



## **Fairford Neighbourhood Development Plan (Regulation 16 Consultation) Revised SA and Site Assessment Report only**

Following a clarification meeting with the independent examiner, Mr Andrew Ashcroft, to consider points raised on the Sustainability Appraisal on 10 May, Fairford Town Council has submitted a revised Sustainability Appraisal and Sites Assessment. These two documents only are now subject to consultation for a six week period, from Friday 9<sup>th</sup> June 2017 till 17:00 on Friday 21<sup>st</sup> July.

Copies of these documents are available to view on the Cotswold District Council's website:  
[www.cotswold.gov.uk/neighbourhoodplanning/consultations](http://www.cotswold.gov.uk/neighbourhoodplanning/consultations)

Hard copies are also available for inspection between 9:00 and 17:00 Monday to Friday at the Council offices on Trinity Road, Cirencester, Gloucestershire, GL7 1PX.

Copies are also available for inspection at:

Fairford Community Centre  
Monday – Friday 10:00 – 13:00

**All comments must be received by 17:00 on Friday 21<sup>st</sup> July 2017.**

### **There are a number of ways to make your comments:**

- Complete this form and email it to: [neighbourhood.planning@cotswold.gov.uk](mailto:neighbourhood.planning@cotswold.gov.uk)
- Print this form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX
- We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

All comments will be publicly available, and identifiable by name and (where applicable) organisation. Please note that any other personal information provided will be processed by Cotswold District Council in line with the Data Protection Act 1998.

### **How to use this form**

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box. Please repeat this section for subsequent comments relating to other sections of the plan.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	Mr Matthew Kendrick
<b>Address</b>	Unit 106 86-88 Colston Street Bristol
<b>Postcode</b>	BS1 5BB
<b>Telephone</b>	0117 930 0413
<b>Email</b>	matthew@grassroots-planning.co.uk
<b>Organisation (if applicable)</b>	Grass Roots Planning Ltd
<b>Position (if applicable)</b>	Director
<b>Date</b>	21 <sup>st</sup> July 2017

## **PART B**

**To which part of the document does your representation relate?**

Paragraph Number		Policy Reference:	FNP3
------------------	--	-------------------	------

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

<p><b>Please give details of your reasons for support/opposition, or make other comments here:</b></p> <p>Please see attached submitted statement (292 A3 MJK CC 210717 Representations to Fairford Neighbourhood Plan inc. Appendices).</p> <p style="text-align: right;">(Continue on separate sheet if necessary)</p>
--

<p><b>What improvements or modifications would you suggest?</b></p> <p>Please see attached submitted statement.</p> <p style="text-align: right;">(Continue on separate sheet if necessary)</p>
---

Please make sure any additional pages are clearly labelled/ addressed or attached.

**REPRESENTATIONS TO THE FAIRFORD  
NEIGHBOURHOOD PLAN**

**ON BEHALF OF CLIFTON HOMES LTD**

**LAND TO THE EAST END, FAIRFORD**

**July 2017**



**REPRESENTATIONS TO FAIRFORD TOWN COUNCIL'S  
NEIGHBOURHOOD PLAN (REGULATION 16 CONSULTATION)**

**ON BEHALF OF CLIFTON HOMES LTD**

Grass Roots Planning Ltd  
86-88 Colston Street  
Bristol  
BS1 5BB

Tel: 0117 930 0413  
Mob: 07813 091 861

Ref: 292/A3/CC/MJK  
Date: 21<sup>st</sup> July 2017

Email: [enquiries@grassroots-planning.co.uk](mailto:enquiries@grassroots-planning.co.uk)  
Web: [www.grassroots-planning.co.uk](http://www.grassroots-planning.co.uk)

**COPYRIGHT**

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Grass Roots Planning Ltd.



## 1.0 INTRODUCTION

1.1 On behalf of Clifton Homes, Grass Roots Planning have been instructed to prepare and submit representations to Fairford Town Council's Neighbourhood Plan (Regulation 16 Consultation). Our representations primarily relate to land at East End, Fairford, which is designated as an allocation within the draft plan under policy FNP3.

1.2 Whilst we appreciate that only the revised Sustainability Appraisal and Site Assessments Documents are currently out for consultation, we consider this to be an appropriate opportunity to respond to comments and queries raised by both the Examiner and Cotswold District Council, which were published after the previous consultation date of the 11<sup>th</sup> April 2017, and the Examiner's notes from the clarification meeting, on the 25<sup>th</sup> May 2017.

1.3 We have previously made representations seeking land at East End, Fairford to be allocated and we are pleased that after consultation with the Town Council, the site was considered appropriate for residential development to include retirement homes, and parking to serve the adjacent surgery.

