Map, as a valued landscape. | There are no Likely Significant Effects of this policy on European sites. |

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| | Development proposals in the River Coln Valued Landscape, that may otherwise be suited to a countryside location, will only be supported if they will maintain the essential open character of the land. | This is a development management policy that defines and protects the open character of the River Coln and Fieldway Valued Landscape.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP10 is therefore screened out from Appropriate Assessment. |
| **Policy FNP11 – Valuing Hedgerows and Trees** | Development proposals that require the removal of trees should make provision for their replacement with trees of (wherever possible) native species within the site boundary. Where appropriate each tree removed should be replaced with at least two new trees.<br><br>Development proposals that require the removal of all or part of a hedgerow should make provision in the landscape scheme:<br>a) either for its replacement within the site of hedgerow of a similar length, height and form, and of similar or greater density of native species to match existing or nearby hedging;<br>b) or to deliver biodiversity value of the equivalent to that lost with additional hedgerow or other shrub or tree planting elsewhere;<br>c) or to deliver a replacement boundary treatment of a different type which is more appropriate to the site and its surroundings and which respects and complements the wider development proposal.<br><br>Proposals for new planting should link, where appropriate, existing landscape features such as patches of woodland to watercourses or ponds. Hedgerows should be integrated into the development boundary features or be part of the open space provision to ensure their long-term management and retention. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that protects hedgerows and trees in Fairford. There are no European Sites designated for animal species that rely on such functionally linked habitats linked to the Fairford Neighbourhood Plan. However, this policy is positive for the environment as it provides and / or protects wildlife corridors in Fairford.<br><br>The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP11 is therefore screened out from Appropriate Assessment. |
| **Policy FNP12 – Achieving High Standards of Design** | Proposals for new development, including extensions to existing buildings, should be of the highest design standards, in accordance with the Cotswold Design Code given effect by the relevant policies of the | There are no Likely Significant Effects of this policy on European sites. |

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| | CDLP and should have regard to the key design principles set out **Error! Reference source not found.**.<br><br>The proposals should have specific regard to:<br>a) enhancing key views, particularly to the Church of St Mary's, across Upper and Lower Green, and from within the Fairford Conservation Area and Special Landscape Area to the surrounding countryside;<br>b) maintaining key views listed in **Error! Reference source not found.**;<br>c) Any conservation area appraisal or conservation area management plan. | This is a development management policy that sets out design standards for new developments. All planning proposals will have to adhere to the Cotswold Design Code and have specific regard to enhancing / maintaining key views.<br><br>However, design standards have no relevance to European Sites. The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP12 is therefore screened out from Appropriate Assessment. |
| **Policy FNP13 – Conserving Non-Designated Heritage Assets** | The FNP identifies the Local Heritage Assets as listed below for the purpose of applying CDLP in relation to sustaining and enhancing non-designated heritage assets. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that provides for the conservation of non-designated heritage assets.<br><br>However, the protection of heritage assets has no direct relevance to European Sites. The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP13 is therefore screened out from Appropriate Assessment. |
| **Policy FNP14 – A new Low Carbon Community in Fairford** | The Neighbourhood Plan proposes land between Leafield Road and Hatherop Road (north of John Tame Close and St. Mary's Drive, as shown on the Policies Map) for a low, or zero, carbon residential development.<br><br>Proposals for housing development of around 80 homes will be supported, subject to delivery of a comprehensive proposal satisfying the following criteria:<br>• Development is not commenced until the necessary upgrade and improvements to the local utilities infrastructure are as provided for by Policy; | Likely Significant Effects of this policy on European Sites cannot be excluded.<br><br>This policy provides for a new low carbon residential development comprising 80 homes on land between Leafield Road and Hatherop Road. It further sets out specific development criteria, including the provision of adequate utilities infrastructure, design standards and accessible open space, and the avoidance of flood risk areas.<br><br>The following potential impact pathways are associated with this policy: |

