

Martin Perks

From: CARR, Andy <Andy.CARR@gloucestershire.gov.uk>
Sent: 21 October 2021 14:50
To: Martin Perks
Subject: RE: Coln House School Fairford 20/04147/FUL and 20/04148/LBC
Attachments: Coln House Sustainability Statement.pdf

Dear Martin,

Thank you for your e mail of 8 July 2021 providing feedback from Planning and Licensing Committee on 7 July 2021 and the resolution to defer determination of the applications.

In addition to the comprehensive supporting information already submitted with the applications and the comprehensive officers report to Committee recommending approval I have provided further information below as requested

- Coln House School closed on 31st March 2017 and with the exception of the former school playing fields no other use by GCC or the community has taken place since with the buildings remaining vacant
- The former school playing fields have continued to be used by the community following closure of the school under licence granted by GCC
- Property Board recommended to Cabinet that the site be declared surplus to GCC requirements in July 2017. This process included consideration of alternative GCC service uses. None were identified, due, in large part, to the unsuitability of the listed building for service type uses, including the very high maintenance and running costs.
- Cabinet declared the site surplus to requirements of GCC in September 2017 and approved the strategy of developing proposals to secure planning permission for the development of the site to secure best value for the council and deliver a viable re-use of the listed building.
- A decision was taken at the outset to protect the playing fields for future community use and discussions took place with the Town Council to look at options for the future control and management of this asset. It was agreed that the best solution would be to transfer the site to the Town Council so that they had control over its use and management.
- There followed a series of investigation works, scheme development and consultation events, including the statutory planning consultation process, regarding the future use of the site and redevelopment. One consultation undertaken posted information sheets to 2000 homes in Fairford, 18 replies were received and considered.
- During this process The Town Council had expressed aspirations to develop ancillary facilities on the playing fields to enhance the use by the community
- GCC has successfully negotiated with the Secretary of State for Education to allow this to happen, subject to planning permission, under the terms of their approval to the disposal of the former school site under S77 of The School Standards and Framework Act. This approval will also, in any event, safeguard the ongoing community use of the playing fields. The playing fields do not form part of the ongoing planning application under consideration.
- GCC has developed detailed planning applications for redevelopment of the site excluding the playing fields, the first part at Applestone Court was granted permission in 2020 with the second part presented to and deferred by Cotswold District Council Planning Committee on 7 July.
- Since Planning Committee GCC has engaged again with the Town Council and considered their latest aspirations in relation to the site.
- We discussed that sports facilities provided by Cotswold District Council had been withdrawn from Fairford and the Town Council's desire to develop facilities to enhance the playing fields usage which could involve developing a sports pavilion, changing rooms, toilets and showers and a community room. The Town Council requested that this facility be accessed and sited on the brownfield development site where GCC has submitted its redevelopment proposals for housing.
- The Town Council also presented aspirations to use the former listed school buildings for a business centre with multi-purpose meeting rooms, café and restaurant and serviced offices.

GCC Property Board considered this information and continues to support the aspirations of the Town Council to develop ancillary facilities on the playing fields to support and enhance their future use should they agree to take on responsibility for them.

It agreed that a fair contribution to infrastructure and community facilities was being provided through S106 and Community Infrastructure Levy contributions. The CIL contribution arising from redevelopment for housing totals over £300,000. It was not supportive of allocating land already identified as part of the development site for this purpose as this would seriously affect the viability of the development that already has the support of planning officers and is viable and deliverable.

Property Board also considered other ambitions to use the listed buildings for business and catering purposes. It considered the cost of refurbishment and on-going maintenance and running costs against potential revenue generation and concluded that these uses and community use were not viable. The proposed redevelopment delivers a viable and long term re-use of the listed buildings.

Property Board also agreed a commuted sum would be provided to the Town Council for the future maintenance and upkeep of the playing fields under an agreement for the Town Council to take on responsibility for them.

In addition, and to help the Town Council develop its ideas to consider the provision of ancillary facilities on the playing fields in the future, GCC has commissioned its development consultants to carry out an initial feasibility report looking at the viability of siting a building with associated access and car parking on the playing fields whilst maintaining current playing pitch provision. This information was sent to the Town Council on 13 September 2021. Discussions with the Town Council on the future control of the playing fields are ongoing.

Should no agreement be reached with the Town Council for them to take responsibility for the playing fields their existing use by the community will be maintained as required by the approval of the Secretary of State for Education under continued GCC ownership.

With regard to questions raised over the Climate Change agenda I have attached a report from Energist UK Ltd providing further evidence of the overall sustainability of the proposals.

I trust that this additional information will enable you to refer the applications for planning permission and listed building consent to your Planning Committee for determination at the earliest opportunity.

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Go to www.gloucestershire.gov.uk to find information on any County Council service. It couldn't be easier to find information instantly and in some cases apply for services online.

From: Martin Perks [<mailto:martin.perks@cotswold.gov.uk>]
Sent: 08 July 2021 15:01
To: CARR, Andy
Subject: Coln House School Fairford 20/04147/FUL and 20/04148/LBC

Dear Andrew,

Sustainability Statement

Coln House School, Horcott Road, Fairford

Sustainability Statement

On Behalf of Gloucestershire County Council

Revision C

Date: 15th October 2021



REVISION HISTORY

Revision	Issue Date	Description	Issued By	Checked by
A	28/09/2021	First Issue	TW	MA
B	06/10/2021	Amendments	TW	
C	14/10/2021	Amendments	TW	

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Calculations contained within this report have been produced based on information supplied by the Client and the design team. Any alterations to the technical specification on which this report is based, will invalidate its findings.