1.4 We strongly support this allocation and consider that whilst providing housing to meet local need is important and will help boost the District's housing land supply, the site will also provide infrastructure that local people have highlighted as a significant requirement through the consultation process.

1.5 This document sets out our opinions on policy FNP3 defined in the draft Fairford Neighbourhood Plan and seeks to respond to comments and queries raised by Cotswold District Council, local ward members, and the Inspector. In particular, we will set out answers to the following queries or concerns that have been raised and these can be summarised as follows:

- The site's viability, with regards to the ability to deliver parking for the NHS surgery and the retirement homes;
- Whether parking for the GP Surgery is an appropriate benefit;
- Restricted occupation for older people;
- Whether any ecological surveys have been undertaken;
- Whether there is a Flood Risk in relation to surface water in the local area;
- Access via East End;
- Whether the site has been assessed in terms of its historical impact;
- The impact on views from PROWs; and
- Whether the allocation of other sites in Fairford is appropriate.

- 1.6 As you may be aware, we attended a meeting to discuss proposals for the site at East End with the Town Council on the 23<sup>rd</sup> August 2016 and received some positive comments regarding the potential development of the site. Further details of this meeting are set out in Section 2 of this statement.
- 1.7 We therefore welcome the allocation of the site for development within the submission Neighbourhood Plan.



## 2.0 THE SITE

- 2.1 The site currently accommodates a dwelling known as 'Pengerric', a single storey detached bungalow of poor quality design, which does little to contribute towards the character of the Conservation Area. The site is enclosed by hedgerows and mature trees on its northern and eastern boundaries. On the southern and western boundaries lies existing residential development comprising predominantly semi-detached and detached dwellings, of both a traditional and contemporary nature.
- 2.2 East End has a variety of facilities, including a Public House, elderly accommodation, surgery, bowling club, coffee shops, a pharmacist and local supermarket. Therefore, we consider that this is an appropriate location as the site is highly accessible to these services and the Town Council has agreed with this. This has been further accepted in the updated Sustainability Appraisal & Site Assessment Report, which assesses the site as being '<1,000m walking distance of the town centre', which was concluded as a positive effect of development in this location. We support this assertion.
- 2.3 The site is not subject to any designations such as a SSSI, SAC, AONB, but it does lie within the Conservation Area and adjacent to the settlement boundary. There are several listed buildings in proximity, including Moor Farm, East End House, and Morgan Hall. Cotswold District Council considers that the wall on the northern boundary of the site should be treated as curtilage listed as it forms the setting to Morgan Hall.

### *Consultation Stages*

- 2.4 A request for pre-application advice was submitted to Cotswold District Council in August 2015 (Application Ref: 15/03728/PAYPRE) with regards to the proposed development of the site. A response was received in November 2015 which provided advice in respect to matters such as the principle of development, heritage, landscape, biodiversity, trees, archaeology, access/transport, flood risk and drainage, contamination and environmental health and refuse and recycling provision. The response identified that the predominant issue would be the impact upon the Conservation Area and curtilage listed wall which forms the northern boundary of the site and connected to that, the impact on the setting of Morgan Hall.
- 2.5 There were no significant issues raised in relation to flood risk and drainage or highways, and these responses can be found as Appendix D to this document.
- 2.6 Following receipt of this pre-application advice, the applicants sought to meet with the Town Council to ascertain their views on the proposals for the site. This culminated in a meeting with the Neighbourhood Plan Steering Group and local residents on the 23<sup>rd</sup> August 2016, and the

relevant consultants and the applicant attended this to discuss the proposals presented in letters, which were sent out previously in July 2016. Details of this letter, including the masterplan that was sent out at that time, can be found in Appendix E to this document.

2.7 The meeting was a positive engagement with the local community who indicated that they may support the development subject to a number of considerations:

- The previous masterplan included a large level of public open space - whilst the community liked the idea of this they considered that there is already a large level of POS in the town, and the priority should be parking for the GP Surgery which lies in close proximity;
- This is because the current provision for the surgery is inadequate and results in on-street parking, which means that it is difficult for staff to park their cars;
- Therefore, the Steering Group proposed that parking should be provided on the site to provide parking for NHS staff, so that the car park outside of the surgery itself could become less busy and free up spaces for elderly users who cannot walk far without difficulty;
- The previous masterplan incorporated two storey dwellings, and the scale of these and the barn-style building was considered to be too large and not part of the local vernacular;
- Comments were made that a lower form and scale, such as a cottage-type development, could be more supported;
- Drainage problems in the surrounding was raised as an issue;
- Two options were presented by residents in relation to drainage: 1) that the Keble fields development agreed a strategy by which Thames Water would upgrade the drainage facilities in the town; or 2) the other option would be to take the site 'off-grid' and provide package treatment facilities; and
- Some residents mentioned that there is not a particular need for big detached properties in Fairford; instead, there is more of a need for smaller accommodation which would be suitable for elderly people looking to downsize.

