Document	Reference (Section etc.)	Page	Text	Comment
HELAA	Fairford – F15	-	Site is wholly within / contains: - ALC Grade 2 - Conservation Area - Airfield Safeguard Area - Brize Norton - Airfield Safeguard Area - Fairford - Areas susceptible to groundwater flooding - Clearwater and superficial deposits flooding The site comprises greenfield to the east of Fairford. The site lies in a sensitive location within the Fairford Conservation Area. It forms an important part of the Conservation Area and its setting. It is assessed in the Study of Land Surrounding Key Settlements (2026) to have 'Low-Medium' landscape sensitivity. The site is covered by an area TPO. Development of the site may lead to loss of best and most versatile agricultural land. There is a small agricultural access onto the site from the north, however the area TPO would make it difficult to make the access suitable for intensification. The site is unsuitable for development due to harmful impact on the Conservation Area, and unsuitable access.	We question whether the land is ALC 2. (It has been pasture as long as anyone here can remember and access is isolated from other agricultural land); part of the site is potentially susceptible to surface/groundwater flooding but the northern part (approx half) is higher. The development proposal includes restoration of the footway along London Road to the north of the site by removing parking on it. This, together with improvement of the entrance to give improved visibility and generation of ongoing revenue for better maintenance of the large and currently poorly managed trees along the northern boundary of the site (specifically identified in the original CA policy statement) would arguably bring a significant improvement to this corner of the Conservation Area. In addition, the site is well located relatively close to facilities such as the doctors' surgery, particularly as accommodation for older people. We believe that this site is not only suitable for development on this basis, but also deliverable.
HELAA	Fairford – F20A	-	"The site comprises greenfield to the southeast of Fairford. The site lies in a sensitive location adjacent to the Fairford Conservation Area. It forms an important part of the Conservation Area setting. It is assessed in the Study of Land Surrounding Key Settlements (2026) to have 'Medium-High' landscape sensitivity. It is adjacent to the Cotswold Water Park SSSI. Any environmental impacts would need to be mitigated. Development of the site may result in the loss	There are numerous issues with this site, including conflicts with the SSSI impact zone, impact on historic landscape (identified as River Coln Valued Landscape in the Fairford Neighbourhood Plan), setting of Morgan Hall (Grade 2 listed) and Conservation Area, intrusion into countryside, mostly grade 2 agricultural land, drainage (groundwater susceptibility) and route of main sewer; access through the Keble Fields estate (Trubshaw Way) to the north may not be suitable due to the contorted road configuration, particularly for construction. Additional studies are recommended to establish suitability. The previous SHELAA states that the site is 'Unsuitable' and 'Development would also

Document	Reference (Section etc.)	Page	Text	Comment
			of best and most versatile agricultural land. There is no existing access onto the site, but this can potentially be created. The site is potentially suitable subject to creation of suitable access and consideration of other identified constraints."	break away from existing settlement pattern into open countryside.' Also, identified in the Landscape Assessment of Land Surrounding Settlements in Cotswold District Appendix 19 (Fairford) as an area where development is not considered suitable.
HELAA	Fairford – F39C		There is existing access to the site via the current land use. Investigation may be required to determine whether the access is suitable for residential intensification. Development may lead to the loss of best and most versatile agricultural land. The site is potentially suitable for development subject to suitable access and mitigation of identified constraints.	The potential capacity of 80 units appears to be a combined number for F39C and F52 together. The planning application for the combined site (25/03880/OUT) indicates that only a much smaller number is feasible on F39C itself, and this would be the case particularly if access is taken through the contorted road configuration of the adjacent existing estate. We have not seen this land rated as ALC 2 previously, probably because it is low lying and susceptible to surface and groundwater flooding.
HELAA	Fairford – F52		Site is wholly within / contains: - Grade 2 Agricultural Land - Airfield Safeguard Area - Fairford - Airfield Safeguard Area - Brize Norton - Areas Susceptible to Groundwater Flooding - Clearwater and Superficial Deposits Flooding The site is a greenfield site to the east of Fairford. Development of the site may result in loss of best and most versatile agricultural land. It is assessed in the Study of Land Surrounding Key Settlements (2026) to have 'Medium' landscape sensitivity. A planning application (ref: 25/03880/OUT) for up to 74 dwellings is currently pending decision. There is no existing vehicular access, though this could likely be created from the A417. Further investigation is required to determine whether suitable access can be provided. The site is potentially suitable for	The potential capacity of 80 units appears to be a combined number for F39C and F52 together. The planning application for the combined site (25/03880/OUT) indicates that only a much smaller number is feasible on F52 itself, and this would be the case particularly if access is taken through the contorted road configuration of the adjacent existing estate. Access directly from the A417 now appears feasible, as the speed limit on that section has been reduced. We have not seen this land rated as ALC 2 previously, probably because it is low lying and susceptible to surface/groundwater flooding.

Document	Reference (Section etc.)	Page	Text	Comment
			development subject to provision of suitable access and consideration of other identified constraints.	
HELAA	Fairford – 53A		The site is a greenfield site to the south of Fairford. It is assessed in the Study of Land Surrounding Key Settlements (2026) to have 'Medium-High' landscape sensitivity. The site is adjacent to a SSSI and any environmental impacts would need to be mitigated. There is no existing vehicular access from public highways, though this could likely be created from Horcott Road. Further investigation is required to determine whether suitable access can be provided. Development of the site would represent significant encroachment into open countryside. The site is potentially suitable for development subject to provision of suitable access and consideration of other identified constraints.	The site is actually in Kempsford Parish. Apart from the drainage issues, which have the potential to affect both the adjacent Horcott lakes (part of Cotswold Water Park SSSI) and the Air Base at RAF Fairford, this site is also subject to high peak noise levels from heavy bomber operations at the base, so with the prospect of this being an on-going situation (at least for significant periods) it is highly questionable whether this is a suitable site for major housing development at the present time. The main travel route from the site is likely to be via the junction of Horcott Road with the A417, which is already constrained and needs to be assessed as part of a study of routes and traffic through the town.
Site Selection Topic Paper	(General comment)			This document (and the supporting 'evidence' including the HELAA) would clearly have benefited from 'fact checking' with local communities before being used as the basis for selecting site allocations. (See also comments under Site Development Frameworks and Site Development Templates)
Site Selection Topic Paper	Fairford - F57A, F57B, F57C (Sustainable Urban Extension) Land north east of Fairford	57		In addition to the constraints identified, F57B and F57C appear to overlap with the Nature Improvement Area, part of the function of which is supposed to be to provide a link between the Cotswold Water Park SSSI and the Cotswold National Landscape. It isn't clear how this will be mitigated, which seems fundamental to this allocation.

