

# Evidence Base

## Fairford Landscape & Local Green Space Study



**August 2020 (revised November 2021)**

# Fairford Landscape & Local Green Space Study

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## 1.0 Introduction & Purpose

1.1 This Landscape & Local Green Spaces Study has been undertaken by local residents of Fairford, with the professional support of RCOH Ltd, in the course of preparing a local Neighbourhood Plan. The aim of this study is to provide evidence for policy choices and wording in the Fairford Neighbourhood Development Plan (NDP), in particular Policies FNP8, FNP9 and FNP10.

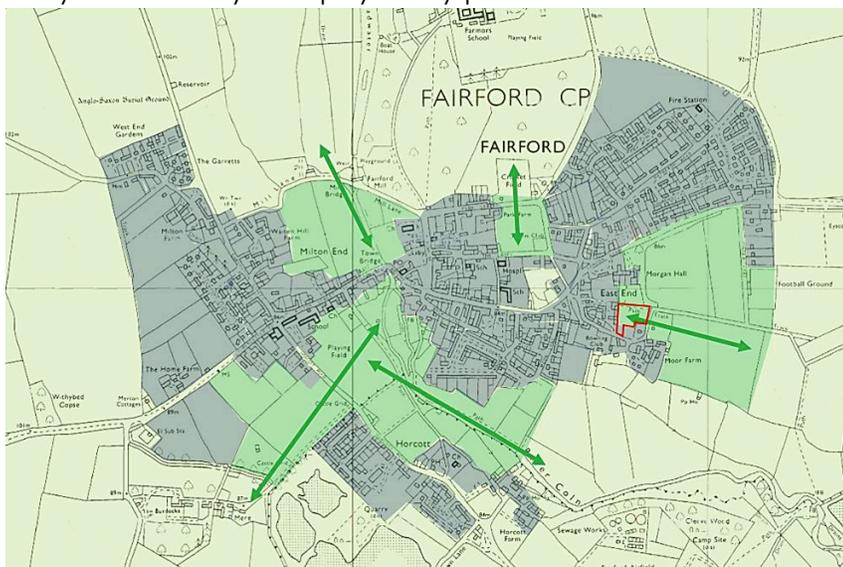
1.1.1 The designations proposed in this document for the NDP are a crucial component in support of that plan. They do not seek to rule out any form of development and other policies in the NDP have responded to the requirement for growth in the town.

1.1.2 An earlier NDP was rejected in 2017 by examiner Andrew Ashcroft and did not proceed to referendum.

## 1.2 Background

1.2.1 Fairford Town has all the characteristics of a small Cotswold market town in that the open spaces, both within and around the town, are a crucial component of the townscape. One of the distinctive, even unique, features of Fairford is the way in which the countryside comes right into the heart of the town, particularly at the top of the High Street and at the Greens. 'At the northern end of the High Street is Fairford Park. This close proximity of High Street and parkland is one of the town's most distinctive qualities.'<sup>1</sup>

1.2.2 'Between the town and Milton End to the west is an important rural valley corridor through which the Coln has been canalised as the 'Broadwater'. The finest views of the church are over this open area.'<sup>2</sup> The White Report recognises the unique pattern of settlement in Fairford: the edges of Fairford are one of the town's most distinctive features; they are 'visually and physically permeable between the town and the floodplain providing



1.2.3 1979-82, 1:10,000 O.S. map. 2018 Areas developed or under development (shaded grey) surviving green corridors (shaded green). Most of the development has been completed (2020). The large Keble Fields development to the east of the town is beyond the limits of this map.

<sup>1</sup> 'The White Report': Study of Land Surrounding Key Settlements in Cotswold District Council, June 2000, para. 10.2, p.30

<sup>2</sup> 'The White Report': Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.2, p. 62

good continuity between the town and its landscape context<sup>3</sup>. This 'rural feel' was identified in the consultation questionnaire as a much-valued aspect of town life.

1.2.4 There are several constraints on development which need to be taken into account when deciding on new development sites. As an ancient ford for the River Coln, Fairford is sited on a floodplain and the old medieval town largely developed to the north of the river on higher ground. Horcott to the south, a quite distinct settlement<sup>4</sup>, is bounded by the river, Horcott Hill, the airfield, and several lakes resulting from gravel extraction.

1.2.5 To the south west and south east of the town are gravel extraction lakes, (Horcott Lakes and the Lake 104 complex); to the south is RAF Fairford; to the north are the Ernest Cook Trust Estate and a protected Special Landscape Area. Squeezed between these areas are the river and the A417 – a District Link road running through the medieval centre of the town, closely bounded by listed buildings. In places the carriageway is less than 3.5m wide.

1.2.6 Recent housing developments have taken place along the A417 at the eastern and western edges of the town, creating a kind of dumbbell effect and seriously, negatively, affecting the main approaches to the town. At the moment the town is struggling to retain the rural and Cotswold character of the settlements; the open spaces listed here are a vital part of the plan to redress the balance. It should be noted that the NDP foresees a future of the town as including an increase in visitor numbers from tourism.

1.2.7 Fairford is also one of the very few towns in the Cotswolds to have no formally designated green spaces in the Cotswold District Council Local Plan 2011-2031 (CDLP) but it is clear that the existing spaces are widely valued; this is particularly true today since so many fields have recently been taken for housing. The lakeside and riverside walks have long been identified as important to the character of Fairford. The Fairford Health Check, published April 2005 after extensive local consultation, led to Fairford Town Council's (FTC) policy aim 'to perpetuate the distinct green character that makes Fairford special, and to designate Lake 104 and the riverside as an area that cannot be built upon or spoiled'.

1.2.8 Although Fairford Town and Horcott are two distinct settlements with quite different histories, the shorter name 'Fairford' is generally used here to cover the whole area under consideration.



1.2. 9 River Coln<sup>5</sup>

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<sup>3</sup> Ibid, para. 12.8, p. 62

<sup>4</sup> See NDP Chapter 2. Fuller details can be found in NDP Evidence Base, Fairford Character and Design Assessment, paras. 1.2.18, 1.2.19 and Section 6)

<sup>5</sup> Photograph/map numbers are integrated into the paragraph number system

## 2.0 LOCAL GREEN SPACES (FNP8)

2.0.1 The NDP designates the following land as Local Green Spaces, as shown on the Policies Map:

- i. The Walnut Tree Field;
- ii. Upper Green;
- iii. Coln House Playing Field.

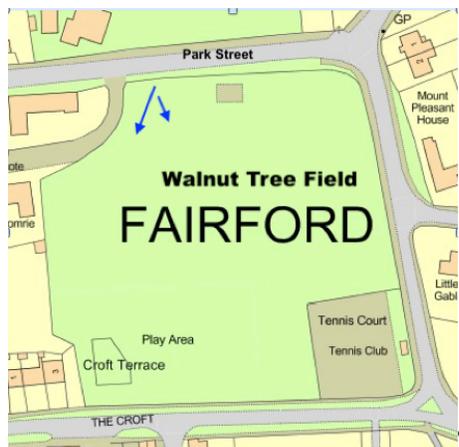
Development proposals that lie within a Local Green Space will only be permitted in very special circumstances.

2.0.2 These three sites are analysed according to the criteria set out in NPPF Paras. 101 & 102 'The Local Green Space designation ... should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife;
- and where the green area concerned is local in character and is not an extensive tract of land.'

2.0.3 2017 NDP Examiner Andrew Ashcroft writes, 'Based on the findings of the Study and my own observations I am satisfied that the Walnut Tree Field, Upper Green and the Coln House Playing Field comfortably satisfy the three tests in paragraph 77 of the NPPF<sup>6</sup>. On this basis, they have regard to national policy.'<sup>7</sup>

### 2.1 The Walnut Tree Field (shown as 'I' on the Policies Map)<sup>8</sup>



2.1.1 Map showing the position and facilities of The Walnut Tree Field.

2.1.2 Questionnaire responses identified this as the most highly valued community green space and it is within the Conservation Area. The land contains the town's children's playground, exercise equipment, tennis courts, skateboard ramp and is much used for community events (eg. Fairford festival). It is owned by the Ernest Cook Trust.

<sup>6</sup> Now NPPF para.100

<sup>7</sup> Andrew Ashcroft: 'A report to Cotswold District Council on the Fairford Neighbourhood Plan' 2017 para. 7.46

<sup>8</sup> All blue arrows in this document mark the position from which photographs were taken and the direction faced.

<sup>9</sup> Except where otherwise stated, all maps were created using Parish Online or the NDP Policies Map

2.1.3 Area: 1.47ha



2.1.4 Walnut Tree Field from Park Street looking towards Fairford Cottage Hospital



2.1.5 Walnut Tree Field from Park Street looking towards the Tennis Courts

2.1.6 NPPF: Is the green space in reasonably close proximity to the community it serves?

This site is the 'green lung' of Fairford as it is right at the heart of the town, on the way home from school for many, and well supplied with play and exercise equipment.

2.1.7 NPPF: Is the green space demonstrably special to a local community and holds a particular local significance?

Consultation Day comments 2019 – 'Excellent facility.' 'Very good facility wonderful for the children.' 'An excellent community space.' Must be kept – wonderful space for youngsters of all ages.' 'Central, important to keep this empty community resource.' 'All green local spaces are important to the character of Fairford and the well being of its inhabitants.' 'It's a brilliant space. Would love to see a better skate park.' 'Essential green space.' 'Keep.'

Consultation Days comments September 2016 - 'It is a pleasure to go past the Walnut Tree Field on a nice day, often 40 or 50 people, grandparents, parents and young children using the facility.' 'Definitely need to preserve Walnut field – nice to see improvements there.' 'We very much value the Walnut field as a play space between the school and the main residential areas. It is extremely useful, well positioned and well used.' 'Questionnaire comments - 'Our grandchildren love going there.' 'For everyone young and old, large community space, it's great for community events and a meeting place.' 'Brilliant for parents and children alike.' '...park very important for children to play in safe area.' In total, 154 people said that they especially valued 'Walnut Tree Field' in response to the question, 'Are there any particular public open/green spaces you especially value and, if so, why?'

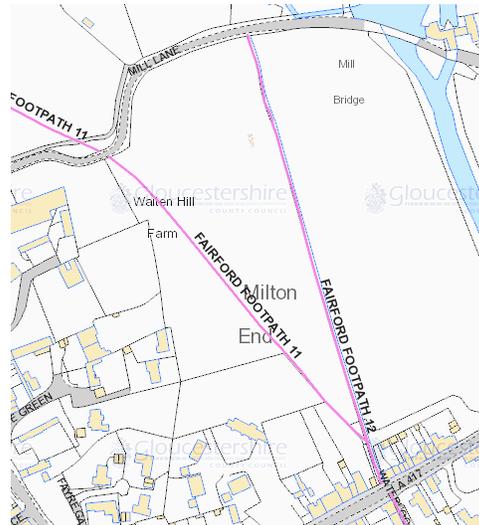
2.1.8 NPPF: Is the green space local in character and not an extensive tract of land?

This is a lovely space, overlooked by the historic, listed dovecote, in one of the most attractive areas of the town. It is bordered by old Cotswold stone walls and Fairford Preservation Society (now Fairford Community Voice) undertook significant tree planting in recent years. The site has a strong relationship with the Special Landscape Area (designated by CDLP Policy EN6, para.10.6.3), which extends as far south as Park Street. The open character of the space contributes to the setting of that much larger landscape. At 1.47ha, it is certainly not 'an extensive tract of land'.

**2.2 Upper Green (shown as 'ii' on the Policies Map)**



2.2.1 Map showing location of Upper Green



2.2.2 Map showing location of Upper Green PROWs. Detail from Gloucestershire C. Council: Highways Public Rights of Way Map

2.2.3 Questionnaire responses identified this as highly valued. It is in the centre of the town, within the Special Landscape Area, between the Town Bridge and Mill Bridge. It is one of the most photographed and visible green spaces in the town and forms an essential part of the Special Landscape Area (designated by the CDLP, Policy EN6) and of the Fairford Conservation Area. Community events are regularly held here, especially on celebratory occasions eg. the Jubilee Beacon. There are two PROWs (BFA11 and BFA12)<sup>10</sup> across the land and it is heavily used by walkers.

2.2.4 The area is divided into Upper and Lower Greens by a brook; Lower Green is within the floodplain and is an integral part of the recently constructed flood defences as a designated water attenuation area. Visually Lower Green is a part of the proposed Local Green Space setting, but its main function now is to protect the town from floods.

2.2.5 Upper Green is largely owned by the Ernest Cook Trust. The fenced area directly to the east of Fayre Court wall is within the boundary of Fayre Court. However, visually this land is an integral part of Upper Green. The recent development of Fayre Court land and subsequent sales included a clawback/coverage provision which would be triggered by the grant of a

<sup>10</sup> All PROW references and maps sourced from Gloucestershire County Council PROW online map at <https://www.gloucestershire.gov.uk/highways/public-rights-of-way/rights-of-way-online-map/>

residential planning consent for any further houses in that area. The section marked to the south of Upper Green in the map above, is the fenced area.

2.2.6 Area: 2.93ha



2.2.7 Upper Green - looking across towards Milton Street

2.2.8 NPPF: Is the green space in reasonably close proximity to the community it serves?

Upper Green is close to both the Town Bridge and Mill Bridge. The Green is at the centre of the town.

2.2.9 NPPF: Is the green space demonstrably special to a local community and holds a particular local significance?

Consultation Day comments 2019 – ‘Beautiful space.’ ‘This is essential for the character of Fairford.’ ‘Historic space and an asset to the town.’ ‘Keep.’