2.8 It was considered that subject to the above points being considered and met where possible, local residents and the Neighbourhood Plan Steering Group could be prepared to support a forthcoming application or allocation in the plan.

2.9 Following this meeting, the Town Council along with the NP Steering Group began drafting policies for the Fairford Neighbourhood Plan. Whilst this work was being undertaken, technical work was instructed by the applicants and plans altered to address the issues raised by local residents.

- 2.10 This resulted in the site being allocated for development proposals in the draft Neighbourhood Plan (Policy FNP3), which was submitted for examination in February 2017.
- 2.11 We consider that the above engagement undertaken by our clients meet favourably with the spirit and requirements of the Localism Bill.

### 3.0 THE PROPOSED DEVELOPMENT

- 3.1 In response to issues raised by Town Council members, in relation to scale and form of the previous development proposed (please see Appendix E for a previous version of the masterplan), and a desire to see parking provided on the site to serve the nearby doctor's surgery, our architect re-considered the layout and sought to address these concerns by providing lower, more 'cottage-like', forms of development at 1.5 storeys in height, that better reflects the character of development found at East End. We understand that Town Council members were happier with the type of architecture now proposed.
- 3.2 The revised layout now provides for 4 retirement apartments on the site's frontage onto East End, a terrace of three 1.5 storey cottages, and three single storey bungalows. Most importantly in respect to meeting the aspirations of the local community, 20 parking spaces, and a footpath link to serve the adjacent GP surgery, as requested by the Town Council, are provided in the north-western corner of the site.
- 3.3 These dwellings will be of a design, scale and layout which are appropriate to the Fairford Conservation Area and will draw heavily on the scale and height of those historic cottages found on East End. This will be achieved through the use of materials such as Cotswold Natural Stone (or similar), to respect the character of the dwellings which surround the site. By doing this, we believe our proposal will fall in line with guidance set out within point five of Policy FNP3, and Policy FNP16 – *'Achieving high quality standards of design'*.

#### 4.0 **RESPONSE TO ISSUES RAISED THROUGH THE EXAMINATION PROCESS**

##### *Examiner's Clarification Note*

4.1 Following a meeting on the 10<sup>th</sup> May 2017, the Inspector published a series of questions in relation to the policies set out in the Fairford Neighbourhood Plan. In relation to policy FNP3, the following questions were asked:

- Has the policy been tested for its viability?
- In particular, have the implications of the first criterion been specifically tested in general terms and with the site owners in particular?

4.2 A response from the Neighbourhood Plan Steering Group on the 20<sup>th</sup> June 2017 provided further information in relation to our meetings with the Town Council and stated that the two meetings with us had clarified the acceptability of the site's development including its viability. The response also identified that the policy requirements must be accepted by the applicants as a condition of support for the allocation which allows an infrastructure problem to be rectified.

4.3 We have also prepared separate evidence, undertaken by the applicant (Clifton Homes), who are representing the landowner, which provides a brief summary in relation to the site's viability and the ability to deliver not only the parking for the doctor's surgery but also the retirement homes. This can be summarised as follows and found as Appendix B to this document:

- A retirement company is already interested in purchasing the site and has made an offer acceptable to our client and landowner with whom there is a commercial agreement to sell the land subject to a minimum price – the offer received achieves this minimum price;
- The development of the new retirement homes will achieve a satisfactory return of circa 22% gross profit margin which is close to industry standards;
- This gross profit margin includes the cost of providing the parking and reflecting the sales value of the retirement homes;
- The costings for the parking and the construction of the homes on site have been undertaken by a qualified quantity surveyor;
- The preference for the parking is a rural-type gravel finish to minimise its visual impact whilst also ensuring it is easily maintainable; and
- Whilst the impact of the loss of land, and a significant additional cost for parking will impact the profits of the development, the figures produced show that what is proposed as part of policy FNP3 is a viable and deliverable scheme.

4.4 We hope that the information provided by the Town Council can be supplemented by this evidence to alleviate any concerns the Inspector may have regarding the deliverability of the site and therefore its ability to meet local need and overall housing supply.