Document	Reference (Section etc.)	Page	Text	Comment
Site Selection Topic Paper	Fairford - F20A Land south east of Fairford	57-58	The site comprises greenfield land to the south-east of Fairford and is affected by the Fairford and Brize Norton Airfield Safeguard Areas and areas of groundwater flood susceptibility. The site contains predominantly Grade 2 and Grade 3 agricultural land and development would result in the loss of best and most versatile agricultural land. The site lies adjacent to the Fairford Conservation Area and the Cotswold Water Park SSSI and contributes to the rural setting of the settlement. Suitable access arrangements have not yet been identified, and further work would be required to establish whether a safe and deliverable access solution can be achieved. The site has been assessed as having Medium-High landscape sensitivity, reflecting its contribution to the transition between Fairford and the surrounding countryside. However, the site adjoins existing development and may be viewed as a logical rounding-off of the south-eastern edge of the town. Development would need to carefully address impacts on the Conservation Area setting, Public Rights of Way and the adjacent Cotswold Water Park landscape. Overall, the site is considered a **Clear Preferred Site Option (+)**, as it is reasonably well related to the existing built form of Fairford and may provide an opportunity for sustainable growth at the edge of the settlement. However, access, landscape,	It is unclear why this site has been identified as a 'Clear Preferred Site Option(+)' in preference to others such as F15 (See our comments on the HELAA). The description on pp 57-58 includes several reasons why this site is not suitable, e.g. "The site contains predominantly Grade 2 and Grade 3 agricultural land and development would result in the loss of best and most versatile agricultural land. The site lies adjacent to the Fairford Conservation Area and the Cotswold Water Park SSSI and contributes to the rural setting of the settlement. Suitable access arrangements have not yet been identified, and further work would be required to establish whether a safe and deliverable access solution can be achieved." Compare also the 2021 SHELAA: "Unsuitable - site is currently 'land locked' with access being a major issue preventing development. ... Development would also break away from existing settlement pattern into open countryside. The site is also within the emerging Fairford Neighbourhood Plan 'River Coln Valued Landscape' (Policy FNP10), which is a valued landscape that is out of the ordinary in local landscape terms by way of its open, riparian character and the purpose this serves in helping define the significance of the Conservation Area when viewed from the south-east. … Development would also break away from existing settlement pattern into open countryside. …)." Also, the Landscape Assessment of Land Surrounding Settlements in Cotswold District Appendix 19 (Fairford) identifies 'areas where development is not considered suitable' including: • The floodplain due to the intrinsic scale, character and quality of the landscape, its contribution to the town's setting and because of its flooding characteristics

Document	Reference (Section etc.)	Page	Text	Comment
			heritage and environmental considerations would need to be carefully addressed through the design and masterplanning of any future development.	and states (p9) 'Development here would extend built form south-eastwards, encroaching into the open countryside, eroding the sense of separation between Fairford and the river valley.' The site is now assessed as 80.76% Grade 2 agricultural land in the current HELAA (probably the best such land in the area south of the town. It is also an area which is "susceptible to groundwater flooding - Clearwater and superficial deposits flooding" as well as being in the impact zone of the nearby/adjacent lakes of the Cotswold Water Park SSSI and geese etc are regularly seen here. There is also heritage impact on the setting of the Conservation Area (considered to be most important in the Heritage Impact Assessment), Morgan Hall and the ancient 'Fieldway' track. The site is clearly NOT "well related to the existing built form of Fairford" and it would NOT be "a logical rounding-off of the south-eastern edge of the town"! Development of this site would also appear to conflict with Core policy 60, since it is land that may be functionally linked to the Severn Estuary SPA/Ramsar and the HRA identifies it as having 'high suitability for qualifying bird species'.
Site Selection Topic Paper	Fairford - F39C, F52 Land west of Terminus Cottage and Station Cottage	58-59	The site comprises greenfield land to the east of Fairford and is wholly affected by the airfield safeguarding areas associated with Fairford and Brize Norton. The site is affected by areas of groundwater flood susceptibility and comprises Grade 2 agricultural land. Access opportunities vary across the site, with some existing access arrangements present, while other areas would require the creation of new access and further investigation to determine suitability for residential development.	These sites are potentially the most suitable for development in the south-eastern area of the town. However, as stated they are at least partly susceptible to groundwater flooding (as was seen when the adjacent estate was being built) and surface water flooding. There is also an issue of cumulative impact on highway safety if access were taken via the existing estate because of the contorted road configuration there. The current planning application (25/03880/OUT) shows access taken directly from the A417 (where the speed limit has recently been reduced to 40 mph). Access via this direct route would also make far more sense for construction, rather than going through the adjacent occupied estate.

Document	Reference (Section etc.)	Page	Text	Comment
			A planning application for residential development is currently under consideration on part of the site. Overall, the site is considered a **Clear Preferred Site Option (++)**, as it is well related to the existing settlement and there are no significant environmental, heritage or infrastructure constraints that would be likely to preclude development. The identified constraints are limited in extent and are considered capable of mitigation through the development process. The Employment Land Review (2026) notes that F52 could form an extension to the existing employment area to the south. However, the site is closely bounded by existing and proposed residential development, which would significantly constrain the scale and type of employment uses that could be accommodated and limit the site's attractiveness for employment purposes. Development within F52 would also result in the loss of a green buffer and could adversely affect the setting of Horcott Lake and the transition between Fairford and the surrounding countryside. Whilst development may be achievable in principle, landscape considerations, agricultural land loss and infrastructure constraints reduce its suitability relative to less constrained alternatives. On this basis, whilst F52 is part of the proposed allocation, it is not envisaged that built	The statement “However, the site is closely bounded by existing and proposed residential development, which would significantly constrain the scale and type of employment uses that could be accommodated and limit the site's attractiveness for employment purposes” could also apply to the proposed employment land in the ‘Illustrative Concept Framework’ for strategic Site 7. Some noise screening from the adjacent timber factory may be required for properties at the southern end of the site. The statement “Development within F52 would also result in the loss of a green buffer and could adversely affect the setting of Horcott Lake” seems to be based on a misunderstanding of the geography of Fairford, since the Horcott lakes are at the opposite (western) end of the town.