Consultation Days comments September 2016 – ‘The Upper Green – have walked dogs across there for 12 years plus. Jubilee beacon.’ ‘Upper Green also of huge importance – historic views (+ probably my chosen best view) + one of the few relatively unchanged views/areas since C18th – characterises Fairford, part and parcel of ‘famous views’ of mill/church.’

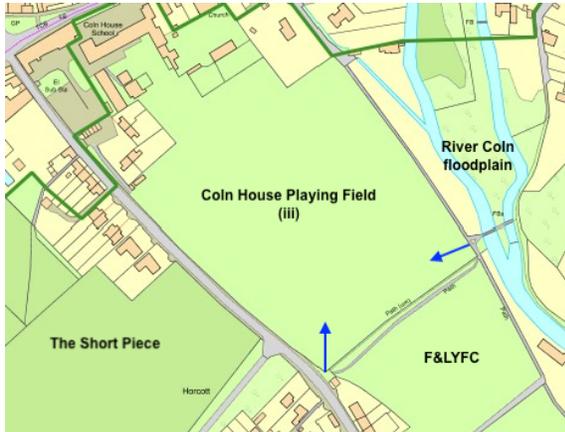
2.2.10 NPPF: Is the green space local in character and not an extensive tract of land?

Upper Green has been used by the residents of Fairford for many, many centuries. It is, in large part, essentially, a ‘working’ field and cows often graze there, a green in the most ancient sense bringing the living countryside right into the town. Originally much larger it was ‘part of the Milton End common [and] was probably used by the Welsh drovers to pasture their cattle when stopping at the town.’<sup>11</sup> Although a part of the Special Landscape Area, the space is distinct with defined boundaries that give it a local character. It forms part of one of the most important ‘postcard’ views of Fairford, with Lower Green, the Mill and St Mary’s Church’. At 2.93ha it is not an ‘extensive tract of land’ and is at the centre of the community it serves.

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<sup>11</sup> Victoria County History vol. 7 p. 72.

## 2.3 Coln House Playing Field (shown as 'iii' on the Policies Map)



2.3.1 Map showing location of Coln House Playing Field



2.3.2 Coln House Playing Field from PROW by Dilly's Bridge

2.3.3 The area of the playing field at Coln House has had a long history in Fairford, from Anglo-Saxon settlement, to lunatic asylum to school. Coln House was a residential school in Gloucestershire for the education and care of pupils who had a primary diagnosis of social, emotional and mental health (SEMH) needs. In 2017 the local authority closed the school and permission has been granted for conversion to residential use. The land in question is the playing field at the back of the school, in a prominent position. It is tree-lined and surrounded by footpaths, so is a familiar and peaceful local landscape.

2.3.4 In the past plans to extend the school buildings onto this land had to be abandoned due to significant archaeological finds (the application was 1999 CT0056/J and it was withdrawn in 2000). 'The results of the evaluation suggest the presence of an extensive Anglo-Saxon settlement of late 5<sup>th</sup> to 9<sup>th</sup> century date. Any groundworks penetrating to more than 0.32m in depth would destroy significant archaeological deposits.'<sup>12</sup> The case for preserving the archaeological heritage of this area is made in paragraph 3.4.5 in The Short Piece analysis and is equally applicable to this playing field<sup>13</sup> which is of historical significance to the area. In 1999 the report on this field stated, 'The most important element in this assemblage is the Anglo-Saxon component. Evidence of Anglo-Saxon occupation is relatively rare and very piecemeal in Gloucestershire...'<sup>14</sup> and it is not unreasonable to suggest that this field, linked with The Short Piece finds, comprise two parts of the same settlement, bisected by the modern Horcott Road. A comment arising from the 2016 pre-submission consultation makes the point well: 'Fairford is an area that WAS rich in archaeology which unfortunately has been lost either by gravel extraction or by development ... it could be a future asset to the town if investigated properly.'

2.3.5 On the 1841 Tithe Map, Coln House Field was described as 'Field for exercising lunatics'; however, it was very much more than a field as it also contained gardens which were worked

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<sup>12</sup> An Archaeological Evaluation at Coln House School, Fairford, Gloucestershire for County Property Services, by Paul Nichols, 1999, p. 13)

<sup>13</sup> See para. 6.7.8 for a recent response of the Gloucestershire County Council Archaeologist to a query regarding this site

<sup>14</sup> Ibid p.12

by the residents as therapy; the asylum closed in 1944<sup>15</sup>. Since then, as a school facility (opened 1950), it has seen fetes, hog roasts, parties and various festival activities. It is bordered on two sides by heavily walked PROWs, both important routes into Fairford for Horcott residents. In particular, the children of Horcott use these paths as crucial parts of safe routes into school. The open ground of this playing field is a significant feature of these walks and the tranquility it provides is highly valued.

2.3.6 The playing field is now used by Fairford Rugby Club. When Fairford Youth Football Club (FYFC) was formed in 1976 (as Fairford & Lechlade Youth Football Club), they used this facility until they moved to their own ground next door – and it is still used by this club as an overspill facility due to the popularity of the FYFC.

2.3.7 Coln House Playing Field, directly opposite The Short Piece, also forms an important part of the Local Gap between Fairford and Horcott. The White Report of 2014 made specific mention of the importance of the 'Open land between Fairford and Horcott in order to maintain the separate identity of the settlements.'<sup>16</sup>

2.3.8 The view 'Over Coln House playing fields from Horcott Road towards St Mary's Church, the river and town centre beyond' has been identified as a key view in both NDP Appendix C: NDP12 Achieving High Standards of Design, and in the Evidence Base: 'Fairford Character and Design Assessment'.

2.3.9 Environment Agency Flood Map for Planning: flood zone 3 runs across the south-eastern corner of the site (see FYFC maps), confirmed in the Fairford Hydrological Study of 2018 (see map 2.3.12 below<sup>17</sup>).

2.3.10 Area: 3.03 ha



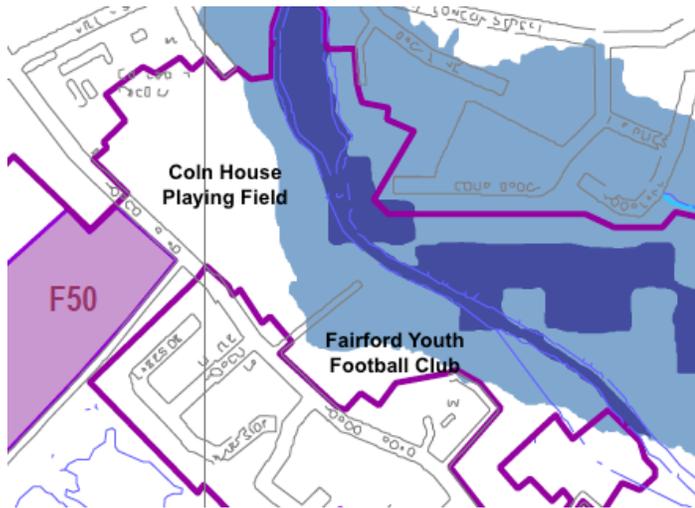
2.3.11 Coln House Playing Field taken from Horcott Road, the tower of St Mary's Church in the distance.

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<sup>15</sup> For a fuller history of Coln House see Evidence Base: Fairford Character and Design Assessment para. 2.7.2

<sup>16</sup> The White Report: 'Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.12, p. 63

<sup>17</sup> Water Resource Associates: Groundwater Monitoring and Review of Flood Risk at Fairford, 2018 Fig. 5-1 p.19



2.3.12  
 Map from 2018 Hydrological Study, Figure 5-1 p.19<sup>13</sup>  
 Light blue = medium risk from river flooding  
 Dark blue = high risk from river flooding

2.3.13 NPPF: Is the green space in reasonably close proximity to the community it serves?

This site lies between the western half of the town and Horcott. Crucially, it links the open space of The Short Piece with the River Coln and ensures that the separation of settlements continues across the Horcott Road.

2.3.14 NPPF: Is the green space demonstrably special to a local community and holds a particular local significance?

The playing field is within the curtilage of a listed building which dates at least from 1806, and which has served a social function ever since 1816, well integrated into the local community. This, together with its considerable archaeological importance (2.3.4), means that the field is of historic significance. Consultation Day comments 2019 – ‘Would be fabulous to protect this green space.’ ‘This would be good to keep as it is.’ ‘Potential for opportunity to be an asset facility for the town.’ ‘Should be maintained for the use of the community.’ ‘Keep for the community.’ ‘Public open space.’ ‘Keep.’

2.3.15 Fairford and Horcott have always been welcoming to those who might be considered ‘different’ or disadvantaged in some way. From the time of The Retreat, when ‘lunatics’ were housed here in open conditions, to more recent years when children who were less able or with special problems came here from far afield, all were welcomed by the local community. Even more, they were supported and encouraged. The annual Coln House fete was always well attended, local people bought produce from their gardens, and when out and about in town the children were always accepted. As such this area has a particularly special place in the life of local people and this field has become very much the focus of this feeling. It is understood that this is private land at the moment, but just as residents were protective of those who needed and used this space in the past, so they are of the space itself today. It is hoped that the land will remain available for Fairford Rugby Club

2.3.16 Quite apart from school events, the field is well used by local residents for sports and quiet contemplation, well attested to by 2016 pre-submission consultation comments. ‘On Saturday and Sunday we watch men and juniors play their soccer and rugby there supported my friends and parents. This is a beautiful area with great views across to the old town and church.’ ‘I walk the dogs along the river bank daily and enjoy watching the birds in the Coln House field and the ducks sun bathing in the summer. My husband has fond memories of playing sport there when it was used as the sports field for the old Farmers school in the market place.’ ‘The field is used by local sports teams on a regular basis. I worked at Coln House for nine years some time ago and am very fond of the large open space it gives.’ ‘The Coln

House field has been there as long as I remember. I grew up in Fairford and played football there.' 'Due to its proximity to the river we often sit and watch the abundance of nature and wildlife, from ducks and moorhens to dragon flies and on one occasion we saw a kingfisher.' 'It provides a valuable space for recreational activity ... with the majority of other sport facilities located on the North and East side of the town.'

2.3.17 Other comments made on the Informal Consultation Days in September 2016 include: 'Gap between Horcott/new development + Coln House also critical. Views of Fairford setting as you come down hill.' '[Green spaces] to be preserved + Coln House playing field especially.' 'Preserve as much as possible!'

2.3.18 NPPF: Is the green space local in character and not an extensive tract of land?

By reason of its long history, from Neolithic (HER 45955) to Anglo-Saxon times to the present day, this land is strongly local in character. It is a playing field and cannot be considered to be 'an extensive tract of land'. In addition this space, together with The Short Piece, makes an important contribution to defining the character of Fairford Conservation Area, by allowing the historic group character of buildings in the town centre to be enjoyed in views across the space, especially in winter.

### **3.0 THE FAIRFORD – HORCOTT LOCAL GAP (FNP9)**

3.0.1 The NDP defines the Fairford to Horcott Local Gap on the Policies Map. It includes Coln House Playing Field (coloured dark green as it is also a proposed Local Green Space). Development proposals within the Local Gap will only be supported if they do not harm, individually or cumulatively, its open character.

3.0.2 The Fairford - Horcott Local Gap aims

- a) to prevent the visual coalescence of the town's two constituent components, Horcott and Fairford;
- b) to ensure that the character of Fairford and Horcott as essentially rural communities is maintained; and
- c) to preserve a visual break between old and new, between Conservation Area and new estate.

3.0.3 As well as this, the Local Gap proposed will provide a valuable source of green infrastructure which will offer important recreational and landscape benefits to the local community as well as nature conservation value. The White Report recognizes the value of this gap, identifying it as unsuitable for development as it is, 'Open land between Fairford and Horcott [needed] in order to maintain the separate identity of the settlements.'<sup>18</sup> The open land here is also needed in order to maintain the essential rural character of both settlements which is so valued by both the White Report and local residents. The fields protect lovely views of the Conservation Area, the church tower and the river. Indeed, this green band, at root, settles both communities in their ancient landscape.

3.0.4 The open nature / sense of separation between these settlements cannot be retained by other policy designations and is essential to help preserve the distinctive settlement pattern. In addition, in this particular case, the proposed local gap is vital for the protection of the town from future flood events, from groundwater and surface water flooding, a problem which has

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<sup>18</sup> The White Report: 'Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.12, p. 63

been exacerbated in recent years by the construction of hundreds of houses uphill of the sites in question. The slope uphill is gentle but it is nonetheless significant, draining down over 200m from Withington at the head of the water catchment area.

3.0.5 NPPF Section 14 states: 'Plans should ... [take] account of the impacts of climate change, by: ... 'safeguarding land from development that is required, or likely to be required, for current and future flood management'<sup>19</sup>. Thames Water's 'Fairford Drainage Strategy' identifies 'loss of green space results in more strain on the sewerage network when it rains heavily'<sup>20</sup> as a cause of drainage problems. This is particularly relevant for the proposed Fairford-Horcott Local Gap as in recent years over 200 houses have been built directly to the north and east of the land in question.

