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| Main Plan (Printer Friendly version) | Foreword | vi-vii | | Good objectives, but will it work out like that in practice? |
| Main Plan (Printer Friendly version) | Foreword | vii | 'A Plan that is "Green to the Core" will also support nature recovery, manage flood risk and protect our landscapes and heritage' | Many will question whether this plan is actually 'Green to the Core' because of the impact of the development it proposes, particularly in the South of the District, on the existing Cotswold Water Park Nature Recovery Plan, the Cotswold Water Park SSSI and valued landscapes around some of our settlements. |
| Main Plan (Printer Friendly version) | Foreword | vii | 'Third, it puts infrastructure at the heart of development.' | National policy indicates that development should be 'infrastructure led'. However, in many cases we are still trying to catch up with the requirements from previous development and the new housing will be dependent on infrastructure that doesn't yet exist. Infrastructure requirements listed in the IDP do not seem to address all the needs effectively, are not fully costed and in some cases do not appear to make the developments they are supporting viable, so it is unclear how they are to be reliably funded – particularly under new Unitary and/or Strategic authorities which may have different priorities. |
| Main Plan (Printer Friendly version) | 1. Introduction 1.9 | 2 | "Cotswold District is part of the Gloucestershire Strategic Housing and Economic Market Area" | **Housing and economic market areas are supposedly the concept that the housing requirement model and methodology are based on. As we have argued in the Parish/Town Councils' joint letter to the Secretary of State, it seems inappropriate to apply the 'standard method' to an area which is only part of a HMA, with high local prices based on the 'attractiveness' and restricted supply due to national policy in 80% of the area, and seek to cram the overwhelming majority of the factored-up 'requirement' figure into the remaining 20% where the infrastructure is inadequate and in many cases already overstretched.** |
| Main Plan (Printer Friendly version) | 1. Introduction 1.10 | 2 | "the amount of housing the Local Plan needs to plan for, known as the 'housing requirement', can be lower, or higher, than the Standard Method figure, depending on local circumstances" | We note that this is acknowledged. |

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| Main Plan (Printer Friendly version) | 1. Introduction 1.10 | 2 | "However, as the extent of land available for development outside of any designated areas is sufficient to meet the identified need in full, this Local Plan does seek to meet the full housing need for Cotswold District of 17,918 homes over the Plan period (2026 to 2043)" | **It has yet to be demonstrated that the amount of development and individual sites proposed in this Plan can be delivered sustainably and viably with adequate supporting infrastructure within the areas outside the CNL in accordance with policies of the NPPF as a whole.** |
| Main Plan (Printer Friendly version) | 1.15 | 4 | 'Neighbourhood Development Plans … must be in line with national planning policy and the currently adopted Local Plan' | This statement is not strictly true, depending on what is meant by 'in line with'. |
| Main Plan (Printer Friendly version) | 2. Spatial Portrait, 2.1 | 9 | "The strategic imperative to make the Local Plan "Green to the Core" is a key unifying factor" | If it is an 'imperative', why is it proposed to build over such large parts of the Cotswold Water Park Nature Improvement Area in the south of the District, conflicting with the established Nature Recovery Plan? This doesn't seem 'Green to the Core'. |
| Main Plan (Printer Friendly version) | 2. Spatial Portrait, 2.37 | 19 | "However, much of the District does have good road links, with easy access to the motorway network via A-class routes, although this does not apply to the northernmost parishes." | The reference to 'A-class routes' is seriously misleading in respect of the A417 through Fairford and the A417 and A361 through Lechlade in the south of the District, both of which are highly constrained without any easy suitable alternative routes or under this Plan with good (unconstrained) links to Cirencester and the A417 north from there to Gloucester and Cheltenham (See the Strategic Transport Assessment). |
| Main Plan (Printer Friendly version) | 2. Spatial Portrait, 2.39 | 20 | "Two of the secondary schools (The Cotswold Academy and Chipping Campden School) also provide sixth-forms." | Farmor's School in Fairford also has a 6th Form, so it is three. |
| Main Plan (Printer Friendly version) | 3. Spatial Vision and Strategic Objectives Spatial vision | 25 | Cotswold District will continue to be 'Green to the Core' | Many will question whether this plan is actually 'Green to the Core' because of the impact of the development it proposes, particularly in the South of the District, on the existing Cotswold Water Park Nature Recovery Plan, the Cotswold Water Park SSSI and valued landscapes around some of our settlements. |

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| Main Plan (Printer Friendly version) | Chapter four: Spatial Strategy, 4.2 | 29 | "It focuses growth in the most sustainable settlements" | **Fairford Town Council questions whether Fairford is truly one of the 'most sustainable settlements' for large-scale development based on its relatively poor transport connections and the actually very limited scale of services in its small existing town centre, which is misrepresented in the Settlement Role and Function Study – for example, this states that Fairford has 2 'supermarkets' when in reality it only has one medium-sized and 2 small 'convenience stores', as we pointed out in the Regulation 18 consultation. Further studies are required to establish the sustainability and deliverability of the proposed strategic extension (Site 7), including a detailed study of the likely impact of the additional generated traffic on the very constrained roads in Fairford itself and on other minor routes in the surrounding area.** |
| Main Plan (Printer Friendly version) | Chapter four: Spatial Strategy, Figure 4.1 | 32 | "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." | Both Fairford and Lechlade are designated in the current Local Plan (2018) policy EC7 as only 'District Centres' because of their much lower level of facilities than the 'Key Centres', which have continued to suffer losses to residential use. The suggestion that Fairford can serve as a 'main service centre' in its current form seems to be based on erroneous information in the Settlement Role and Function Study indicating that it has 2 'supermarkets' when in fact it has one medium-sized and 2 small 'convenience stores'. The Retail & Town Centres Study identifies (Table 4.1) that Fairford has far less 'town centre uses' (27) compared with Cirencester (313), Stow-on-the-Wold (137), Tetbury (94), Moreton-in-Marsh (90), Bourton-on-the-Water (71) and Chipping Campden (48). The Retail & Town Centres Study recommends that what is needed is a medium-sized foodstore of around 1500 sq.m rather than a new 'local centre'. |
| Main Plan (Printer Friendly version) | Core Policy 3: Meeting Housing Needs in Cotswold District – Non-Strategic Allocations | 43 | (Table 4.7) | The allocation Land at Totterdown Hill, Horcott (F53A) is actually in Kempsford Parish although the traffic from it probably affects Fairford's road system more. |

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| Main Plan (Printer Friendly version) | Core policy 4, Table 4.9 | 47 | "Development outside the Development Boundaries indicated on the Policies Maps will only be permitted where it is allocated by the Local Plan or has been allocated within a Made Neighbourhood Development Plan." | An emerging spatial strategy or allocations by a post-Reg 16 Neighbourhood Plan would presumably be material considerations, in accordance with NPPF policy DM4. |
| Main Plan (Printer Friendly version) | Core Policy 5: Meeting Business and Employment Needs in Cotswold District – Table 4.11 | 51 | 'Strategic extension to the north-east of Fairford' | We question whether the allocation of 4.2 ha for B2, B8 and E(g) uses in Fairford sufficient to compensate for the recent loss of 3 small employment sites within the town and meet the reasonable employment needs related to the proposed new housing without increasing the amount of out-commuting (See also our related comment on the draft Employment Land Review.) |
| Main Plan (Printer Friendly version) | Infrastructure Delivery, including Core Policy 6 | 52-55 | | **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.** |
| Main Plan (Printer Friendly version) | | 53 | 4.51 states "CIL is charged on all new dwellings, not just major developments" | **It is assumed in the IDP (1.1.1) that strategic sites will be zero rated, which would leave local communities without CIL money to pay for additional local needs arising due to the development (likely to be principally due to the strategic allocations). Is this really the intention? We have too much experience of s106 commitments being underestimated initially and/or subsequently waived to the detriment of the local community.** |
| Main Plan (Printer Friendly version) | Chapter six: South Cotswolds Area Strategy – 6.14-6.16 | 85-86 | | |

