

COTSWOLD DISTRICT LOCAL PLAN

PREFERRED OPTIONS CONSULTATION: DECEMBER 2025

FAIRFORD TOWN COUNCIL

Key Points

Fairford is a historic small market town situated at the southern edge of the Cotswolds dip slope between the Cotswold National Landscape and the upper Thames flood plain, on the lower reaches of the river Coln. Geographically, development of the town is constrained to the south by the river and the flood plain and to the north by the Special Landscape Area. Fairford also has other significant infrastructure constraints.

Fairford sits on the A417 'District Link' road between Lechlade and Cirencester, part of the old main route from London to Gloucester prior to the completion of the M4 motorway in 1971, which relieved traffic through the highly constrained road through the town centre (only 3.4 metres wide at the narrowest point at the bottom of the market place and with a number of other points where it is only effectively single carriageway due to local parking and service needs). There are many listed buildings adjacent to this section of road. Plans (and land) for a prospective bypass to the south of the town centre were abandoned in the 1990s (ref. Gloucestershire Structure Plan 2nd Review 1999), as were plans for a Cotswold Water Park 'Eastern Spine Road' (dropped from the Infrastructure Development Plan in 2016), and there is no other feasible economic route for an east-west bypass either south or north of the town (in the latter case this would involve crossing the river, flood plain and Special Landscape Area).

Because Fairford is poorly located with respect to the strategic road network and has only very limited local facilities (apart from the secondary and primary school, a small town centre with heritage constraints and very limited commercial space, and only small-scale community facilities) it is not an attractive location for creating significant new high-value jobs. The two 'supermarkets' listed in the Settlement Role and Function Study are in reality only small and medium convenience stores, the larger of which has only very limited adjacent parking space on a constrained section of the A417 in the town centre, and are totally inadequate to support all the shopping needs of the existing population, let alone a significantly expanded town. The town's public Sports Centre was transferred to Farmor's School some years ago and the promised Leisure Facility Building which was to include a swimming pool with public access for residents of Fairford and surrounding villages now looks unlikely to be delivered despite the s106 agreement requiring this.

Apart from for local service, care and hospitality jobs, the main existing local employers are the local Schools, RAF Fairford (mostly a variable population of USAF personnel but

also staff for the Royal Air Force Charitable Trust (RIAT)) and some local industry including units associated with the motor industry in Swindon (which is now significantly reduced). At least three small local employment sites have been lost to residential development in the last 10 years. As noted in the Settlement Role and Function Study, as a result there is both a relatively high level of out-commuting (to higher paid jobs elsewhere) as well as significant in-commuting for lower-wage jobs.

Given Fairford's limited facilities and poor transport connections (which are presumably why it has not been included in scenario 4), it is extremely hard to see how it can reasonably be considered as a 'main service hub' (ref. para 4.24 of the SRFS) or a sustainable location for major strategic housing without proper strategic planning and committed investment to avoid placing an unacceptable additional burden on already overloaded local services and infrastructure (including the town's sewage treatment system). Figures provided by Thames Water indicate that even with the planned upgrade the town's sewage treatment works will have only limited capacity to accommodate further new development beyond that already committed, since the catchment for this includes not only Fairford itself but villages to the north and northeast including Quenington, Coln St Aldwyns, Hatherop and Eastleach Turville.

Even the proposed developments in Fairford at the 'non-strategic' level will require thorough addressing of spatial, highways and infrastructure issues (including a further upgrade of the sewage treatment system) to avoid creating new problems, particularly related to primary school catchment and associated peak traffic flows through the town.

Responses to Specific Questions:

Question 1 – Which of the above scenarios has your preference? Why do you prefer this option?

The Town Council prefers a hybrid version of scenarios 4, 5 and 6.

It supports Scenario 4 in principle, which is the most consistent with national policy in seeking to use existing and potential public transport corridors and hubs to focus housing growth. The scenario assumptions are clear that this would rule out Fairford as a valid strategic location as the town is unique amongst the Principal Settlements in its relative isolation from the strategic highway network and has only modest bus and other local services. However, the Town Council recognises that the non-strategic level of growth for the town (approx. 470 homes) is reasonable, even in this scenario.