Document	Reference (Section etc.)	Page	Text	Comment
			development would be included in this part of the site.	
Site Selection Topic Paper	Fairford - F53A Land at Totterdown Hill, Horcott	60-61	The site comprises greenfield land to the south of Fairford and is affected by the airfield safeguarding areas associated with Fairford and Brize Norton. The site is affected by areas of groundwater flood susceptibility and includes a small area of Grade 2 agricultural land. The site is located adjacent to a Site of Special Scientific Interest, requiring careful consideration of potential ecological impacts and appropriate mitigation. A planning application for residential development is currently pending determination on the site. There is currently no existing vehicular access, although access may be achievable from Horcott Road, subject to further investigation. The Employment Land Review (2026) identifies that, given the proximity of the established Horcott Industrial Estate, there is limited justification for the creation of a further standalone employment area in this location. Development would also represent a significant encroachment into open countryside and is less well related to the existing employment hierarchy. Overall, the site is considered a **Clear Preferred Site Option (+)** for residential development, as the identified ecological, access and flood risk constraints are considered capable of mitigation, and the site is reasonably well related to Fairford.	Fairford Town Council is not aware of any ''current application for residential development" of the site – There is none shown on the portal map (although there may have been a pre-app). Apart from the drainage issues, which have the potential to affect both the adjacent SSSI lakes and the Air Base at RAF Fairford, this site is also subject to high peak noise levels from heavy bomber operations (and maintenance) at the base, so with the prospect of this being an on-going situation it is highly questionable whether this is a 'suitable' site for major development at the present time. The main travel route from the site is likely to be via the junction of Horcott Road with the A417, which is already constrained and needs to be assessed as part of a study of routes and traffic through the town. Development of this site would also appear to conflict with Core policy 60, since it is land that is functionally linked to the Severn Estuary SPA/Ramsar and the HRA identifies it as having 'high suitability for qualifying bird species'.

Document	Reference (Section etc.)	Page	Text	Comment
Draft Cotswold Employment Land Review July 2026	7.16	112	"Fairford on the other hand is anticipated to see substantial residential growth, and it would be appropriate to include further employment land provision aligned to this. "	Providing for only a pro-rata increase in employment land is clearly not enough to address the current high net out-commuting from Fairford (ref fig 2.7, p24). A proper economic strategy for the local area, including attracting new higher value jobs, is clearly needed if the large amount of new housing development is to be justified.
Draft Cotswold Employment Land Review July 2026	7.16	112	"We recommend provision of around 4 ha of employment land is provided as part of mixed-use urban extensions where the residential development can help to support infrastructure delivery."	It is unclear whether whether/how the implications of increased industrial/distribution business activity on the local highway network (particularly the centres of Fairford, Lechlade and smaller villages) have been considered. There are peak capacity constraints on the A417 through Fairford, at Lechlade and on the E side of Cirencester.
Established Employment Sites Review July 2026 Update	EES26 - Horcott Industrial Estate Description etc.	58-59	"Horcott Industrial Estate is a medium sized industrial estate dominated by the company Resintech … "	ResinTech only has 2 units; the site is now mainly dominated by New Wave Seafoods and PaperBackShop (pbshop.co.uk), with others including 2 auto workshops and a gym. This site is not ideal for heavy industry and distribution because of the constrained local road network (including the Horcott Road/A417 junction, a general weight limit on Horcott Road and proximity of housing. There is also a significant surface water drainage issue (pooling following heavy rain).
Established Employment Sites Review July 2026 Update	EES26 - Horcott Industrial Estate Accessibility/Strategic Access	58	"Bus services operate from various stops within Fairford (all within a 10-minute walking distance) to Swindon and Lechlade (74), Kempsford (75) and Cricklade (76)."	Buses 74 (Swindon and Lechlade) and 75 (Kempsford) do not exist. 76 requires change at Cirencester to get another service to Cricklade.
Established Employment Sites Review July 2026 Update	EES28 Whelford Lane Industrial Estate Description etc.	64		Information on occupancy of the site appears to be out of date.
Established Employment	EES28 Whelford Lane Industrial Estate -	64	There is a bus stop on the A417 adjacent to the site, which operates services to Fairford,	The bus stop doesn't seem to be there now and services 74, 75 do not exist. Bus services clearly need improving.

Document	Reference (Section etc.)	Page	Text	Comment
Sites Review July 2026 Update	Accessibility/Strategic Access		Cirencester, Swindon and Lechlade (74 and 75).	Visibility at the site exit needs improving.
Settlement Role & Function Study	3.2 Settlement Scoring and table 6	11-13		The ratings in this document take very little account of the scale/capacity of facilities; e.g. the employment sites in Fairford and the overall capacity are in no way comparable with those in Cirencester (This is reflected in the high level of out-commuting from Fairford shown in the Employment Land Review); in commercial terms, Fairford has a relatively high proportion of small businesses, few large ones. Apart from the schools, it lacks the other strategic facilities of the Key Centres. A proper study and a judgement are needed about what this means in sustainability terms, when residents (a high proportion of whom are elderly) are so dependent on facilities elsewhere.
Settlement Role & Function Study	Table 2	4	Fairford line in table	Fairford doesn't have 2 supermarkets, it has one medium-sized and 2 small convenience stores (as we pointed out in our Reg 18 representation); the Post Office only operates limited hours.
Settlement Role & Function Study	Table 3	6	Fairford line in table	The Secondary School and 6th Form College in Fairford are parts of the same establishment.
Settlement Role & Function Study	Table 4	7	Fairford line in table	Fairford doesn't have 'Allotments' but only 'Grow plots'; deduct 1 point
Settlement Role & Function Study	Table 6	12	Public Transport Provision score - Fairford	How do we get 2 points for our very limited bus services (which seem to include the school bus services)? The only 'Regular' service 855 is the Farmor's school bus service, 72F is a pre-bookable community service only operating 1 day a week, SM6 appears to be a private service. Should only be 1 point.
Draft Cotswold	2. Background & Context Issues	7	'The current adopted development plan for Cotswold District is the Cotswold District Local	The 'development plan' also includes Minerals and Waste Plans and made Neighbourhood Plans, including the Fairford