*Whether parking for the GP Surgery is an appropriate benefit*

4.5 Three concerns were raised by a ward councillor and Cotswold District Council, regarding the provision of parking for the GP Surgery on site. The concerns raised were that Fairford Surgery is already '24% below its ideal spatial size', and therefore the provision of parking would only exacerbate the problem of lack of space, the Sustainability and Transformation Plan states that 'of significance, is the Primary Care Strategy, which indicates an increased role for GP Surgeries', and lastly, that 'if the GP Surgery were to move, the benefit would be lost for this development'.

4.6 The main documents referred to are the Primary Care Strategy (2016 – 2021) and the Sustainability and Transformation Plan, undertaken by Gloucestershire County Council. Having examined these documents in detail, we have found that the Primary Care Strategy sets out a vision of:

- Attracting and retaining the best staff through promoting Gloucestershire as a great place to live and work, and offering excellent training opportunities;
- Ensuring good access to primary care 7 days a week;
- Creating a better work-life balance for primary care staff;
- Maximising the use of technology;
- Reducing bureaucracy; and
- Supporting practices to explore how they can work closer together to provide a greater range of services for large numbers of patients.

4.7 The vision highlights the success in providing additional appointments per month, including evening and weekends. Therefore, we consider that the reference to the increased role of GP Surgeries envisaged by the Primary Care Strategy doesn't necessarily result in an increased number of patients, or a required expansion of the current surgery, or more GPs - it's simply spreading the number of patients over a longer time period, to meet local needs for access to medical services.

4.8 On the current registered list sizes, 90% of practices in the Gloucestershire area are in buildings smaller than recommended sizes (Page 23 of the Primary Care Strategy Plan). Almost a quarter of practices are in buildings significantly smaller; therefore, the surgery at Fairford is not an exception. Whilst this is clearly an issue, providing parking to meet the problems faced by local

residents, staff, and patients now will alleviate issues of space and provide the necessary infrastructure which has been highlighted as an issue for local people in this plan process.

4.9 The adopted Primary Care Strategy also sets out a prioritised Primary Care Infrastructure Plan (PCIP). This sets out where investment is anticipated to be made in either new or extended buildings. Hilary Cottage Surgery in Fairford is not considered to be a prioritised surgery that requires extending or replacing at the current time.

4.10 Furthermore, the Hilary Cottage (Fairford) Patient Participation Group states within their most recent published meeting minutes the following:

*'as discussed at the previous meetings, and as detailed in the recent brief from the partners, despite the new housing already being built in and around Fairford, numbers have not greatly increased. Cirencester is deemed more at need for new premises with the large planning increase in housing'.* (Paragraph 6.1, minutes from 30<sup>th</sup> June 2016).

4.11 We therefore consider that Fairford surgery is not currently a priority for the South Cotswolds Local area and according to the Town Council, *'the NHS has stated that the present facility can be expanded to cope with increased doctors/patients'* (Paragraph 9.13 of the update to the Sustainability Appraisal). Therefore should an expansion of the current surgery be required in the future, the development of the site at East End will reduce the need to consider the level of car parking available near to the site.

4.12 The surgery lies within a highly sustainable location and therefore many residents are able to walk or cycle to the facility. We do not think it would be prudent to close such a facility even in the long-term, where it is a significant benefit to local people being located in proximity to existing residential dwellings.

4.13 As such, whilst we appreciate concerns regarding the expansion of the surgery, a large proportion of this is unfounded and/or has a similar situation for the majority of GP Surgeries in Gloucestershire. The development of the site at East End will provide a significant benefit in providing dedicated parking for the surgery in perpetuity, which will resolve current issues now for local people and staff by reducing the level of on-street parking in the area.

#### *Restrictive Occupation*

4.14 Concerns were raised by Cotswold District Council in relation to the ability to restrict occupation on the dwellings – as set out above, the applicants have already received an offer from a retirement company to purchase the site (Blue Cedar Homes Ltd). In the event that a planning

application comes forward, the applicants will be happy to place a condition to ensure that the homes will be restricted for occupation for elderly people in perpetuity. Please see Appendix C which summarises Blue Cedar Homes' position in respect to the purchase of the site.

