COTSWOLD LOCAL PLAN 2026-2043

REGULATION 19 REPRESENTATION BY FAIRFORD TOWN COUNCIL

OCTOBER 2026

Further to the publication of the Cotswold District Council (CDC) Regulation 19 Cotswold Local Plan 2026-2043 (CLP) on 24 August, Fairford Town Council (FTC) submits these formal representations. As required by §36 of the December 2024 National Planning Policy Framework (NPPF), they are framed using three of the tests of soundness: is the CLP justified, effective and consistent with national policy? They principally concern Core Policies 2, 3, 6, 12, 13, 51, 52 and 64, the Site Development Framework for Site 7 (Land north-east of Fairford) in Appendix B, and the non-strategic allocations at Fairford.

In those regards, FTC considers the CLP **unsound** for the reasons set out below.

In accordance with section 20(6) of the Planning and Compulsory Purchase Act 2004, in seeking these changes, Fairford Town Council wishes to submit a statement to, and participate in, the examination of the CLP in due course.

Context

The CLP proposes 1,141 homes and 4.2ha of employment land at Site 7, plus up to 235 homes on three non-strategic sites (Table 6.2): some 1,376 homes in and around a small historic town. FTC does not oppose growth in principle, but Fairford already suffers from the consequences of previous unplanned development: east-west A417 traffic through a historic core whose heritage constraints prevent relief of its pinch points; low local employment following the loss of small employment sites to housing; a small and fragile town centre; high seasonal groundwater that makes SuDS difficult; and a groundwater-impacted sewage system that regularly discharges untreated sewage to the River Coln and the Cotswold Water Park (CWP) SSSI lakes downstream.

Unjustified

Spatial strategy

The spatial strategy of Core Policy 2 has not been tested against a reasonable alternative of meeting some of the District's local housing need on major sites at sustainable locations in the Cotswold National Landscape (CNL).

The option of allocating land in the CNL was defined and assessed in the Sustainability Appraisal at the earlier Regulation 18 stage ('Scenario 6'), and unaltered at this stage, but it unnecessarily assumed meeting a very significant proportion of that need in the CNL. The 'scenario' was unsurprisingly discarded as being inconsistent with national policy but the Town Council considers the exaggeration in scale of the option has resulted in it failing the definition of 'reasonable' per the Regulations.

There is no explanation in the Sustainability Appraisal for why a reasonable alternative including some major site allocations in the CNL (of those identified in the HELAA) – over and above the single proposal for major development (150 homes) at Chipping Campden ('NE of Aston Road') – was not identified and assessed. Aside from Chipping Campden there are a number of sustainable towns in the CNL by way of their scale,

services and existing access to the strategic road network and well-connected public transport services.

National policy allows for planning authorities to demonstrate exceptional circumstances for proposing major development in a National Landscape. The Town Council considers the scale of the uplift in the District's housing needs and the difficulty of identifying and delivering sufficient genuinely suitable and sustainable sites outside the CNL to be such that those circumstances are clearly present.

Even if unnecessarily exaggerated, Scenario 6 showed how dependent the spatial strategy is on meeting some of that need in the CNL. The decision to meet that need in full, but not with any meaningful contribution of land in the CNL, has therefore resulted in significant, adverse consequences for the 17% of the CLP area not in the CNL like Fairford. CDC's failure to inform that decision by not re-testing the reasonable alternatives in the Sustainability Appraisal is flawed and renders the CLP unsound.

Location of the Strategic Extension at Fairford

The allocation of a 'strategic extension' to the east of Fairford in Core Policy 12 is unjustified versus other reasonable alternatives for growing the town with a more proportionate extension or developing elsewhere.

The proposed location is furthest from the town centre but closest to the existing secondary and primary schools. The location of those schools on the north-east periphery of the town, furthest away from where the town has grown the most over the last decade to the west of the town, creates significant access and movement problems. With no effective solution to improving road, active travel and public transport infrastructure for east-west journeys these problems will only worsen with the scale of development proposed.

The option of growing the town to the west (Broad Location 12B in the Assessment of Broad Strategic Development Locations of November 2025) was not available because no land was offered there. It was identified, but discarded in a flawed methodology, which only considered constraints, but did not identify opportunities to avoid or mitigate those constraints and did not compare the three locations around Fairford (A, B and C).