3.0.6 Cotswold Water Park reports clearly identify Horcott as a settlement separate from Fairford: 'Other settlements in the area include Horcott, a small linear village located at the north-west base of Horcott Hill.'<sup>21</sup> It is not without significance that the Historic Environment Record lists all the Horcott HER references under 'Kempsford', the parish it was part of until 1987 (see para. 1.2.4). The 1834 map below, clearly shows the historical status of Horcott as a separate settlement in a separate parish. This has recently been acknowledged in a recent Cotswold Archaeology report, 'The ...green spaces either side of Horcott Road act as a buffer between the town of Fairford and the modern extension to the historic hamlet of Horcott ...'<sup>22</sup>



3.0.7  
1834 map of Fairford parish.  
Gloucestershire Archives  
Reference P141MI71

3.0.8 It can be seen, therefore, that this local gap whilst clearly fulfilling the requirement of 'preventing the coalescence of settlements' has various other functions and is the reason why it is proposed that some of this area be designated 'Local Green Space' ie. Coln House Playing Field (iii)

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<sup>19</sup> National Planning Policy Framework, Section 14, 'Meeting the challenge of climate change, flooding and coastal change', p. 47, para. 161 b)

<sup>20</sup> Thames Water, Fairford Drainage Strategy: Stage 1 – Initialise and Prepare, p. 13

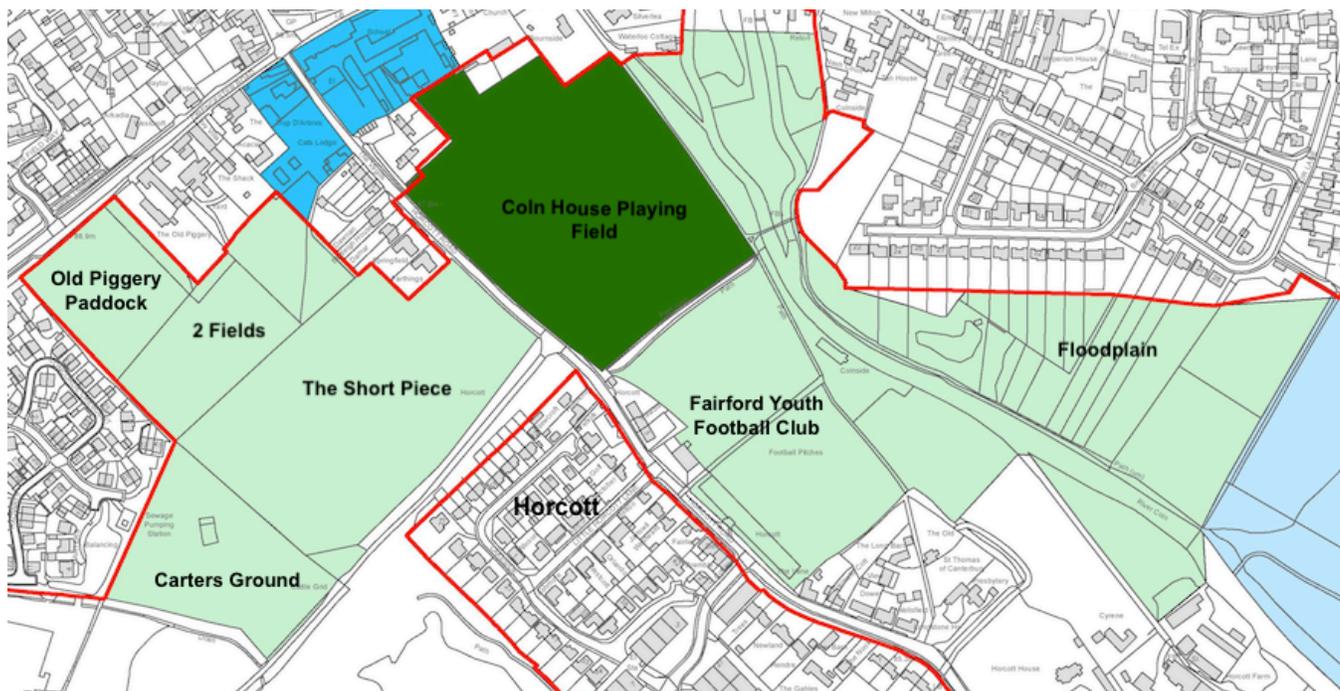
<sup>21</sup> Cotswold Water Park; Integrated Landscape Character Assessment: Final Report 2009 'Ecological Character' 6.0 Section 6.0 p. 81

<sup>22</sup> Cotswold Archaeology, Coln House, Fairford, Gloucestershire Heritage Statement, CA 18423, October 2020, p.34, para. 5.14

3.0.9 NDP 2017 Examiner Andrew Ashcroft writes: 'I am satisfied that the proposed Local Gap meets the basic conditions. There is a clear role and purpose for a Local Gap in this sensitive part of the neighbourhood area. There is a significant difference in the characters of Fairford and Horcott and the prevention of coalescence between the two will serve a clear planning function. I am also satisfied that in most cases its boundaries have been sensitively and appropriately defined. In particular the section between Horcott Road and the A417 (including The Short Piece) is particularly sensitive to built development. The gap in built development along Horcott Road (represented by The Short Piece to the south west and by Coln House School Playing Field to the north east) is particularly prominent in the local townscape. It represents a discernible gap between the two settlements.'<sup>23</sup>

3.0.10 The Fairford - Horcott Local Gap consists of:

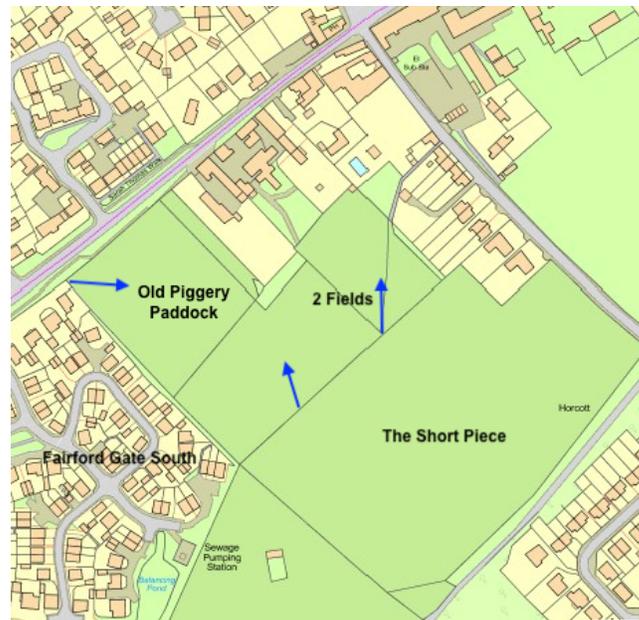
- a) Old Piggery Paddock;
- b) 2 Fields linking Old Piggery Paddock and The Short Piece;
- c) Carters Ground;
- d) The Short Piece;
- e) Coln House Playing Field (also a proposed Local Green Space);
- f) Fairford Youth Football Club (FYFC); and
- g) Floodplain extending along the River Coln from Town Bridge to Snake Lane/Cutlers Ford.



3.0.11 Map showing location of Fairford – Horcott Local Gap

<sup>23</sup> Andrew Ashcroft, 'A report to Cotswold District Council on the Fairford Neighbourhood Plan' para.7.59. See paras. 7.53 -> 7.63 for the full argument.

### 3.1 Old Piggery Paddock



3.1.1 Map showing position of Old Piggery Paddock and 2 fields

3.1.2 This is a site that was the subject of some debate during the 2014 Appeal by Gladman Developments against the decision to refuse planning permission on what is now Fairford Gate South (see map above). This Appeal was won by Gladman Developments but the value of this particular site was recognised and was mentioned positively several times in the Section 'Effect of the development on the setting of the town of Fairford'<sup>24</sup>. Additionally, during the course of the appeal it was accepted that development of the appeal site should not make the Old Piggery Paddock more vulnerable to development as an 'infill' site.

3.1.3 An example of one of the comments made by the Appeal Inspector:  
'I agree that, on this side of the road, there is an aesthetically pleasing transition from the Old Piggery to the countryside, via the adjoining paddock with its stone wall and the appeal site. ... The relationship with the countryside still exists, and indeed the edge of the conservation area is very strongly rural in character. This reflects the historical role of Fairford as a market town set in the countryside landscape.'<sup>25</sup>

3.1.4 It is proposed that this paddock should be designated as the western start of the Fairford - Horcott Local Gap. This will also protect the setting of the buildings of the Conservation Area and maintain the rural character of the town (recognised as important by the planning inspectorate). It is the last remaining rural gap on this main entrance to Fairford.

3.1.5 Agricultural Land Classification: 2 Very Good  
Area: 0.83 ha

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<sup>24</sup> 13/03097/OUT | Erection of up to 120 dwellings (all matters reserved other than means of access), Land Parcel South Of Home Farm Cirencester Road Fairford. para. 50 onwards

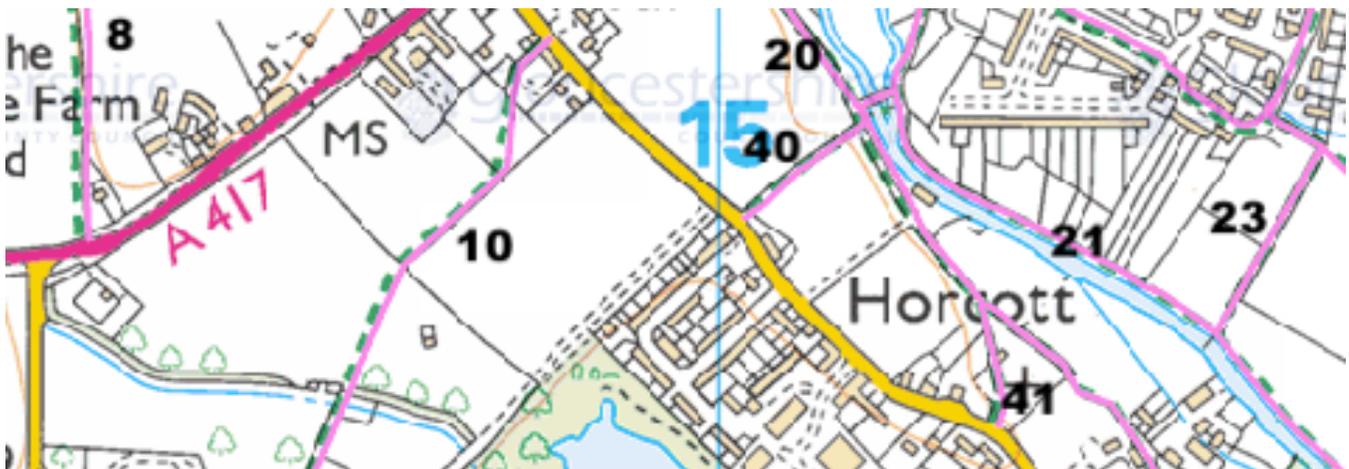
<sup>25</sup> Ibid, para 68.



3.1.6 The Old Piggery Paddock

### 3.2 Two Fields

3.2.1 These modest fields allow a 'through view' of the countryside from the A417 and from Horcott Road, and therefore are instrumental in emphasising the rural setting and clearly indicating the separation of the two settlements. A section of the smaller of the two fields is currently used to store caravans and was recently included in a planning application (refused)<sup>26</sup>. In addition, a PROW (BFA10) crosses these fields using a series of old stone stiles which have been proposed as Non-Designated Heritage Assets. The hedgerows should be restored and maintained. 'If a hedge ceases to be valued, then the land it is on is usually reclaimed ...'<sup>27</sup>



<sup>26</sup> CDC Planning Reference: 20/00932/FUL Demolition of existing buildings and roadside wall with the retention, conversion and extension of the roadside building to form a single dwelling, together with the erection of 17 two and two and a half storey residential dwellings, creation of a new access off the Cirencester Road, and garaging, parking, public open space, landscaping and all enabling development | Yells Yard Cirencester Road Fairford Gloucestershire

<sup>27</sup> John Wright 'A Natural History of the Hedgerow' 2016 p.3

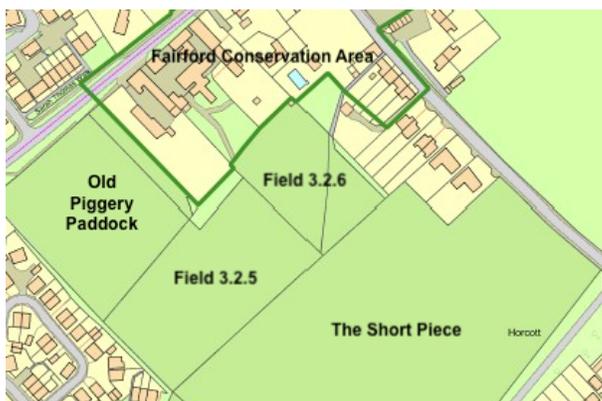
3.2.2 Map showing PROW numbers in this area, all with the prefix BFA. Detail from Gloucestershire County Council: Highways Public Rights of Way Map

3.2.3 The Conservation Area boundary runs along the edges of these two fields (Map 3.2.7) and they are clearly important to the setting of the buildings in the Conservation Area. Their position is such that they naturally form a part of the gap which provides the open, rural setting for both Fairford and Horcott.

3.2.4 Agricultural Land Classification: 2 Very Good Total area: 1.27 ha



Photograph 3.2.5  
2 fields between Old Piggery Paddock and The Short Piece



3.2.7 Map showing 2 fields position relative to Conservation area (green line = CA boundary)

### 3.3 Carters Ground



3.3.1 Map showing Carters Ground with The Short Piece to the NE, Fairford Gate South to the W, and Horcott Lakes to the SE

3.3.2 Carters Ground is an old field which contains a historic early C19th Cotswold stone field barn which is proposed as a Non-Designated Heritage Asset (NDP13) due to its archaeological significance. It is used by 7 species of bats<sup>28</sup>. The south east corner of the site is subject to surface water flooding – this is recognised on the Environment Agency Surface Water Flooding Map. The field is rich in wildlife.