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| Main Plan (Printer Friendly version) | 6.16 | 85 | 'The Frameworks provide a comprehensive and coordinated masterplanning approach for each site, establishing the overarching development principles and policy requirements to guide future proposals' | The Frameworks do not adequately address all the implications and issues that will be created at Settlement level and beyond, which needs to be the subject of more comprehensive master planning exercises. |
| Main Plan (Printer Friendly version) | 6.14 and Core Policy 12 (Table 6.1) | 85 90 | 'strategic extension to the north east of Fairford (1141 dwellings)' | **We request the deletion of this site unless it is robustly demonstrated, with evidence, that: (a) impacts on the highway network within and beyond Fairford, and on the town centre, have been modelled in detail and can and will be effectively mitigated; (b) any retail element, located close to the A417 and aligned with the Retail and Town Centres Study, will complement and not harm the vitality and viability of the town centre; (c) water supply and sewage treatment upgrades will be in place before development commences, secured by a Statement of Common Ground with Thames Water and the Environment Agency and by Grampian-style policy wording in Core Policy 64 and the Framework controlling development beyond identified capacity; (d) impacts on the Severn Estuary SPA/Ramsar, the CWP Nature Improvement Area and the Nature Recovery Plan will be effectively mitigated; and (e) the site is viable with all necessary infrastructure, which is fixed in the Plan rather than the IDP and supported by a comprehensive masterplan for the whole town prepared with FTC. It is not sound to leave all these matters to the later planning application stage, when they raise such fundamental deliverability issues.** |

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| Main Plan (Printer Friendly version) | 6.25 | 93 | 'which is well-related to the village'<br>'a new street to act as a primary vehicular route linking the site parcels between Leafield Road and London Road (A417), relieving congestion around Fairford Primary School and Farmor's School, improving circulation and providing a direct route for east west movements'<br>'an approach that … sensitively manages relationships with nearby heritage assets, including Mount Pleasant Cottage'.<br>'new routes including along the former railway alignment.' | Please refer to Fairford as 'town' not 'village'<br>**Note in particular that the 'new street' doesn't relieve the problem of east-west movements through the town but redirects traffic back into the town centre from a different direction likely to increase conflict with AT users in Leafield Road, Park Street and High Street/Market Place and/or MilL Lane.**<br>We don't understand the significance of the reference to Mount Pleasant Cottage. Please clarify.<br>The route along the old railway line is a fantasy, owing to ownership/access issues |
| Main Plan (Printer Friendly version) | 6.26 | 93 | | There is no main verb in the sentence. |
| Main Plan (Printer Friendly version) | 6.17 | 86 | 'These smaller sites provide opportunities to reinforce local settlement patterns, support existing services and facilities, and deliver a balanced mix of housing, including affordable homes, while responding sensitively to local landscape character and heritage context.' | This doesn't reflect the reality for Fairford. Together with the strategic allocation this will place an increased burden on already-overstretched local services. See separate comments about site F20A which will also break away from the existing pattern of development and intrude into locally valued landscape. |
| Main Plan (Printer Friendly version) | Figure 6.1 | 88 | | The Fairford-Lechlade Multi-Use Path route is shown incorrectly (not feasible on this route). |

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| Main Plan (Printer Friendly version) | Chapter six: South Cotswolds Area Strategy – Core policy 12, table 6.2 | 90 | "South-east of Fairford – number of dwellings 55" | **We request the deletion of this allocation for reasons explained in the main body of our representation – principally conflict with previous site assessments, heritage, valued landscape, access issues and a well thought-out spatial strategy in the Fairford Neighbourhood Plan (2023). Development of this site would also appear to conflict with Core Policy 60.**<br>**The feasibility of the 3 non-strategic sites proposed in addition to the strategic extension in Fairford is still to be established, owing to physical constraints on E-W traffic flows, biodiversity considerations, water supply and sewage treatment capacity.** |
| Main Plan (Printer Friendly version) | Table 6.2 | 90 | West of Terminus and Station Cottages - 30 | We believe the combined site (F39C+F52) could accommodate a larger number of dwellings with access taken directly from the A417 – This may be best deleted from this plan and addressed through an update to the Fairford Neighbourhood Plan with an appropriate policy in the Local Plan t cover this. |
| Main Plan (Printer Friendly version) | Table 6.2 | 90 | At Totterdown Hill, Horcott - 150 | This site is actually in Kempsford Parish.<br>We request the deletion of this site, for the following reasons:<br>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 periodic heavy bomber operations at the base. The main travel route from the site is likely to be via the junction of Horcott Road with the A417, which is already problematic 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'. |

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| Main Plan (Printer Friendly version) | Strategic Infrastructure Delivery 6.33-6.34 and Core policy 13 | 100 | "… Strategic Site Allocations will deliver the bulk of these improvements, supported by non-strategic allocations, sites with planning permission and windfall development where appropriate." | The infrastructure needs arising from the strategic and non-strategic allocations at Fairford separately and in combination, both within the strategic extension and elsewhere need to be determined by a proper traffic assessment of the local road network, a proper impact assessment of the proposed retail element and a comprehensive master planning exercise taking account of the wider context of the town. |
| Main Plan (Printer Friendly version) | 6.34 | 100 | "Delivery will be phased in line with each strategic allocation's masterplan and Site Development Framework (**Appendix B**)." | Where there are both strategic and non-strategic allocations in a settlement, such as in Fairford, this could mean no infrastructure would be delivered unless/until the strategic allocation is developed, which is unacceptable if vital elements are needed for the non-strategic allocations earlier. The master planning needs to be at Settlement level. |
| Main Plan (Printer Friendly version) | Core Policy 13 | 101 | 'integration with the former railway alignment' | It is unclear what is meant by 'integration with the former railway alignment' in b) – Please clarify. This is not a deliverable longer-distance AT route because of ownership issues to the east. |
| Main Plan (Printer Friendly version) | Core Policy 30: Roof-Mounted and Ground-Mounted Solar Panels | 151 | 'Development proposals will be supported and encouraged in principle where planning permission is required for … the development of solar arrays over car parks, including within Conservation Areas' | It is concerning that consideration of the impact on the setting of heritage assets is not included in the criteria – It should be, as this could be a serious issue e.g. where a car park is located close to an important heritage asset. |
| Main Plan (Printer Friendly version) | Chapter nine Transport 9.1-9.34 and Core Policies 33-39 | 157-173 | | It needs to be recognised that in rural areas (including rural market towns more remote from main centres) private car transport is still going to be the most practical means for people to reach services; also, minor roads provide important links and alternative routes between destinations, helping to provide 'resilience' in the local road network, so traffic regulation of these routes should not be unnecessarily restrictive. More use could be made of the verge areas on historic 'drove road' routes to provide segregation of cycling/pedestrians from vehicular traffic. |