Inaccurate and conflicting evidence

The Settlement Role and Function Study credits Fairford with two supermarkets (it has three convenience stores), allotments it does not have, a full-time Post Office (it operates limited hours), a separate sixth form college (it is part of Farmor's School) and a bus score that conflates school-only services. FTC identified some of these errors at Regulation 18; they have not been corrected.

They inflate Fairford's standing in the Core Policy 4 hierarchy on which the scale of growth depends, and the Study takes no account of the scale of facilities. For example, the Retail and Town Centres Study (Table 4.1) records only 27 'town centre uses' in Fairford, compared with 313 in Cirencester, 137 in Stow-on-the-Wold, 94 in Tetbury (a location for which there are no major proposals), 90 in Moreton-in-Marsh, 71 in Bourton-on-the-Water and 35 in Lechlade.

Retail and the town centre

The Retail and Town Centres Study (Table 5.7, §§5.75-5.81) recommends a medium-sized food store of around 1,500 sq m net, "with exact size to be determined via an impact assessment", and states there is "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'".

Yet §6.25 and Core Policy 52 require a local centre at Site 7 with a food store of up to 1,500 sq m net, and the Site 7 Framework requires a 0.5-1ha local centre "in line with" the same Study. Core Policy 52 also caps local centre food stores at 1,000 sq m gross, contradicting

its own Fairford entry. No impact assessment has been undertaken, although Core Policy 51 would require one for any proposal over 200 sq m. Without a satisfactory conclusion from such a study indicating that the proposed provision could successfully complement and benefit the existing town centre, the retail proposals are unjustified and risk serious harm to the latter and therefore the sustainability of the settlement.

Transport

The Strategic Transport Assessment represents Site 7 as a single zone joining the A417 west of Hatherop Lane. The Evidence Base Comments Log (Modelling Queries, 15 April 2026) accepts that impacts on Hatherop Lane, Southrop Road and their A417 junctions "are not represented in the modelling work" and that "a more detailed assessment may be required".

There has been no modelling of the pinch points through the town (Market Place/A417, London Street, Bridge Street, Milton Street, Coronation Street, Mill Lane, the former Coln House School crossroads and Welsh Way), nor of alternative routes via Hatherop/Quenington or via Whelford and Kempsford to the A419 (requiring engagement with Wiltshire Council).

The claim (§6.25; Integrated Impact Assessment §5.2.31) that the "new street" between Leafield Road and the A417 relieves school congestion and provides "a direct route for east-west movements" misunderstands Fairford's geography. Instead, it redirects increased traffic into the centre via Leafield Road, Park Street and High Street, and conflicts with the Framework's own "quiet lane" treatment of Leafield Road. Apart from impacts on highway and pedestrian/cycling safety, the consequences of increased traffic and congestion will include increased pollution with adverse impact on air quality, health and the fabric of historic buildings, particularly in the 'enclosed' spaces of the Market Place and London Street.

The new draft Gloucestershire Transport Plan doesn't appear to take account of the amount of development proposed in this corner of the District under this new Local Plan and only includes some of the transport 'interventions' proposed in the Infrastructure Delivery Schedule and deletion of improvements to the A417/Whelford Road junction (which would potentially have an important role in diverting traffic away from the bottlenecks in Fairford town centre). This seems to provide clear evidence that the priorities of the likely new Unitary authority are likely to be different. The lack of a Statement of Common Ground with GCC covering this casts further doubt on whether the infrastructure proposals on which this plan depends are actually likely to be delivered.

Water supply and wastewater

The Water Cycle Study rates foul sewerage network capacity and water supply network capacity for Site 7 as 'red', and water supply as 'red' for sites F20A and F53A. It acknowledges groundwater infiltration and storm discharges at Fairford Sewage Treatment Works (Table 7.5) but wrongly places Fairford in the upper Coln catchment (p141).

The WINEP upgrade has been repeatedly delayed and has no firm date, and a further growth scheme is likely to be needed. On 21 September 2026 Thames Water confirmed to FTC that the CLP assessments of waterbody classification and the measures required to accommodate growth take no account of storm discharges or pollution of the SSSI lakes. There is no Statement of Common Ground with Thames Water. There is therefore no evidence that the necessary capacity can be delivered in step with the allocation.

Habitats, nature recovery and landscape

Appendix B identifies Site 7 as having "high potential" to support qualifying birds of the Severn Estuary SPA/Ramsar site; the HRA says the same of F20A and F53A. Whether the land is functionally linked is deferred to application-stage surveys, and Natural England advises that further mitigation work is required.