3.3.3 Views across Carters Ground from Horcott Lakes permissive path



3.3.4

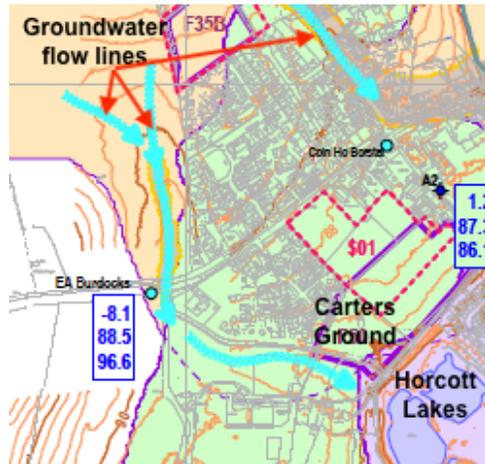
3.3.5 These photographs (above) were taken from the same position on the Horcott Lakes walk about a year apart – a valuable view showing the early C19th Cotswold stone field barn (zoom used on 3.3.4). An unfinished Bloor development (now completed Fairford Gate South) in the field beyond is clearly visible in 3.3.3 and is even more so in 3.3.4. The narrowness of the remaining Fairford – Horcott Local Gap is apparent.

3.3.6 Running alongside the southern boundary of this field is the ditch which takes run-off water from fields, springs and developments to the north of the A417 and from the development to the immediate west of the field. The ditch runs underneath the Mere driveway and into the Horcott Lakes site (see map 3.3.7 below<sup>29</sup>). Drainage runs via the Dudgrove Ditch from Horcott Lakes, across the runway of RAF Fairford (which has flooded in the past) to the nearby settlement of Whelford. This was one of the fields (together with The Short Piece) subject to a planning application which was called in by the Secretary of State who agreed with the Inspector that 'the proposed development would cause the separation between Fairford and Horcott settlements to be lost, and thus would be harmful to the character and appearance of the area'<sup>30</sup>.

<sup>28</sup> fpcr: Ecological Appraisal for Gladman Developments Ltd. Land off Horcott Road, Fairford 2016, para. 4.41 p.38 (CDC Application No.16/01766/OUT)

<sup>29</sup> Water Resource Associates: Groundwater Monitoring and Review of Flood Risk at Fairford, 2018 Fig. 4.9 p.16

<sup>30</sup> Section 78 Appeal made by Gladman Developments Ltd, Land at West of Horcott Road, Fairford, GL7 4DA, Application Ref: 16/01766/OUT. P. 3, Para.20



3.3.7 Map detail showing groundwater flow lines, including a main line (blue/turquoise) running to the south of Carters Ground.

3.3.8 This site forms the western end of the Fairford – Horcott Local Gap and is therefore crucial for the demarcation of the two very distinct settlements of Horcott and Fairford at its narrowest point. As has been noted in The Short Piece analysis, consultants for Gladman Developments Limited accepted that the gap here is narrow, but it is, nonetheless, a gap, and its protection has become even more imperative. The developer's suggestion is that the fields south of The Old Piggery would maintain an 'additional green gap'<sup>31</sup> but this is to make a nonsense of the 'gap' concept since development here would eliminate any sense of there being two separate and distinct settlements. At this point (Carters Ground), any housing would extend, literally uninterrupted, from Horcott to the A417.

3.3.9 The Fairford - Horcott Local Gap has to be a coherent, interconnected partition which clearly separates Fairford from Horcott, allowing open views across the fields to the Conservation Area if coalescence of the two settlements is to be prevented. This is recognised by CDC: 'The flat lowland qualities and open pastoral character are typical of this landscape character type. I consider that these qualities along with attractive landscape features such as established hedgerows, low stone walls and mature roadside trees make an important and pleasing contribution to the rural setting of the village which should be preserved. This can be appreciated from a number of local viewpoints.'<sup>32</sup>

3.3.10 It is, perhaps, worth pointing out that until recently, this gap was clear and uninterrupted with views right across to the A417. Housing expansion is threatening the sense of open countryside, of two distinct agricultural settlements, as views close in. Communities face losing this sense altogether if this field and others in the proposed gap are not protected from development.

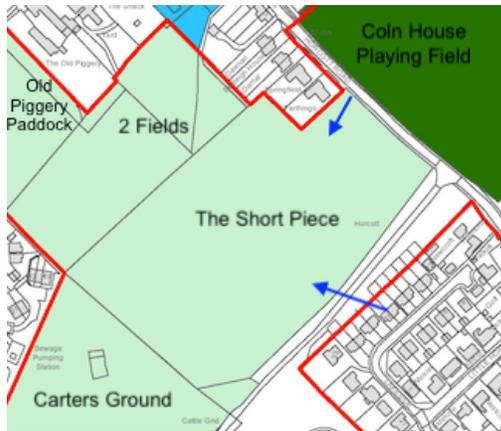
3.3.11 Consultation Day comments 2019 – 'Endorse local green gap proposals.' 'Support.' 'Do not allow any development.' 'Important to maintain space between Horcott and Fairford.'

3.3.12 Agricultural Land Classification: 2 Very Good  
Area: 2.35ha

<sup>31</sup> CDC Planning Reference: 16/01766/OUT 'Outline with all matters reserved apart from access for up to 92 dwellings (including up to 50% affordable housing) public open space and children's play area and associated works.'

<sup>32</sup> CDC Planning Reference: CT.9172, 16/01/66/OUT: Development Services – Landscape Response, KS, p. 3

### 3.4 The Short Piece



3.4.1 Map of The Short Piece location



3.4.2 The Short Piece looking from Fairfield towards Horcott from Horcott Road

3.4.3 The Short Piece is another old field and (together with Carters Ground and Coln House Playing Field) is a central site which maintains the separation of Fairfield from Horcott and provides a real sense of openness.<sup>33</sup> Horcott's history is very different from that of Fairfield since it only left the parish of Kempford and joined the parish of Fairfield in 1987; Dilly's Bridge, linking Horcott and Fairfield was only installed in 1990.

3.4.4 It is proposed that this site should form a part of the Fairfield-Horcott Local Gap as it is key to the demarcation of the two very distinct settlements of Horcott and Fairfield. In addition, this is one of the very few remaining significant archaeological sites and is therefore of historical significance.

3.4.5 Fairfield is an area rich in archaeological heritage, recognized by Gloucestershire County Council who write, 'Fairford parish is particularly rich in undesignated heritage assets of archaeological interest, some of which are of equivalent significance to designated assets (NPPF 139)'<sup>34</sup>. Over recent years, much of that heritage has been destroyed. Not only have contractors undertaken work without notification (HER 7215, 7216)<sup>35</sup>, but whole sites have been lost: a Romano-British site with Iron Age ditch is now a gravel pit (HER 27768) as is a Romano-British farming settlement including two stone-lined wells (HER 2477); the source of a Neolithic polished flint axe is lost beneath a lake (HER 2490) as is the source of a late Bronze Age socketed spearhead (HER 3333). Much evidence points to an extensive Anglo-Saxon settlement west of the River Coln, from Horcott Lakes to the south, and Pip's Field (now Stoneleigh development) to the north. The serious damage to this part of the town began with the building of the runway for RAF Fairford, then the extensive quarrying at Horcott Lakes and finally with the construction of large housing estates. Very little remains, but one area which does is The Short Piece/Coln House Playing Field.

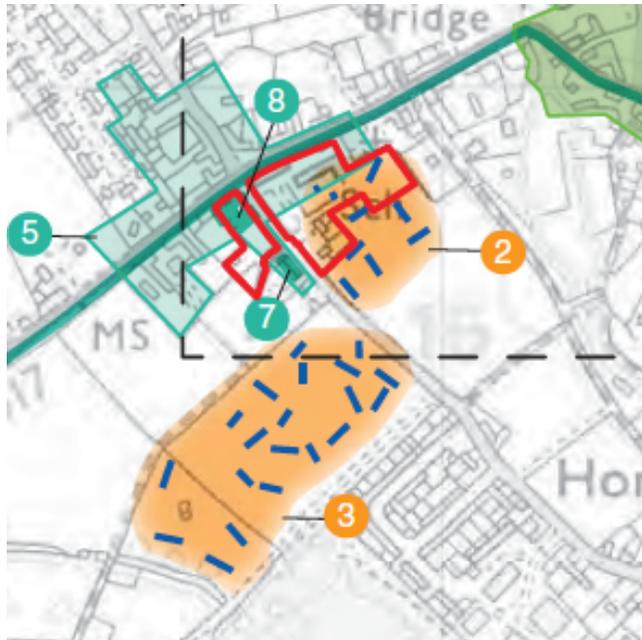
3.4.6 The archaeological report for The Short Piece (and Carters Ground) site states, 'In terms of artefacts, the period and quality of the Anglo-Saxon finds is such that this signifies a notable

<sup>33</sup> See 'The Neighbourhood Area,' Section 2A of the Fairford Neighbourhood Plan, 'A Brief History', 2.22, 2.23 for the history of Horcott.

<sup>34</sup> Robert Niblett, Planning Officer for Gloucestershire County Council in email, response to Fairford Neighbourhood Plan Pre-Submission Consultations.

<sup>35</sup> All HER references are to the Historic Environment Record for Gloucestershire: <http://www.heritagegateway.org.uk/Gateway>

site, where the main activity took place ... and so there is a high possibility of the finds assemblage being extensive and, therefore, informative. This site is liable to offer opportunities of closer scientific dating and so improve understanding of occupation sequence within a wider region much favoured for settlement in this period.'<sup>36</sup> 'Overall, it was apparent that the site contains a significant array of archaeological features that all offer good potential to contribute to a number of research priorities for the wider region.'<sup>37</sup> There is 'evidence for prehistoric activity in the form of possibly Neolithic pits and Anglo-Saxon occupation in the form of sunken feature buildings and post-built structures ...The settlement, probably 5th to 7th or early 8th century in date, comprised up to fifteen possible sunken-featured buildings (SFBs) and a posthole arrangement thought to be the remains of a post built rectangular structure with the potential to be a hall-type building' (HER 45955, 48671).



3.4.7  
Map detail showing evidence of Anglo-Saxon settlement  
Orange = Anglo-Saxon  
Blue lines = evaluation trenches  
2 = Coln House  
3 = The Short Piece and Carters Ground

3.4.8 The response of the Gloucestershire Archaeologist to the survey is disappointing in that whilst acknowledging that 'it is clear that the archaeological remains present on this site have the potential to make a very substantial contribution to our understanding of the archaeology of Gloucestershire, and indeed further afield' he nonetheless raised no objection to the development of the land subject to certain provisos. Development would certainly destroy whatever remains, and there would be no opportunity for future generations, with superior methodologies and equipment, to investigate the site. The Council for British Archaeology states, 'The CBA best practice guidelines show that as long as they remain safe then it is better to leave the evidence for future generations to investigate with better techniques and with better-informed questions to ask.'<sup>39</sup> These are the principles which should be followed here.

<sup>36</sup> Archaeological Evaluation at land off Horcott Road, Fairford, Gloucestershire by Worcestershire Archaeology. 2016, p. 23

<sup>37</sup> Ibid, p.24

<sup>38</sup> Cotswold Archaeology, Coln House, Fairford, Gloucestershire Heritage Statement, CA 18423, October 2020, p.13. See also para. 3.1 for further detail.

<sup>39</sup> Council for British Archaeology: Archaeology Out There website <http://new.archaeologyuk.org/best-practice>

3.4.9 The 'Two Fields' PROW runs along the northern boundary (BFA10) of the site, separated only by a low wall, allowing clear, open views; a permissive path runs along the southern boundary (providing access to Horcott Lakes); and Horcott Road runs along the eastern boundary. The views across the fields are much appreciated and highly valued. The mature lime trees along Horcott Road, together with the mature avenue of mixed beech and copper beech along The Mere drive, are significant landscape features, a visual amenity which needs protecting for all. In the past local residents used what is now Mere drive to reach Horcott Lakes (the public footpath being impassable at the time), 'My brother-in-law clearly remembers regularly using this access with other residents, for many years prior to it being 'closed off' to the public' and 'The drive to Mere was one of our main accesses to Totterdown lakes before the new house was built and the path across the fields is a good short cut to the lane to Marston Meysey.' (Pre-submission consultation comments).

3.4.10 The report of RPS CgMs for Gladman Developments Limited, 21 July 2016 describes The Short Piece, accepting that 'The existing gap between Horcott and Fairford on the western side of Horcott Road is already extremely limited...The most southerly Fairford house on Horcott Road is only approximately 125m from the most northerly Horcott house.'<sup>40</sup> This makes the remaining gap even more significant and the need for protection even more urgent. This report explicitly acknowledges the fact that there is a clear 'Horcott' - 'Fairford' distinction.

3.4.11 It is also important to note that these fields (Carters Ground and The Short Piece) form 'an important part of the setting in which the Conservation Area (CA) is experienced and consequently it makes a positive contribution to the character and appearance of the CA'<sup>41</sup>.