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| | • Development conforms with the requirements of FNP15 to deliver sustainable housing;<br>• The layout and landscape scheme incorporate appropriate measures, including tree planting, to mitigate the visual effects of the development on the countryside to the west, north and east of the site, with provision for this to be maintained in perpetuity;<br>• Development satisfies, as a minimum, the standards required for the "Building with Nature[37] – Design" level. Developments that meet the higher levels ("Good", "Excellent") of the standard would be strongly supported.<br>• The design and landscaping have regard for the setting of the Fairford Conservation Area;<br>• Provision is made for a link road to give access between the schools and the A417 to the east of the town, for a dropping-off point away from the school and a safe walking route to the schools;<br>• The scheme provides one or more areas of publicly accessible open space, including a children's play area (LEAP) and a community garden or allotments;<br>• Provision is made for the delivery of self or custom build plots in line with CDLP policy H1;<br>• The scheme keeps housing away from areas prone to surface or ground water flooding and incorporates measures to contain and attenuate surface water either in low lying areas within the site boundary or on other land within the control of the applicant in accordance with FNP4; and<br>• Provision is to be made for affordable housing in accordance with CDLP policy H2. | • Recreational pressure<br>• Water quality<br>• Water quantity, level and flow<br>• Atmospheric pollution<br><br>Overall, Policy FNP14 is screened in for Appropriate Assessment 'in-combination'. |
| **Policy FNP15 – Sustainable Homes and Housing Need** | Subject to the development being found to be acceptable when judged against other policies in the FNP, innovative approaches to the construction of low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported. Examples | There are no Likely Significant Effects of this policy on European sites. |

[37] https://www.buildingwithnature.org.uk/how-it-works

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| | would include, but would not be limited to earth sheltered, rammed earth, or straw bale construction, construction to Passivhaus standards, conversion to EnerPHit standards.<br><br>The sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings will be encouraged, including the retrofitting of listed buildings, buildings of solid wall or traditional construction and buildings within conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future.<br><br>Proposals for housing development should provide a mix of housing types that have an emphasis on two and three-bedroom houses.<br><br>Proposals for new housing that go beyond the requirements of Building Regulations and implement the design criteria set out in "The Lifetime Homes Design Guide" will be supported.<br><br>In residential developments all garage and off-street parking must include provision for the safe charging of electrical vehicles. Schemes including communal parking areas must include a scheme for communal charging points. | This is a development management policy that stipulates the provision of sustainable homes and an adequate housing mix. Sustainable features to be provided include construction to Passivhaus standards and conversion to EnerPHit standards.<br><br>While this is a positive policy for the environment, there are no direct implications for European Sites. The policy does not provide for a location and / or quantum of residential or employment development.<br><br>Policy FNP15 is therefore screened out from Appropriate Assessment. |
| **Policy FNP16 – Growing Our Local Economy** | All new non-residential buildings should achieve the BREEAM Excellent standard.<br><br>Insofar as planning permission is required proposals to intensify the existing business uses on the Whelford Lane Industrial Estate, as shown on the Policies Map, will be supported, provided they use the existing access to the A417.<br><br>Proposals for a change of use of Coln House School, as shown on the Policies Map, from its established C2 (residential institutions) use will only be supported if they comprise the reuse and/or conversion of the site to include B1 business and/or community uses. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that addresses economic growth in Fairford. However, the policy mainly proposes the intensification of existing business uses, rather than promoting additional employment development.<br><br>The policy does not provide for a location and / or quantum of new residential or employment development.<br><br>Policy FNP16 is therefore screened out from Appropriate Assessment. |