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| Main Plan (Printer Friendly version) | Core Policy 34: Assessing and Managing Transport Impacts | | "The delivery of proposed infrastructure schemes should be fully evidenced through engineering feasibility, highway safety compliance, land control, funding and include clearly defined timing of delivery within the Plan period." | This should apply to the making of this Plan as well as development proposals. Otherwise, there is a danger that development proposals for the site allocations will not be able to meet these requirements and will therefore be either undeliverable or unsustainable in practice. |
| Main Plan (Printer Friendly version) | Core Policy 35: Active Travel: Walking, Cycling & Wheeling | | | It needs to be recognised that in rural areas (including rural market towns remote from most facilities) private car transport is still going to be the most practical means for people to reach services and minor roads provide important links and alternative routes between destinations, helping to provide 'resilience' in the local road network, so traffic regulation of these routes should not be unnecessarily restrictive. More use could be made of the verge areas on historic 'drove road' routes to provide segregation of cycling/pedestrians from vehicular traffic. |
| Main Plan (Printer Friendly version) | 10.4-10.8 and Core Policy 41: Standards for New Residential Development | 178-179 | | Higher levels of accessible provision may be appropriate in locations where there is higher demand particularly from an ageing population. |
| Main Plan (Printer Friendly version) | 10.9-10.26 and Core Policy 42: Affordable Housing | 180-183 | | Shouldn't this policy include a requirement to give priority to people with qualifying local connections? |

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| Main Plan (Printer Friendly version) | 10.38, 10.39 and Core Policy 44: Specialist Accommodation | 186-188 | 10.38 Residential care accommodation should normally be located within settlements where there is easy access to a range of services, e.g. shops, healthcare and social facilities. This should enable non-car access to local facilities for residents and staff.<br>10.39 Enabling opportunities for active lifestyles and older peoples' engagement in community life may, for example, include the provision of safe and accessible green infrastructure, sports facilities, allotments, services and facilities and a layout that encourages walking and cycling. These matters will be especially important to address where there are identified health and well-being needs. | Easy car transport access is also important e.g. where the residential accommodation is not located close to the facilities and/or public transport provision is limited or not sufficiently accessible, as older people may have limited mobility and walking/cycling may not be practical for them, so they are reliant on car transport (driven by themselves or others). |
| Main Plan (Printer Friendly version) | Development Policy 5: Replacement Dwellings | 201 | "b) the scale, form and footprint of the replacement dwelling is smaller than, or of a similar size and scale (not materially larger) to the existing dwelling (including any extensions)" | It needs to be clarified whether this policy is intended to apply within development boundaries since, if so, some of the conditions would appear unnecessarily restrictive, e.g. if a larger dwelling or more than one dwelling could easily be accommodated on the plot. |

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| Main Plan (Printer Friendly version) | Chapter eleven Economy, Retail and Tourism<br>Core Policy 46: New Employment Development | 204 | Outside Development Boundaries, and outside Established Employment Sites, proposals for small-scale employment development appropriate to the rural area will be permitted where they:<br>d) do not entail residential use as anything other than ancillary to the business<br>e) are justified by a business case, demonstrating that the business is viable or facilitate the retention or growth of a local employment opportunity, and<br>f) are not large-scale, unless it is in accordance with other policies that expressly deal with large-scale development in such locations. | It needs to be clarified what is meant by 'the rural area', particularly around settlements for Fairford where it may be desired to encourage new employment (not necessarily 'small scale') to minimise the need for out-commuting from large-scale housing development and help support the vitality and viability of the nearby Town Centre.<br>What we are really saying is that there needs to be a proper economic strategy for the locality to justify large scale housing developments under this Plan. |
| Main Plan (Printer Friendly version) | Core Policy 47: Safeguarding Established Employment Sites | 205-207 | | How does CDC intend to safeguard employment land specifically intended for office use by 'knowledge based' businesses? A policy is needed on Article 4 Directions, to protect against loss of such sites to residential use through permitted development rights as has already happened e.g. with Quest House in Fairford, which was part of the London Road Industrial Estate. Such office use, which should be part of a local economic strategy, can contribute to much-needed higher-value employment, helping to provide better opportunities for local young people and improve the 'Affordability' ratio, while not placing the same burden on local highway infrastructure as heavy traffic from manufacturing and distribution services. |

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| Main Plan (Printer Friendly version) | Core Policy 49: Development of Tourist Facilities and Visitor Attractions | 210 | "provided that:<br>a. the proposals is viable without the provision of visitor accommodation" | Depending on the nature of the proposed facility, condition a. may be an inappropriate restriction since on-site visitor accommodation may avoid/reduce the need for people to travel repeatedly to/from the site by private car from other locations and thereby minimise unsustainable travel. |
| Main Plan (Printer Friendly version) | Core Policy 51: Town Centre Uses | 217 | "All proposals for Main Town Centre uses must:<br>…<br>g) ensure where feasible that where ground floor redevelopment or alterations are proposed, that access to the upper floors is unaffected or enhanced to enable their availability for other permissible uses." | Condition g) must not be allowed to mean that redevelopment of ground floors to enhance the use of upper floors adversely impacts the viability of the ground floor unit for retail or other town centre service use. Clarification is needed on this.<br>Unfortunately, we have already seen a number of instances where important retail frontage space has been given over to entrance halls for AirBNBs, detracting from town centre viability. |

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| Main Plan (Printer Friendly version) | 11.46-11.48 and Core Policy 52: New Local Centres | 218-219 | "11.46 The spatial strategy proposes a substantial increase to the size and function of a number of settlements across the District, proposing strategic allocations and one entirely new settlement to meet local housing, employment and other needs. To ensure that sustainable communities are developed in these locations, it will be essential to anchor the new communities with local centres that provide retail opportunities, convenience and community services."<br>"11.48 … Proposals that broaden the function of Local Centres in a manner proportionate to the scale of the development they serve will be supported." | **This needs to be done without damaging the vitality and viability of the existing settlement centres.**<br>**This should not be about developing new communities linked to the existing settlements and adding to the burden on their existing infrastructure and services, but rather by developing extensions which integrate effectively with them.** |
| Main Plan (Printer Friendly version) | Core Policy 52: New Local Centres | 219 | "New Local Centres which contain and/or partly contain a convenience/ food store (up to 1,000sqm gross) and community uses and other appropriate local services will be required as part of the following strategic allocations: …<br>Strategic extension to the north-east of Fairford (food store up to 1,500sqm net)" | **The policy as written contradicts itself re the size of the store required in Fairford.**<br>**In any case an impact assessment is required to provide evidence that this can be achieved in a way that complements and does not adversely impact the vitality and viability of the existing town centre.** |

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| Main Plan (Printer Friendly version) | Core Policy 52: New Local Centres | 219 | Proposals for new Local Centres at these locations should:<br>b) be located centrally within the strategic allocation to maximise the opportunity for sustainable travel (walking, and cycling) for the majority of proposed/ new dwellings<br>on the site …<br>f) provide opportunities, where appropriate to the scale and function of the Local Centre, for flexible workspace, co-working facilities, health services, childcare provision and other complementary uses that support the creation<br>of a sustainable and self-contained community. | The new facilities should not necessarily be located centrally within the new strategic extension if these have to complement facilities in other parts of the settlement, for the benefit of the whole community. **This needs to be spatially planned on a whole settlement basis**, taking account of transport connections and providing appropriate parking facilities, since distances from further parts of the settlement as in Fairford (and outlying villages also being served) may be too great for many people to walk or cycle.<br>Any 'self-containment' should be planned at the settlement level, not just for the strategic extension. |
| Main Plan (Printer Friendly version) | Chapter twelve Historic Environment – 12.16 and Core Policy 55: Conservation Areas | 235-236 | "The Council has carried out a series of conservation area appraisals leading to management plans" | There are a number of conservation areas in the District, such as in Fairford, which do still not have appraisals or management plans more than 50 years after they were designated (despite this being a statutory obligation) and the Council has stated that the do not have the resources to provide these even when the local community have offered to carry out a significant part of the work. **The policy needs to include a commitment to remedy this situation, so that assessments do not have to be carried out for planning applications on an ad hoc basis without consistent understanding of key elements of local character and their relationship to the wider context.** |