It cannot currently support Scenario 5 as it rules out any major development in the Cotswold National Landscape (CNL). The Town Council disagrees with the absolutist approach taken by CDC in this regard, which is contrary to national policy (Ref NPPF para 190). If access to high quality public transport services in particular is an

increasing priority in national policy, even in hitherto the most protected areas like the Green Belt, then it is wrong to rule out the opportunities to create new or enlarge existing settlements in the CNL in taking Scenario 4 further.

The Town Council would also argue that if Fairford is not well enough located to be part of Scenario 4 then why has that fact not prevented the inclusion of a 1,400 urban extension to the town as part of Scenario 5?

But it cannot support Scenario 6 either, because it makes unnecessary, implausible assumptions for the scale of housing growth in a number of settlements in the CNL. The scenario has been set up to fail and therefore should not have been regarded as a 'reasonable' alternative in the Integrated Impact Assessment (IIA).

Instead, the Town Council would support a growth strategy based on the proposed 265 net new housing target for the town, which it assesses to be the maximum level of growth in extending the immediate edges of the town. Even this scale of growth will depend on a further upgrade to the WwTW (Sewage Treatment Works) (a problem incorrectly understated in the evidence base, as the Town Council can evidence) and new strategies for tackling the town's ground water and drainage constraints, which are well-acknowledged but again absent in the evidence base.

In addition, any spare capacity at the schools, and especially the one primary school, will be absorbed by this scale of growth. It is currently unknown whether the GP surgery in Fairford has the capacity to cater for the proposed increase in population, taking account of the likely demographics.

Depending on the location of the proposed sites, there may also be site specific issues and/or opportunities that need to be addressed.

These issues point to a wider problem hidden in the Settlement Role & Function report for Fairford. The town is barely a Principal Settlement in practice, certainly compared to others in the District. It does not have the potential to improve its local commercial and public services in its centre – which were never intended to support a larger population – meaning that any improvements must be on its periphery. This presents a critical challenge now the town has grown beyond the ideal 800m walking distance from the centre and its main east-west road (A417) is too narrow to handle additional internal or external traffic without harmful heritage, air quality and pedestrian safety effects that cannot be mitigated. The latter is a major constraint that is relevant to any major development within around 5 miles either east or west of Fairford.

Should CDC continue to identify the Fairford area as a strategic growth location then those proposals must result from (and be supported by) a comprehensive detailed impact assessment and proper master planning exercise through 2026 with the meaningful engagement of those stakeholders that know the town and its issues best (including Fairford Town Council). That work must ensure that the outcome does not

lead to the worst of all worlds: too much growth for the town to absorb, but not enough to finance and deliver the necessary timely infrastructure upgrades.

Fairford Town Council acknowledges that the major local landowner's preference is for any major strategic development to be in Broad Location 12A on the eastern side of the town, extending from the A417 about as far north as the schools and with potential for some commercial or community development south of the Southrop road. This would link between the schools and facilities along the A417, with its own 'spine' road. However, it would require careful consideration to be given to access to the town centre (including parking) as well as the mitigation of E-W traffic flows through the town.

The Town Council agrees that Broad Locations 12C and 13 are not appropriate for either extensions of Fairford/Horcott or new settlements. Also, any proposal for major development on the west or south-west side of the town (including in 12B) would require a comprehensive Flood Risk Assessment and mitigation plan, because of the fact that the Totterdown/Dudgrove brook catchment drains via culverts through the Air Base and the discharge rate at the eastern end is subject to a strict constraint because of flood risk issues in Kempsford/Whelford. This is in addition to the physical constraints at the A417/Horcott Road/Coronation Street junction.

There are many inter-related issues in planning long-established towns like Fairford. Whether adopting an 'onion ring' urban extension or 'hub and spoke' new village settlement model for growth, or a combination of both, it is vital to understand those inter-relationships.

For example, the town centre is very small and with no practical opportunity to increase its size or increase parking provision, to better enable new residents in peripheral housing estates or new villages to visit by car or to use more shops or services. Note that the town does not have two supermarkets (per the Settlement Role & Function Study) – it has one small and two medium size convenience stores, none with any opportunity to increase their size or associated parking provision. But new commercial floorspace on the town edge would risk undermining the town centre unless it was designed and could be maintained in future to be clearly complementary. It is unclear how this could be ensured.