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| **Policy FNP17 – Sustaining a Successful Town Centre** | The Neighbourhood Plan identifies the Town Centre, as shown on the Policies Map, for the purpose of applying other development plan policies relating to retail development.<br><br>Insofar as planning permission is required proposals for the conversion of A1 retail or B1 business premises in the town centre to residential use will not be supported. The loss of main town centre uses on the ground floor within the Town Centre boundary identified on the Policies Map will be supported provided the development does not harm the vitality and viability of the Town Centre and evidence has been submitted to demonstrate that the property has been continually, actively and effectively marketed for at least 12 months and that the use is no longer of commercial interest.<br><br>Proposals for conversion to residential use will be supported on the upper floors of business premises in the Town Centre, provided that the conversion would not adversely affect the viability of the premises for commercial use.<br><br>Proposals to improve the Market Place to create a more attractive environment for shoppers and visitors, including expanding the pedestrian area in front of the Bull Hotel, will be supported, provided any loss of existing car parking spaces is compensated for by new spaces within or on the edge of the Town Centre. | There are no Likely Significant Effects of this policy on European sites.<br><br>This is a development management policy that sustains Fairford's town centre. For example, the conversion of existing business premises to residential development will be resisted. Furthermore, improvements to the Market Place to create a more attractive environment will be supported.<br><br>The policy does not provide for a location and / or quantum of new residential or employment development, other than the quantum of housing allocated in Fairford in the overarching Cotswold District Local Plan.<br><br>Policy FNP17 is therefore screened out from Appropriate Assessment. |
| **Policy FNP18 – New Visitor Accommodation** | Proposals for the development of new visitor accommodation or for a change of use to such accommodation will be supported, provided they are located either within the defined Fairford Development Boundary or comprise the appropriate and sustainable reuse of a redundant agricultural building in the countryside. | Likely Significant Effects of this policy on European Sites cannot be excluded.<br><br>This is a development management policy that supports the development of new visitor accommodation in the defined Fairford Development Boundary. Such accommodation may increase the overall tourism activity in Fairford and increase the number of visitors in the North Meadow and Clattinger Farm SAC, particularly when viewed in context with Policy FNP7.<br><br>The following potential impact pathways are associated with this policy: |

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| | • Recreational pressure<br><br>Overall, Policy FNP18 is therefore screened in for Appropriate Assessment. |

COTSWOLD DISTRICT COUNCIL

**Representation to the Fairford Neighbourhood Plan Regulation 16 consultation**

Please find below comments from **Cotswold District Council** (CDC) on the Fairford Neighbourhood Plan 2020-2031.

CDC acknowledges the work that has been put in by the authors of this NDP and commends them for their efforts.

The Council hopes that the following comments, observations and suggested amendments will assist with the progress on the plan through examination. In general these have been written to try to identify either points which in officers' opinion may not meet the Basic Conditions against which the NDP will be assessed, or where the wording used may be open to interpretation during the development management process.

As context, Cotswold District Council is committed to a partial update of its Local Plan, with an aim to adopt an updated Local Plan in 2023. Following an Issues and Options Consultation in early 2022, the focus of development will remain broadly consistent with our current strategy of directing development towards our principle settlements. Reflecting the corporate ambitions of the Council, housing affordability and climate change considerations are likely to drive some other policy changes.

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**p24 para 3.7** – 'Policy DS2: Development Boundaries – to update the current defined development boundaries to take account of the new site allocation (FNP14) and the withdrawal of site F_35B'

The wording of this section is unclear. It references the extant LP policy, in line with the purpose of this section, but confuses the purpose of this reference by noting that the development boundary will change as a consequence of NDP's own site allocation and site 'deallocation', given weight by FNP1 and FNP14. It would be clearer to simply reference the LP policy, in the same fashion as the other LP policy references, and explain its relationship to the NDP's proposals elsewhere.

**p26, para 3.9.** We note Fairford's analysis of the sites allocated in the Local Plan, and their intention to allocate an alternative site. Notwithstanding the evidence that Fairford has presented regarding the developability of the Local Plan allocations, and their clear confidence that these sites will therefore come forward for development, we understand these sites will remain Local Plan allocations until they are formally deallocated.

**p37 FNP1 The Fairford and Horcott Development Boundaries**

Para 1.2, To save confusion CDC suggest removing specific reference to DS1 and DS2 and refer instead to 'DS policies'. This ensures DS3 and DS4 are included, the latter of which defines exceptions to the presumption against market dwellings in the open countryside.

**p39 FNP2 Providing a New Burial Ground**

We welcome this policy, which balances an acknowledged infrastructure need with tests to ensure its development would be sustainable. There is some 'conflict' with LP INF5 in the requirement to provide off-street parking, but we would expect this to be within the space for

difference enabled by the requirement for the Neighbourhood Plan to be in 'general conformity'.

**p41 FNP3 Maintaining Viable Community Facilities**

We welcome the identification of facilities of community value, ensuring their function will be taken fully into account in any development management decisions. The description of the facilities is particularly helpful. It would be helpful to make clear if the list is exhaustive. If so, it would benefit from inserting semicolons/commas and an 'and' after the penultimate item.

**p45 FNP4 Managing Flood Risk**

Policy FNP4.1 is superfluous and duplicates NPPF and the PPG. Please note the PPG was updated on 25 August 2022 to reflect changes to the NPPF.