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| Main Plan (Printer Friendly version) | Chapter thirteen Natural Environment – para 13.7 and Core Policy 60 | 246, 250 | "Functionally Linked Land (FLL) describes areas of land or sea outside a designated site which are critical to or necessary for the ecological or behavioural functions of that site. Within the District, this includes the Cotswold Lakes SSSI, which is used by birds from Severn Estuary SPA/Ramsar. Other habitats may also be used by SPA/Ramsar birds for foraging." | This is identified in the HRA in relation to the strategic extension and 2 of the non-strategic sites in Fairford, but it is not clear whether/how this has been taken into account in the HELAA assessments, the Site Selection Topic Paper and Core Policies 2, 3 and 12. Development of these sites would appear to conflict with Core Policy 60, which states:<br>"The highest level of protection will be given to Habitat Sites (formerly known as European Sites). Development will not be permitted if it would adversely affect the integrity of a Habitats Site either alone or in combination with other developments, and directly or via functionally linked habitats. Proposals having a harmful impact on the integrity of Habitats Sites that cannot be avoided or adequately mitigated will not be permitted." |
| Main Plan (Printer Friendly version) | Chapter thirteen Natural Environment – para 13.17 | 248 | "Local Nature Recovery Strategies (LNRS) are an England-wide system of spatial strategies. Gloucestershire's LNRS was published by GCC in February 2026 and endorsed by CDC Cabinet in March 2026. All strategies establish priorities and map proposals for specific actions to drive nature's recovery, expand and connect existing habitat, and provide wider environmental benefits." | Gloucestershire Local Nature Recovery Strategy (Feb 2026) refers to local Nature Recovery Plans and among other things stresses the importance of connectivity. The Cotswold Water Park Nature Recovery Plan (2021-) identifies connectivity between the lakes of the Cotswold Water Park SSSI and the CNL (formerly AONB) as a key objective. The Fairford strategic allocation (Site 7) appears to conflict with this – so how is this impact to be addressed? |

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| Main Plan (Printer Friendly version) | Core Policy 60: Biodiversity and Geodiversity | 250 | "The highest level of protection will be given to Habitat Sites (formerly known as European Sites). Development will not be permitted if it would adversely affect the integrity of a Habitats Site either alone or in combination with other developments, and directly or via functionally linked habitats. Proposals having a harmful impact on the integrity of Habitats Sites that cannot be avoided or adequately mitigated will not be permitted." | This doesn't clearly address how impacts on the LNRS and local NRPs such as the Cotswold Water Park NRP – particularly in relation to connectivity between the Cotswold Lakes and the CNL – are to be addressed.<br>What is proposed to mitigate impacts on sites functionally linked to the Severn Estuary SPA/Ramsar, including the Fairford strategic extension, F20A and F53A? |
| Main Plan (Printer Friendly version) | Core Policy 61: Local Green Spaces (LGS) | 253 | "Development will only be permitted within a Local Green Space where there are very special circumstances, which outweigh the harm to the Local Green Space. Particular attention will be paid to the evidence presented by the local community when assessing development proposals that are likely to affect a designated Local Green Space." | **Is this also intended to apply to LGSs designated in Neighbourhood Plans? Should the LGSs designated in made Neighbourhood Plans be included or referred to in this policy and the policy maps, as the LGSs designated under the 2018 Local Plan have been, to clarify this?**<br>**For the Fairford Neighbourhood Plan (2023) the relevant LGSs are:**<br>• **The Walnut Tree Field**<br>• **Upper Green**<br>• **Coln House Playing Field**<br>**Supporting evidence for the designation of these is contained in the Landscape & Local Green Space Study for the FNP.** |

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| Main Plan (Printer Friendly version) | Core Policy 61: Local Green Spaces (LGS) | 253 | "LGS 22: Fairford - The Park Close/ Park Close Pocket Park, Faulkers Close, Honeybone Green Space & Play Area, Keble Fields, Milking Path" | **We would like the LGSs designated for Fairford (LGS22) to be named as follows:**<br>• **Park Close/Queens Field Green**<br>• **Faulkers Close Green**<br>• **Honeybone Close Green Space and Play Area**<br>• **Keble Fields Green**<br>• **Milking Path Park**<br>**(also in the Local Green Spaces Evidence Paper)** |
| Main Plan (Printer Friendly version) | 13.20-13.27 and Core Policy 62: Landscape | 254-255, 258 | | Valued landscapes can be identified through Neighbourhood Plans |
| Main Plan (Printer Friendly version) | Core Policy 63: Managing Flood Risk | 261-262 | | This policy also needs to address risks to properties outside the site from surface water run-off, including during the site clearance and construction period – Suggest wording from Fairford Neighbourhood Plan policy FNP4 |
| Main Plan (Printer Friendly version) | Water Management Infrastructure 13.51-13.53 | 263 | "13.52 It is important to not underestimate the time to deliver water/wastewater infrastructure and offsite upgrades. Thames Water state, for example it can take between 18 months to 3 years for local upgrades and 3 to 5 years plus for more strategic solutions to be delivered, and allow the water company sufficient time to undertake any necessary capacity improvement works." | **It can and does sometimes take longer than this for upgrades to be delivered, even when they are subject to a regulatory enforcement programme such as WINEP. There is still no firm date for the delivery of the Fairford Sewage Treatment Works uprating, which has been needed for about the last 10 years due to groundwater infiltration problems and previous housing development and was supposed to have been completed by March 2025. There must be serious doubts about Thames Water's ability to deliver new schemes on the scale needed to support the proposed level of development until there is an enduring solution to the company's financial problems.** |

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| Main Plan (Printer Friendly version) | 13.54 | 263 | "In relation to water quality, the WCS finds that it is not possible for the watercourses receiving discharges from several settlements to achieve Good Ecological Status (GES) in relation to the chemical element Phosphate. The Local Plan has limited scope to improve Phosphate levels because many actions are outside planning control. However, **Core Policy 64** aims to reduce demand for water in new developments, which will assist in reducing the risk of exacerbating a deterioration in standards." | On 21 September 2026 Thames Water confirmed to FTC that the Water Framework Directive based methodology of waterbody classification and the measures required to accommodate growth take no account of storm discharges or pollution of the SSSI lakes downstream which take place seasonally from the Fairford sewage treatment works. EA have taken an action to comment on the implications of this.<br>Phosphate is not the only issue, although it is potentially the most important for still water bodies such as lakes. Increased population must result in increased levels of pollutants and hence ecological impact irrespective of water consumption. The appropriate upgrades and other necessary measures are therefore essential to support the planned level of development in Fairford. |
| Main Plan (Printer Friendly version) | 13.54 | 263 | "The Cotswold Lakes (formerly Water Park) is a designated bathing water" | Need clarification on which lakes this applies to. |