Document	Reference (Section etc.)	Page	Text	Comment
Retail & Town Centres Study	Para 2.3		Plan 2011-2031, which was adopted in August 2018.'	Neighbourhood Plan (2023), which should also have been taken into consideration. The latter includes a defined 'town centre' boundary and specific objectives: 'Promote appropriate mix of retail, service, community and tourism facilities to encourage business and increase footfall' and 'Make Fairford Town Centre an attractive and convenient place to shop' and a supporting policy FNP18 Sustaining a successful town centre, with appropriate justification.
Draft Cotswold Retail & Town Centres Study	Table 5.7 Land north-east of Fairford	60	'Medium sized foodstore to provide role/function which retains a larger proportion of grocery trips in Fairford. Size of store should be in the region of 1,500sq m net, with exact size to be determined via an impact assessment. No requirement for new local centre within the strategic development area, as spending/needs associated with planned residential growth should be used to support existing defined 'town centre'.	We understand the logic of this, since there isn't sufficient space for a medium-sized supermarket within or on the edge of the existing defined town centre. However, as indicated in our response to the Regulation 18 consultation, we believe a proper town centre study is needed to ensure that any new facility does not undermine the existing town centre but complements it. We believe this study is needed before committing to any loosely specified 'local centre' in the new strategic extension as part of the new development plan policies.
Draft Cotswold Retail & Town Centres Study	5.78	64	"However, these circumstances may well change with provision of circa 850 new homes in Fairford via a strategic development allocation."	Recommendations appear to be based on assumption of 850 new homes in the strategic extension north east of Fairford. This is significantly less than is proposed in the PDO, which presumably means the case is likely to be stronger.
Draft Cotswold Retail & Town Centres Study	5.80-5.81	64	The exact size of a new store will need to be tested via detailed assessment of its likely impact on Fairford 'town centre' '… we do not recommend that a new strategic development area should be required to provide a range of Class E uses in a new local centre. Instead, new provision should be limited to a medium size foodstore with the additional spending capacity generated by the	We understand the logic of this, since there isn't sufficient space for a medium-sized supermarket within or on the edge of the existing defined town centre. However, as indicated in our response to the Regulation 18 consultation, we believe a proper town centre study is needed to ensure that any new facility does not undermine the existing town centre but complements it. This is needed before the Plan is finalised to confirm what is really needed and that this is sustainable, otherwise the impact could be disastrous.

Document	Reference (Section etc.)	Page	Text	Comment
			growing local population used to reinforce existing uses in the defined centre.'	
Strategic Transport Assessment				(See also separate review document: 20260909-Traffic Analysis_v3 attached separately)
Strategic Transport Assessment	2.2.1 What is Vision & Validate?	4	(Whole section) '… sets clear ambitions for mode shift, accessibility, and climate mitigation and resilience.'	We agree that 'projecting future travel demand from historic data' is inappropriate, particularly where such relatively large increases in local population and hence travel needs are planned. However, modelling of the likely effects is clearly necessary, especially where road infrastructure contains significant constraints (as on the A417 through Fairford) and commuting distances are relatively long and to a number of different destinations, so that AT options are always likely to be of limited use.
Strategic Transport Assessment	(A Long-term, Place-based Vision)	4	'… ensuring that spatial growth is aligned with transport opportunities'	There is little evidence that the PDO 'spatial strategy' has taken account of these constraints, at least for Fairford.
Strategic Transport Assessment	(Validated through Scenario Testing & Engagement)	4	'The preferred approach is then validated against a multi-criteria assessment framework (using KPIs representing the objectives), modelling evidence, stakeholder input, and deliverability criteria, ensuring it is both ambitious and achievable.'	Unfortunately, the 'assessment framework' and modelling don't seem to have taken any account of the constraints that exist at a local level and don't seem to have addressed the capacity of 'pinch points' that are not 'main' junctions but still have a major influence on local main route capacity. There has been no engagement with the local community about this.
Strategic Transport Assessment	2.2.3 Applying the Vision & Validate Approach	6	(Intervention) 'This was informed both from modelling (e.g. on likely demand corridors with the most impact for active travel) and through good practice urban design (e.g. ensuring active travel corridors to key services in line with guidance).'	We cannot identify whether/how the effect of major housing development to the east on traffic flows through the key pinch points in Fairford has been modelled, or what is proposed to address this other than AT 'interventions' (some remote from Fairford) and untested assumptions about modal shift and travel routes. The existing layout clearly doesn't conform to 'good

Document	Reference (Section etc.)	Page	Text	Comment
			(Mitigation) 'This iterative process ensured that the spatial strategy was refined in response to evidence, rather than assumptions.'	practice urban design' but this is constrained by heritage considerations. The latest draft Gloucestershire Local Transport Plan proposes deleting improvements to the A417/Whelford Road junction, which might have helped to divert some of the traffic away from Fairford, so we have to question the claims of stakeholder engagement.
Strategic Transport Assessment	2.3 Encouraging sustainable travel	7	The ASI framework sequentially prioritises: • Those measures which AVOID the need to travel (either negating the need for some journeys altogether or reducing the length of journeys) through measures such as transit-orientated development and compact multi-use development. • SHIFT as many of the remaining journeys onto the most sustainable and energy efficient modes of travel: public transport, wheeling and walking. • Minimising the impact of residual vehicle trips by IMPROVING their sustainability. This includes promotion of electric vehicles and energy efficiency in the provision of public transport.	This is good in principle, but: Without a serious strategy and plan to create new higher value jobs and enhance services locally, people living in the Fairford area will continue to be dependent on the private car as their main means of accessing employment and services. With so many different commuting destinations and distances and the nature of roads and traffic as they are, there is no evidence that the aspirational amounts of modal shift assumed are realistically achievable or that useful bus services can be provided to meet all needs on a viable basis. Focusing new housing development in poorly connected locations such as Fairford exacerbates the problem.
Strategic Transport Assessment	2.5.5 Objective 5: Attractive & viable public transport	12	'High quality, high frequency and reliable public transport services;' 'Improved bus infrastructure such as dedicated bus lanes and traffic signal priority to improve reliability of services; '	As far as Fairford is concerned, dream on!
Strategic Transport Assessment	Figure 3.7	24		This doesn't show capacity at the key pinch points in the centre of Fairford, which include the A417/Market Place junction. This doesn't appear to have been modelled.