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EXECUTIVE SUMMARY

This Sustainability Statement outlines how Gloucestershire County Council ('the Applicant') has designed the scheme: Coln House School, Horcott Road, Fairford ("the Site") as a sustainable development.

The Applicant has sought to make this a green and sustainable development that complements the character of the local area.

This Sustainability Statement supports the planning application submitted to Cotswold District Local Council.

The key sustainability features outlined within the Sustainability Statement are:

ENERGY and CLIMATE CHANGE: The Applicant is committed to a design approach that aligns with the principles of the energy hierarchy. The Site will achieve a total reduction in regulated CO₂ emissions in order to reach the Target Emission Rate (TER) Approved Document Part L (AD L) 2013 through fabric-first, demand reduction and low carbon and renewable energy measures and will successfully deliver the minimum on-site reduction target in regulated CO₂ emissions over AD L 2013 for domestic elements of the Site.

FLOOD RISK: Full consideration has been given to the Development's vulnerability to fluvial and tidal flooding, surface water flooding, groundwater flooding and drainage and infrastructure flooding. The Applicant's accompanying drainage strategy will ensure that appropriate measures for the management of surface water run-off have been fully considered and incorporated within the development scheme.

WATER EFFICIENCY AND WATER MANAGEMENT: All dwellings included in the application proposals will be designed to meet a maximum water consumption rate of 110 litres per person per day.

MATERIALS AND WASTE: As the site is a re-development of an existing property as well as the demolition and development of new build dwellings, the existing structure will be improved upon by insulating and improving the structure, already in situ. A sustainable and environmentally responsible approach should be taken to the management of domestic waste and waste during the design and construction process of the Application Proposal.

TRANSPORT AND TRAVEL: A transport statement has been completed by Helix Transport Consultants Ltd to accompany this application and concludes that there are no valid highway or transportation reasons to prevent this proposed development.

ECOLOGY AND BIODIVERSITY: An Ecology Assessment has been carried out and a report compiled by All Ecology Ltd. Ecological Impacts on the site have been investigated to assess the Application Proposal to Biodiversity. The potential environmental effects of the proposal have been considered through a series of studies which, in combination, will contribute to the overall, long-term sustainability of the Application Proposal.

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1. INTRODUCTION

1.1 Objectives

This Sustainability Statement has been produced by Energist UK on behalf of Gloucestershire County Council ('the Applicant').

The proposed scheme will replace an existing, inefficient site. The existing structures currently have a high energy usage due to older, less efficient heating systems as well as a lack of thermal efficiency throughout. The more modern approach to the re-development and the inclusion of the new build dwellings within the scheme, will improve upon the efficiency of the whole site significantly, due to the use of modern building techniques, the improvement in existing building fabric and the new building elements as well as the installation of modern, more efficient heating systems.

The surrounding environmental spaces will also benefit greatly, the current surroundings being mainly hardstanding which will be replaced with a more improved and welcoming green infrastructure.

This report will set out the sustainability benefits and improvements that can be achieved through the proposed re-development scheme at: Coln House School, Horcott Road, Fairford ('the Site') which falls under jurisdiction of Cotswold District Local Council.

For the purposes of this Statement, sustainable development is defined as:

Development that meets the needs of the present without compromising the needs of future generations to meet their own needs.

Source: Brundtland (1987)

This definition addresses the idea that limitations can be imposed by development and on the environment's ability to meet present and future needs.

The proposed development aims to:

- Address key environmental issues.
- Respond to planning policies specific to these environmental issues.
- Deliver actions and standards of environmental performance demonstrating measures that can be taken to embed sustainability.

The ways in which this development can deliver a sustainable development is set out using the following headings:

- Climate Change, Energy & Overheating
- Water Management
- Flood Risk
- Materials & Procurement
- Waste
- Transport
- Ecology and Biodiversity

This Statement sets out how measures can be integrated that ensure an environmentally responsible approach to the Site and construction of the scheme.

2. THE APPLICATION PROPOSAL

Planning permission is sought for:

The re-development of the Grade 2 listed, Coln House School, Horcott Road, Fairford will provide 7 residential dwellings, across the existing 3 storey property.

The properties proposed are a combination of one, two and three bedroom flats and a two, five and six bedroom house ('the development'). It also proposes 17 new build dwellings, built predominantly on the footprint of the existing, more modern school buildings.

Map 1. Site layout - Coln House School, Horcott Road, Fairford



Source: Quattro Design Architects (Dwg no: 5875/P/110)

3. CLIMATE CHANGE, ENERGY AND OVERHEATING

Policy Drivers	Cotswold District Local Plan (2011-2031) – Adopted 3 August 2018) – Policy INF10 Climate Change, Sustainable Design, Construction and Energy SPD Refer to Appendix 2 for detailed policies.
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3.1 Introduction

Achieving sustainable development means that plans should secure net gains within economic, social and environmental objectives (NPPF, paragraph 8). Environmental objectives include using natural resources prudently, minimising waste, mitigating and adapting to climate change and moving to a low carbon economy. The South of England is likely to face significant challenges from a changing climate and changing weather patterns. To avoid the costs associated with retrofitting and replacement, new buildings should be future proofed; suited to, and easily adaptable for, the range of climate conditions and weather patterns we are likely to see over the next century, and adaptable to new technologies. The buildings we build today are likely to be with us into the next century, so the benefits of building adaptable and efficient developments will last a long time.