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| Main Plan (Printer Friendly version) | Core Policy 64: Water Management Infrastructure | 265 | "Proposals must take into account the capacity of existing off-site water and wastewater infrastructure and the impact of development on it; and make satisfactory provision for improvement where a need is identified that is related to the proposal. Where such infrastructure is required, it must be in place prior to the occupation of the development, or, if it is demonstrated that delivery within that timetable is not possible, within a timeframe that has first been agreed by the Local Planning Authority. Proposals, which result in the need for off-site upgrades will be subject to conditions to ensure that the first and/or subsequent occupancy is aligned with the delivery of the necessary infrastructure upgrades." | **The wording of the section Water and Wastewater Provision needs to be more robust to ensure that necessary upgrades are completed in time – Linking to start of development (or development e.g. above foundation level) is more likely to be enforceable in practice than linking to any level of occupation.** |
| Main Plan (Printer Friendly version) | 13.77-13.85 and Core Policy 10: Trees, Hedgerows and Woodlands | 273-275 | | Connectivity of hedgerows and woodland is also important for maintaining biodiversity, so fragmentation of this should be avoided and enhancement encouraged. |

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| Main Plan (Printer Friendly version) | Core Policy 69a: Good Design Outcomes and Process for Strategic Allocations | 289 | "In addition to the requirements of **Core Policy 69,** proposals for the strategic allocations made by this Plan should also:<br>a) prepare a comprehensive Development Framework for the whole site and adjoining highway areas as relevant" | **For strategic extensions such as that proposed at Fairford, comprehensive master planning is needed that considers transport links and the location of facilities in the context of the wider settlement and wider area, not just the site itself and adjoining highway areas.** |
| Appendices A and B | Appendix A General Policy Requirements | 1 | "The Council has prepared its own District-Wide Design Code, to be adopted as a Supplementary Plan, and adherence to this code will be expected for all sites, as described above. The Design Code will be treated as a material consideration in the assessment of all future strategic and non-strategic site planning applications." | Is the District-Wide Design Code necessarily appropriate for all the strategic sites, e.g. if a local Design Code is agreed as part of the master planning? |
| Appendices A and B | Appendix A General Policy Requirements | 2 | "The Infrastructure Delivery Plan (IDP) captures this detail and is a live document that should be read in conjunction with the Site Templates and Frameworks." | It is concerning that the Infrastructure Delivery Plan is stated to be a 'live document' that could change in a way that makes the delivery of the planned development unsustainable and potentially undeliverable.<br>A solution to this is to include in the Site Development Frameworks/Templates requirements that no housing construction should be commenced until specific critical/essential infrastructure has been delivered, i.e. 'Grampian style' conditions.<br>(This would of course require commitment from the relevant infrastructure providing bodies to ensure that the development is viable.) |

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| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Site Context<br>NB There is duplicate page numbering in this document – Page nos. referred to here are those at the bottom of the page. | 32 | Legend: "Strategic Road Network" | The roads shown on the diagram on p30 as such are not part of the 'Strategic Road Network' as defined by DfT/Highways England (although CDC are using a wider definition to include other A roads. This doesn't include the Southrop Road (which is also proposed as an AT route).<br>The diagram doesn't adequately recognise the role of other existing secondary roads – particularly Hatherop Road and Hatherop Lane. |
| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Site Context, Notes<br>NB There is duplicate page numbering in this document – Page nos referred to here are those at the bottom of the page. | 32 | "Land to the east of the site falls within a flood zone associated with the River Coln and the wider Water Park" | The land to the east of the site is prone to flooding from the Thornhill brook (rather than the river Coln or wider Water Park)<br>There are drainage issues N of Crabtree Park and toward the southern end of Red Barn field (just N of the junction of Southrop Road with A417) which may require the use of some of the land where housing is proposed for SuDs attenuation features – This should have been picked up by reference to FTC's WRA report (a key part of the supporting evidence for Fairford Neighbourhood Plan) |

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| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Illustrative Concept Framework<br>NB There is duplicate page numbering in this document – Page nos referred to here are those at the bottom of the page. | 33 | (Map) | • At least 3 more junctions within the area shown would require improvements, including crossings of the 'new street' with Southrop Road and Hatherop Road and the junction of Leafield Road with Park Street.<br>• 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). We already have experience of this from the gas main renewal work last winter. It doesn't provide an effective relief route for the A417 through the town, because Mill Lane is so constrained.<br>• The AT route shown along Hatherop Road down to the A417 is illogical and ignores the hazardous configuration at the 'triangle' near the Railway Inn. It makes more sense to continue round Mount Pleasant to Park Street, although there are visibility issues at the junctions.<br>• Traffic routes require proper assessment and master planning for the settlement as a whole (and beyond). |
| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Illustrative Concept Framework | 33 | | • Drainage issues N of Crabtree Park and toward the southern end of Red Barn field (just N of the junction of Southrop Road with A417) may require the use of some of the land where housing is proposed for SuDs attenuation features |
| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Illustrative Concept Framework | 33 | | • New Retail (not 'Local Centre') probably needs to be closer to A417 if it is to complement (rather than compete with) the existing town centre and serve the whole town, not just the new extension. |

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| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Design Principles<br>The Comprehensive Masterplan | 34-35 | "As set out in the policy requirements, a Comprehensive Masterplan, using the Illustrative Concept Framework and IDP as a starting point, will be required ahead of the determination of the first application on site, supported by more detailed masterplanning across the full allocation and supported by detailed infrastructure phasing and feasibility work." | • The 'Master Planning' needs to be done at the level of the whole settlement, not just the strategic extension, to effectively address the implications of increased traffic flows E-W through the centre and ensure that new retail development complements, rather than competes with, the existing 'fragile' town centre.<br>• The present draft IDP doesn't appear to effectively address all the necessary requirements, so really the Master Planning exercise needs to be carried out before committing to the strategic extension, to establish and demonstrate its viability if feasible. This will enable requirements to be included that no housing construction should be commenced until specific critical/essential infrastructure has been delivered, i.e. 'Grampian style' conditions. |
| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Design Principles Framework | 34 | "Provide a development of approximately 1,150 homes" | This is a different number to that given in Core Policy 12 |
| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Design Principles Framework | 34 | "Focus higher density development around … areas closest to the existing built-up area of Fairford,"<br>"Integrate development sensitively with the existing built-up area of Fairford and the approved (but not yet built out) planning permission to the north west of the allocation." | • These 2 requirements seem inconsistent |

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| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Design Principles<br>Movement and Public Transport | 34 | "Incorporate and improve existing PRoW ensuring pedestrian and cycle movement can be accommodated"<br>"Create a new active travel route along the historic railway line, linking eastwards to the surrounding countryside and make appropriate interventions on Southrop Road and Leafield Road to facilitate movement by active travel between the site and the centre of Fairford."<br>"Increase the frequency of the Stagecoach West 76 bus service to run once an hour to provide better public transport connectivity to Cirencester." | • Which PRoW(s) is this referring to?<br>• It isn't appropriate to incorporate cycle movement on Public Footpaths.<br>• There are ownership/access issues east of the site on the old railway line route.<br>• "Appropriate interventions" for Southrop Road and Leafield Road need to be identified and their feasibility assessed, since there are apparent conflicts with main vehicle routes and limited road widths.<br>• The main bus service linking to Cirencester is the 77, not 76 which currently goes via Kempsford and Down Ampney. |
| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Design Principles<br>Movement and Public Transport | 34 | "Provide a segregated Cycleway between Fairford and Lechlade, suggested as being provided on Park Street (c.0.3km) followed by quiet lane treatment (with physical calming measures) on Leafield Road (0.5km) followed by footway upgrade to shared space (0.4km), segregated route along Hatherop Lane (0.3km) and then again (shared) along to Southrop Road (2.2km) followed by enhanced of a bridleway (1.6km) finally quiet lane treatment on Hambidge Lane (2.7km). " | 'along to [Southrop] Road'?<br>Map required to clarify.<br>The 'footway upgrade' appears to refer to a public footpath on private land;<br>The feasibility of a segregated cycleway on Park Street and quiet lane on Leafield Road need to be demonstrated;<br>It is unclear whether there is sufficient space for segregation on Hatherop Lane and A417 London Road;<br>Is upgrade of the bridleway (1.6km) feasible if this is over arable land?<br>Is Quiet Lane treatment of Hambridge Lane feasible, particularly if this is de facto part of a vehicle route to bypass Lechlade and Fairford centres via Quenington?<br>An alternative southern route is being worked on locally, via lakes 104/103, Waterski Club, Whelford Lane, Dudgrove Lane and Longdoles Lane. |