In addition, with the existing primary school located beyond the town's NE edge, any absorption of spare capacity by school age population on that side of the town may skew and undermine its catchment area for the southern and western areas of the town.

A further factor may be the accommodation strategy of RAF Fairford. To date it has sought to locate a small proportion of its personnel within the town with others over a wider area or on the Base itself. There is also the Royal Air Force Charitable Trust, who have their HQ adjacent to the Base. This is shown in the employment and travel to work

data in the evidence base, in terms of the higher proportion of the town's workforce travelling less than 2km for work than the District average.

It is understood that the future role envisaged for RAF Fairford has recently changed and it is unclear what the implications for housing required in Fairford are. This is always to some extent subject to changes in US policy. The base already attracts a significant number of commuting trips through Fairford, and the recent major housing developments have generated high levels of out-commuting from the town. There continues to be a moderate amount of out-commuting to RAF Brize Norton, although this may reduce due to the availability of more housing there.

Question 2 – Should the Council consider locating development in locations it considers unsustainable to meet the government housing target? Please explain.

The Town Council considers it neither acceptable nor necessary for CDC to propose allocating land in unsustainable locations. The problem created by CDC in the Local Plan scenarios is the opposite. It is choosing to avoid strategic development in some very sustainable locations because they are located in the CNL and is taking no account of how the strategic planning of such development could ensure the potential for harm to the CNL is avoided or mitigated.

Outside the CNL in areas like Fairford, the Scenario 5 strategy carries a high risk of harming the sustainability of established towns and villages in a relatively small geographic area with its cumulative effects. Neither the strategy nor the Integrated Impact Assessment have understood or tested the potential for these effects or identified associated mitigation measures.

Question 3 – To what extent would you support increasing housing density in developments (such as smaller houses and gardens, more flats or higher buildings) to help meet the full housing target? Please also explain why.

The made Fairford Neighbourhood Plan allows for a higher density of housing development in some parts of the town than the average for the District. Some parts of the town are traditionally built at high densities and the Town Council would expect any new development to make as efficient use of the land as possible taking account of the demographics it is intended to cater for (e.g. families or retired people requiring gardens) and design constraints including height restrictions on buildings due to the proximity of RAF Fairford and RAF Brize Norton.

Well planned and laid out, modest urban extensions can follow the same higher density 'pattern book' for building without necessarily harming the town's special historic character. However, the Town Council would not regard much of what has been built in

the town over the last decade to be of that high standard and would look to the Local Plan, or a refresh of the Neighbourhood Plan or new design code, to require and deliver higher standards in the future.

Question 4 – Do you think the proposed level of development up to 2043 – the end of the Local Plan period – and beyond 2043 is sustainable? If not, what provisions would need to be added to the settlement(s) to make them a sustainable location for the proposed level of development? These could be new services, facilities or the provision of infrastructure. Please clearly state which settlement(s) your comment relates to.

Fairford Town Council accepts that the District is likely to be able to demonstrate valid reasons why the Local Plan cannot meet in full the Standard Method housing requirement. However, it is vital that the Local Plan passes its examination quickly to resecure the benefits of an up-to-date development plan, especially for those parts of the District like Fairford that are most exposed to the ‘tilted balance’ when housing supply performance fails. CDC must therefore seek to plan as positively as possible to minimise the risk of the Local Plan failing its examination, while also ensuring that it is realistic, so it is not doomed to fail later due to under-delivery.

In this regard, Fairford Town Council acknowledges that CDC has a difficult balance to strike between housing growth, the need for local employment, services and infrastructure to support this, and environmental constraints, given the large part of its area that lies within the National Landscape. For decades that balance has unfortunately been struck in the same way: avoid any major development in the National Landscape and accept the inevitable social and economic harm that results both inside and outside the area.

For decades, the much lower housing levels planned for by CDC have not exposed this trade-off and those settlements outside the CNL like Fairford have been regarded as necessary and sustainable ‘pressure valves’ when housing supply and delivery have not met targets. In the case of Fairford, this has meant housing development that has overloaded local infrastructure and services including the town’s sewage system and been at the expense of the loss of commercial space in the town centre and a number of small employment sites in the town, making it less sustainable.

The new national standard method has brought the trade-off into much sharper relief, as the cumulative scale of growth in the arc SE and SW of Cirencester outside the CNL is unprecedented and very likely undeliverable and undevelopable. The weaknesses of this strategy are made clear in the Development Strategy Options Topic Paper (commentary to Table 6 on pp31-32).