3.4.12 This field, together with Carters Ground, are, quite literally, the last fields on this side of Horcott Road, which separate the two settlements. This is acknowledged in The White Report evaluation of the site as lying 'on the south western edge Fairford on very gently sloping land separating it from Horcott to the south' and 'it provides a green gap between Fairford and Horcott when combined with playing fields along the River Coln corridor to the north east.'<sup>42</sup> Fewer than two years ago, this gap extended all the way through to the A417. However, unplanned development has eaten away at this and it is vital that this separation be maintained, not only for the present, but also for future generations of residents. 'The site has value in providing the setting to the western end of the Conservation Area which features recessive but attractive traditional buildings which form a positive introduction to the old settlement.'<sup>43</sup>

3.4.13 AECOM's Site Assessment Report for Fairford Town Council concludes: 'The site is available; however, it is not considered suitable due to several significant constraints. These include landscape, rural character, risk of groundwater flooding, the setting of Fairford Conservation Area and the town itself, loss of agricultural land, and access via Horcott Road.'<sup>44</sup> This, and the following assessment, refers to Carters Ground as well as The Short Piece.

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<sup>40</sup> CDC Planning Reference: 16/01766/OUT 'Outline with all matters reserved apart from access for up to 92 dwellings (including up to 50% affordable housing) public open space and children's play area and associated works.'

<sup>41</sup> Section 78 Appeal made by Gladman Developments Ltd, Land at West of Horcott Road, Fairford, GL7 4DA, Application Ref: 16/01766/OUT. P. 3, Para.21.

<sup>42</sup> The White Report for Cotswold District Council, 'Study of Land Surrounding Key Settlements' 2014, Section 8 p.23

<sup>43</sup> Ibid p.23

<sup>44</sup> AECOM: Site Assessment Report for Fairford Town Council, January 2019, p. 17, para.4.41

3.4.14 The SHELAA assessment of this site (The Short Piece and Carters Ground) considers it to be unsuitable: 'the site prevents the coalescence of Horcott and Fairford and provides a green space that forms the setting of the Conservation Area and its relationship with the countryside, which would be removed by the site's development. There are also non-designated heritage assets within the western part of the site, which include stiles and a historic stone field shelter and enclosure. These structures and their field setting would be severely compromised by development, even if retained. There are also highways concerns at Horcott Road's junction with London Road'<sup>45</sup>.

3.4.15 Agricultural Land Classification: 2 Very Good Area: 3.20ha



3.4.16 Looking across The Short Piece from Horcott towards the Conservation Area

### 3.5 Coln House Playing Field



3.5.1 Coln House Playing Field photograph taken from Dilly's Bridge corner.

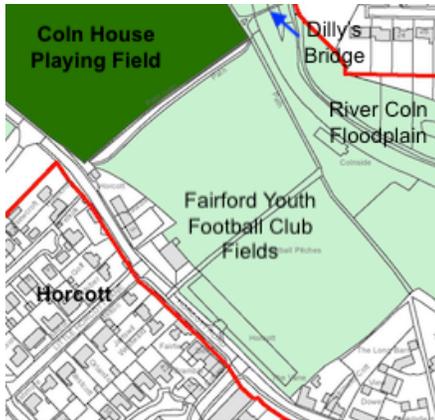
3.5.2 See Local Green Space discussion

3.5.3 An area between Coln House playing field and the river has been maintained as a community area/garden. There are plans to create a wildflower area in this riverside garden.

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<sup>45</sup> CDLP Strategy: Strategic Housing and Economic Land Availability Assessment, para. 2.2.02. Site Assessments 4, p.53

### 3.6 Fairford Youth Football Club (FYFC)



3.6.1 Map showing location of FYFC



3.6.2 Environment Agency flood map for FYFC fields<sup>46</sup>

3.6.3 These two playing fields have long been a part of the lives of the children of Fairford. When the school was situated in what is now Fairford Community Centre, these fields were used as their sports ground. Crocodiles of children could regularly be seen wending their way down through the town to these fields. When the school transferred to The Park and what is now Farmor's School, the fields remained fallow until bought by FYFC (then, Fairford and Lechlade Youth Football Club). Now they are used regularly both by the children of Fairford and by children from other towns and villages who participate in junior tournaments and friendly matches. The club has links with Cheltenham Football Club which, in the summer school holidays, conducts well-attended training sessions for children here. It is also used for casual kickabouts and a caravan park during the International Air Tattoo. The club has invested in car parking and clubhouse facilities which enhance the value of the site to the town.

3.6.4 The fields both form part of the Fairford - Horcott Local Gap continuing the line from Coln House Playing Field, south and along the river. It is ideally placed between the two communities to serve them both with Horcott to the west and south, Fairford to the east and north.

3.6.5 Tarmacked, well-used PROWs run along 2 sides of this area, to the north and west (BFA40 and BFA50). These have become much more heavily used since the installation of Dilly's Bridge as there is now a quick route through to the centre of Fairford (and the schools) from Horcott.

3.6.6 The fields mark the start of the Coln River Valley floodplain at Fairford. The Environment Agency Flood Map for Planning: flood zone 3 extends some way across these fields (see 3.6.2). The White Report of 2000 has identified areas 'where development is not suitable' One is 'The floodplain due to the intrinsic scale, character and quality of the landscape, its contribution to the town's setting and because of its flooding characteristics.'<sup>47</sup>

3.6.7 Consultation Day comments - 'We use the Horcott [Fairford] Youth Football pitches very regularly and having this safe, accessible space for children to learn new skills and take exercise is very valuable.' 'Football ground plus areas and footpath behind for walking.'

<sup>46</sup> Environment Agency Flood Map for Planning: <http://maps.environment-agency.gov.uk/wiyby/wiybyController>

<sup>47</sup> 'The White Report:' Study of land surrounding Key Settlements in Cotswold District: June 2000, para.10.12, p. 31

3.6.8 The area is regularly walked by residents surrounded as it is by PROWs. Dog walkers, joggers, school children, people going shopping, regularly cross this land and the open space is highly valued. It is a critical aspect of the setting of Horcott.

3.6.9 Area: 2.43 h



3.6.10 Fairford Youth Football Club Ground, taken from Horcott / Fairford footpath

### **3.7 The Floodplain extending along the River Coln from Town Bridge to Snake Lane and Cutlers Ford**

3.7.1 A sinuous line of green fields and gardens combines to create linked vistas throughout the whole length of the town. 'The flood plain to the south consists of a variety of smaller meadows and larger arable fields away from the river to the east. The meadows are enclosed by outgrown hedges with fences ... The floodplain is an important element of the landscape setting to the town.'<sup>48</sup>

3.7.2 The riverside here is home to a population of water voles. The river bank is maintained to support and increase this population eg. planting and conserving reed plantations. Much of this work is carried out by a local volunteer group advised by Gloucestershire FWAG (Farming and Wildlife Advisory Group).

3.7.3 A new footpath surface has recently been built as part of the River Walk which means that this area is now much more accessible to all residents and visitors.

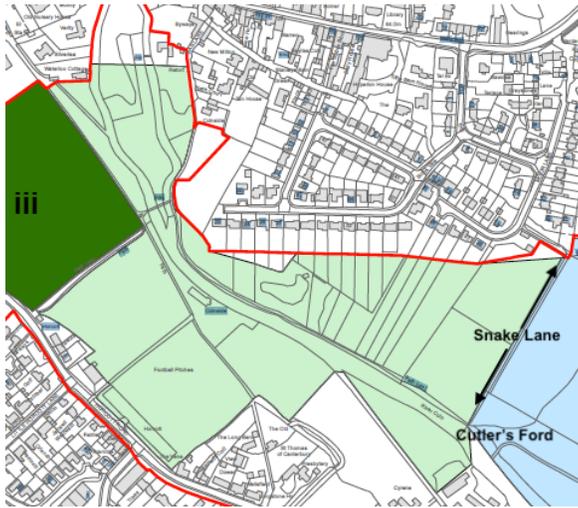
3.7.4 'The area is heavily used as a recreational resource e.g. dog walking.'<sup>49</sup> From the Fairford - Horcott Local Gap, to the fields which run along the River Coln and form the River Walk, all the way to Lake 104. This area is nearly all in the floodplain. Some of the views have been affected by development at both the west and east end of the town, which makes the remaining landscape so much more precious. 'The floodplain is an important element of the landscape setting to the town.'<sup>50</sup> It anchors the Fairford – Horcott Local Gap on the river, leading from Bull Island and Dilly's Bridge down to the fields opposite the working Horcott Farm; from one river crossing down to the next, Cutlers Ford, which permits the passage of farm vehicles, as well as children paddling in the summer heat.

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<sup>48</sup> The White Report: 'Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.6, p. 62

<sup>49</sup> Ibid, p. 62

<sup>50</sup> Ibid, para 12.8, p. 62



3.7.5 Map showing the extent of the floodplain of the Fairford – Horcott Local Gap, illustrating the way in which the gap functions to separate the two communities but which also acts as a meeting place along the river path, providing recreation and leisure space as well as valuable water storage.

3.7.6 A Cotswold Water Park report on this area states, 'The broad riparian corridor and floodplain area will provide additional benefits through management of parts of this area for wildlife as well as for water control thereby ensuring more effective water storage in the Upper Thames as well as helping to protect settlements downstream.'<sup>51</sup> 'One of the key strands to this vision is that built development should not, and cannot be undertaken on the floodplain; this will protect settlements elsewhere in the Upper Thames, will prevent inappropriate developments and will also safeguard these areas for wildlife.'<sup>52</sup>

3.7.7 All these areas are unsuitable for development as they are either in the River Coln floodplain, or are at the highest risk of groundwater flooding according to the Gloucestershire Groundwater Management Plan<sup>53</sup>. The data provided includes Fairford observation wells and 'indicate many exceedances of the ground level recorded [...] There is clear indication of an upward trend in groundwater level at ...and Fairford'.<sup>54</sup> Appendix C. Groundwater Level Data chart p.52 for Fairford shows ground water levels between 1996 and 2010 with multiple exceedances above ground level.

3.7.8 The Examiner noted 'the boundary of the proposed Local Gap running artificially through the rear gardens of residential properties in Courtbrook and Moor Lane. Plainly this is not ideal for development management purposes. However, on balance I do not recommend any changes to its spatial extent. In any event it is unlikely that built development would be proposed or practical in these rear gardens.' An explanation for this boundary is that it roughly reflects the lines of hedges which formed original southern boundaries of these gardens, separating them from fields beside the river. The gardens were extended when plans for a by-pass were cancelled and the reserved fields were sold off to the residents, most of whom removed the hedgerows. The revised line here takes the Development Boundary line to define the floodplain edge.

<sup>51</sup> Cotswold Water Park; Integrated Landscape Character Assessment: Final Report 2009 'Ecological Character' 6.0 Section 6.0 p.33

<sup>52</sup> Cotswold Water Park Biodiversity Action Plan 2007-2016, Section 31, p. 24

<sup>53</sup> Gloucestershire Groundwater Management Plan, Groundwater Immediate Assessment – South Gloucestershire District April 2015 Map p.35, Chart p. 52.

<sup>54</sup> Ibid, p. 12

## 4.0 RIVER COLN VALUED LANDSCAPE (FNP10)

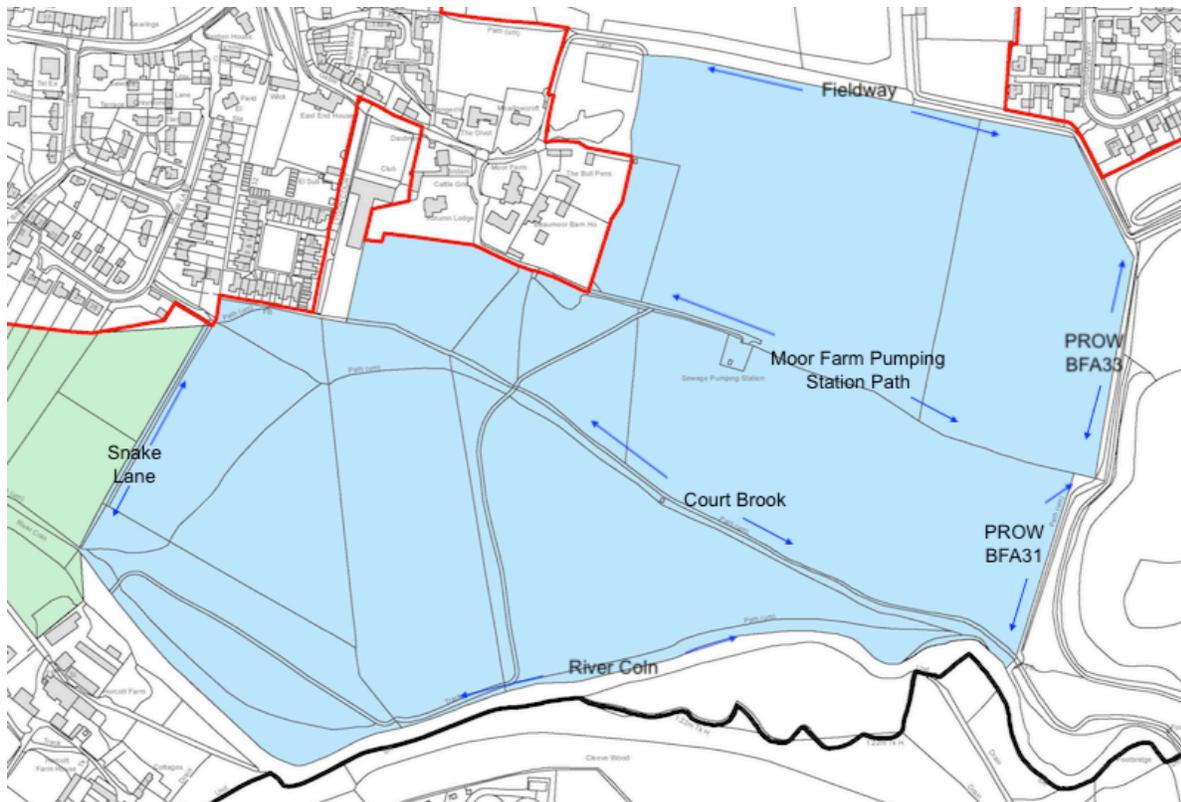
4.0.1 The FNP10 identifies land between the River Coln and Fieldway, as shown on the Policies Map, as a valued landscape.

