

Change of use of agricultural land to allow for the siting of caravans in association with Fairford Royal International Air Tattoo (for up to 28 days annually) at Cutlers Field and Horcott Hill Fairford Gloucestershire

Full Application 25/03721/FUL	
Applicant:	Royal Air Force Charitable Trust Enterprises (RAFCTE)
Agent:	Plan-A Planning & Development Ltd
Case Officer:	Jordan Hawes
Ward Member(s):	Councillor Helene Mansilla and Cllr Tristan Wilkinson
Committee Date:	10 June 2026
RECOMMENDATION:	PERMIT

1. Main Issues:

- (a) Principle of Development
- (b) Design and Impact on the Character and Appearance of the Area
- (c) Impact on Residential Amenity, Public Health and Waste Management
- (d) Impact on Biodiversity
- (e) Impact on Highway Safety
- (f) Impact on Flood Risk

2. Reasons for Referral:

- 2.1 The application has been brought before the Planning and Licensing Committee as required by the Scheme of Delegation and Planning Protocol as the site relates to the development of 1 hectare or more land (please refer to 3.A Types of applications not to be determined under delegated powers).

3. Site Description:

- 3.1 The application site comprises sections of two agricultural fields on the south-eastern periphery of Fairford, just north of RAF Fairford. Both sites, Cutlers Field and Horcott Hill, located south-west and north-east of Horcott Road, respectively, have existing vehicular accesses.
- 3.2 The site is located approximately 0.5km south of the Cotswold Water Park Site of Special Scientific Interest (SSSI) and is within the outer zone of influence for the North Meadow Special Area of Conservation (SAC).

4. Relevant Planning History:

4.1 There is no relevant planning history for the site.

5. Planning Policies:

- NPPF National Planning Policy Framework
- EC1 Employment Development
- EC5 Rural Diversification
- EC10 Tourist Facilities & Visitor Attractions
- EC11 Tourist Accommodation
- EN1 Built, Natural & Historic Environment
- EN2 Design of Built & Natural Environment
- EN4 The Wider Natural & Historic Landscape
- EN8 Bio & Geo: Features Habitats & Species
- EN9 Bio & Geo: Designated Sites
- EN14 Managing Flood Risk
- EN15 Pollution & Contaminated Land
- INF4 Highway Safety

6. Observations of Consultees:

6.1 Biodiversity Officer: No objections.

6.2 Natural England: No comments regarding the impact of the development on the SSSI; confirmed that the application can be screened out of Appropriate Assessment as it relates to the North Meadow SAC.

6.3 GCC Highways: No objections subject to conditions.

6.4 GCC Lead Local Flood Authority: No Objections.

6.5 Environmental Health - Air Quality: No comments.

6.6 Environmental Health - Contamination: No objections.

6.7 Environmental Health - Noise and Amenities: No objection.

6.8 Flood Risk Management Officer: No objections.

6.9 Ministry of Defence: No objections subject to condition.

7. View of Town/Parish Council:

7.1 No comments received at time of writing.

8. Other Representations:

8.1 No comments received at time of writing.

9. Applicant's Supporting Information:

- Appendix 3: Details of Temporary Ancillary Facilities, received 24 November 2025;
- Article 18 Consultation with Highway Authority (response to Highway Authority consultee comments), prepared Royal Airforce Charitable Trust Enterprises (RAFCTE; received 24 March 2026);
- Delivery Instruction - Royal International Air Tattoo 2026 (Volunteer Village), received 22 April 2026;
- Delivery Instruction - Volunteer Campsite, dated 24 April 2024);
- Details of Temporary Trackway, received 4 February 2026;
- Ecological Appraisal and Impact Assessment, prepared by Cotswold Environmental (dated December 2025);
- Planning Statement, prepared by Plan-A Planning and Development Ltd (dated November 2025);
- Pre-application Advice Note - 24/02994/PAYPHH, prepared by Cotswold District Council (dated 4 November 2024);
- Pre-application Advice Note - 24/03016/PAYPHH, prepared by Cotswold District Council (dated 11 November 2024);
- Residents' Newsletter, received 24 November 2025;
- Site 1 - Vision Splays (dwg no. FFD 1-12), received 27 April 2026;
- Site 2 - Vision Splays (dwg no. FFD 1-13), received 27 April 2026;
- Traffic Management Plan, prepared by Tracsis Events (dated 26 June 2025);
- Waste Management Arrangements (email), prepared by Nicola Pugh (received 9 April 2026);
- Waste Report, prepared by M.J Church (received 24 November 2025).