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Strategic Transport Assessment	4.5 Adjacent authorities' policy	35		Why is there no reference here to Swindon and Wiltshire? These are most relevant in the South of the District, which the Gloucestershire Housing and Economic Needs Assessment shows as being in the 'Swindon travel to work area'.
Strategic Transport Assessment	Figure 6-9: Forecasted PSO vs Core Minus volume to capacity ratio on links during morning peak hour	66		This figure seems to be showing significant problems on the A429 and B4225 south-westwards towards Cirencester (which seem to be driving aspirational AT proposals east of Cirencester), in Cirencester itself (ring road), at the eastern Spine Road (off the A419 at S Cerney) and at the junction of High Street Meysey Hampton with the A417 (an accident blackspot). Pinch points including the junction of Market Place Fairford with A417 and known congestion issues in Lechlade (A417 and A361) do not appear to have been modelled (See comments from GCC on Evidence Base Comments Log). There seem to be dubious assumptions about traffic using some very minor roads, e.g. from Marston Meysey to Down Ampney. It needs to be clarified what assumptions have been made about commuting destinations from and through Fairford and Lechlade.
Evidence Base Comments Log (published 22 Sept)	GCC Feedback tab			GCC Feedback tab continues to show no evidence that the effects on the main pinch points on the A417 through Fairford have been modelled.
Evidence Base Comments Log (published 22 Sept)	Modelling Queries tab: (comments dated 15.04.2026)		'Fairford – development at Fairford is represented by one zone, which connects into the highway network onto the A417 west of Hatherop Lane. The allocation site Land north-east of Fairford (816 dwellings) is located adjacent to Hatherop Lane and Southrop Road, however the impact on these roads and their junctions with the A417 is not represented in the modelling work.'	The housing number apparently modelled for the strategic extension north-east of Fairford is lower than the PDO. Impacts on other roads/junctions in Fairford also need to be considered, particularly as more development may force additional journeys onto these. A more detailed assessment is required with the correct proposed numbers.

Document	Reference (Section etc.)	Page	Text	Comment
			'Hatherop Lane and Southrop Road carry relatively low levels of traffic, and we envisage that the additional demand will not create any issues. However, once more details on access arrangements become available for this site, a more detailed assessment may be required.'	
Draft Facilities Planning Model Assessment for Swimming Pool Provision	Location of Unmet Demand 6.5-6.8	31	6.5 'In 2025 unmet demand is highest in Cirencester, Tetbury and Fairford at 4 sqm of water in each location (see Map 6.1).' 6.8 The changes in unmet demand are as follows (see Map 6.2): • Fairford – increases by 3 sqm of water to 7 sqm of water	We note that Fairford is identified as a location of high unmet need for public swimming pool access.
Swimming Pools, Sports Halls and Playing Pitch Provision Addendum (CDC July 2026)	Methodology Meeting the need for swimming pools in Cotswold District	2-3	Using the SFC, the Council has established that the new housing figures and associated population increase will require: • 1.7 new swimming pools (358.16 sqm and 6 lanes) The location of new swimming pools will be determined by the level of unmet need, which has been identified across the District at the following settlements: • Fairford ...	Provision for a publicly accessible swimming pool made under s106 agreement for consent 09/00872/OUT and 09/00882/OUT in 2010 – not yet fulfilled – could/should be referred to as this may provide the basis to meet the local need (possibly with additional financial contribution)
Cotswold IDP	1.1.1 Context Role of the IDP	07		**FTC doesn't consider that all the issues and infrastructure needs have been fully and correctly identified in the Infrastructure Delivery Plan and Schedule. This affects the sustainability and/or viability of the allocations.** **Inconsistencies between documents heighten concerns that key elements of infrastructure will not be delivered.**

Document	Reference (Section etc.)	Page	Text	Comment
Cotswold IDP	1.1.1 Relationship with CIL	07	'For the purposes of this IDP, it is currently assumed that the strategic sites will be 'zero rated' and not liable for payment of CIL (with planning obligations secured by alternative measures). As a result, this IDP retains reference to CIL as this will be collected under the non-strategic site allocations and windfall development, and the supporting work will be a helpful resource for future CIL applications.'	**This would leave local communities without CIL money to pay for additional local needs arising from the development (likely to be due principally to the scale of the strategic sites) that have not been identified in the IDP and Schedule. Is this in fact the intention?** **We have too much experience of the costs of s106 requirements being underestimated initially and/or subsequently waived to the detriment of the local community**
Cotswold IDP	2.7 Transport Approach and Commentary	42	"Detailed transport assessment and modelling has been produced by City Science consultants and key outputs of this study are integrated into this IDP. A series of transport workshops was planned to feed information between City Science, the district and county transport teams and P+P to ensure the requirements of the transport workstream are adequately captured in the IDS."	The modelling by City Science doesn't appear to have identified or addressed key constraints at the very local level on key routes, such as the pinch points on the A417 through Fairford. It is concerning that the engagement process did not include local communities (Parish/Town Councils) since the latter are best placed to identify key issues at the very local level.
Cotswold IDP	2.8 Utilities 2.8.1 Water supply and waste water Approach	46	'Capacity is not considered a constraint, given adequate time and planning certainty, which are both required in order to provide investment in additional capacity when and where it is needed. Strategic infrastructure such as extensions to wastewater treatment works can be planned and funded through the price review process, and coordinated with new development as part of wider Asset Management Planning.'	**We note that the issue of waste water treatment capacity at Fairford has not been identified in this section. Our experience is that even when the need for upgrades has been identified and these are part of a regulatory compliance programme (WINEP) delivery is regularly delayed to successive plan periods, and it is not sufficient to rely on statutory obligations. This situation is unlikely to change until there is an enduring solution to Thames Water's financial problems.**
Cotswold IDP	4.5 Transport Fairford interventions map	82	(Schemes)	See detailed comments in separate attachment. Note: The 76 bus service route is shown incorrectly;

Document	Reference (Section etc.)	Page	Text	Comment
				Onsite provision of services is in a different location than in the Site 7 Development Framework; There is already a 20 mph limit in parts of the town, including on part of the A417 (This doesn't seem to be in the IDS list)
Cotswold IDP	4.8 Utilities	90-92	FAIRFORD | AMBER | -1693 'Likely to be close to or exceed permit during plan period. Upgrades and / or a change to permit limit may be required. No significant constraints have been identified.'	The strategic extension east of Fairford is shown as RAG Red for bot water supply and waste water treatment in the Water Cycle Study. STW discharges are also regularly exceeding permit limits. WINEP upgrade has been delayed with no firm completion date currently. It is concerning that a change of permit limit is suggested when pollution is affecting SSSI lakes downstream of the STW.
Cotswold IDP / Infrastructure Delivery Schedule				See detailed comments in separate attachment.
Local Green Spaces Evidence Paper	Contents list and pp 1, 8, 15, 35-44	C.L., 1, 8, 15, 35-44		Naming of new spaces to be amended to: • (016) Park Close/Queens Field Green • (017) Faulkers Close Green • (018) Honeybone Close Green Space and Play Area • (019) Keble Fields Green • (020) Milking Path Park
Local Green Spaces Evidence Paper	1.4	1	'Listed below are the nominated sites that will go forward in the Local Plan 2026-2043 for Local Green Space designation'	Should LGSs already designated in made Neighbourhood Plans, including the 3 LGSs designated in the made Fairford Neighbourhood Plan (2023) also be included here and consolidated into the new Local Plan? (Supporting evidence will have been provided previously, e.g. in the Landscape & Local Green Spaces Study for the Fairford Neighbourhood Plan.)
Water Cycle Study	Table 3.1	38	Fairford STW 2018	This seems to be assuming a higher number of dwellings in the Plan period than the PDO. Need confirmation whether this includes sites outside Fairford but within the STW catchment.