#### *Assessment of ecological impact*

- 4.15 An ecological impact assessment was undertaken in July 2016 following a series of surveys on the site (undertaken in September 2015 and July 2016), to ascertain any potential ecological assets and assess any statutory designations that may be affected by the development proposals.
- 4.16 This identified that within the surrounding context of the site, the nearest statutory designated area is the Cotswold Water Park Site of Special Scientific Interest (SSSI), which is located approximately 700m to the south-east of the site. Approximately 1.2km away, also to the south-east is the Whelford Meadow SSSI. A priority habitat lies adjacent to the northern boundary of the site, within the grounds of Morgan Hall.
- 4.17 The majority of the site comprises managed semi-improved grassland, which is considered to be of low ecological value. There are trees and hedgerows present along the site and this provides some level of ecological value, mostly due to minor opportunities that it offers faunal groups such as bats and birds.
- 4.18 When undertaking site surveys, there was no evidence of Great Crested Newts, Badgers, or other protected species.
- 4.19 Therefore, the current recommendations for mitigation are to provide a range of new tree and shrub planting within the application site and it is recommended that local native species are considered. Consideration should also be given to installing bat boxes where dwellings front onto open spaces, and House Sparrow nesting boxes should also be incorporated.
- 4.20 A copy of the Ecological Impact Assessment which was undertaken in July 2016 can be found as Appendix F.
- 4.21 Furthermore, it has been confirmed by the applicant's ecologist that as the site represents a semi-improved grassland field, it is not considered to fall within the priority habitat classification identified within the grounds of Morgan Hall. Given this and the small-scale nature of any proposals, it is further considered any direct (i.e. habitat loss) or indirect (through construction effects) impacts on this adjacent habitat would not be significant and no specific mitigation would therefore be required.



4.22 Therefore, we consider that the Town Council’s sustainability appraisal can reduce the ‘potential negative effect’ in relation to Biodiversity to ‘neutral’, or even ‘potential positive’ effect. This is because through ecological mitigation, including the provision of bird and bat boxes, as well as a range of diverse flora and fauna planted within the public open space, the site’s ecological value may well be increased.

4.23 As the development proposed has now changed, the ecological assessment will be updated and different mitigation proposed, but the baseline information remains the same.

4.24 This therefore responds to concerns raised over whether an ecological assessment has been undertaken for the site.

#### *Flood Risk and Drainage*

4.25 Flood risk and surface water drainage have been raised as an issue, both by the District and Town Council. The Flood Maps for planning show that the site is considered to be at low risk from surface water flooding (see figure 1 below). However, as can be seen on the maps, East End itself and the surrounding roads are considered to be at high risk from surface water flooding.

4.26 A small part of the site is identified as being at low risk as shown in light blue but built form can be steered away from these areas and the current master plan allows for this.