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| Appendices A and B | Appendix B Site Development Frameworks Site 7 – Design Principles Movement and Public Transport | 34 | "Provide an active travel route including cycling and walking to provide a route into Cirencester. This route would be approximately 10.7km long and would be formed through upgraded bridleways, quiet lane treatment, on road segregation and upgraded footpaths to shared space, linking in to scheme D7, with additional details found in the Strategic Transport Assessment on potential routing." | This route is 10.7km to where it links with D7, i.e. not the whole route.<br>It is unclear exactly which roads/paths this is referring to, based on the sequence in the description – Map required to clarify.<br>What proportion (and what demographic) of people are expected to use this route to employment or study on a regular basis, rather than other modes and other destinations? What are City Science's assumptions about the latter and what evidence are these based on? |
| Appendices A and B | Appendix B Site Development Frameworks Site 7 – Design Principles Movement and Public Transport | 34 | "Provision of a segregated active route linking Site to the town centre via Southrop Road and London Road. Package of measures includes ensuring filling in gaps in pedestrian infrastructure and ensuring continuous footpaths and adequate crossing facilities, as well as enabling a shared used road with a cycleway." | Segregation on Southrop Road and London Road/London Street seems unlikely to be feasible without addressing on-road parking near Cinder Lane. |

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| Appendices A and B | Appendix B Site Development Frameworks Site 7 – Design Principles Movement and Public Transport | 34 | "Provision of an active route connecting Site to the town centre via Hatherop Road. Measures could include widening existing footpaths in some areas and, ensuing adequate crossing facilities and implementing shared used road with a cycleway." | Segregation on Hatherop Road, Mount Pleasant to London Road and London Road/London Street unlikely to be feasible. Why not Hatherop Road – Mount Pleasant – Park Street? Junction improvements may be needed at Mount Pleasant, the Croft and Park Street/Leafield Road. |
| Appendices A and B | Appendix B Site Development Frameworks Site 7 – Design Principles Movement and Public Transport | 34 | "Support designation and surfacing upgrade of Cinder Lane as a quiet road to encourage active travel from Site to the Town centre." | Cinder Lane is a private road (in bad condition, so unsuitable for cycling) and a public footpath route. |
| Appendices A and B | Appendix B Site Development Frameworks Site 7 – Design Principles Movement and Public Transport | 34 | "Improve active travel links along Horcott Road to encourage sustainable access from Site to the town centre. This includes widening the footpaths and improving crossing over wide-mouth junctions heading to town centre, as well as introducing a cycleway. This could connect to existing the cycleway crossing Dilly's Bridge and connecting to Gas Lane, providing a more direct route to High Street." | (This requirement seems mainly relevant to site F53A.)<br>The route over Dilly's Bridge is a Public Footpath (not bridleway/cycleway) across private land, and other footpaths e.g. to St Thomas' church are too narrow for combined cycle use, so cycle route would have to be via Horcott Road and A417 Milton Street or Coronation Street and Mill Lane, requiring additional traffic calming/segregation improvements there. |

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| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Design Principles<br>Movement and Public Transport | 34 | "Providing footpaths along Leafield road and a cycleway to enable active travel into town centre from Site." | Leafield Road may not be wide enough to accommodate a segregated cycleway. This AT route may conflict with some bus and commercial vehicle access to the schools and Fairford Park access off Leafield Road north of the schools. Improvements needed to visibility and priorities at the junction of Leafield Road with Park Street. |
| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Design Principles<br>Movement and Public Transport | 34 | | Additional requirements may be needed (if not already covered), including:<br>Controlled crossing(s) on A417 London Road;<br>Additions to Fairford-Cirencester AT route (including segregated footways in Welsh Way and visibility improvements at western end of Mill Lane);<br>Other junction improvements along new primary road route;<br>Junction and pedestrian improvements at 3 Corner Copse (junction of Hatherop Road with Hatherop Lane);<br>Pedestrian crossing improvements at A417/Coronation Street junction;<br>Safety improvements to A417/Whelford Road junction (roundabout?);<br>AT Improvements on Whelford Road |
| Appendices A and B | Appendix B Site Development Frameworks<br>Site 7 – Design Principles<br>Local Centre | 34 | "Provide a local centre of approximately 0.5-1ha of local centre uses at the heart of the development. In line with the Town Centre and Retail Study (2026), this should seek opportunities to provide retail, community and service uses an a locally appropriate scale that support the day-to-day needs of residents." | New Retail (not 'Local Centre') needs to be closer to A417 – Core policy 12 para 6.25 refers to a 'local centre', which is inconsistent with the Retail & Town Centres Study. |

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| Appendix C | Appendix C Site Development Frameworks **Land south-east of Fairford (ref: F20A)** | 68-70 | | Delete this allocation from Appendix C.<br><br>F20A conflicts with FNP10 River Coln Valued Landscape designated by the Fairford Neighbourhood Plan (2023), supported by evidence in FNP Landscape and Local Green Spaces Study, and would therefore conflict with Core Policy 62. The proposal to develop the eastern part conflicts with the SSSI impact zone. There are numerous issues with this site, including impact on historic landscape, 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, particularly for construction. Additional studies are recommended to establish suitability. The previous SHELAA states that the site is 'Unsuitable' and 'Development would also break away from existing settlement pattern into open countryside.' |

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| Appendix C | Appendix C Site Development Frameworks **Land south-east of Fairford (ref: F20A)** | 69 | Access and movement<br>i. Vehicular access must be provided from Trubshaw Way.<br>ii. Off-road pedestrian and cycle connections must be enhanced between the site, Fairford town centre, the rural areas of the Cotswold Water Park, and the wider Public Rights of Way network.<br>iii. The footpath along the northern boundary of the site must be retained, enhanced, and integrated into the site's green infrastructure framework, with improvements to its setting and user experience. Its significance as a non-designated heritage asset (The Fieldway) must be enhanced and better revealed. | Vehicular access from Trubshaw Way may not be suitable, given the contorted road configuration within the Keble Fields estate (including hazardous T-junctions) and conflict with the public footpath (BFA30).<br>The best way to conserve/enhance the footpath's setting and significance as a heritage asset and community amenity is not to develop the site for housing. |