Document	Reference (Section etc.)	Page	Text	Comment
Water Cycle Study	Table 3.2	38	Fairford STW 206	This seems to be assuming a higher number of dwellings in the Plan period than the PDO. Need confirmation whether this includes sites outside Fairford but within the STW catchment.
Water Cycle Study	7.3 Storm tank overflows Table 7.5 WwTW EDM RAG data	128-129	Line for Fairford STW	There are well-known Issues with groundwater infiltration affecting Fairford STW and dry storm discharges affecting SSSI lakes downstream via seasonal spillage from the river and overflow from the adjacent Court Brook. Thames Water have told FTC (at a meeting on 21/09/2026) that the assessments of waterbody classification and feasible/required measures to accommodate the new growth do not take account of the storm discharges or pollution of the SSSI lakes. Environment Agency have taken an action to comment on the appropriateness of this. Target completion date for planned STW treatment capacity uprating (under WINEP regulatory action programme) to address 'quality' issue repeatedly delayed; currently estimated 2025-2030 but no firm date. The STW is currently (or has been) in breach of its licence (Ref Coln Restoration Group). Further 'growth scheme' likely required to meet demand from proposed new developments (Ref Minutes of Fairford Water & Sewage Issues Joint Working Group). This is a key issue affecting whether the amount of new housing proposed in Fairford is sustainable.
Water Cycle Study	8. Water quality Phosphate	136		This section doesn't address the potentially higher impact of phosphate on the ecology of static water bodies, particularly lakes downstream Fairford which are part of the Cotswold Water Park SSSI.
Water Cycle Study	8.2.2 Results	141	'… Fairford … are situated in the upper catchment where the current WFD classification for ammonia and BOD is "High" (i.e. the best water quality)'	Fairford is in the lower catchment of the river Coln!

Document	Reference (Section etc.)	Page	Text	Comment
Water Cycle Study	10. Conclusions and Recommendations - Wastewater treatment	180		We understand Fairford STW is already operating outside its permit limit and there is currently no firm date for completion of the planned upgrade.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	Parts 1 and 2	16-123	(General comment on the methodology)	We have experience of AECOM's methodology from our Neighbourhood Plan (2023). This is a very 'qualitative' methodology and doesn't provide appropriate weighting to factors and impacts which are considered the most important (or even critical) in the local context, so overall conclusions on both Scenario/option and Theme basis can be suspect. Issues that are important at individual site or settlement level can be submerged in an 'overall' assessment or (as in this case) not considered at all, which is symptomatic of the fact that alternatives at the detailed level are not properly considered and the plan as whole may contain many elements that are unjustified and unsustainable, i.e. it is not 'Green to the Core'.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	5. Defining Growth Scenarios 5.2.31	28	"The sites have been comprehensively master planned"	This is not claimed in the Plan and is manifestly untrue. The consequence of this is that the impact of the plan proposals is much more uncertain than the IIA would have us believe. Together with the uncertainty this creates over what supporting infrastructure is required and is therefore likely to be funded and delivered, this means that the adverse impacts are inevitably likely to be greater.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	5.2.31 Fairford – Land to the north east of Fairford	29	"delivering … and a new through road that will help to reduce traffic impacts in the settlement centre … . The through road will form a primary vehicle route linking the site parcels between Leafield Road and London Road (A417), relieving congestion and providing a direct route for east-west movements."	This seems to be based on a misunderstanding of the geography of Fairford (perhaps because the 'Concept Framework' for Site 7 doesn't cover the centre and western part of the town). It doesn't provide mitigation for the impact of increased traffic. The new 'primary road' route provides connectivity from the A417 through the proposed strategic site to Leafield Road, but this only redirects traffic back into the town centre from a potentially more problematic direction (including conflict with proposed AT routes on Leafield Road, Park Street, High Street/Market Place and/or Mill Lane). We already have

Document	Reference (Section etc.)	Page	Text	Comment
				experience of this from the recent gas main renewal work. It doesn't provide an effective relief route for the A417 east-west through the town because Mill Lane is so constrained.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	5. Defining Growth Scenarios Table 5.1	32-33		We note that none of the scenarios is any different in respect of Fairford, so they are not 'alternatives' in this sense. Other reasonable alternatives within Fairford have not been considered. Also, the Plan cannot reasonably be considered as 'Green to the Core' when meeting the housing requirement figure has been treated as an imperative, regardless of the sustainability or otherwise of individual site allocation proposals.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	9. Appraisal of the Regulation 19 version of the Local Plan – Biodiversity 9.1.1-9.1.18	76-80		There ought also to be reference here to the Cotswold Water Park Nature Improvement Area (where there are a number of site allocations) and the Cotswold Water Park Nature Recovery Plan, since these appear to be significantly impacted.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	9. Appraisal of the Regulation 19 version of the Local Plan Table 9-1	80	Effect dimensions: "Direct, long-term, positive" Recommendations/Mitigation Measures: "None proposed"	The impacts of so much development, in particular across the south of the District, cannot reasonably be described as 'positive' – At best these are 'mixed' for this theme. Mitigation measures (which seem to be inherent in some of the policies) need to be recognised or identified, and proper costing is needed to assess the effect on viability of the proposed development. Without this, the Plan is not 'Green to the Core'.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	9. Appraisal of the Regulation 19 version of the Local Plan Climate change mitigation – 9.1.36	84	'The use of the settlement hierarchy (**CP4**) is effective for concentrating development in locations with the best access to services, jobs and public transport. By focusing the majority of growth in Principal and Non-Principal Settlements, the strategy supports shorter travel distances and increases the potential for walking, cycling and public transport use, which are critical for reducing transport-	Site 7 and 3 non-strategic sites have been allocated in Fairford, which certainly doesn't have the best access to services, jobs and public transport and is not one of the 'more connected settlements'.