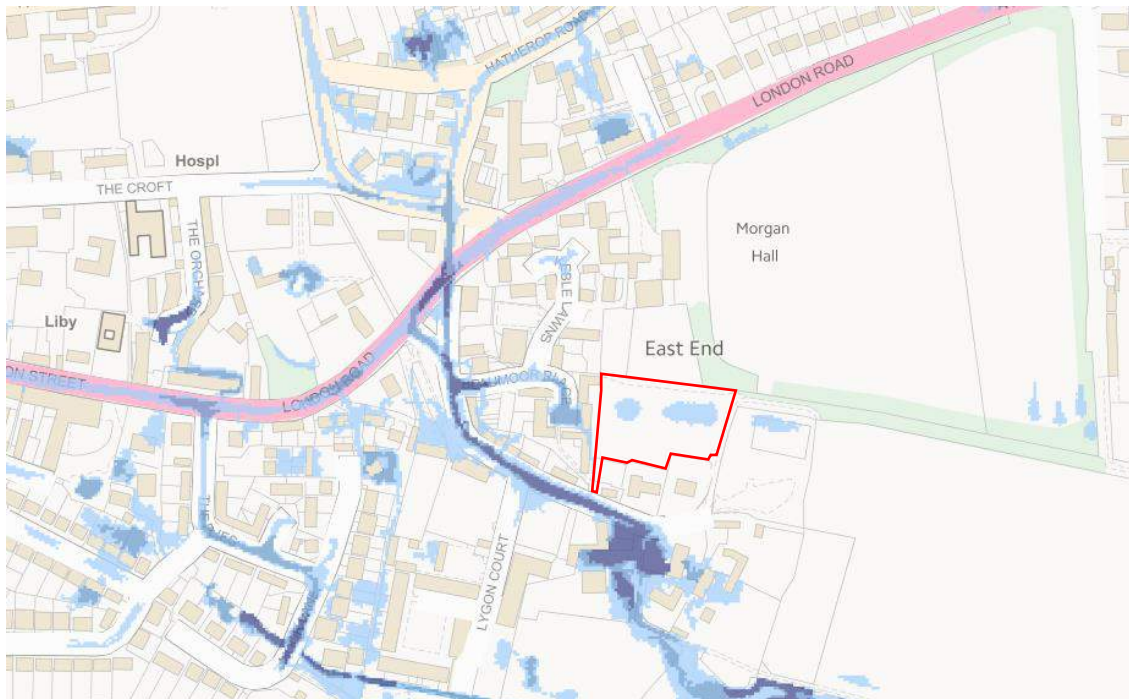


Figure 1. Environmental Maps showing risk of surface water flooding

- 4.27 In light of this the proposed development would seek to reduce surface water run-off rates back to or below greenfield rates and the applicants would strive to improve the existing situation.
- 4.28 Technical work will be undertaken to support any future application for the site and this will ensure a suitable drainage strategy is prepared that mitigates surface water flooding effects and improves the situation by attenuating to below greenfield run-off rates.

*Access via East End*

- 4.29 Concerns were raised by the Town Council's site assessments sheet that access into East End may be a concern. Within the pre-application advice sent to the applicants, the highways authority raised no issue provided that adequate visibility splays and the correct number of parking spaces could be implemented.
- 4.30 In addition to this, technical work has been undertaken by consultants Key Transport who are currently progressing a Transport Assessment for the site. The work undertaken to date has included a speed survey and site assessment to ascertain the acceptability of existing visibility splays for the entrance into the site.
- 4.31 Within their pre-application advice, Gloucestershire County Council advised that a 54m visibility splay would be required for sites where a 30mph speed limit was in place, such as this site. Key Transport therefore undertook a speed survey in August 2016 to ascertain whether cars really would travel at this speed past the site and found that the majority of cars were far below the speed limit in place. As such, it was considered that visibility splays of 19m to the west, and 21m to the east are required and these have been achieved by bringing the proposed carriageway on the site further forward. Details of the speed survey can be provided on request.
- 4.32 In addition to this, the most westerly detached dwelling will have a covenant placed on it to ensure that no large plants or hedgerow can be placed in the front garden that could potentially impinge visibility. This will ensure that around the top bend of the road within the site, an adequate visibility of 18m is achieved.
- 4.33 We therefore consider that there are no issues in relation to the proposed access from East End into the site, and this complies with the advice given by the highways authority during the pre-application process.

### *Historical Assessment*

4.34 A full historical assessment will be undertaken to support any future planning application for the site. Our archaeological consultants have already undertaken a Geophysical Survey which can be found as Appendix G to this document. The results of this can be summarised as follows:

- No magnetic responses were recorded that could be interpreted as being of archaeological interest;
- A small number of amorphous magnetic responses in the south of the area are likely to be of natural origin, possibly a result of natural pitting within the underlying limestone geology; and
- Widely spaces and parallel linear anomalies are visible across the site which is likely to be a result of medieval ridge and furrow cultivation.

4.35 The historical assessment will be informed by the design proposals for the site. As previously highlighted in earlier representations, we consider that there is limited inter-visibility between Morgan Hall and the site due to the high Cotswold stone wall and intervening vegetation. This is acknowledged by the Neighbourhood Plan Steering Group and we consider this to be a pragmatic approach to the assessment of the site.

4.36 An assessment of the historic environment will assess the full range of both designated and non-designated heritage assets, including the Conservation Area, and the setting of the listed buildings, as per the District Council's request within the pre-application advice.

4.37 Impact on these heritage assets will be limited and can be mitigated through an effective design proposal, such as that which we have presented in Appendix A, which is an extract of the current layout for the site. The following design changes have been made since our discussions with the Town Council, and we consider that this fully respects the quality and setting of the stone wall and the Conservation Area:

- Pulling the built form further away from the curtilage listed wall of Morgan Hall;
- Providing a proposed new 1m high stone wall to delineate the public open space from the existing stone wall to be retained, which provides a clear distinction between old and new;
- Providing 4 retirement apartments on the site front onto East End, a terrace of three 1.5 storey cottages, and three single storey bungalows. The development proposed will be subservient to the listed buildings and surrounding traditional development in scale, form and mass;

- The provision of 20 car parking spaces which will be softened through the provision of planting;
- The provision of this planting will further limit visibility between the site and Morgan Hall; and
- The existing vegetation which covers the existing stone wall will be removed during the development of the site and the wall repointed if required.

4.38 The majority of the development would not be visible from the public highway and therefore would not be prominent within the Conservation Area. As such, the perception of the area would not be altered significantly.

4.39 Overall, we consider that through an appropriate design and layout for the site, openness to the curtilage listed structure, and therefore the setting to Morgan Hall, can be retained and the development of the site will have a positive impact on the Conservation Area.