In FNP4.1, the policy seeks to control the allocation of sites, but we cannot see how a neighbourhood plan policy can achieve this: the NDP policy does not direct policy development in either the Local Plan or a successor Neighbourhood Plan, albeit it would be the intention of the LPA to respect the objectives of an extant NDP in any such exercise.

It is not clear how policy FNP 4.2, 4.3 and 4.4 will work with the established sequential and exception tests. Para 6.22 provides useful context.

Paragraph 6.23 explains that FNP4 is designed to address issues not adequately addressed by CDLP and national policy and guidance but it is not clear where these issue gaps are.

Is bullet 1 consistent with NPPF footnote 55? Footnote states:

"A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use."

National policy does not introduce a distinction between major or minor development, rather its focus is on all development within flood zones 2 and 3 and within flood zone 1 sites of 1ha+ or EA and SFRA identified land or land generally known to flood from other sources.

Bullet 3 - is superfluous and it is not clear how this addresses a deficiency of existing policy either locally or nationally. Such matters would be taken into account and are mandated by national policy and guidance. That said references to CDC review highlights a helpful resource.

Bullet 5 - is superfluous and it is not clear how this addresses a deficiency of existing policy either locally or nationally.

Bullet 6 - it is not clear how this addresses a deficiency of existing policy either locally or nationally. If this is retained it could be useful to make reference to future updates that both CDC and GCC undertake periodically.

It might be easier to alter the wording at 6.23 to state the following: *"This policy is designed to address these issues and to further emphasise matters covered in varying degrees by CDLP policy EN14 and National policy and guidance (NPPF/PPG). The key points are:"* This would avoid any discussion on highlighting the matters not adequately covered in local and national policy.

Minor formatting issues at FNP4.1 (footnote 5).

**p49 FNP5 Investing in Utilities' Infrastructure Improvements**

We support the intent of this policy, recognising that it is an issue of particular local concern. The explanatory note at 6.25 appears to overlook 'electricity' as essential infrastructure – presumably an oversight in light of the final clause of the policy. FNP5.5 superfluous - recent changes to building regulations 2010 (approved document S, June 2022) now mandates this.

**p53 FNP6 Managing Traffic in the Town**

The NPPF supports the need to avoid adverse impacts through development and to mitigate them where they may occur. It requires the response to be proportionate. Development should be refused on transport grounds only where the residual cumulative impacts are severe. "Residual" here means after mitigation measures have been applied. Although the setting of a specific threshold of 10 dwellings or 1000 sq m of commercial floorspace may not conflict directly with the NPPF's requirement for proportionality, it could be counterproductive in the sense that a proposal for 9 dwellings (or 999 sq m of commercial floorspace) would fall through the net – even if the traffic impact of the development was significant due to location or a specific business use.

We welcome the emphasis throughout the plan on supporting the transition to electric vehicles, which chimes with the Council's declaration of a Climate Change emergency, and indeed the national ambition to move away from petrol/diesel powered internal combustion engines. However, building regs have recently been updated to require the provision of car chargepoints, a broader requirement than the clause added here.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1057375/AD_S.pdf

**p55 FNP7 Improving Access to Visitor Attractions**

We support this policy - we'd note that the improvements this policy supports would not only support access to visitor attractions, but could also promote active travel by residents for leisure and work, supporting reduced carbon emissions and better health and wellbeing.

**p57 FNP8 Protecting Local Green Spaces**

We support this policy in principle – while CDC has designated some Local Green Spaces in the Local Plan, we see their designation as a strong component in neighbourhood planning. The approach taken by Fairford in preparing the evidence and engaging with stakeholders appears to the Council as robust and appropriate.

**p59 FNP9 Protecting the Fairford-Horcott Local Gap**

The area covered by this policy is already outside the Development Boundary, and thus not susceptible to development unless it fits one of the exceptions to DS4.

The gap the policy refers to is readily discernible on the Insert Map for SP5.

Open market housing development in this area would be in conflict with LP policy DS4. Exceptions are set out in LP policies H3, H5, H7 and EC6. The proposed policy is in conflict with those LP policy exceptions in the event they cannot meet the requirement of this policy.