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| Appendix C | Appendix C Site Development Frameworks **Land south-east of Fairford (ref: F20A)** | 69 | Landscape Integration and Green Infrastructure<br>iv. A robust green infrastructure buffer must be provided along the southern and eastern boundaries of the site to ensure integration with the wider landscape and to create a sensitive transition between built development and the open countryside. A substantial area of greenspace must also be retained at the western end of the site to maintain the agricultural character of this area and preserve the setting of (and views into and out of) the Conservation Area and nearby listed buildings.<br>v. The buffer must incorporate biodiversity enhancements, particularly reflecting and complementing habitats associated with the nearby Site of Special Scientific Interest, and may include Sustainable Drainage Systems (SuDS) and areas of accessible natural greenspace.<br>vi. Opportunities must be taken to utilise land to the south of the site (within the adjoining field) to deliver additional green infrastructure and biodiversity enhancements, unless it can be | No green 'buffer' is going to ensure 'integration with the wider landscape' or disguise the intrusion of housing into this unless (e.g. by boundary tree planting) it destroys the essential open character of that part of the River Coln Valued Landscape designated in Fairford Neighbourhood Plan policy FNP10. |

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| | | | robustly demonstrated that this is not feasible. | |

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| Appendix C | Appendix C Site Development Frameworks **Land south-east of Fairford (ref: F20A)** | 69-70 | Biodiversity and Ecology<br>vii. Development must enhance and create wildlife linkages and habitats within the site, including the retention and planting of species that support pollinators, recognising the site's location within a B-Line network.<br>viii. The green infrastructure on the site must include the provision of coastal and floodplain grazing marsh and woodland habitats, reflecting the proximity of priority habitats and to support habitats suitable for species for which the site has potential to be functionally-linked land.<br>ix. Measures must be incorporated into both the construction process and the long-term design and management of the site to ensure the protection of the adjacent Site of Special Scientific Interest (SSSI).<br>x. Appropriate access management measures and enhancements must be delivered in relation to the adjacent SSSI to mitigate the effects of increased recreational pressure arising from the development. | Surely this needs to be done before the site is allocated (to the extent that this hasn't already been assessed in the HRA)?<br><br>How will the authority identify suitable alternative locations for the birds displaced from this site? |

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| | | | xi. Ecological surveys shall be undertaken to assess the site suitability as supporting habitat for birds from the Severn Estuary SPA/Ramsar. Where the site is found to be of moderate or high suitability, overwintering bird surveys shall be required to determine whether it is functionally linked to the SPA/Ramsar. Where a functional link is identified, appropriate mitigation measures, including the provision of compensatory habitat on- or off-site, shall be secured. | |

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| Appendix C | Appendix C Site Development Frameworks **Land south-east of Fairford (ref: F20A)** | 70 | Historic Environment<br>xii. Any planning application for the site must be supported by a comprehensive archaeological evaluation and a Heritage Impact Assessment.<br>xiii. The site design must respect the setting of the adjacent Conservation Area to the north; the rural setting of Morgan Hall and other nearby listed buildings; and non-designated heritage assets such as the Fieldway and the cropmarks within the site.<br>xiv. Building heights must be restricted to respect the low level town skyline and help preserve views between the town and the surrounding landscape. | Housing development intruding into the River Coln Valued Landscape will by its nature NOT respect the setting of the Conservation Area, Morgan Hall and Fieldway to the north. |
| Appendix C | Appendix C Site Development Frameworks **Land west of Terminus Cottage and Station Cottage (ref: F39C / F52)** | 71-73 | **Site Area:** 3.3 hectares<br>**Proposed Uses:** Residential (around 30 homes) | This site could potentially accommodate more homes, with access directly from the A417 – To be determined by an updated Fairford Neighbourhood Plan. |

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| Appendix C | Appendix C Site Development Frameworks **Land west of Terminus Cottage and Station Cottage (ref: F39C / F52)** | 72 | Access and Movement<br>i. Vehicular access must be provided via Trubshaw Way.<br>ii. Pedestrian and cycle connections must be delivered to link the site with the adjoining development to the west, ensuring good permeability and integration with the wider area. | Access direct from the A417 is now potentially more practical now the speed limit has been reduced and would also make more sense, especially for construction.<br>It needs to be confirmed by detailed study that the traffic impact from these sites in combination with other proposed strategic extension (Site 7) on congestion and safety in the historic centre and other roads in Fairford (e.g. Leafield Road) can be satisfactorily mitigated. |
| Appendix C | Appendix C Site Development Frameworks **Land west of Terminus Cottage and Station Cottage (ref: F39C / F52)** | 72 | Design and Layout<br>iii. Built development must be restricted to the south-western field (F39C), to protect the setting of nearby non-designated heritage assets and the hedgerow between F39C and F52.<br>iv. The existing hedgerow separating fields F39C and F52 must be retained and strengthened as a key landscape feature.<br>v. Development must provide positive and active frontages onto Trubshaw Way and Morecombe Way, contributing to natural surveillance and a high-quality street environment. | This site could potentially accommodate more homes, with access directly from the A417 – To be determined by an updated Fairford Neighbourhood Plan. Development of the south-western field arguably has more impact on local heritage assets. |

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| Appendix C | Appendix C Site Development Frameworks **Land west of Terminus Cottage and Station Cottage (ref: F39C / F52)** | 72 | Landscape Integration and Green Infrastructure<br>vi. Field F52 must be retained as green infrastructure, incorporating biodiversity enhancements, Sustainable Drainage Systems (SuDS), and areas of accessible natural greenspace.<br>vii. A green infrastructure buffer must be provided along the eastern boundary of the site to deliver visual and noise screening from adjacent employment uses. | This site could potentially accommodate more homes, with access directly from the A417 – To be determined by an updated Fairford Neighbourhood Plan. Development of the south-western field arguably has more impact on local heritage assets. |

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| Appendix C | Appendix C Site Development Frameworks **Land west of Terminus Cottage and Station Cottage (ref: F39C / F52)** | 72-73 | Biodiversity and Ecology<br>viii. Development must enhance and create wildlife linkages and habitats within the site, including the retention and planting of species that support pollinators, recognising the site's location within a B-Line network.<br>ix. The green infrastructure on the site must include the provision of coastal and floodplain grazing marsh and woodland habitats, reflecting the proximity of priority habitats and to provide habitats suitable for species for which the site has potential to be functionally-linked land.<br>x. Measures must be incorporated into both the construction process and the long-term design and management of the site to ensure the protection of the nearby Site of Special Scientific Interest (SSSI).<br>xi. Ecological surveys shall be undertaken to assess the site suitability as supporting habitat for birds from the Severn Estuary SPA/Ramsar. Where the site is found to be of moderate or high suitability, overwintering bird surveys shall be required to | This site was identified in the HRA as having least potential to be functionally-linked land out of the proposed site allocations in Fairford. However, an attenuation basin would likely be required to deal with surface water drainage, owing to high seasonal groundwater levels in the location. |

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| | | | determine whether it is functionally linked to the SPA/Ramsar. Where a functional link is identified, appropriate mitigation measures, including the provision of compensatory habitat on- or off-site, shall be secured. | |
| Appendix C | Appendix C Site Development Frameworks **Land west of Terminus Cottage and Station Cottage (ref: F39C / F52)** | 73 | Flood Risk and Water management<br>xii. Any planning application for the site must be supported by a comprehensive site specific Flood Risk Assessment. The application must show how the Flood Risk Assessment has informed the site design and layout. | Agreed. An attenuation basin is likely required to deal with surface water drainage, owing to high seasonal groundwater levels in the location. |
| Appendix C | Appendix C Site Development Frameworks **Land at Totterdown Hill, Horcott (ref: F53A)** | 74-76 | | Land at Totterdown Hill (F53A, 150 homes), in Kempsford Parish, is exposed to high peak noise from bomber operations at RAF Fairford, drains towards RAF Fairford and the Horcott Lakes SSSI, and would load the constrained Horcott Road/A417 junction, which has not been assessed. |