Biodiversity Net Gain Information:

- BNG Metric (received 13 January 2026);
- BNG Assessment (received 13 January 2026);
- BNG Baseline Site 1 (received 13 January 2026);
- BNG Baseline Site 1 and 2 (received 13 January 2026);
- BNG Baseline Site 2 (received 13 January 2026);
- BNG Proposal Site 1 (received 13 January 2026);

- BNG Proposal Site 1 and 2 (received 13 January 2026);
- BNG Proposal Site 2 (received 13 January 2026).

10. Officer's Assessment:

- 10.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'
- 10.2 The starting point for the determination of this application is therefore the current development plan for the District which is the adopted Cotswold District Local Plan 2011 - 2031 and the Fairford Neighbourhood Plan 2020 - 2031.
- 10.3 The policies and guidance within the revised National Planning Policy Framework (NPPF) are also material planning considerations.
- 10.4 In addition to the above, it is noted that the Government published a draft version of the NPPF on the 16th December 2025. The consultation period for the aforementioned document expired on the 10th March 2026 and it is anticipated that a final version of the NPPF will be released in Summer 2026. Whilst the draft NPPF is a consultation document, it is considered that the proposed policies within it are a material consideration and must be given a degree of weight at the present time.

Proposed Development

- 10.5 Pre-application discussions confirmed that the siting of other temporary structures and campsites, excluding the siting of caravans, would meet the criteria for permitted development as set out under Class B (temporary use of land) of Part 4, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.
- 10.6 As such, this application seeks permission for a recurring temporary change of use of sections of two agricultural fields to 'sui generis' to allow for the siting of approximately 150 caravans to solely accommodate volunteers and workers associated with the annual Fairford Royal International Air Tattoo festival for up to 28 days per year. The north-east site, referred to as Cutlers Hill, would host a volunteer village with at most 100 of the proposed 150 caravans, whilst the south-western site, Horcott Hill, would accommodate up to 50 caravans for

contractors. Both sites would utilise existing vehicular accesses off of Horcott Road.

(a) Principle of Development

10.7 Local Plan Policy EC1 'Employment Development' states that *'employment development will be permitted where it:*

(a) supports the creation of high quality jobs in professional, technical and knowledge-based sectors and seeks to support economic opportunities which capitalise on the strength of existing academic and training institutions and research organisations;

(b) maintains and enhances the vitality of the rural economy;

(c) enables opportunities for more sustainable working practices, including home-working;

(d) supports and improves the vitality and viability of Primary, Key, District and Local Centres; or

(e) supports sustainable tourism in ways that enables the District to attract higher numbers of longer-stay visitors.'

10.8 Local Plan Policy EC5 'Rural Diversification' states that *'development that relates to the diversification of an existing farm, agricultural estate, or other land-based rural business will be permitted provided that:*

(a) the proposal will not cause conflict with the existing farming operation including severance or disruption to the agricultural holding that would prejudice its continued viable operation;

(b) existing buildings are reused wherever possible; and

(c) the scale and design of the development contributes positively to the character and appearance of the area.'

10.9 Local Plan Policy EC10 'Development of Tourist Facilities and Visitor Attractions' states that *'new or extended tourist facilities and visitor attractions (excluding accommodation) will be permitted provided the proposal:*

(a) has a functional relationship and special affinity with the historic and natural heritage of the area;

(b) is well related to the main tourist routes;

(c) is an identified opportunity that is not met by existing facilities; and

(d) as far as possible, use is made of existing buildings, particularly agricultural buildings in the countryside, with the number and scale of new buildings kept to a minimum.'

10.10 Local Plan Policy EC11 'Tourist Accommodation' states, with regard to Touring Caravan and Camping Sites, that: *'proposals for the development of new, or the expansion of, existing touring caravan and camping sites, will be permitted provided that the proposal:*

(a) is well related to the main tourist routes; and

(b) makes use of any converted or potentially convertible agricultural buildings that may be available with the number and size of any associated new buildings kept to the minimum necessary.'

10.11 The proposals relate to the siting of caravans to accommodate employees and volunteers associated with the annual Royal International Air Tattoo festival at RAF Fairford. The event benefits the local economy through attracting tourists and visitors to the area, benefiting local businesses. As such, the proposed development is considered to meet criterion (b) of Policy EC1 (Employment Development)

10.12 Accommodation for employees and volunteers is vital to facilitating the success of the event. Given the scale and nature of the event, it is not possible to accommodate workers and volunteers in existing tourist accommodation. The caravans would be sited on agricultural land on the fringe of Fairford, identified as a Principal Settlement, for a period of up to 28 days per year. After the event, the sites would be cleared and restored to their original agricultural use and appearance.