*Views from the Public Rights of Way*

4.40 Concerns were raised in terms of impact on the views from the Public Rights of Way (PROWs) that lie within and adjacent to the site. Whilst we appreciate that the view will be changed permanently, as would with any greenfield site, the public rights of way in this instance are not in a particularly rural location.

4.41 The site is surrounded by existing residential development and therefore the change in view will not alter so drastically that it would have a serious negative effect on this occasion. Both Public Rights of Way will be retained and enhanced through the provision of open space.

*Assessment of Site Alternatives*

4.42 Cotswold District Council are currently preparing a new Local Plan to cover the period 2011 – 2031. The Plan has reached Regulation 19 Consultation but is yet to go to examination. Currently, the council have allocated two sites in Fairford to meet the required housing need of 77 dwellings over the plan period.

4.43 This includes a site at Milton Farm (Ref: 35B) and Faulkners Close (Ref: F44). When displayed against land at East End, the Sustainability Appraisal prepared by the Neighbourhood Plan Steering Group shows the following:

	<b>SA/SEA Objectives</b>							
	Environmental Quality	Biodiversity	Climate Change	Historic Environment & Landscape	Land Resources	Population & Communities	Health & Well-being	Economy & Enterprise
<b>Site Assessments</b>								
F35B Milton Farm	-?	0	-	0	-	-	0	0
F44 Faulkers Close	-?	-	-	0	0	-	0	+/-?
FNP 3 East End	-	-?	-?	0	0	+	+	0

*Table 1. Assessment of Sites*

4.44 Aside from the fact that we consider that the overall required number of dwellings in the draft plan should increase, as can be seen from above, the site at East End scores more positively than the two currently allocated sites in the draft Local Plan. As we have already stated above, the effect on biodiversity on our own site can be taken to a neutral or even positive benefit with the technical information provided. Furthermore, the impact on the environmental quality will be lessened as drainage work to be undertaken will improve the existing situation in the local area and reduce the risk of surface water drainage.

4.45 As such, we consider that the Neighbourhood Plan Steering Group has assessed the sites correctly and allocating the site at East End is preferable and has less technical constraints than other sites which have currently been allocated in the Local Plan. The site at East End will also provide a significant benefit to the local community in the form of parking for the surgery and retirement homes for local need.

*Amendments to Policy FNP 3*

4.46 We previously raised a number of issues in relation to the policy details of the allocated site and further details of this can be found in our representations made in December 2016. In summary, the concerns raised were as follows:

- The policy previously required the delivery of parking prior to occupation of the first dwelling. We therefore requested that this element of the policy be changed to allow for the occupation of 3 of the dwellings, to provide the cash flow to deliver the requested

parking for the surgery. The policy has now been changed to reflect this request and we support this fully.

- Previously, the policy only allowed for dwellings of 1 storey in height; we respectfully requested a change to 1.5 storeys to provide a good mix of retirement style living options. This has also been amended to reflect our request and we support this element of the policy.
- Our final request was to amend the proposed allocation development boundary line presented in the inset maps within the document. This was to ensure that the boundary line covered the whole site, to allow the delivery of both the car park and the public open space alongside the boundary wall to Morgan Hall. This has now been amended of part of inset map 3, and therefore we fully support this element of the policy.

4.47 With the changes suggested, the site would provide enough revenue to pay for the properly consolidated car park and footpath to the surgery whilst also providing a good variety of retirement style housing, a key benefit to the local area. This has now been further evidenced by the supporting statements from Clifton Homes Ltd and Blue Cedar Homes which identify that the site is viable and deliverable.

## 5.0 **CONCLUSION**

- 5.1 In conclusion, we consider that pro-active engagement with Fairford Town Council has resulted in the allocation of a site that is deliverable and suitable to the developer as well as providing a significant infrastructure benefit for the local people. Homes will be provided to suit local needs in the form of retirement properties and parking will be provided for the NHS surgery.
- 5.2 We have assessed the site in terms of development plan policies and have undertaken technical work which will support a forthcoming allocation and application for permission, and have found that no technical constraints would outweigh the benefits of this development.
- 5.3 We therefore whole-heartedly support Policy FNP3 which has come forward as a result of collaborative and pro-active thinking with Fairford Town Council and the NP Steering Group, and we look forward to working closely with members in future as part of the application process.