The Application Proposal will be designed to achieve a total reduction in CO₂ emissions which exceeds the Target Emission Rate, defined as the baseline emissions permitted under Approved Document Part L of the Building Regulations 2013 using SAP12 emission rates. This will be achieved through fabric first and demand-reduction measures as well as low carbon and renewable energy measures.

As the proposal includes conversion of a listed building, there are certain constraints in place which limit the design and improvements normally available, but opportunities to reduce CO₂ emissions are proposed which include:

- Introduction of secondary glazing
- Efficient heating of the building through the proposed improvement in insulation
- Introduction of a more effective and efficient heating system that can be generated through renewable resources, subject to site constraints.
- Zone/ unit-controlled heating, meaning areas are only heated when required
- The use of sustainable drainage solutions

The overall scheme, a mixture of converted and new build dwellings, will bring into the area the benefits of modern building techniques, the forthcoming building regulation standards and the continued use of local, natural materials.

Passive measures to reduce overheating will be favoured and prioritised over other conventional measures, focusing on the selection of high-albedo materials, effective ventilation and site microclimate improvements (such as tree planting and limiting areas of tarmac or other highly absorbent materials).

Natural ventilation being the most effective way of mitigating overheating ventilation will be prioritised wherever technically feasible.

The following combination of measures, summarised in Table 1, are included in the design of the Site.

Table 1. Measures incorporated to deliver the energy standard.

Fabric first: Demand-reduction measures	<ul style="list-style-type: none">▪ Energy-efficient building fabric and insulation to relevant heat loss floors, walls and roofs.▪ High-efficiency secondary glazing throughout.▪ Efficient-building services including high-efficiency heating and ventilation systems.▪ Low-energy lighting throughout the building.
Renewable and low-carbon energy technologies	<ul style="list-style-type: none">▪ Low-carbon heating and hot water options and practical renewable technologies.

4. WATER MANAGEMENT & STORAGE

Policy Drivers	Cotswold District Local Plan (2011-2031) – Adopted 3 August 2018) Climate Change, Sustainable Design, Construction and Energy SPD Refer to Appendix 2 for detailed policies.
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4.1 Increasing water efficiency and reducing water demand in new dwellings.

It is acknowledged that the water consumption of homes has a significant impact on not only direct operational running costs (i.e., water consumption charges), but also indirectly through additional energy usage and the heating of water for domestic use. This is, in part, reflected in SAP 2012 methodology which assumes reduced energy consumption should a dwelling be compliant with Approved Document Part G.

By incorporating water-efficient fixtures and fittings as a standard specification within each new dwelling, a standard of 110 litres per person per day can be achieved (excluding an allowance of 5 litres or less per person per day for external water consumption).

5. FLOOD RISK

Policy Drivers	Cotswold District Local Plan (2011-2031) – Adopted 3 August 2018) Climate Change, Sustainable Design, Construction and Energy SPD Refer to Appendix 2 for detailed policies.
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5.1 Strategy for Delivery

Full consideration has been given to the Development's vulnerability to fluvial and tidal flooding, surface water flooding, groundwater flooding and drainage and infrastructure flooding through a Flood Risk Assessment (FRA). The Applicant's accompanying drainage strategy ensures that appropriate measures for the management of surface water run-off have been fully considered and incorporated within the development scheme.

The reports concludes that the site is considered to be of low to negligible risk from all sources and is considered to accord with the requirements of the National Planning Policy Framework, with residual risk to the site fully mitigated.

6. MATERIALS AND WASTE

Policy Drivers	Cotswold District Council Local Plan (2011-2031) – Adopted 3 August 2018) Climate Change, Sustainable Design, Construction and Energy SPD
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6.1 Introduction

The impact of materials selection is an important consideration when designing any development. The energy and natural resources consumed over the course of extraction or procurement, processing and manufacturing can be significant. The continued use of natural, local materials will be prioritised where possible, in line with local policy.

As the proposal includes conversion, the existing structure will be utilised. Currently on the existing site, there are also more modern, yet inefficient buildings which are due to be demolished and those materials can also be re-used, where possible, within the development.

A sustainable and environmentally responsible approach should be taken to the management of domestic waste and waste during the design and construction process of the Application Proposal.

7. TRANSPORT, CYCLING & WALKING

Policy Drivers	Cotswold District Local Plan (2011-2031) – Adopted 3 August 2018) Climate Change, Sustainable Design, Construction and Energy SPD Refer to Appendix 2 for detailed policies.
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7.1 Strategy for Delivery

A Transport Assessment has been carried out and a statement compiled to accompany this application. The statement concluding that there are no major changes to either access to site, therefore preserving the historic stone boundary walls. Due to the nature of the proposed scheme being residential, the traffic cluster effect previously recorded will be minimised, therefore making access and exit to the development safer and less obtrusive and a lesser amount of transport around the development in general.

To future proof the application proposals, the Applicant will be installing the required car charging points to encourage the use of electric cars by residents and visitors. They will also be providing the required cycle parking spaces, assisting in the promotion of the benefits for a healthier and more sustainable community.

8. ECOLOGY & BIODIVERSITY

Policy Drivers	Cotswold District Council Local Plan (2011-2031) – Adopted 3 August 2018) – Policy EN8 Climate Change, Sustainable Design, Construction and Energy SPD Refer to Appendix 2 for detailed policies.
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8.1 Strategy for Delivery

An Ecology Assessment has been carried out and a report compiled by All Ecology Ltd. Ecological Impacts on the site have been investigated to assess the Application Proposal to Biodiversity. The potential environmental effects of the proposal have been considered through a series of studies which, in combination, will contribute to the overall, long-term sustainability of the Application Proposal.