10.13 With regard to Policy EC5 (Rural Diversification), it is considered that owing to the temporary nature of the works, the proposal would not conflict with existing farming operations. Criterion (b) in this case is not relevant as there are no existing buildings that could be re-used to achieve the proposals. Whilst the scale and design of the development would not contribute positively to the

character and appearance of the area, the caravans would only be situated for up to 28 days per year and in association with a festival resulting in evident public benefits. As such, on balance it is considered that the proposal would be in accordance with Policy EC5.

10.14 With regard to Policies EC10 (Development of Tourist Facilities and Visitor Attractions) and EC11 (Tourist Accommodation), it is considered that the proposed site would have a functional relationship with the historic and natural heritage of the area given the association with the RIAT festival and the proximity of the sites to RAF Fairford. The sites would be well connected to main tourist routes, both being accessed from an A-road and on the fringe of Fairford. The proposal is an identified opportunity which is not met by existing facilities; and, as above, there are no existing buildings that could be re-used to accommodate workers and volunteers at such a scale for a temporary period. As such, the proposals are considered to accord with Policies EC10 and EC11.

10.15 In light of the above, the proposals are considered to accord with Local Plan Policies EC1, EC5, EC10 and EC11; as such, the principal of the proposal is considered acceptable.

(b) Design and Impact on the Character and Appearance of the Area

10.16 Local Plan Policy EN2 states that development will be permitted which accords with the Cotswold Design Code. Proposals should be of design quality that respects the character and distinctive appearance of the locality.

10.17 Local Plan Policy EN4 states that development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape.

10.18 Section 12 of the NPPF requires good design, providing sustainable development and creating better place to live and work in. Paragraph 135 states decisions should ensure that development will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Development should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping, which are sympathetic to local character and history maintaining a strong sense of place.

10.19 The proposed development would result in the introduction of caravans to the two agricultural fields for a period of up to 28 days annually. The works would be in association with the annual Fairford RIAT festival.

10.20 Whilst the sites are within open countryside, and the siting of caravans would harm the rural character and appearance of the site to a degree, it is noted that this would be for a limited period of up to 28 days annually, after which the site would be restored. The two sites are located on the periphery of Fairford, a principal settlement, and within close proximity to RAF Fairford. The north-eastern site is also within close proximity to a sewage treatment facility. As such, whilst the sites are within open countryside they are within close proximity to existing non-agricultural development and the proposed use is unlikely to materially harm the character and appearance of the sites and their surroundings. Any such harm would also be outweighed by the evident public benefits associated with the development, particularly with regard to the local economy.

10.21 The proposals are therefore considered to accord with Local Plan Policies EN2 and EN4, NPPF paragraph 135 and the policies of the draft revised NPPF (December 2025).

(c) Impact on Residential Amenity, Public Health and Waste Management

10.22 Local Plan Policy EN2 refers to The Design Code (Appendix D) which sets out policy with regard to residential amenity. This expects proposals to respect amenity in regard to garden space, privacy, daylight and overbearing effect, in conformity to the amenity requirements of Section 12 of the NPPF.

10.23 Local Plan Policy EN15 'Pollution and Contaminated Land' states that:

1. Development will be permitted that will not result in unacceptable risk to public health or safety, the natural environment or the amenity of existing land uses through: (a) pollution of the air, land, surface water, or ground water sources; and/or (b) generation of noise or light levels, or other disturbance such as spillage, flicker, vibration, dust or smell.

2. Unless proposals would result in no unacceptable risk to future occupiers of the development and/or the surrounding land, development will not be permitted: (a) that is located on or in the vicinity of land that is contaminated or suspected of being contaminated; and/or (b) on land that contains or which potentially would create through development a pathway for migration of a potentially hazardous substance into a sensitive receptor.

3. In respect of affected sites the developer and/or landowner will be required to undertake appropriate investigation(s) and to carry out necessary remedial works.'