4.0.2 The River Coln Valued Landscape Value (RCVL) aims:

- a) to recognise, safeguard and enhance the riparian landscape;
- b) to promote a sense of pride in the area and encourage a sense of place;
- c) to acknowledge the quality and character of the landscape, its wildlife and its ecological value;
- d) to encourage active water management activities
- e) to enhance the role of this area in providing a wildlife corridor from the SSSI and Whelford Pools Nature Reserve to the east and the Fairford-Horcott Local Gap and SLA to the west<sup>55</sup>
- f) to support the National Pollinator Strategy: for bees and other pollinators in England, Nov. 2014.

4.0.3 The River Coln Valued Landscape (RCVL) will consist of:

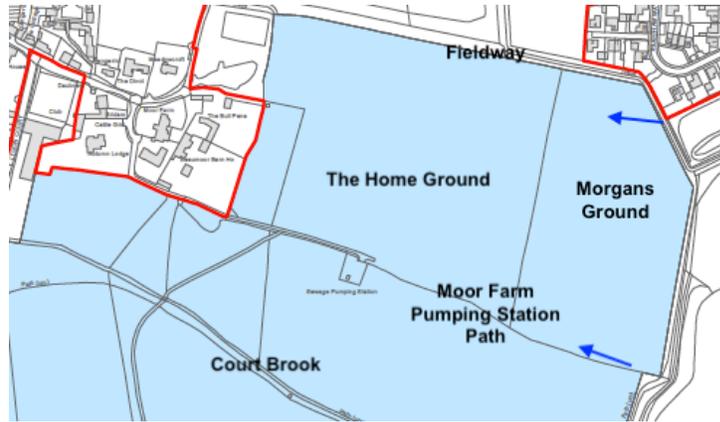
- a) Fields running between Fieldway and the Moor Farm Pumping Station Path;
- b) River Coln floodplain, from Snake Lane (west) to the Moor Farm Pumping Station Path (north) and the floodplain fields to hedge line of PROW BFA31 (east);



4.0.4 Policy map showing the full extent of the proposed River Coln Valued Landscape (in blue)

<sup>55</sup> In January 2021 Natural England designated the whole of the Cotswold Water Park as SSSI. As a consequence the proposed River Coln Valued Landscape Area now borders a SSSI (PROW's BFA33 and 31 mark the border with the new SSSI).

## 4.1 Fields between Fieldway and the Moor Farm Pumping Station Path (The Home Ground and Morgans Ground)



4.1.1 Map showing location of RCVL fields between Fieldway and Moor Farm Pumping Station Path

4.1.2 These fields (The Home Ground, with a fenced tree-planted area to its west, and Morgans Ground) lead out of the floodplain and are important as a visual amenity; they will also be needed if ever one of the NDP's desired projects (reinstatement of the water meadows) is to be completed. They form the first river terrace coming down from the old 'Fieldway' path. As can be seen from the map, they are the only remaining fields where such restoration is possible. The area concerned includes both Fieldway and the Pumping Station Path.

4.1.3 This site also has historic, as well as natural, value. A part of this site is mentioned in the Historic Environment Record 2480 DESCRIPTION: 'Cropmarks of a settlement site consisting of circles & irregular enclosures & ditches were seen from the air in 1942, south-west of Fairford railway station.' Elsewhere the record states, 'Two probable Prehistoric or Roman hut circles were seen as cropmarks and mapped from good quality air photographs. The hut circles are centred at SP 1601 0077 and SP 1600 0076 [Morgan's Ground] and are 11m and 12m in diameter. They are joined together by a double ditched linear feature 8m long which has been interpreted as a trackway.' Such archaeological finds should be preserved (see 3.4.8) – much of the archaeological record in this area has been lost to gravel pits and development).

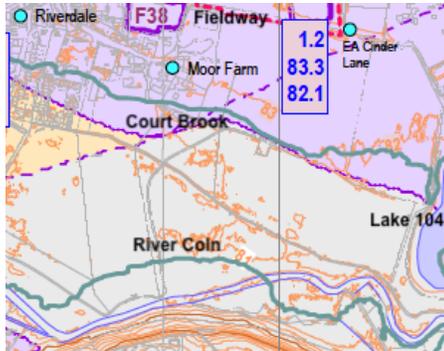
4.1.4 In addition, the developments currently agreed (Lake 104, 103, 103a) and recently completed (Keble Fields) are likely to exacerbate existing surface water flooding problems. The area is part of the Cotswold Water Park where gravel extraction has created extensive areas of open water. The hydrogeological properties are such that there is likely to be a high ground water level in addition to the normal surface water run-off (see maps 4.1.7, 4.1.8 below<sup>56</sup>). This means that the usual SUDS mitigation systems will be inadequate and this land will therefore be needed to attenuate the excess surface water run-off resulting from the developments. Fairford is a very ancient settlement; green spaces which have never been built on in the past were left for the good reason that they store water and flood in wet seasons.

4.1.5 These are sites at the highest risk of groundwater flooding according to the Gloucestershire Groundwater Management Plan, Groundwater Immediate Assessment – South Gloucestershire District April 2015 Map p.35, Chart p. 52. WILD Project Rivers Management Plan

<sup>56</sup> Water Resource Associates: Groundwater Monitoring and Review of Flood Risk at Fairford, 2018 Fig. 4.9 p.16. Maps 4.1.7 and 4.1.8 are both taken from this document.

for Fairford Parish May 2016, p.7, states, '...future management practices should aim to create more flood winter storage capacity for storm events.'

4.1.6 One of the comments made on the 2016 Consultation Days was, 'I have twice walked the area even in 'dry-ish' weather and have stuck a garden fork into the soil south and east of Fairford Town Football Ground or north of the river and found the tines wet.'



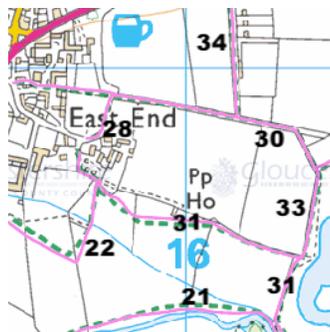
4.1.7 Map showing the dividing line (line of dashes) between Cornbrash Limestone (north west) and Kellaway Clay (south); detail from Fig. 4.9 p.16 of Fairford Hydrological Survey. The area to the south and east of this line (most of this area) has serious groundwater issues. The area to the north and west is drier.

4.1.8 Map showing the extent of flood risk from rivers in RCVL. Detail from Fig 5-1 p.19 of Fairford Hydrological Survey



4.1.9 It is proposed that these fields should form the northern boundary of the RCVL, between the floodplain and the Conservation Area. This will also maintain the rural setting of several listed buildings as well as that of an ancient lane which was an important link in the field (and drove road) system, which is still visible, still widely used by the community and such a distinctive part of the town: Fieldway. These fields were, at the time of the enclosures, divided into multiple small land holdings ('allotted' land) and therefore the site would be suitable for more allotments (there are already private allotments on field F-45).

4.1.10 PROWs run along 3 sides of this area, to the north (Fieldway) BFA30, to the south BFA31 and to the east (on the far side of the hedge line) BFA33.



4.1.11 Map showing PROW numbers in this area, all with the prefix BFA. Detail from Gloucestershire County Council: Highways Public Rights of Way Map

4.1.12 Consultation Day comments 2019 – ‘Homeground and Morgans Ground needs to be protected as green space – its such an area of local beauty used by my children as a perfect place to enjoy and play.’ ‘Problem of balance – gaps needed and preservation of countryside – not spilling into surroundings.’ ‘Good.’ ‘Need to protect.’ ‘Asset to the town.’

4.1.13 2016 Pre-submission consultation comments indicate the importance of this area of land to the local community. ‘Wildflowers, Wild Animals, Birdlife. I walk north, south & east of this land and have personally encountered and watched; roe deer, 30 different bird species, several types of orchids.’ ‘This area is crucial to keep wildlife in the town by providing a natural habitat. Also a great space for exercising dogs.’ ‘Recreational value – encourages walking. Richness of its wildlife. Natural environment essential to wellbeing’. ‘Every spring on the eastern edge of Morgan’s Ground there are dozens of grass snakes emerging from hibernation – a privileged sight. In the summer skylarks are seen and heard in the sky above the cereal growing in these and neighbouring fields.’ They [the fields] form part of a rich corridor for wildlife, areas which we are fast losing.’ ‘This is a great wild life corridor, with nest birds and mammals in spring, but in the winter it comes into its own being a great area for winter thrushes, finches and buntings – all declining species.’

4.1.14 A larger area, an ‘Area of Special Landscape Value’ (ASLV) was proposed in the unsuccessful 2017 NDP. The proposed RCVL does not include Lake 104 (a lake created by gravel extraction) in order to overcome the objections raised. The owners of the site have confirmed ‘that the removal of the Lake 104 site from the proposed ASLV (Policy FNP12)<sup>57</sup> would address my Client’s primary concern with the previous version of the Neighbourhood Plan’.<sup>58</sup>

4.1.15 Policy SP5 of CDLP (replacing Policy UT1, see Section 5.1 below) refers to ‘Cotswold Water Park: Post-Mineral Extraction After Use’. This policy therefore applies to Lake 104, 103 and 103a but not to the agricultural landscape to the west of the lake - the area which is now proposed as an RCLV. Thus, there would be no longer be any conflict between the two policies (the RCLV and Policy SP5) – this conflict was the basis for the objection to the ASLV policy in the unsuccessful 2017 NDP.

4.1.16 It is considered that a RCVL would enhance the amenity of Lake 104, protecting the views towards the town. The Appeal Inspector (for the development referred to in 4.1.4 and 5.1.8) writes, ‘...it is the combination of the landscape character of the site together with its location in relation to Fairford and the public accessibility it enjoys which results in its main amenity value.’<sup>59</sup>

4.1.17 In addition, the RCVL would go a long way to upholding to local wishes made clear in The Fairford Health Check as long ago as 2005 which led to the FTC policy aim ‘to perpetuate the distinct green character that makes Fairford special, and to designate ... the riverside as an area that cannot be built upon or spoiled’<sup>60</sup>.

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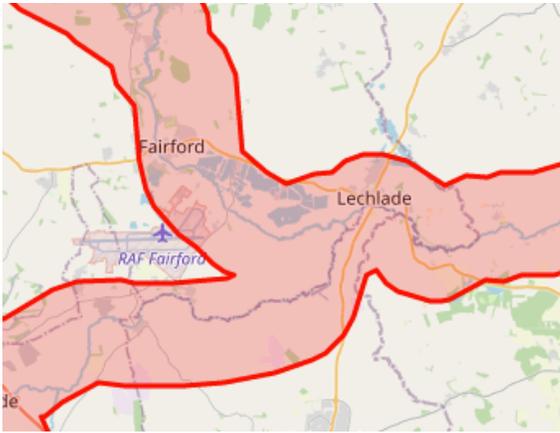
<sup>57</sup> Now RCVL Policy FNP 8

<sup>58</sup> See email from David Neame, 15 January 2018, to Roz Capps, in Evidence Base

<sup>59</sup> Lake 104, 103, 103a Appeal Ruling APP/F1610/A/07/2043652/NWF, para. 237, p.32

<sup>60</sup> See para. 1.2.7 of this document

4.1.18 The two areas together have the potential to make a significant contribution to the National Pollinator Strategy since Fairford, and this area is squarely on one of the proposed B-Lines. 'The B-Lines are a series of 'insect pathways' running through our countryside and towns, along which we are restoring and creating a series of wildflower-rich habitat stepping stones.'<sup>61</sup> Wildflower areas have already been planted by volunteers elsewhere in Fairford eg. Coln House School garden close to Dilly's Bridge.



4.1.19 Detail from map showing the proposed B-Lines across England, supporting the National Pollinator Strategy. Fairford and the proposed Area of Special Landscape Value, fall within the B-Line area.

4.1.20 Evidence of this area as a 'valued landscape' can be found in the 100m of hedgerow and hedge infill planting along the eastern boundary of Morgans Ground and the work listed in para. 4.2.7. Consultation day comments indicate a high degree of value being placed upon the range of wildlife in the area. In addition, Fairford Town Council are taking a lead in their work on the ERDF Wild Towns Project and are initiating projects in the town associated with this project<sup>62</sup>.

4.1.21 This policy also supports CDC in its 'Ecological Emergency Plan', in particular the intention to, 'Promote the creation of new natural green spaces and green links across the District'<sup>63</sup>.