9. CONCLUSIONS

The Applicant has designed a scheme that will exceed the minimum carbon emission reductions as outlined in the Local Plan and ensure this development is future proofed against climate change and to reflect the increasing decarbonisation of the national grid.

It is concluded that the proposed development can deliver a Strategy that provides opportunity to meet:

- I. A total reduction in CO₂ emissions which exceeds the TER ADL 2013. (using SAP 12 emission factors)
- II. A total water consumption of 110 litres per person per day.

APPENDICES

APPENDIX 1: LIST OF ABBREVIATIONS

ADL 2013	Approved Document Part L of Buildings Regulations 2013
ASHP	Air Source Heat Pump
BER	Building Emission Rate
BMS	Building Management Systems
BREEAM	Building Research Establishment Environmental Assessment Methodology
DHW	Domestic Hot Water
LPA	Local Planning Authority
PV	Photovoltaics
SAP	Standard Assessment Procedure

APPENDIX 2. PLANNING POLICY AND DESIGN GUIDANCE

The Climate Change Act (2008)

Passed in November 2008, the Climate Change Act mandated that the UK would reduce emissions of six key greenhouse gases, including Carbon Dioxide, by 80% by 2050.

As a consequence, the reduction of carbon dioxide emissions is at the forefront of National, Regional and Local Planning Policy, along with continuing step changes in performance introduced by the Building Regulations Approved Document L (2013).

Approved Document L (2013)

This development is subject to the requirements of Approved Document L (2013). ADL 2013 represented an approximate reduction of 6% in the Target Emission Rate (kilograms CO₂/m²/year) over the requirements of Approved Document L (2010) for residential development and an aggregate 9% reduction for non-residential development. ADL (2013) also sees the introduction of a Fabric Energy Efficiency Target, a measure of heating demand (kWhrs/M²/Year) to ensure new build dwellings with low carbon heating systems, still meet satisfactory energy efficiency standards.

National Planning Policy Framework (2021)

The National Planning Policy Framework encourages Local Planning Authorities to 'support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change' (NPPF paragraph 152), 'whilst taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implication for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of over shading from rising temperatures'. (NPPF Paragraph 153).

Paragraph 155, upholds the requirement for Local Plans to: 'To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts); b) consider identifying suitable areas of renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.'

In paragraph 157, NPPF stipulates that local planning authorities should take account of the benefits of decentralised energy and passive design measures as a means of energy efficiency in new development: 'In determining planning applications, local planning authorities should expect new development to: a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its

design, that this is not feasible or viable; and b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.'

Cotswold District Local Plan (2011-2031) – Adopted 3 August 2018)

Fairford (Policy S5):

7.6.1 Fairford is one of the largest settlements in the District. Horcott lies a very short distance to the south-west of Fairford's built up area. Although separated by the River Coln flood plain, the two areas all but join at the northern end of Horcott Road and their physical separation is fairly imperceptible on the ground. Given this, and the fact that Horcott Industrial Estate is the town's main employment area, Horcott is considered to be an integral part of Fairford.

7.6.2 RAF Fairford, located to the south of Horcott, is an important strategic 'stand by' airfield, which continues to host the world famous annual Air Tattoo.

7.6.3 Although Fairford is not located within the AONB, it has a pleasant riverside setting, with a Special Landscape Area (SLA) covering Fairford Park and the Coln valley to the north of the town. Wherever development is located, it should be carefully conceived to ensure that it helps the built environment, as far as possible, to blend into the town's subtle landscape setting.

7.6.4 The town has a good range of community facilities and services and has a reasonable employment base with a higher than average proportion of those jobs in growth sectors. Fairford's employment role, however, is in danger of decreasing as there is a poor balance of jobs to workers.

7.6.5 Perhaps unsurprisingly, given the close proximity of Swindon (12 miles), Fairford's self-containment is lower than some of the District's other larger settlements.

7.6.6 Tourism is important to Fairford's economy, and the wider Cotswold Water Park. The benefits of tourism to the town should be maximised, for example, through the improvement of cycle/footpath links with the Cotswold Water Park, Lechlade, and the route of the Thames and Severn Canal.

7.6.7 Community-led planning documents and surveys have identified infrastructure projects including the provision of land for allotments and the development of sporting facilities. Proposals for new development will take account of parking facilities and congestion issues.

7.6.8 Two sites have been allocated for housing development. Evidence suggests that it would be prudent to phase these sites to the latter part of the Plan period.

Policy EN1:

BUILT, NATURAL AND HISTORIC ENVIRONMENT New development will, where appropriate, promote the protection, conservation and enhancement of the historic and natural environment by:

- a. ensuring the protection and enhancement of existing natural and historic environmental assets and their settings in proportion with the significance of the asset;
- b. contributing to the provision and enhancement of multi-functional green infrastructure;
- c. addressing climate change, habitat loss and fragmentation through creating new habitats and the better management of existing habitats;
- d. seeking to improve air, soil and water quality where feasible; and
- e. ensuring design standards that complement the character of the area and the sustainable use of the development.

Policy EN2:

DESIGN OF THE BUILT AND NATURAL ENVIRONMENT Development will be permitted which accords with the Cotswold Design Code (Appendix D). Proposals should be of design quality that respects the character and distinctive appearance of the locality.