Document	Reference (Section etc.)	Page	Text	Comment
			related emissions. This is particularly important in a largely rural district where car dependency can otherwise be high. Locating development in more connected settlements also makes it more feasible to provide infrastructure such as public transport services, active travel routes and low-carbon energy systems.'	
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	9. Appraisal of the Regulation 19 version of the Local Plan Climate change mitigation Table 9.3	87	Effect dimensions: "Direct, long-term, positive" Recommendations/Mitigation Measures: "None proposed"	Taking account of the fact that significant development has been located in settlements such as Fairford, which is not well connected and for which significant mitigation measures are required but not yet adequately defined, the effects are at best 'mixed' for this theme.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	9. Appraisal of the Regulation 19 version of the Local Plan Cumulative and in-combination effects – 9.1.198	118	"Cumulative effects may also occur in settlements that have already experienced recent growth, such as Moreton-in-Marsh"	Fairford also needs to be referred to here. This is particularly relevant in relation to issues such as water supply, sewage treatment and highway capacity in the very constrained centre of town.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	Appendix C Key Sustainability Issues Economy and Employment	143	"Very few locations in Cotswold District offer positive viability thresholds for new employment development"	This may be at least partly because of the lack of an effective local area economic strategy for creating higher value jobs, which would help to support the case for improvements in local infrastructure.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	Appendix C Key Sustainability Issues Economy and Employment	143	"difficulties in attracting workers due to median wages below the national average"	It is not just 'median wages' (which are part of the Government's 'Affordability' measure) but the type of jobs on offer in the absence of a local economic strategy for higher value employment.

Document	Reference (Section etc.)	Page	Text	Comment
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	Appendix C Key Sustainability Issues Economy and Employment	143	"Need to compete with larger surrounding towns such as Swindon, Cheltenham, Tewkesbury and Gloucester"	Surely, to justify building such large amounts of housing as proposed in parts of the District such as the south, this needs to be under either a specific strategy for the local area (based on defence/ aerospace?) or an economic strategy for wider area based on one or more of the larger centres mentioned – in which case it is not a matter of 'competing' with these, but rather of whether places such as Fairford are the appropriate location for large amounts of new housing.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	Transport and Air Quality	144	"Households owning numerous cars reinforces the reliance on accessing services and facilities by car."	Taken with the statement "Public transport is not currently a realistic alternative mode of transport in many parts of the district", this seems to be confusing cause and effect.
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	Appendix D Settlement-by-settlement discussion of sites: Fairford	156	Most of the northern half of the town is a designated Conservation area, containing Grade I, Grade II, and Grade II* Listed Buildings. Land to the north of the town is within a Special Landscape Area, encompassing Fairford Park estate. The River Coln (and areas of Flood Zone 2 and Flood Zone 3) passes through the Special Landscape Area and the town, continuing to the south east where it forms the southern border of the Whelford Meadows SSSI and Cotswold Water Park SSSI. The SSSIs comprise a series of lakes which extend northward from the River Coln to the A417. Land to the south of the town is also within the boundary of the Cotswold Water Park SSSI, which extends to RAF Fairford. The south of the town also comprises areas of Grade 2 and Grade 3a 'best and most	There seems to be no consideration here of other important sustainability related issues at site or settlement level, such as highways, water supply and sewage treatment capacity (and consequences for pollution), the level of local facilities or noise from heavy bomber operations at RAF Fairford, and the measures necessary to address these.

Document	Reference (Section etc.)	Page	Text	Comment
			versatile' agricultural land. The town is not within the Cotswolds National Landscape. Additionally, Land to the north east and to the west of Fairford is comparatively less constrained, with key constraints including the setting of the Special Landscape Area, SSSI Impact Risk Zones, and Groundwater Source Protection Zones.	
Integrated Impact Assessment (Incorporating …) (AECOM July 2026)	Appendix D Settlement-by-settlement discussion of sites: Fairford	156	Reflecting the above, the following sites (or clusters of sites) have been taken forward to Stage 3 of the site selection process for a potential sustainable urban extension: 'Land north east of Fairford' (F57A, F57B, F57C). Within the HELAA, of the sites classified as 'potentially deliverable / developable' or 'deliverable / developable' for a sustainable urban extension, 'Land to the south west of Fairford (F53A and F53B)' could deliver up to 420 homes reflecting the indicative site capacities within the HELAA. An outline planning application of 74 homes has come forward on Site F53A. Constraints to development across Site F53B limit further opportunities for expansion, given the adjacent SSSI and its associated Impact Risk Zones. On this basis, the sites are considered separately for potential non-strategic development during the plan period.	There doesn't seem to be any assessment at either individual site or settlement level of the impacts of the proposed development, or reasonable alternatives, against the various criteria.
Integrated Impact Assessment (Incorporating	Appendix D Settlement-by-settlement discussion of sites: Fairford	157	Within the HELAA, the following 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Fairford have been considered in detail through Stage 3 of the site selection	There doesn't seem to be any assessment at either individual site or settlement level of the impacts of the proposed development, or reasonable alternatives, against the various criteria.

Document	Reference (Section etc.)	Page	Text	Comment
…) (AECOM July 2026)			process, specifically: F20A, F39C, F45, F52, F53A, F53B, F56A, and F56B.	
IIA Report Non-Technical Summary	General Comment			The same comments apply as for the full Integrated Impact Assessment report. We have experience of AECOM's methodology from our Neighbourhood Plan (2023). This is a very 'qualitative' methodology and doesn't provide appropriate weighting to factors and impacts which are considered the most important (or even critical) in the local context, so overall conclusions on both scenario/option and Theme basis can be suspect. Issues that are important at individual site or settlement level can be submerged in an 'overall' assessment or (as in this case) not considered at all, which is symptomatic of the fact that alternatives at the detailed level are not properly considered and the plan as whole may contain many elements that are unjustified and unsustainable, i.e. it is not 'Green to the Core'.
Habitats Regulations Assessment (LUC July 2026)	Cotswold Local Plan 2026 – 2043: Spatial Strategy South Cotswold - Strategy Area 2.7	15	'Tetbury, Fairford and Lechlade are recognised for their important role as the main service centres providing a wide range of services, facilities and employment opportunities for surrounding communities'	Fairford does not currently have a level of facilities sufficient for it to be properly regarded as a 'main service centre', so this doesn't justify the impacts of the new development proposed on habitats.
Habitats Regulations Assessment (LUC July 2026)	Figure 2.1 – Local Plan site allocations	19		The site allocations are wrongly labelled
Habitats Regulations Assessment (LUC July 2026)	Figure 5.1: Key strategic roads within Cotswold District and within 10km	47	(Map)	The section of the A417 from Lechlade to Cirencester through Fairford is a 'District Link' not a 'Strategic' road.