Site 7 also partly overlaps the CWP Nature Improvement Area (Appendix 17) and conflicts with the CWP Nature Recovery Plan objective of connecting the Cotswold Lakes with the National Landscape. Allocating before these matters, and any need for compensatory habitat, are understood is not justified.

Non-strategic sites and reasonable alternatives

Land south-east of Fairford (F20A) comprises more than 80% of Grade 2 agricultural land (HELAA), it is susceptible to groundwater flooding and lies within the River Coln Valued Landscape (Fairford NP Policy FNP10). The Site Selection Topic Paper itself notes that no safe access has been identified, the 2021 SHELAA found it "unsuitable", and the Landscape Assessment (Appendix 19) finds the floodplain unsuitable for development.

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. The Topic Paper contains clear factual errors (for example, that F52 would affect the setting of Horcott Lake, which is at the opposite end of the town), and more suitable alternatives such as F15 and F39C/F52 with direct A417 access have not been properly assessed.

Employment and travel to work

The 4.2ha at Site 7 is a pro-rata provision that does not address existing net out-commuting (Employment Land Assessment, Fig. 2.7), and there is no strategy to attract employers. The Site Selection Topic Paper rejects F52 for employment because it is "closely bounded by existing and proposed residential development", which equally describes Site 7's employment parcels.

The Gloucestershire HENA places the south of the District in the Swindon travel-to-work area (Fig. A40), so the CLP is in effect meeting part of the needs of a neighbouring area; yet no Statement of Common Ground with Wiltshire has been signed and a lower level of growth at Fairford has not been tested as a reasonable alternative.

Ineffective

Viability and funding

The Viability Addendum Infrastructure Note (Table 4.1.1) shows expected contributions at Site 7 of £20,258 per qualifying unit against costs of £27,639, a deficit of £7,381 per unit. Its conclusion that the gap "could be closed relatively easily" by rising values or "re-profiling of the timing of infrastructure payments or timing of provision" is speculative. Core Policy 6 already allows contributions to be deferred where viability is contested, and Appendix A makes all site requirements "subject to viability considerations".

Experience in Fairford is that this leads to deferred or abandoned infrastructure and reduced affordable housing. Strategic sites are to be zero-rated for CIL (Viability Assessment §2.36), contrary to the statement at §4.51 that CIL "is charged on all new dwellings", leaving no neighbourhood CIL for FTC to address town-wide impacts.

Unaddressed Requirements

Appendix A states that the Infrastructure Delivery Plan is a "live document" and that "where there is conflict, the IDP will be taken to set out the most up-to-date requirements". Key obligations can therefore change without examination. Moreover, the spatial strategy and infrastructure priorities may well change as a result of Local Government Reorganisation.

The Site 7 Framework is headed "draft, commercial in confidence", gives a different figure (approximately 1,150 homes) from Core Policies 2 and 12 (1,141), covers three non-contiguous parcels, and does not address the centre or west of the town. No comprehensive masterplan has been prepared with FTC; the only agreement with a land interest is a Memorandum of Understanding.

Water phasing

Core Policy 64 requires upgrades only "prior to the occupation of the development" or within any later timeframe the LPA agrees. This contradicts §4.54, which says critical infrastructure such as sewage treatment upgrades is "most likely to be needed before a development can commence". Given Thames Water's record at Fairford, occupation-linked conditions will not prevent further pollution including increases in pollution of the river Coln and SSSI lakes downstream of the STW.

Transport mitigation

The only public transport measure is an hourly service 76 to Cirencester, which does not serve commuters to Swindon and elsewhere (the Established Employment Sites Review cites services 74 and 75, which do not exist). The active travel route along the former railway (Core Policy 13(b)) is undeliverable owing to land ownership to the east, the multi-use path in Figure 6.1 is wrongly drawn and may not be as suitable as an alternative southern route being pursued locally (requiring different interventions), and the other routes are neither defined nor costed. The Town Council is producing a note of the additional interventions it considers need to be incorporated as Critical/Essential in the Infrastructure Delivery Plan and Schedule to address the increased traffic likely to be generated locally by the scale of the proposed development to resolve some of the unsound proposals. This will be made available for the examination hearings in due course.