Policy EN7:

TREES, HEDGEROWS AND WOODLANDS

1. Where such natural assets are likely to be affected, development will not be permitted that fails to conserve and enhance:
 - a. trees of high landscape, amenity, ecological or historical value;
 - b. veteran trees;
 - c. hedgerows of high landscape, amenity, ecological or historical value; and/or
 - d. woodland of high landscape, amenity, ecological or historical value.
2. Where trees, woodland or hedgerows are proposed to be removed as part of development, compensatory planting will be required.
3. Development proposals affected by (2) above should, where appropriate, have regard to the potential for new or extended woodland to assist in carbon storage and to be a potential local source of biomass or biofuel.

Policy EN8:

BIODIVERSITY AND GEODIVERSITY: FEATURES, HABITATS AND SPECIES

1. Development will be permitted that conserves and enhances biodiversity and geodiversity, providing net gains where possible.
2. Proposals that would result in significant habitat fragmentation and loss of ecological connectivity will not be permitted.
3. Proposals that reverse habitat fragmentation and promote creation, restoration and beneficial management of ecological networks, habitats and features will be permitted, particularly in areas subject to landscape-scale biodiversity initiatives. Developer contributions may be sought in this regard.
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.
5. Development with a detrimental impact on other protected species and species and habitats "of principal importance for the purpose of conserving biodiversity"(42) will not be permitted unless adequate provision can be made to ensure the conservation of the species or habitat.

Policy EN11:

HISTORIC ENVIRONMENT: DESIGNATED HERITAGE ASSETS - CONSERVATION AREAS Development proposals, including demolition, that would affect Conservation Areas and their settings, will be permitted provided they:

- a. preserve and where appropriate enhance the special character and appearance of the Conservation Area in terms of siting, scale, form, proportion, design, materials and the retention of positive features;
- b. include hard and soft landscape proposals, where appropriate, that respect the character and appearance of the Conservation Area;
- c. will not result in the loss of open spaces, including garden areas and village greens, which make a valuable contribution to the character and/or appearance, and/or allow important views into or out of the Conservation Area;
- d. have regard to the relevant Conservation Area appraisal (where available); and

e. do not include internally illuminated advertisement signage unless the signage does not have an adverse impact on the Conservation Area or its setting.

Policy EN14:

MANAGING FLOOD RISK

1. Development proposals must avoid areas at risk of flooding, in accordance with a risk-based sequential approach that takes account of all potential sources of flooding. 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.
2. Minimising flood risk and providing resilience to flooding will be achieved by:
 - a. applying the sequential test for assessment of applications for development in Flood Zones 2 or 3, applying the exception test where necessary and in that event requiring developers to demonstrate that both limbs of the exception test can be satisfied;
 - b. requiring a site specific flood risk assessment for:
 - i. proposals of one hectare or greater in Flood Zone 1;
 - ii. all proposals in Flood Zones 2 and 3; or
 - iii. proposals in an area in Flood Zone 1 that has critical drainage problems.
3. 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 (SuDS).
4. Developers will, where required, fund flood management and/or mitigation measures for the expected lifetime of the development including adequate provision for on-going maintenance.

Policy EN15:

POLLUTION AND CONTAMINATED LAND

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.

Policy INF10:

RENEWABLE AND LOW CARBON ENERGY DEVELOPMENT

1. Proposals for the generation of energy from renewable or low carbon sources will be permitted, provided it is demonstrated that:
 - a. any adverse impacts individually and/or cumulatively, including; visual amenity; landscape character; heritage assets; biodiversity; water quality and flood risk; highways; residential amenity, including shadow flicker, air quality and noise, are or can be satisfactorily mitigated;
 - b. it is of an appropriate type, scale, and design for the location and setting;
 - c. it is compatible with surrounding land uses, such as military activities; and d. it avoids using the best and most versatile agricultural land unless justified by compelling evidence.

2. The infrastructure and all associated apparatus and structures relating to the installation must be removed, and the site reinstated where appropriate, should it become redundant for energy generation purposes.