Document	Reference (Section etc.)	Page	Text	Comment
Habitats Regulations Assessment (LUC July 2026)	Tables 5.1-5.7	49-53		The increase in traffic on the A417 From Lechlade to Cirencester through Fairford doesn't appear to have been modelled (possibly because this section of the A417 is only considered a 'District Link' not a 'Strategic' road). The effects on FLL adjacent to this will therefore presumably not have been considered.
Habitats Regulations Assessment (LUC July 2026)	Direct pollution (5.72-5.78) and Wastewater Treatment (5.79-5.82)	62-65	**5.76** Development that is adjacent to the Cotswold Water Park SSSI could result in pollution that could indirectly affect Severn Estuary SPA/Ramsar bird species. The following site allocations and policy areas have the potential to result in direct pollution at the Cotswold Water Park SSSI: Fairford: F53A, F20A, F39C, F52, and part of strategic site: Land north east of Fairford.	The Cotswold Water Park SSSI lakes to the south of Fairford are currently seasonally polluted indirectly by discharges from the Fairford sewage treatment works via overflows from the river downstream of the STW. This pollution affecting the FLL is likely to be increased unless/until the planned and overdue uprating of the sewage Treatment Works and any necessary further upgrade is completed.
Habitats Regulations Assessment (LUC July 2026)	Water quality/quantity – abstraction and wastewater treatment - 6.51	88	"Beyond 2030, there should be sufficient time once the Local Plan is adopted for water companies to provide additional capacity where required"	Experience over the last decade indicates that, even when a sewage treatment works is already acknowledged to be operating outside its capacity and 'dry storm discharging' e.g. due to groundwater infiltration and there is an agreed need to upgrade, this doesn't guarantee that this will actually happen. The Fairford STW upgrade under the WINEP programme has already been delayed from the previous AMP period, and this is only to meet existing need. This situation is unlikely to improve until there is an enduring solution to the financial problems of Thames Water.
Viability Assessment (Quintic Advisory May 2026)	2.36	13	'The Council has advised that it will be undertaking a review of its CIL Charging Schedule and it expects to adopt a new Charging Schedule soon after the Local Plan has been adopted in 2028. CIL rates will be informed by evidence of viability, but it is expected that Local Plan strategic allocations will be zero rated for CIL purposes, given that they will be delivering community	The supporting briefs and Infrastructure Delivery Schedule don't appear to adequately address all the consequential infrastructure needs for the wider town, let alone the affected wider surrounding road network, so this will provide no money for local communities to meet these other needs.

Document	Reference (Section etc.)	Page	Text	Comment
			infrastructure onsite, as well as funding highways improvements.'	
Viability Addendum Infrastructure Note (Quintic Advisory July 2026)	4.1 and Table 4.1.1	4	Fairford: Land north-east of Fairford Residential units: 1141 Infra requirement per unit: £27,639 Total resources generated: £20,258	This gives a deficit per unit of £7381. It isn't clear what housing type/size mix this is assumes. There is a worrying statement that "It is likely that these funding gaps could be closed relatively easily by increasing values over the course of the development or by re-profiling of the timing of infrastructure payments or timing of provision." Based on experience, it seems more likely that infrastructure will be deferred and costs will increase, resulting in appeals against s106 requirements based on 'viability' and the non-delivery of infrastructure which was deemed to be 'critical' or 'essential'. The most likely way of increasing values over the course of the development would seem to be by reducing the proportion of 'Affordable' housing, which would seem to defeat the main purpose of improving housing affordability in the Plan area.
Statement of Consultation August 2026	Summary of the main issues raised and how they have been addressed 4.9 and Table 2	9-16		Cotswold District Council does not appear to have taken account of a number of points we raised on the Regulation 18 Consultation, as highlighted elsewhere in this response. A number of these were related to factual inaccuracies and the supporting documentation. Failure to address these calls into question the soundness of the proposals and the justification for them.
Statement on Effective Cooperation	Appendix 1: Statements of Common Ground Summary Table	9-10		Holding letter only from Wiltshire Council No SOCG agreed yet with: Warwickshire (unsigned) National Highways (working on) Thames Water (working on) The lack of a SoCG with Thames Water gives rise to uncertainty about the deliverability of the amount of development proposed in the south of the District and Fairford in particular.

Document	Reference (Section etc.)	Page	Text	Comment
				Thames Water may not be able to make the necessary commitment until an enduring solution to their financial problems is in place.
Statement on Effective Cooperation (Including Addendum)	Appendix 2: Statements of Common Ground Swindon, Worcestershire, South Gloucestershire, Stroud, West Oxfordshire		"Due to the number of additional sites submitted in response to the 2025 Reg 18 consultation, which are predominantly located outside of the national landscape, it is no longer anticipated that Cotswold will need to identify any unmet housing, employment or other needs. In the event that a modest level of unmet need is identified, CDC consider the emerging Spatial Development Strategy and new Local Plan for the new unitary Council in Gloucestershire will provide a more effective mechanism to plan for this. On this basis, it is not anticipated that any neighbouring authorities will be asked to contribute towards any unmet housing, employment or other needs."	A judgement seems to have been made prematurely before establishing the sustainability, consistency with national policy and deliverability of a number of strategic and non-strategic allocations and the combined amount of proposed housing development within what is essentially only a part of a part of a housing market and economic area whose priorities and spatial strategy are likely to change significantly as a result of impending local government reorganisation.
Statement on Effective Cooperation (Addendum)	SoCG with Swindon Borough Council	9	Proposed growth at Fairford will include all infrastructure requirements, including for education provision to avoid any wider implications. The proposals are informed by detailed evidence including traffic modelling as outlined above.	This is misleading. There does not appear to have been detailed traffic modelling of the road network in Fairford (which is critical) and other key affected routes in the area but only modelling of 'main' junctions. A proper modelling study is needed.
Statement on Effective Cooperation (Including Addendum)	Statements of Common Ground		Holding letter only from Wiltshire Council No SOCG agreed yet with: Warwickshire (unsigned) National Highways (working on) Thames Water (working on)	The lack of a SoCG with Thames Water gives rise to uncertainty about the deliverability of the amount of development proposed in the south of the District and Fairford in particular. Thames Water may not be able to make the necessary commitment until an enduring solution to their financial problems is in place.

Document	Reference (Section etc.)	Page	Text	Comment
Statement on Effective Cooperation (Including Addendum)	Environment Agency			No acknowledgement of issues re Fairford STW and impacts on local environment including lakes of the Cotswold Water Park SSSI downstream.