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| Appendix C | Appendix C Site Development Frameworks **Land at Totterdown Hill, Horcott (ref: F53A)** | 75 | Access and Movement<br>xiv. Vehicular access to the site must be taken from the adjacent private road to the west. If it can be robustly demonstrated that this is not feasible, an alternative access may be provided from Horcott Road.<br>xv. Existing roadside trees and hedgerows must be retained and reinforced, with development making use of existing access points where possible. Visibility splays must be minimised, and any loss of vegetation must be mitigated through replacement planting.<br>xvi. Off-road pedestrian and cycle connections must be enhanced between the site, Fairford, the Cotswold Water Park, and the wider Public Rights of Way network. | Access from Horcott Road will be on a hill. |
| Appendix C | Appendix C Site Development Frameworks **Land at Totterdown Hill, Horcott (ref: F53A)** | 75 | Design and Layout<br>xvii. Built development must be restricted to the northern two fields of the site to minimise landscape and visual impacts.<br>xviii. Development must provide a positive and active frontage onto Horcott Road, creating a high-quality gateway that reflects the rural character of the area. | This will maximise visual impact for receptors on permissive paths around the northern Horcott Lakes and near Horcott Farm and the River Coln. |

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| Appendix C | Appendix C Site Development Frameworks **Land at Totterdown Hill, Horcott (ref: F53A)** | 75 | Landscape Integration and Green Infrastructure<br>xix. A robust green infrastructure framework must be established across the southern, western and eastern parts of the site to ensure integration with the wider landscape and to provide a sensitive transition to the open countryside.<br>xx. This framework must incorporate biodiversity enhancements, particularly reflecting and complementing habitats associated with the nearby SSSI and to create habitats suitable for species for which the site has potential to be functionally-linked land.<br>xxi. This framework must also incorporate public access, including footpath linkages to the surrounding countryside and areas of accessible natural greenspace. Sustainable Drainage Systems (SuDS) may be integrated within these green infrastructure areas where appropriate., | The site is unlikely to integrate well with the surrounding landscape owing to the fact that it is on rising ground (Totterdown Hill). |

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| Appendix C | Appendix C Site Development Frameworks<br>**Land at Totterdown Hill, Horcott (ref: F53A)** | 75-76 | Biodiversity and Ecology<br>xxii. Development must enhance and create wildlife linkages and habitats across the site, including the retention and planting of species that support pollinators, recognising the site's location within a B-Line network. The green infrastructure on the site must include the provision of coastal and floodplain grazing marsh and woodland habitats, reflecting the proximity of priority habitats.<br>xxiii. Appropriate access management measures and enhancements must be delivered in relation to the adjacent SSSI to mitigate the effects of increased recreational pressure.<br>xxiv. Measures must be incorporated into both the construction process and the long-term design and management of the site to ensure the protection of the nearby SSSI.<br>xxv. Ecological surveys shall be undertaken to assess the site suitability as supporting habitat for birds from the Severn Estuary SPA/Ramsar. Where the site is found to be of moderate or high suitability, overwintering bird surveys shall be required to | Surely this needs to be done before the site is allocated (to the extent that this hasn't already been assessed in the HRA)?<br><br>How will the authority identify suitable alternative locations for the birds displaced from this site? |

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| | | | determine whether it is functionally linked to the SPA/Ramsar. Where a functional link is identified, appropriate mitigation measures, including the provision of compensatory habitat on- or off-site, shall be secured. | |
| Appendix C | Appendix C Site Development Frameworks **Land at Totterdown Hill, Horcott (ref: F53A)** | 76 | Water management<br>xxvi. Any planning application for the site must be supported by a comprehensive site specific Flood Risk Assessment. The application must show how the Flood Risk Assessment has informed the site design and layout, including utilisation of the south-western area at risk of surface water flooding as green open space. | Careful consideration needs to be given to drainage to avoid causing flooding at the nearby RAF Fairford air base, which is downstream in the catchment. |

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| Appendix C | Appendix C Site Development Frameworks **Land at Totterdown Hill, Horcott (ref: F53A)** | 76 | Historic Environment<br>xxvii. Any planning application for the site must be supported by a comprehensive archaeological evaluation and a Heritage Impact Assessment.<br>xv. The site design must respect the wider rural setting of nearby listed buildings Bailiffs Cottage, Horcott House and Horcott Farmhouse.<br>xvi. The layout must avoid or limit development in the north-eastern part of the site, retain and strengthen boundary planting along Horcott Road, preserve existing field boundaries where feasible, limit building heights, and use low-density development, appropriate materials and building designs that are in keeping with the local vernacular. | Agreed. The north-east part of the site is the most sensitive from the heritage point of view. However, it is also the closest to the main road access and facilities elsewhere in the town.<br>The site is unlikely to integrate well with the surrounding historic landscape owing to the fact that it is on rising ground (Totterdown Hill). Also, the further south housing is developed, the more it will be exposed to high levels of noise from operations at the air base. |
| Appendices 1-21 | Appendix 13 Designated Town Centres | 48 | (Map for Fairford) | This shows Fairford Town Centre as an area including all of High Street and Market Place and part of London Street, but excludes additional areas designated as TC in the Fairford Neighbourhood Plan (2023) including parts of London Street and Park Street and the Car Park to the north of the High Street, which is considered an important element for the viability of the town centre and has potential for some additional retail development along with some additional off-road car parking space north of the High Street.<br>**We request the re-instatement of the additional areas as per the Fairford Neighbourhood Plan policies maps.** |

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| Appendices 1-21 | Appendix 15 Local Green Spaces | 61-63 | (Maps for Fairford LGSs) | **We would like the LGSs designated for Fairford (LGS22) to be named as follows:**<br>• **Park Close/Queens Field Green**<br>• **Faulkers Close Green**<br>• **Honeybone Close Green Space and Play Area**<br>• **Keble Fields Green**<br>• **Milking Path Park**<br><br>**Should the 3 LGSs designated in the Fairford Neighbourhood Plan (2023) also be added here?**<br>• **The Walnut Tree Field**<br>• **Upper Green**<br>• **Coln House Playing Field**<br>**Appropriate supporting evidence is included in the Landscape & Local Green Space Study in the evidence base for the Fairford Neighbourhood Plan (2023).** |
| Appendices 1-21 | Appendix 17 Nature Improvement Areas | 78 | (Map) | Strategic Site 7 in Fairford partly overlaps with the Cotswold Water Park NIA. How is impact on the NIA and Nature Recovery Strategy to be avoided or mitigated, taking account of the objectives of the latter, which is partly to link the Cotswold lakes with the Cotswold National Landscape and maintain Bee-lines? |

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| Policies Maps | Policies Maps | N/A | (Map for Fairford and District-wide policies map) | • The settlement map for Fairford is not drawn at sufficient resolution for features such as settlement and town centre boundaries to be defined accurately.<br>• Fairford Town Centre is shown as slightly larger than in the current Local Plan (2018) but still smaller than that designated in the Fairford Neighbourhood Plan (2023), which includes the car park north of the High Street and includes other buildings which could accommodate town centre uses. We request that the town centre boundary is replaced with the town centre boundary defined in the Fairford Neighbourhood Plan.<br>• We request that the strategic and non-strategic site allocations for Fairford should be removed from both the District-wide policies map and the Settlement maps and that the Settlement boundaries should be defined as in the Fairford Neighbourhood Plan (2023) with a policy stating that these will be defined by an updated Fairford Neighbourhood Plan, based on an agreed housing requirement number. |
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