Site boundary

Site boundary

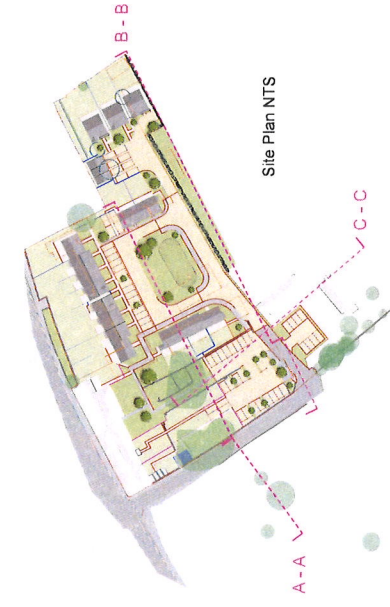


Street Scene A - A

Site boundary



Street Scene B - B



Site Plan NTS

Plots 1 - 4 behind retained wall

Street Scene C - C

Existing Units

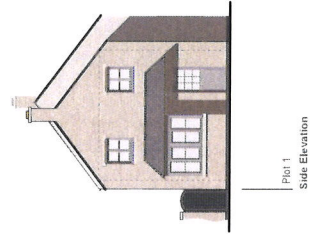
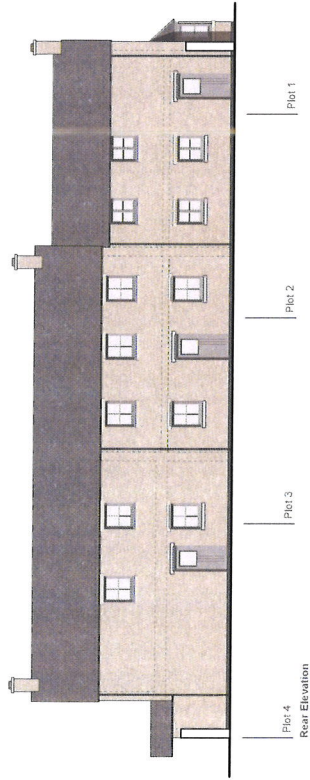
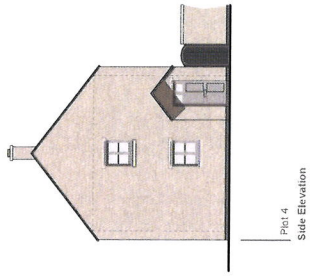
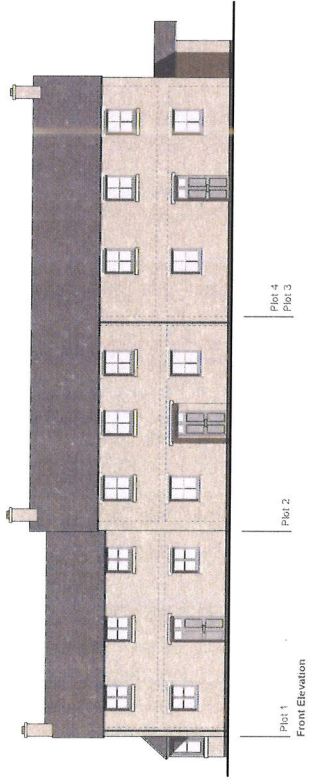
NOTES	REVISIONS	CHECKED	NOTES	PROJECT	CLIENT	DRAWING TITLE	DRAWING NO.	REV
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	A: 13.08.19 - CC:							
	Indicative street scenes updated in accordance with revised site plan.							
	Street scenes updated in accordance with revised site plan and elevation changes.			SCALE 1:200@A1	DATE Sept 2019			
www.quattrodesign.co.uk								



Matthews Warehouse - High Orchard Street, Gloucester GL1 2JY T: 01452 549434

Key

- Natural blue slate tiles
- Natural stone walling
- Light grey window frames
- Grey RWG



DRAWING TITLE

Proposed Elevations:
Plots 1 - 4

PROJECT

Coin House,
Fairford

CLIENT

Gloucestershire County
Council

SCALE

1:100@A1

DATE

Sept 2019

DRAWING NO.

5875-P-1700

REV

B



DRAWING NO.

5875-P-1700

REV

B

Matthew Wainwright, Matt Wainwright, Stuart
Gloucestershire County Council, T. 01452 814234

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REVISIONS
REV DATE DRAWN - CHECKED NOTES

- 23.09.19 - DC - CC:
Drawing created.
Rev 13.08.20 - DC:
Elevations updated in line with revised floor plan 1200RevA
B.09.03.21 - DC:
The elevations have been updated with 1. Roof flats to limit amenity space within shade of trees to rear.
Materials palette revised in line with consultation officers comments.

NOTES

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REVISIONS

REV DATE DRAWN CHECKED NOTES

- 23.08.19 - DC - CC
Drawing created.
A 13.08.20 - DC
Plot 12 revised to be updated in line with revised floor plan.
B 08.02.21 - DC
Plot 12 revised to be updated in line with revised floor plan.
House types revised to be updated in line with revised floor plan.
Materials palette revised to be updated in line with revised floor plan.
Third storey removed from 2nd central units to reduce overall height.

Key

- Natural blue slate tiles
Natural stone walling
Light grey window frames
Grey RWG



DRAWING TITLE

Proposed Elevations:
Plots 5 - 12

PROJECT

Coin House,
Fairford

CLIENT

Gloucestershire County
Council

SCALE

1:100@A1

DATE

Sept 2019



DRAWING NO.

5875-P-1701

REV

C

Key

- Natural blue slate tiles
- Natural stone walling
- Light grey window frames
- Grey RWG

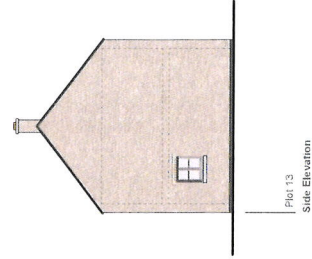
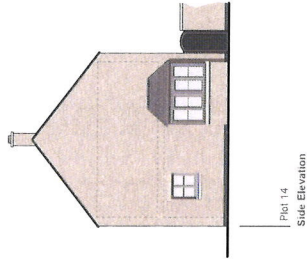
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REVISIONS

REV DATE - DRAWN - CHECKED NOTES

- A - 23.08.19 - DC - CC Drawing created.
- A - 13.08.20 - DC Drawing created.
- B - 13.08.20 - DC Drawing created.
- B - 08.03.21 - DC Drawing created.
- B - 08.03.21 - DC Drawing created.



DRAWING TITLE

Proposed Elevations:
Plots 13 - 14

PROJECT

Coin House,
Fairford

CLIENT

Gloucestershire County
Council

SCALE

1:100@A1

DATE

Sept 2019



DRAWING NO.