4.1.22 Agricultural Land Classification: 3 Good to Moderate. Outside Fairford Development Boundary



4.1.22 Towards Morgans Ground from PROW BFA30/BFA33 junction



4.1.23 Looking west along Moor Farm pumping station PROW BFA31

<sup>61</sup> <https://www.buglife.org.uk/our-work/b-lines/>, 'What are B-Lines'. Also includes link to map from which detail 4.1.19 is taken

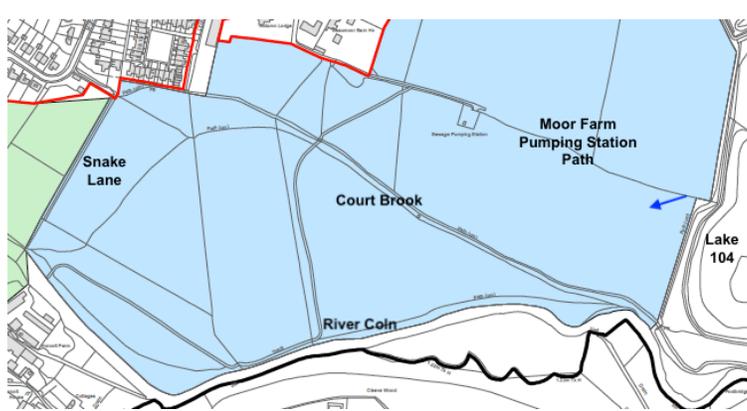
<sup>62</sup> Fairford News, Fairford Town Council, August 2020, pp. 2-3. NDP Supporting Evidence

<sup>63</sup> Cotswold District Council Ecological Emergency Action Plan Annex A: Leading the Way Towards Nature Recovery, para. o)

**4.2 River Coln floodplain, from Snake Lane (the end of the Fairford – Horcott Local Gap) to the hedge line west of the PROW BFA31 and south of the Moor Farm Pumping Station path.**

4.2.1 The fields here were once fully functioning water meadows for which some of the infrastructure (eg. leats and sluices) is still visible. In winter the River Coln regularly breaches its banks, and even where this is not the case, the ground is often extremely wet and boggy underfoot. These are ideal for water meadow restoration and the NDP would support such an undertaking. Restored water meadows here would improve the wildlife corridor to the nearby SSSI and Whelford Pools Reserve as well as the quality of the grassland. That the restoration of water meadows is recognized as important was clear in the grants available from Countryside Stewardship and the Environmentally Sensitive Area Scheme (ESA).

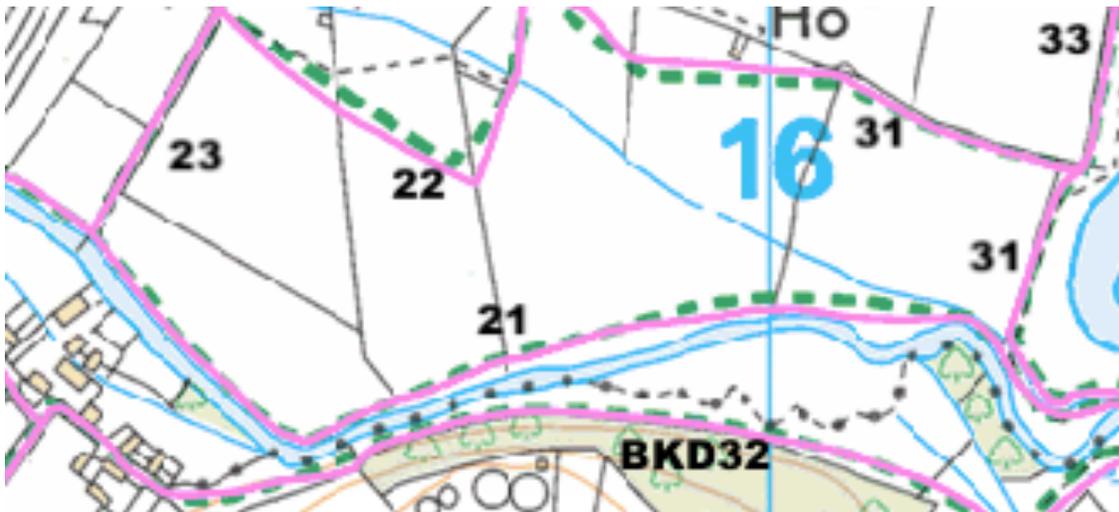
4.2.2 The whole area is outside the Development Boundary.



4.2.3 Map showing River Coln floodplain area

4.2.4 View across floodplain towards River Coln

4.2.5 A PROW BFA21 runs the whole length of the river here; another, BFA23 runs north out of the floodplain, leading into Moor Lane. Further east, a third PROW, BFA22, runs north, linking up with the web of PROWs around the northern half of the proposed RCVL (BFA28, BFA30 and BFA31, BFA34)



4.2.6 Map showing PROW numbers in this area, all with the prefix BFA. South of the river the path number BKD refers to the fact that this is PROW is in Kempford Parish. Detail from Gloucestershire County Council: Highways Public Rights of Way Map

4.2.7 Evidence of this area as a 'valued landscape' can be found in the work carried out by local volunteers.

- Translocation of Ranunculus (Water Crowsfoot) – it had been identified that there was a lack of in-stream vegetation in the river downstream from Cutlers Farm. Vegetation was taken from around the Bull island / Town bridge where it was abundant, and replanted in 6 locations. It has established itself in 3 locations. More work is planned. Ranunculus provides cover for fish and invertebrates as well as helping to maintain river levels during summer months.
- Natural bank repaired in four locations by weaving hazel fascines. This is designed to allow silt to be deposited in the slow water behind the fascines; eventually vegetation will establish and close the gap in the damaged bank. This will allow marginal vegetation to re-establish and create habitat, including for water voles.
- Eight gaps in bankside filled with natural material to create a dead hedge – this is to prevent dogs speeding up erosion and to maintain suitable habitat for water voles.
- Overshading reduced in two locations by removing dense willow. This will allow light into the river and facilitate in-stream vegetation growth and will promote the growth of bankside vegetation suitable for water voles.
- Invasive Himalayan Balsam removed along 3 stretches of the river between Courtbrook and the footbridge across the river (end of BFA21)). This work was done in 2017 and no growth was identified in 2018. It is vitally important it does not establish otherwise it will push out native species and, as it is an annual plant, will leave riverbanks exposed to erosion in winter.
- Ad-hoc removal of litter from within the river when work is undertaken.
- Hedgerow planting (see photographs 4.2.7, 4.2.8 and 4.2.9 below).

Planned projects

- Installation of bat boxes and barn owl boxes
- Regular river fly monitoring + unofficial monitoring of water vole population
- Regular monitoring of river water quality



4.2.8, 4.2.9 and 4.2.10  
Volunteers hedge planting alongside BFA33, Morgans Ground

## 5.0 ALREADY DESIGNATED LANDSCAPE AREAS

5.0.1 Certain areas in Fairford Parish have already been covered by other designations, most of which the NDP supports wholeheartedly, the exception being the gravel extraction site (5.3). They are:

- Cotswold Water Park – lakes formed as the result of mineral extraction
- Special Landscape Area
- Fairford Conservation Area
- Possible Gravel Extraction Site

### 5.1 Cotswold Water Park

5.1.2 Although the whole parish lies within the Cotswold Water Park (CWP), two areas of post mineral extraction are specifically covered by Policy SP5 of the Cotswold District Council Local Plan 2011-2031: these are Horcott Lakes, and lakes to the east of the town, including Lake 104.



5.1.3 Horcott Lakes  
(Fairford Parish boundary in blue)



5.1.4 Lakes to the East of Fairford  
(Fairford Parish boundary in blue)

5.1.5 Policy SP5 of Cotswold District Council Local Plan 2011-2031

#### COTSWOLD WATER PARK: POST-MINERAL EXTRACTION AFTER USE

*Proposals for sports, leisure, and/or recreational development, whether outdoor or water-based, will be permitted on former mineral extraction sites that lie within the Upper Thames Clay Vales National Character Area (National Character Area 108 (Upper Thames Clay Vales))<sup>64</sup> provided the proposals:*

- protect and enhance biodiversity;*
- strengthen the landscape character and reinforce the Cotswold Water Park's sense of place;*
- enhance public accessibility and enjoyment of the lakes and countryside;*
- take account of the implementation of measures put in place as part of the approved restoration and aftercare scheme(s) associated with former mineral extraction*
- satisfactorily mitigate potential unacceptable adverse impacts on residential amenity;*  
*and*
- maintain the character of settlements and their settings.*

<sup>64</sup> This includes the Fairford/Horcott parish

5.1.6 Policy SP5: 12.4.4 ... encourages appropriate outdoor and in particular, water-based activities, while ensuring that local issues and concerns, such as access and the protection of tranquillity, are addressed. New routes for sustainable transport, notably cycling and walking will be encouraged to support tourism and improve local accessibility.'

5.1.7 Policy SP5: 12.4.6 The area is an important resource for biodiversity with the lakes supporting rare aquatic species and waterfowl ... It is important that developments within the area enhance this valuable biodiversity resource, both at a site level and the broader landscape scale. Wildlife is one of the main reasons why visitors are drawn to the area.'

5.1.8 Lakes 104, 103 and 103a have already been granted permission for 200 holiday homes and leisure centre, with most of the development around Lakes 103 and 103a. The PROWs around Lake 104 (BFA30, BFA31, BFA32 BFA33) are protected and the tranquillity of the western half of this lake is preserved. This plan does not seek to alter any of the arrangements already in place for these lakes. Lake 105 bordering on Whelford Road is a water skiing and water sport centre. Lakes 102 and 102a are SSSI, and Whelford Pools Nature reserve is set around lakes 111, 111a and 111b.

5.1.9 Gravel extraction at Horcott Lakes is over. The future for these lakes is uncertain although it is hoped that continued community use and access to the footpaths can be assured. In the past this area has been designated as suitable for quiet activities (fishing etc.) and it is to be hoped that any future use of this site will indeed 'allow local residents to be able to enjoy access to the countryside from their homes, with both existing lakes and future landscapes adjacent to settlements protected as an informal leisure and recreation amenity.'<sup>65</sup>

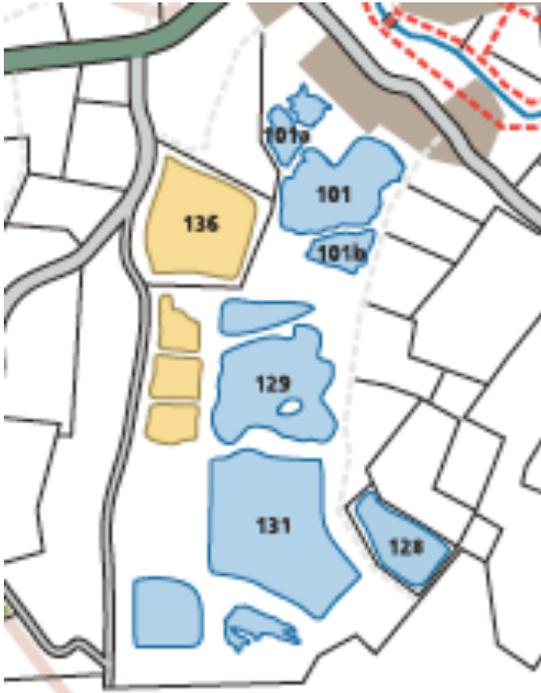
5.1.10 In January 2021 Natural England designated the whole of the Cotswold Water Park as SSSI.



5.1.11 Detail from Natural England map showing new Cotswold Water Park SSSI designation (hatched green) in Fairford Parish

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<sup>65</sup> Strategic Review and Implementation Plan for the Cotswold Water Park, Stage 111, Vision and Implementation Plan, July 2008, p.18, para.4.5 bullet point 4



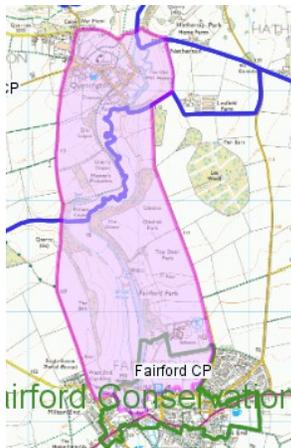
5.1.12 Cotswold Water Park Lake Numbers for Horcott Lakes. (Detail from CWP map.)



5.1.13 Cotswold Water Park Lake Numbers for lakes south west of Fairford (detail from CWP map)

## 5.2 Special Landscape Area

5.2.1 Fairford Special Landscape Area extends from Town Bridge and the Greens north to the edge of the parish boundary, and beyond, accentuating one of the most distinctive features of the town – the penetration of natural landscapes into its centre. It is protected by CDLP Policy EN6.



5.2.2  
 Special Landscape Area = mauve  
 Parish boundary = blue line  
 Fairford Conservation Area = green line

### 5.2.3 CDLP Policy EN6: SPECIAL LANDSCAPE AREAS

*Development within Special Landscape Areas ... will be permitted provided it does not have a significant detrimental impact upon the special character and key landscape qualities of the area including its tranquillity.*

5.2.4 Para. 10.6.1. The purpose of SLA designation is to protect locally significant and valued landscapes that have particular intrinsic qualities or character. Although not nationally designated, in some cases they provide important settings and effective buffers for the Area of Outstanding Natural Beauty.

5.2.5 The SLA in question extends north beyond the parish of Fairford and overlaps the Fairford Conservation Area in the south. The land to either side of the river rises on oolitic limestone. This is a beautiful river valley landscape, with some of the best views from the west, looking over Gassons Field towards Horcott Hill (beyond the parish boundary). The permissive Pitham Brook Path runs along a brook on the west bank of the River Coln providing good views of various leats, sluices and the Cascades.