Community and Green Infrastructure

The 3 Local Green Spaces designated in the Fairford Neighbourhood Plan (2023) have not been picked up and consolidated in the LGS proposals along with the new LGS proposals we submitted. This issue may also apply to LGSs designated in other made neighbourhood plans in the District.

Inconsistent with National Policy

The Fairford proposals are inconsistent with the following December 2024 NPPF policies:

- **§16** – they are not "deliverable" (b), have not been shaped by "early, proportionate and effective engagement" with the community or infrastructure providers (c), and are not "clearly written and unambiguous" (d);
- **§20(b)** – they fail to make sufficient provision for water supply and wastewater infrastructure;
- **§31** – they rest on evidence that is inaccurate, inconsistent and not focused on justifying the policies concerned;
- **§35** – they fail to set out in the Plan the contributions expected from development, deferring them to a "live" IDP, and rely on contributions that the Council's own evidence shows would undermine deliverability;
- **§69** – they fail to provide an indicative housing target for the designated Fairford Neighbourhood Area to enable FTC to bring forward a modified neighbourhood plan containing site allocation proposals;

- **§77** – they fail to show that a significant extension is "supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)" or is viable with such necessary provision, and has community support and a realistic delivery rate;
- **§§109 and 116** – transport impacts have not been identified at plan-making stage, so it cannot be shown that residual cumulative impacts on the road network would not be severe;
- **Chapter 7** – the proposed local centre conflicts with the Council's own retail evidence and has not been tested for its impact on the existing town centre; and
- **§§187 and 193** – they fail to protect a valued landscape and best and most versatile land (F20A), prevent development contributing to water pollution, or show that habitats sites and functionally linked land will not be harmed.

Summary and Modifications Sought

For these reasons FTC considers the CLP, as it applies to Fairford, to be unjustified, ineffective and inconsistent with national policy, and therefore unsound. FTC believes these failings could be overcome by significant additional evidence and the following modifications, agreed through the examination:

1. **Site 7 should be deleted from Core Policy 12 (and other relevant policies, maps and supporting documents amended accordingly)** 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.
2. **The non-strategic allocations at Fairford should be deleted from Core Policy 12** and the policy modified to propose an indicative housing requirement for a modified Fairford Neighbourhood Plan, which FTC will commit to submitting for examination within one year of the adoption of the CLP (with consequential changes to Core Policies 3, 4 and 12). This would enable FTC and the local community to build and test justified and effective options, including opportunities to enhance the Conservation Area and resolve an existing pedestrian and highway safety problem, alongside more commercial and parking space next to the town centre.
3. **The evidence base and Plan should be corrected and consolidated**, including the Settlement Role and Function Study, Tables 4.7 and 6.2, and the Fairford Town Centre boundary (to include the car park area to the north of the High Street, as in the Fairford Neighbourhood Plan (2023)) and three Local Green Spaces designated in the Fairford Neighbourhood Plan.

Statement regarding the use of AI

AI has been used to collate document references but not in the representation itself or supporting documents.

List of supporting documents:

1. Fairford Neighbourhood Plan (2023)
   Fairford-Neighbourhood-Plan-Made-5-June-2023-compressed-1.pdf

2. FNP Landscape and Local Green Spaces Study
   L and LGS study revised

3. Water Resource Associates Report for FNP (2018)
   fairfordtowncouncil.gov.uk/wp-content/uploads/2025/04/Evidence-Base-WRA-Hydrology-Study-Final-Report-06.11.18_compressed.pdf

4. FNP Sustainability Appraisal incorporating Strategic Environmental Assessment
   Report Sustainability Appraisal (SA) for the Fairford Neighbourhood Plan 2019-03-31

5. Minutes of Fairford Water & Sewage Issues Joint Working Group (2024-26) – available on request.

6. Joint Letter sent to the Secretary of State for Housing Communities and Local Government (dated 29 July 2026) and Response received from MHCLG (date 27 August)
   LETTER1.pdf
   TO2026_21232_Response.pdf

7. 09/00882/OUT s106 agreement
   09_00882_OUT-S106_PART_1-322018.pdf

   09_00882_OUT-S106_PART_2-322028.pdf

8. Cotswold Water Park Nature Recovery Plan 2021-
   https://www.cotswold.gov.uk/media/wwferfcb/cotswold-water-park-nature-recovery-plan.pdf

9. Conservation Area Policy Statement

   https://fairfordtowncouncil.gov.uk/wp-content/uploads/2026/10/Fairford-CA-Policy-Statement-1971.pdf