REV

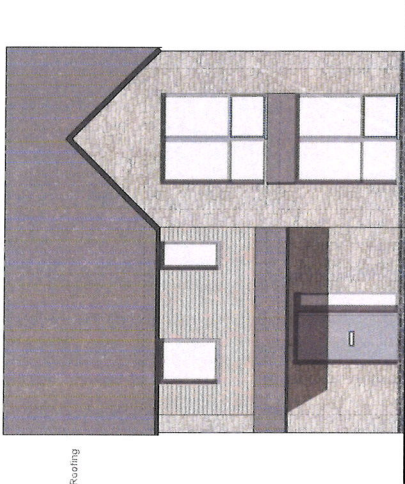
5875-P-1702

B

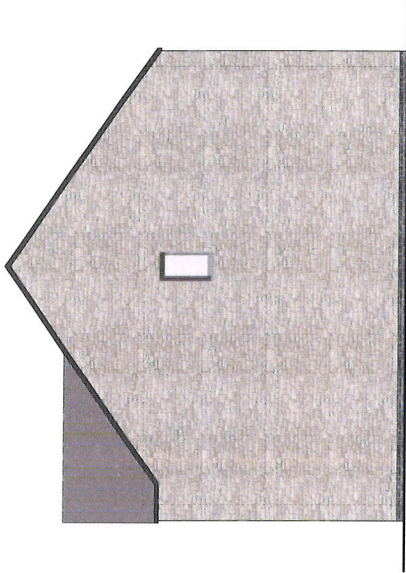
Matthews Architects, High Street, Gloucester, GL1 2ET. T: 01452 424244

Key

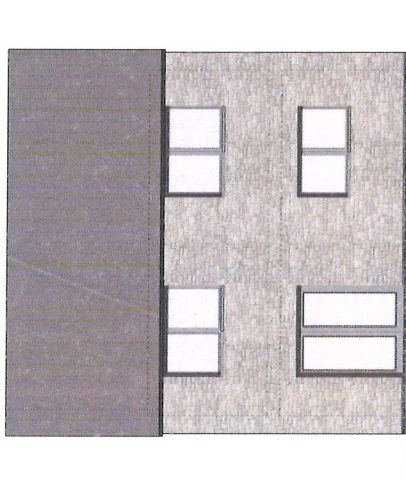
- Light Grey Stone
- Horizontal Timber Cladding
- Blue brick
- Grey Standing Seam Metal Roofing
- Light Grey window frames



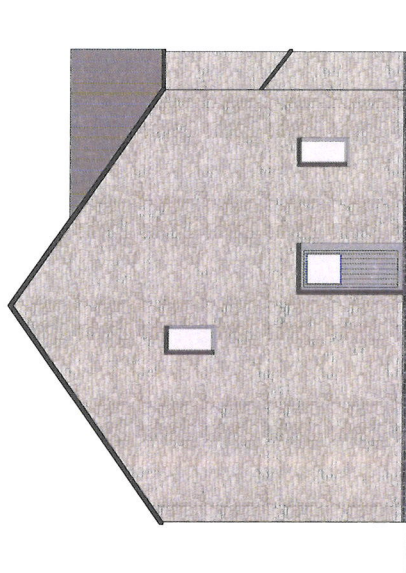
Plot 15
Front Elevation



Plot 15
Side Elevation



Plot 15
Rear Elevation



Plot 15
Side Elevation

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REVISIONS

REV DATE DRAWN CHECKED NOTES

- 25.08.19 - DC - CC
Drawing created.
Plot 15 - DC
House type revised following conservation
officers comments.
B: 24.03.21 - DC
Plot 15 revised.

DRAWING TITLE

Proposed Elevations:
Plot 15

PROJECT

Coin House,
Fairford

CLIENT

Gloucestershire County
Council

SCALE

1:50@A1

DATE

Sept 2019



DRAWING NO.

5875-P-1703

REV

B

Letter from
Cllr Andrews
7th June 2021

20/04147/FUL & 20/04148/LBC Coln House School Fairford

Housing Requirement within Fairford

The need of the current Local Plan for housing provision in Fairford are fully met, and indeed exceeded, within the nascent Neighbourhood Development Plan (NDP) for Fairford. Although the NDP can be afforded little weight given its stage of development, taken together with the approved Local Plan, there is no requirement or justification for additional housing within Fairford that would support the change of use of any land within the Fairford Development Boundary from its currently approved use to that of residential use on the grounds of there being an unmet housing need.

Comment: There is no extant/unplanned requirement for housing in Fairford.

Change of Use

The present Coln House School Site encompasses:

- the Grade II listed Building;
- car parking to its rear;
- a number of originally "temporary" classroom structures;
- a small number of "workers" houses providing accommodation for School Staff; and,
- a large area of sports field.

This planning application does not include the entire site and specifically excludes the large area of sports field that is integral to the site as a whole.

As things stand at present, the viability of the sports field is dependent upon issues relating to access, parking and other facilities provided from within the application site. In excluding the Sports field from the application site, and in not considering the impact of the proposed development upon the continued use of the sports field, it is quite likely that the future use of this community facility will be blighted should this application, which seeks approval for change of use of the application site from community use to residential use, be approved.

Comment: There should be no change of use for the whole of the application site until an assessment has been made and agreed on the viability of the future use of the sports field. In order that any use of the application area that might be needed to ensure the viability of the sports field is recognised in the use, design and layout of any Planning Application.