Of those weaknesses, we would highlight these:

CDC Local Plan Reg 18 Consultation – Fairford Town Council representation.

- High risk of delays due to infrastructure, land assembly, or viability issues
- There are several strategic sites within close proximity of each other, which may potentially be delivering housing at the same time
- Complex governance and delivery – often involve multiple stakeholders, landowners, and delivery partners.
- Requires strong leadership, coordination, and long-term stewardship

None are about the character or function; they are instead about the individual and cumulative risks that would require careful, focused, well-resourced and ongoing long term management to manage effectively.

There are few local planning authorities in the country that could and have met these challenges successfully. In the Town Council's view, CDC has never had to build and maintain the skills and resources necessary to manage this type of development strategy. And impending Local Government Reorganisation will only likely hinder any prospect of managing this scale of change over the critical first five years.

It would therefore propose that an important means by which the final strategy is stress tested is the ability of this and the next local planning authority to lead and deliver it.

There are very likely some growth options, even those of a large scale, that will be easier to deliver, with fewer inter-dependencies, than some of the proposals CDC seems to favour. Some may require trade-offs with subjective environmental constraints, including the CNL, but better they are made than a failure to manage and deliver the more difficult strategy (where those trade-offs have been avoided).

The Town Council considers Fairford is far more vulnerable to strategy failure than its Principal Settlement counterparts. The downside risks are more likely to happen, the downside effects will be more profound, and the risks are more difficult to manage.

Given the level of development proposed in Fairford, even without the strategic extensions suggested in some scenarios, basic improvements that are required to ensure the town remains sustainable include: additional parking and commercial space adjacent to the town centre (which would need to be negotiated with the major landowner) and a further upgrade to the town's sewage system. Careful assessment and planning of these things is required to maximise the benefits and avoid unintended undesirable impacts.

If a larger scale of development were still to be contemplated, other facilities such as a new primary school would certainly be required, and it is unclear how the longer term road constraints problem would be solved.

Question 5 – Are there any other matters beyond conventional housing that have not been listed here that you think should be considered in the Development Strategy for the updated Local Plan?

Other matters that need to be addressed in association with the large scale of housing development being proposed include local employment (other than for the construction), local services including the capacity and accessibility of local health services, green infrastructure and publicly accessible space, and the phasing of the provision of all this to avoid unacceptable burdens on existing services and the local community in the short term. It is clearly more sustainable if housing is planned and developed in parallel with local employment and services so as to avoid simply creating yet more out- and in-commuting. If there is to be any hope of Fairford playing a role as a 'main service hub', a town centre study is needed to address how this could be done so as to improve the vitality and viability of the centre after the losses of commercial space that have been allowed to happen over recent years. This seems to have been done successfully for other small towns such as Cricklade, with the help of a proper town centre and economic study.

The Town Council considers that CDC must achieve a deeper and more joined-up understanding of these other important matters and how they relate to housing supply, particularly in some Principal Settlements like Fairford. The town's rapid, largely unplanned expansion over the last decade has exposed it to the risks identified in Q4.

An Infrastructure Delivery Plan (IDP) cannot be relied upon to resolve everything, as it looks at infrastructure types in isolation and takes a proposed spatial strategy as an input to propose what infrastructure is required as an output. IDPs are not iterative with plan making and do not normally look at settlements holistically. The infrastructure requirements need to be properly assessed, costed and identified in advance for each of the settlements and proposed developments in the Plan, both individually and in combination, so that appropriate funding can be secured for implementation.

Question 6 – Do you agree with the vision and objectives? Or is there anything else that should be covered in the vision and objectives? Please explain.

The Town Council cannot argue with the vision as it is so general it can accommodate any combination of policy objectives that may be in conflict. For example, it envisages 'development will have been guided by a spatial strategy that prioritises environmental stewardship, social equity, and economic vitality, while respecting the District's unique landscape, heritage, and character'. It also expects 'existing Principal ... settlements will have grown proportionately, enhancing their role as local service centres while maintaining their distinct identities'.

For Fairford, the Town Council is not confident these objectives can all be realised with potentially damaging compromises being made and risks being taken in terms of planning and co-ordination.