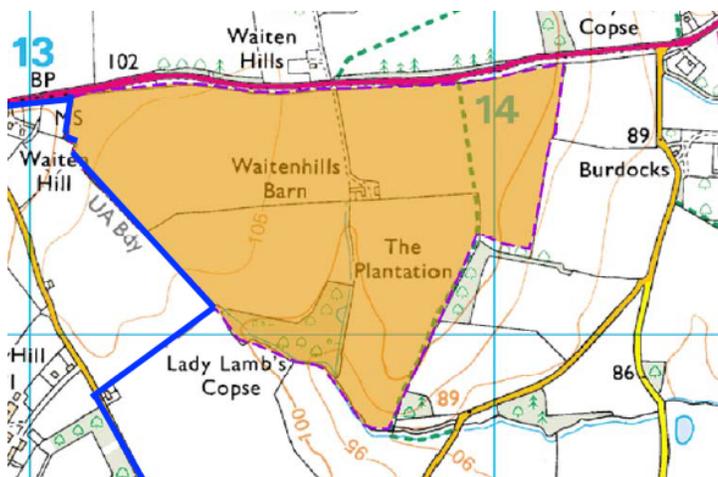
5.2.6 By the late 17th century the course of the river above the town included a mill leat. In the 1780s that stretch of the river was made into a feature of the park, being formed into Broadwater Lake, which contains two islands and is spanned at the southern end by an 18th-century bridge. The cascade feeding it had been constructed by 1757. The mill leats, weirs, bridge and sluices are still in visible and in use today, of interest to industrial archaeologists as well as landscape historians.

5.2.7 A pump house beside the Cascades fed a reservoir situated at the highest point to the east of the town, within Fairford Park. The pump house and reservoir are proposed as Non-Designated Heritage Assets (41 and 44a) as part of Fairford's industrial heritage.



5.2.8  
The Cascades in  
the Special  
Landscape Area

**5.3 Draft Minerals Local Plan for Gloucestershire 2018-2032 – Allocation 8 Lady Lamb Farm p.149-150**



5.3.1  
Area to the west of Fairford  
included in the Draft Minerals  
Local Plan for Gloucestershire  
2018=2032  
Blue line = western boundary  
of Fairford parish.  
Map detail p. 149, Allocation 8  
– Area of Search at Lady  
Lamb Farm.

5.3.2 This area (on the south-eastern slope of Waiten Hill) has been identified as a possible site for gravel extraction. At the moment this is open farm, woodland, farmhouse and farm buildings and footpaths. A new access onto the A417 would be required.

## **5.4 RAF/USAF Fairford**

5.4.1 RAF/USAF Fairford is not in the parish of Fairford but its presence has had a great influence on the settlements of Horcott and Fairford. It was built during WW2 and, effectively, cut Horcott off from the village of Kempford and the rest of Kempford Parish.

5.4.2 Presently under the provisions of the Military Lands Act 1892 (s14) the Secretary of State for Defence is empowered to make byelaws to regulate the use of land being used for military purposes. The Byelaws for RAF Fairford are currently under review.

5.4.3 Current provisions include height restrictions for buildings and a right to shoot over the adjacent Horcott Lake in order to avoid bird strikes. For this reason Horcott Lakes will need to be managed for the foreseeable future. In addition, there are tight restrictions on the flying of drones in this and the surrounding area.

## **6.0 Responses to 2020 Pre-submission consultation comments on Policies FNP8, FNP9, FNP10, FNP11, FNP12, FNP13**

6.1 In general responses from the statutory consultees were supportive of these proposals but various objections came from the representatives of landowners who would be adversely affected by the proposals in that, if accepted, the proposals would inhibit developments on their land. Where comments cover several policies, responses have been provided in the text on the specific policy concerned.

### **6.2 Policy FNP8 Protecting Local Green Spaces**

6.2.1 **CDC** have requested that the references to CDLP policies be deleted, leaving only the NPPF Local Green Space criteria to be met for each site. This has been done.

6.2.2 There seems to have been a basic misunderstanding in the **Abbey Mill Homes** response which claims that 'Part of the Yells Yard site is proposed for designation within the emerging plan as a local green space under Policy FNP8,' (p.2). This is not the case. Only 3 areas are proposed for this designation: Walnut Tree Field, Upper Green and Coln House playing field.

### **6.3 Policy FNP9 Protecting the Fairford-Horcott Local Gap**

6.3.1 **CDC** has queried whether this policy would be in conflict with LP policy DS4 and thence LP policies H3, H5, H7 and EC6. However, the policy intent is to ensure that any development that is otherwise appropriate in this location is located and designed in such a way as not to undermine its visual integrity as explained in P9.3. CDLP Policy DS4 refers to 'land that falls outside Development Boundaries and Non-Principal Settlements [and] is referred to as countryside, even if it is technically previously developed land.' The land comprising the

Fairford-Horcott Local Gap therefore certainly falls into this category. However, it is questionable whether all the particular policies CDC references are applicable to this site.

6.3.2 Policy H3 relates to affordable housing on rural exceptions sites and includes self-build one-off plots.

6.3.3 Policy H5 concerns housing for rural workers ie. where 'there is an essential need for a worker to live permanently at or near their place of occupation in the countryside'. It is difficult to see the relevance of this in the proposed local gap.

6.3.4 Policy H7 allocates particular sites for gypsies and travellers with the proviso in 3d that, 'Where a sufficient supply of pitches or plots cannot be achieved at the above locations new sites will be considered.' It is difficult to see how the probable size of a local authority traveller site is compatible with the aim of maintaining the essential open character of the gap.

6.3.5 Policy EC6 provides for the conversion of rural buildings provided that 'the building is structurally sound, suitable for and capable of conversion to the proposed use without substantial alteration, extension or re-building'. Since the only building (apart from a small facilities building for the football club) in the proposed local gap is a small Cotswold stone field shelter (a non-designated heritage asset) any conversion would necessarily involve 'substantial alteration, extension or re-building' and therefore the provisions of EC6 would not apply.

6.3.6 Thus the only relevant policy which might be impacted by the Policy FNP9 would be policy H3. Policy FNP9 9.1 states that 'proposals that may otherwise be acceptable outside a Development Boundary defined in Policy FNP1 will not be supported if they do not maintain its open character'. However, since the whole aim of this policy is to 'maintain an open character' it is unlikely that any proposed development would be in conflict with the provisions of CDLP Policy H3.

6.3.7 **Abbey Mills Homes** object to the inclusion of the smaller of the 2 fields described in p.3.2 of the Landscape and Local Green Space Study on the grounds that a) its 'ongoing and historic use for the storage of caravans and other machinery is not compatible with this policy', b) it does not 'fulfill the policy objective of being an important local green space' and c) development on this field would 'not lead to any coalescence concerns'.

6.3.8 a) The study recognizes the field's current use for caravan storage and such a use is not seen as incompatible with the policy as this does not harm the land's essentially open character. There has never been any objection to the established use of the land for storage purposes and the inclusion of the field in no way seeks to impede this use. In addition, the position of the field on the boundary of the Conservation Area (para. 3.2.2) does mean that it has a dual function in protecting the setting of the Conservation Area and in maintaining the open, rural landscape in which the settlements sit.

6.3.9 b) This policy does not define this field as 'an important local green space' (see 6.2.2).

6.3.10 c) This field is one of the few remaining to form what is an extremely narrow gap. At present an open vista is retained through from Cirencester Road to Horcott Road and these fields are an important feature which the Local Gap designation is designed to retain: a 'gap', not a narrow corridor.

6.3.11 The **Knight Frank** submission posits that the CDLP 'identifies Horcott as an integral part of Fairford' and that therefore Horcott 'is not treated as a separate settlement'. Additionally, the objection suggests that the 'statutory requirement to preserve the setting and significance of the Conservation Area provides ample control over development in this Local Gap area'.

6.3.12 There is in principle no contradiction between the functional definition of Fairford/Horcott as one overall settlement and the boundary showing that settlement having two distinct, visual components. However, there is sufficient historical evidence (para. 1.2.18 and Section 8 of the Character and Design Assessment and the 1834 map - para. 6.7.5 below) to justify the policy position purely on these, historical grounds. In addition, allowing development adjacent to the boundary is counter to the plan-led system as operated by the use of settlement boundaries (as per the CDLP). It is regretted that CDLP does not draw a distinction between the two settlements but even allowing for this, local gaps are justified on visual coalescence grounds alone.

6.3.13 Certainly some of the proposed Fairford-Horcott Local Gap is adjacent to the Conservation Area but not all and the Gap serves a far wider function (para. 3.0.1 and 3.0.2 of the Landscape and Local Green Space Study) unrelated to the important status of, and protections resulting from, the boundary of Conservation Area.

#### 6.4 **Policy FNP10 River Coln Valued Landscape**

6.4.1 **CDC** welcomed the considerations given to the River Coln Valued Landscape as green/blue infrastructure but is concerned that it is difficult to see how it would be implemented or what its practical effect would be. It is hoped that the additions/clarifications in Policy FNP10 supporting text will answer these questions.

#### 6.5 **Policy FNP11 Valuing Hedgerows and Trees**

6.5.1 We agreed with **CDC's** suggestion of some word changes and the Policy and supporting text have been revised accordingly.

#### 6.6 **Policy FNP12 Achieving High Standards of Design**

6.6.1 **CDC** recommended word change has been made.

6.6.2 An addition has been made to Appendix 3 Design: 'Proposals for new development are strongly encouraged to consider applying the Building with Nature Standards from the planning stage, and to seek the Building with Nature accreditation, in order to support the FTC in its ongoing efforts to improve biodiversity and sustainability in the town.'

#### 6.7 **Policy FNP13 Conserving Non-Designated Heritage Assets**

6.7.1 **CDC's** suggested changes have been included. A map showing the Cotswold Field Shelter in 1834 (see below) has been added as well as extra commentary for the Morgan Hall Park/Jones' Field designation. Following a Cotswold Archaeology Heritage Statement for Coln

House (October 2020), Applestone Court has been included in the NDHA list. An extra paragraph has been added to the Policy: 'Non-householder development on previously undeveloped land must allow for the evaluation of archaeological remains and the protection or investigation of non-designated heritage assets of archaeological importance. Archaeological investigation of any such sites must be carried out as required by the NPPF para.189.'

6.7.2 **Abbey Mill Homes** has challenged the inclusion of Yells Yard (No.7 in the list) as a non-designated heritage asset on the grounds that 'the buildings are curtilage listed and within the Conservation Area'. We accept that a part of the area designated as NDHA might be curtilage listed and have revised the boundary accordingly after consultation with CDC. However, we do not accept that simply being within a Conservation Area is grounds for deletion: many of the proposed NDHAs are within the Conservation Area.

6.7.3 **Knight Frank** would like to see the removal of the Cotswold Stone Field Shelter (No.30 on the list) on the grounds that it is not of architectural or historic interest, not old and not rare, leaving only landmark status (which it certainly has).

6.7.4 The evidence presented by Knight Frank acknowledges the fact that a barn could have been on the site before 1877/82, but argues that this one has been heavily altered. In fact, a parish map of 1834 (1834 Map GA P141MI71) shows this barn isolated in the field, much as it is today.



6.7.5 Detail from 1834 Map - Glos Archives P141MI71

6.7.6 It appears likely that the courtyard of barns referred to by CgMs was built around this much earlier barn. The reasons for the conclusion that in spite of the evidence of an earlier date, this particular building dates from the start of the C20th appears to be based solely on repair work on part of the site. However, the 1834 map shows a far earlier date for the barn, giving an age of at least 186 years, and the fact that it has undergone what appear to be unsympathetic repairs and that a dry stone wall has been allowed to collapse, suggests that the building needs more, rather than less, attention. There may well be other stone barns across the Cotswolds as a whole, but they are becoming rarer as buildings fall into ruin or are converted into homes; small barns such as this really are rare. The designation criteria of A (architectural interest), B (historical interest), C (age), and D (rarity) all stand.

6.7.8 **Response from Gloucestershire county Council Archaeologist** in email<sup>66</sup> to FTC re. Coln House Playing Field. Extract reads, 'The county Historic Environment Record informs that the site is of high archaeological interest. An archaeological evaluation in the northern part of the site established the presence of archaeological features at a depth of 0.32m below present ground surface which suggest the presence of an extensive Anglo-Saxon settlement and a wall dating to the medieval period was also recorded. Extensive evidence has also been recorded in the field to the west of the site including prehistoric features and a round barrow and further evidence of Anglo-Saxon settlement including sunken floored buildings and a possible hall. It is highly likely therefore that archaeological remains are present across the whole of the playing fields.

'Due to the potential for extensive and highly significant archaeological remains within the site any development proposals will need to consider the impacts of the proposals on such remains. Advice from this department will consider the extent of belowground impacts and whether archaeological investigation will be required in order to inform our advice and any necessary archaeological mitigation. The requirement for archaeological investigation will be based on the extent of the belowground impact. From our initial discussions my advice is to ensure where possible belowground impacts should be reduced which also applies to any proposed landscaping such as tree planting and drainage and that there would be no future plans for upgrade of the pitches which would have a belowground impact (as I am aware of from other sports pitch facilities).'

## 7.0 Summary

7.1 This study provides a proportionate evidence base to support three important, complementary policies of the NDP. Those policies do not necessarily rule out any form of development altogether and do not seek to impose a 'green belt by stealth'. Other policies of the plan make more than sufficient provision for the continued growth of the town over the next few years. These landscape policies seek to preserve the essential historic character of the town through this period of growth, for the enjoyment of residents and visitors alike.

## 8.0 Bibliography

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