Impact upon the Conservation Area

Matters relating to interpretation of the relative harm of the design in the context of its impact upon public views of the edge of the Fairford Conservation Area across an open sports field that form part of the preserved gap between Horcott and Fairford, the importance of which has been recognised in the refusal of other development applications in that gap, versus the benefit to the public of additional housing.

These points have been addressed by Fairford Town Council in both its earlier objection comment and its most recent objection comment, with the latter submitted in response to the most recent comment from the Conservation Officer. I attach a copy of that latest comment for ease of Reference. Their objection comment highlights the undesirable proposal to inappropriately adopt a standard vernacular form whilst also intruding upon views of the Grade II listed buildings, Annerley and the Manse, that form part of the public benefit of their setting and views into the Conservation Area from the Horcott Road and the Sports Field.

Comment: Whilst harm to the views into the Conservation Area and the setting of Listed Buildings has been recognised little or no Public Benefit has been identified in this planning application.

Cumulative Impact

The application has been made by GCC who are also a statutory consultee in a number of areas, most notably the assessment of GCC Highways which has (e.g.) not considered the cumulative effect of this development on the continued use of the Sport Fields as a community facility, nor the increased traffic at a constricted junction already agreed at 19/094349/SCR and related plans for the increased use of RAF Fairford that will involve an increase in traffic levels along the Horcott Road. GCC Highways make the assumption that there will be no impact in comparison to level of traffic generated by the School when it was operational without recognising the change of circumstances in the intervening period, in particular the increased traffic generated by the planned expansion of the base.

Comment: It is in the interests of GCC as the applicant to focus solely upon its intent to gain permission for this development and to ignore any other related matters which it might otherwise have regard to as Local Government Authority whether promoting broader issues such as Public Health, Environment, etc. as well as, in this case, the changed circumstances that means this application, which will have a cumulative impact upon road safety, should be judged on that cumulative, rather than any historic, basis.

Public Interest Test

As already noted, GCC is in this case the applicant.

Matters considered under delegated powers do not have the reasons for the decisions made published and are to all practical purposes "Exempt".

There is a general consideration for all decisions made by the Council to consider the Public Interest when making decisions to either exclude or to involve/fully inform the public in its decision making. Taking into account the application of the Freedom of Information Act 2000 (FOIA) to decision making by the Council, accepted relevant decision making that should involve the public includes cases where:

- The public interest in disclosure is particularly strong where the information in question would assist public understanding of an issue that is subject to current debate.
- The issue has generated public or parliamentary debate.
- Proper debate cannot take place without wide availability of all the relevant information.
- The issue affects a wide range of individuals or companies.
- The public interest in a local interest group having sufficient information to represent effectively local interests on an issue.
- Facts and analysis behind major policy decisions.
- Knowing reasons for decisions.
- Accountability for proceeds of sale of assets in public ownership.
- Openness and accountability for tender processes and prices.
- Public interest in public bodies obtaining value for money.
- Public Health.
- Contingency plans in an emergency.
- Damage to the environment.

In addition, In the introduction to the FOIA the Information Commissioner lists the following public interest factors that would encourage the disclosure of information:

- Furthering the understanding of and participation in the public of the issues of the day.
- Promoting accountability and transparency by public authorities for decisions taken by them.
- Promoting accountability and transparency in the spending of public money.
- Allowing individuals to understand decisions made by public authorities affecting their lives and, in some cases, assisting individuals in challenging those decisions.
- Bringing to light information affecting public safety.

Comment: Given the points made above, it is in the Public Interest that this application be considered in Public by the Planning Committee. The public have a right to fully understand the thinking behind any decision that lies solely within the purview of their Local Government Authorities and that is the subject of their legitimate Public Interest given their general and specific objections to it on planning grounds.

Stephen Andrews BSc(Eng)Hon MDA MIET
Councillor and Chair Overview & Scrutiny Committee
Cotswold District Council
Lechlade Kempsford and Fairford South Ward
Website: www.cotswold.gov.uk
Office: +44 (1285) 719924
Mobile: +44 (7795) 915902

7th June 2021

Enclosure:

Fairford Town Council Comment dated 7th June 2021

Fairford Town Council strongly disagree with parts of the Conservation & Design Officer's report (27 May) and the recommendation.

The attached photo view is more representative of the 'setting' of Fairford United Church (and St Mary's from this direction) than the 'Indicative Street View'. This will still be significantly impacted by the new design and layout of the 3 'contemporary' houses.

While the reduction in scale of both the proposed 'contemporary' buildings and the central block is to be welcomed, so that they no longer compete with and detract from the setting and significance of the heritage buildings to the same extent, what they have ended up with looks like 'more of the same' from the new estates, which in no way meets the requirement of CDLP policies EN2 and EN4 to consider the local character of the particular context.

The proposed 3 'contemporary' houses neither follow "an authentic vernacular and traditional approach, in line with the local architectural character" nor are they "designed in a high quality contemporary and innovative manner, which reflects and respects local character" (CDLP para 10.2.11).

It should also be pointed out that the new central block design now has the undesirable (and non-vernacular) tall slate roofs mentioned previously, because of the wide plan depth, making them more prominent in the townscape and almost inevitably leading to loft conversions and a 2 1/2 (i.e. effectively 3) storey result unless PDR are restricted as part of any permission. There are plenty of examples of low-pitched slate roofs on 18th/19th century terraced cottages and other houses in the older parts of Fairford (as well as the United Church itself), as the Conservation & Design Officer should be aware.

The Conservation & Design Officer's report is now contradictory in parts, because the comments on the original design have been retained along with the new additions.