- 10.24 Owing to the nature of the development, the proposals are considered not to impinge on the residential amenities currently enjoyed by the occupants of neighbouring properties in terms of an unacceptable loss of daylight, loss of privacy, or overbearing effect. The proposals are therefore considered to accord with the residential amenity considerations of Local Plan Policy EN2, Section 12 of the NPPF.
- 10.25 The applicant has submitted a Waste Report outlining the waste collection and recycling services. Further information was required during the course of the application. Given the proximity of the site to the RAF Fairford aerodrome, there is a particular concern for the creation of new habitats that can attract and support populations of large and/or flocking bird species which are hazardous to aircraft and can have a detrimental impact on aviation safety, as noted by the MOD's Safeguarding Officer.
- 10.26 In response to Officer comments, the applicant provided further information regarding the waste management of the two sites outlined in an email titled 'Waste Management Arrangements', dated 9th April 2026.
- 10.27 The waste management arrangements are considered sufficient to address the concerns raised by the MOD's Safeguarding Officer regarding bird strike risk and the management of waste.
- 10.28 The proposed arrangements are also considered sufficient to ensure that waste will be collected regularly throughout the course of the event and that the sites will be cleared of all waste after the event, returning the site to its original state. Reporting on all waste disposal and waste transfer will also be carried out after the event.
- 10.29 With regard to public health, the proposed siting of caravans on the sites is considered not to result in any unacceptable risk to public health or safety, the natural environment or air, light or noise pollution, in accordance with Local Plan Policy EN15.

(d) Impact on Biodiversity

- 10.30 Local Plan Policy EN8 outlines that development will be permitted that conserves and enhances biodiversity and geodiversity, providing net gains where possible. Furthermore, it outlines that 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.

- 10.31 Local Plan Policy EN9 seeks to safeguard the integrity of designated biodiversity and geodiversity sites at international, national and local scales.
- 10.32 Section 15 of the NPPF also outlines that development should conserve and where possible enhance biodiversity and geodiversity and should not result in the loss or deterioration of irreplaceable habitats and resources and should provide net gains where possible.
- 10.33 Paragraph 187 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity.
- 10.34 Paragraph 193 of the NPPF states that local planning authorities, when determining applications, should apply the following relevant principle: *"(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused"*.
- 10.35 Paragraph 194 of the NPPF affords Special Areas of Conservation (SAC) the same protection as habitat sites.
- 10.36 Paragraph 195 of the NPPF states that the presumption in favour of sustainable development does not apply where the project is likely to have a significant effect on a habitats site, unless an appropriate assessment has concluded that the project will not adversely affect the integrity of the habitats site.
- 10.37 During the course of the application, Natural England confirmed in writing that, owing to the scope of the works, providing temporary accommodation solely for employees and volunteer workers associated with the RIAT festival, the development could be screened out of appropriate assessment as the proposals would be considered not to increase recreational pressure on the North Meadow Special Area of Conservation (SAC).
- 10.38 Whilst the site lies within the impact zone for the Cotswold Water Park SSSI, Natural England have raised no concerns.
- 10.39 Regarding BNG, the Council's Biodiversity Officer has advised the following:
- "After reviewing the submitted information including measures by which baseline habitats will be retained during the operational phase, the development is not considered to constitute an impact and is not required to*

deliver at least 10% net gains as it will not result in a loss or decrease of the biodiversity of on-site habitats".

- 10.40 Regarding habitats and protected species, the application is accompanied by an Ecological Appraisal and Impact Assessment. No Priority Habitats or notable plant species were recorded within or adjacent to the proposed sites, and the sites comprise intensively cultivated agricultural land.
- 10.41 Whilst the Biodiversity Officer has noted that bats have been recorded within 2km of the site, including species known to be sensitive to light, and recommended that a condition be included to secure a lighting strategy for the site, it is considered that owing to these sites being a relatively small part of the much wider event site which would not be subject to any lighting design strategy, such a condition would be unenforceable and unnecessary in this case.
- 10.42 The proposal is considered not to adversely affect protected species or habitats; as such, provided the development is carried out in accordance with the recommendations made within section 4 of the submitted Ecological Appraisal and Impact Assessment, the proposed development is considered to be in accordance with Local Plan Policies EN8 and EN9, Section 15 of the NPPF and the policies of the draft revised NPPF (December 2025).

(e) Impact on Highway Safety and Parking

- 10.43 Local Plan Policy INF4 states that development will be permitted that provides safe and suitable access and has regard, where appropriate, to the Manual for Gloucestershire Streets.
- 10.44 Local Plan Policy INF5 requires development proposals to 'make provision for residential and non-residential vehicle parking where there is clear and compelling evidence that such provision is necessary to manage the local road network'.
- 10.45 Section 9 of the NPPF promotes sustainable transport. Paragraph 115 states that, in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) 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 48; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

- 10.46 Paragraph 116 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.
- 10.47 The application demonstrates that the existing vehicular accesses provide sufficient visibility to enable safe access and egress for vehicles, and the applicant has confirmed that full traffic management system will be in place, planned and implemented by TRACSIS, details of which are shared with local authorities, emergency services and other relevant bodies through the Safety Advisory Group (SAG). The proposed parking arrangements are also considered sufficient.
- 10.48 Subject to adherence to the approved operational and transport arrangements, the proposed development is considered to accord with Local Plan Policies INF4 and INF5, Section 9 of the NPPF and the policies of the draft revised NPPF (December 2025).