However, the examiner may judge that given the impact is local, it falls within the space allowed under 'general conformity'. The Council is comfortable that the policy sets a reasonable test for new development, supported by a proportionate evidence base.

This policy does not prevent the area being allocated through a Local Plan review/new Local Plan, although we absolutely note the grounds for the determination and appeal of the recent application on this site, and the evidence base supporting this policy.

**p61 FNP10 River Coln Valued Landscape**

The area covered by this policy is already outside the Development Boundary, and thus not susceptible to development unless it fits one of the exceptions to DS4, so the same point applies as made to FNP9 above.

The Council is comfortable that the policy sets a reasonable test for new development, supported by a proportionate evidence base.

This policy could be strengthened further to emphasise the open character **and landscape qualities** (much like EN6) - as explained in the supporting text.

**p63 FNP11 Valuing Hedgerows and Trees**

We welcome the intention of this policy, which recognises the landscape and biodiversity benefits of planting.

**p65 FNP12 Achieving High Standard of Design**

We welcome the emphasis on high quality design. In particular, we commend the extensive evidence base that sits behind this policy, and support the extraction of the key design cues at Appendix 3 to provide an accessible and clear prompt to developers.

**p69 FNP13 Conserving non-designated heritage assets**

We welcome the intention of this policy, and applaud the efforts made in compiling the evidence base. For ease of use, and to give the assets identified full prominence, we suggest that the list of assets could be part of the policy itself.

We note that two terms have been used - non-designated heritage assets (the words used in the NPPF) and local heritage assets. Is there a difference? It would be simpler if it was only NDHAs, which would align with the Local Plan terminology

**p71 FNP14 A New Low Carbon Community in Fairford**

A number of bullets (a, b, c) are technically unnecessary, in that they refer to existing requirements of the planand or the Local Plan (f, j, l)) and so can be read into the policy without being referenced. However, it could be argued they round out the description of the proposal, and they may offer reassurance to the reader that these points have been considered.Indeed the policy is not seeking to dis-apply the referenced Local Plan policies, so we do not think their inclusion is problematic.

Given the size of this development, and the ambition for it to deliver a link road between Hatherop Road and Leafield Road, inevitably it has a highways impact. We understand and applaud the town council's aim to use this opportunity to relieve some of the traffic pressure points in the town through both the location and design of this proposal, and encourage the town council to continue to seek engagement from the County Council to ensure it delivers on this.

**p75 FNP15 Housing Type and Mix**

Para 15.5 As noted above re FNP6, Building Regulations now cover this point in detail. Although we welcome the ambition of this clause, it no longer adds to existing requirements https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1057375/AD_S.pdf.

**p79 FNP16 Zero Carbon Buildings**

The opening phrase is unnecessary, as the other policies are 'read-in' to this policy - the policy could start at 'Innovative'.

**p81 FNP17 Growing our Local Economy**

We welcome the intention of this policy, which should facilitate economic growth and seeks to stop the loss of employment land.

**p83 FNP18 Sustaining a Successful Town Centre**

We note the requirement in Para 18.3 is the same as EC8 (6). The examiner may consider this unnecessary duplication. FNP18.2 duplicates EC8(5). It is clear that the vitality of the town centre can be affected by what would amount to minor changes in larger town centres such as Cirencester and Tetbury. Fairford may wish to focus on the loss of floorspace rather than use. It would help in those instances where an applicant is seeking a partial charge of the total town centre floorspace. Such a change is not a substantial deviation from the intent of the policy as written and would not invite further consultation. This would offer a clear distinction to local plan policy EC8 and thus would offer added value to the overall policy framework.

**p85 FNP19 New Visitor Accommodation**

The approach here is essentially the same as the Local Plan, but the presentation does create some confusion - Para 6.105 reads rather as policy, but is not formatted as such.

Para 6.105 could be made into a clause in the policy to explain the difference, albeit it seems to repeat LP (EC11(7) and other relevant policies. *'Proposals for camping facilities outside the defined Fairford Development Boundary will be supported provided there are no harmful effects on landscape and wildlife'.*

EC11 of LP relates to accommodation (EC10 does not –a ref in Appendix 2 of the FNP may suggest otherwise).

**p87 Implementation and Monitoring**

No specific comment, other to endorse the inclusion of this section.

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