(f) Impact on Flood Risk

- 10.49 Local Plan Policy EN14 seeks to minimise flood risk and improve flood resilience. It states that 'proposals should not increase the level of risk to the safety of occupiers of a site, the local community or the wider environment as a result of flooding' and 'the design and layout of development proposals will take account of flood risk management and climate change and will include, unless demonstrably inappropriate, a Sustainable Drainage System'. This is in accordance with Section 14 of the NPPF.
- 10.50 The application sites are both within Flood Zone 1 and are considered very low risk of flooding, and the proposed development is considered unlikely to have a significant impact on the surface water drainage of the sites. The proposed development is therefore considered to accord with Local Plan Policy EN14, Section 14 of the NPPF and the policies of the draft revised NPPF (December 2025).

11. Conclusion:

11.1 Overall, it is considered that the development is in accordance with established policies and guidance. It is therefore recommended that the application is granted planning permission.

11.2 The CIL rate for this type of development is zero and therefore no CIL is payable.

12. Proposed Conditions:

1. The development shall be started by 3 years from the date of this decision notice.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be carried out in accordance with the following drawing number(s): FFD 1-1, FFD 1-2, FFD 1-7 and FFD1-8.

Reason: For purposes of clarity and for the avoidance of doubt, in accordance with the National Planning Policy Framework.

3. The development hereby permitted shall be used solely for the accommodation of employees and/or volunteers in association with the Royal International Air Tattoo (RIAT) festival for up to 28 days in a calendar year, and shall at no time be used for accommodation on a commercial, business or service-related basis.

Reason: The site is located within the outer zone of influence of the North Meadow Special Area of Conservation (SAC). As the proposed development is for the accommodation of employees and volunteers solely associated with the RIAT festival, the application is screened out of Appropriate Assessment. Were the site to be used for the accommodation of visitors or tourists, the increase in recreational pressure on the SAC would subject the site to the mitigation measures set out in the 'North Meadow and Clattinger Farm Special Area of Conservation Interim Recreation Mitigation Strategy 2023-2028'. Additionally, extending the temporary use beyond 28 days would be contrary to the interests of highway safety and the visual amenity of the rural landscape.

4. The development shall be undertaken in accordance with the recommendations contained within the Ecological Appraisal and Impact Assessment, prepared by

Cotswold Environmental (dated December 2025). All of the recommendations shall be implemented in full according to the specified timescales, and thereafter permanently retained.

Reason: To ensure biodiversity is protected in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Circular 06/2005, paragraphs 187 and 193 of the National Planning Policy Framework, Policy EN8 of the Cotswold District Local Plan 2011- 2031 and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

5. Waste collection shall be carried out in full accordance with the details outlined in the submitted email titled 'Waste Management Arrangement' as received 9 April 2026.

Reason: To ensure that the development will not result in an unacceptable risk to public health or safety, the natural environment or the amenity of existing land uses, and for the mitigation of bird strike risk to aircraft, in accordance with Local Plan Policy EN15.

6. The development shall be carried out in accordance with the submitted operational and transport arrangements, including arrival and departure management, internal circulation, vehicle marshalling and shuttle bus provision, as set out in the submitted Delivery Instructions, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that safe and suitable access is provided for all users of the public highway, in accordance with Local Plan Policy INF4 and paragraph 115 of the NPPF.

Informatives:

1. The applicant is reminded of Regulations 75, 76 and 77 of the Habitats Regulations and their relevance to 'permitted development'.

Regulation 75 of the Conservation of Habitats and Species Regulations states that it is a condition of any planning permission granted by the Town and Country Planning (General Permitted Development) Order made on or after 30 November 2017 that development which is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and which is not directly connected with or necessary to the management of the site, must not be begun until the developer has received written notification of the approval of the Local Planning Authority under Regulation 77.

Therefore, whilst the development hereby approved can be implemented, other works which fall under permitted development which form part of the overall scheme that the LPA is aware of cannot be lawfully commenced until the separate application under Regulation 77 is approved by the Local Planning Authority.

2. Please note that the proposed development set out in this application would be liable for a charge under the Community Infrastructure Levy (CIL) Regulations 2010 (as amended), however, no CIL is payable as the Cotswold CIL Charging Schedule gives this type of development a zero rate. However, if the nature of the development were to change, you are advised to contact the Council to discuss the requirement for planning permission and CIL liability.