# **APPENDIX A – CURRENT MASTER PLAN FOR LAND AT EAST END, FAIRFORD (JULY 2017)**



House/Type	Number	Type	Sqft	Total Sqft	Sqm	Total Sqm
<b>Schedule</b>						
A	1	3 bed 1 st. sur/gar/low	1000	1200	93	93
B	3	3 bed 2 st. house	900	2700	84	252
C	1	3 bed 2 st. house	1050	1350	97	122
D	1	4 bed 2 st. sur/gar/low	1300	1300	121	121
Apt 2	2	2 bed apart-ment	630	1260	93	118
Apt 3	2	1 bed apart-ment	530	1060	51	102
<b>Totals</b>	<b>10</b>			<b>8410</b>		<b>783</b>



East End

Site Layout

1:500

Note:

Copyright is retained by Big Picture Design.

- Legend**
- Site boundary
  - 2m high cotswold stone wall
  - 1.8m high closed boarded gate
  - 1.8m high closed boarded fence
  - 1m high timber gate
  - Patio area
  - Clothes drying line
  - Proposed tree/shrub planting
  - Proposed timber bench
  - Existing tree planting to be retained
  - Grass/lawn area
  - Tarmac surface
  - Bonded gravel surface

**BIG PICTURE DESIGN**

**CLIENT:**  
Clifton Homes

**PROJECT:**  
Land at East End, Fairford

**DRAWING TITLE:**  
Site Layout

**SCALE:** 1:500@A3  
**DATE:** 20/05/2016  
**DRAWING NUMBER:** 13086/002

**DRAWN:** JNM  
**REVISION:** B

**APPENDIX B – LETTER FROM CLIFTON  
HOMES LTD (JULY 2017)**

Coral Curtis  
Grass Roots Planning Ltd  
Unit 106  
86-88 Colston Street  
Bristol BS1 5BB

Date: 17<sup>th</sup> July 2017

Dear Coral

**Land at East End, Fairford.**

I am writing to set out the viability of our proposed scheme at East End, Fairford. This is a well-located small site on East End, it is near an active Bowls Club and very well situated for the local health centre. Its quiet surroundings are ideal for a retirement community.

Our planned development will include a communal garden with Summerhouse that will allow residents to meet and congregate with the rest of the community. Our costings indicate that the development of the new retirement homes will achieve a satisfactory return of circa 22% gross margin. We have already received an acceptable offer from a company specialising in providing retirement properties, Blue Cedar Homes, and discussions are ongoing with them. We have also instructed solicitors to begin drafting an agreement for the site's delivery.

The costings have been completed in a conservative manner by a qualified quantity surveyor with appropriate figures included to allow a high-quality development to be built. Due to the commercially sensitive nature of these costings we can only provide these confidentially to the Inspector and Council if requested. We have looked at the whole housing market in the round to ensure that our assumptions are realistic.

Our QS team have calculated the costs of providing the additional 20 parking spaces for use of the Health Centre staff. Our preferred surface is a rural type gravel finish. We estimate a cost of £35,000 to provide this facility and we have allowed for this in our figures, as well as a contingency cost. Clearly whilst there is a double impact of the loss of land and a significant additional cost to provide the car parking, our figures maintain this is a viable and deliverable scheme.

Should you require any further information please do not hesitate to contact me.

Yours sincerely



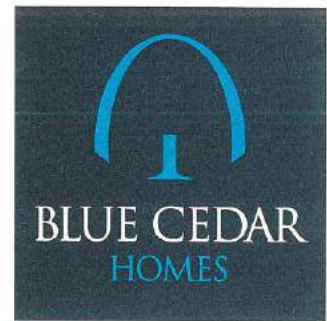
Jonathan Amos  
Clifton Homes

# **APPENDIX C – LETTER FROM BLUE CEDAR HOMES LTD (JULY 2017)**

Our Ref: ST/FairfordNP

20 July 2017

Miss C. Curtis  
Grass Roots Planning Ltd  
Unit 106  
86-88 Colston Street  
Bristol  
BS1 5BB



Dear Miss Curtis

**Re: Land at East End, Fairford**

I am writing in support of the above site, which is a proposed designation within the draft Fairford Neighbourhood Plan under policy FNP3, for retirement housing. Blue Cedar Homes have made and had an offer accepted for the site and solicitors have been instructed.

Blue Cedar Homes are a private retirement homes specialist operating in the South West of England. Our product is very unique and different to that offered elsewhere in the retirement marketplace. All of our homes are future proofed to allow people to 'rightsize' (downsize) at an early age and help reduce the likelihood of needing to move when unforeseen circumstances dictate. Our homes can be adapted as older people's needs progress and we see this as key to what we do. All of the properties benefit from estate maintenance – both communal and individual.

Typically, our schemes comprise 10 to 12 retirement dwellings around a central garden together with a summerhouse. Our developments are high quality, bespoke, low density schemes which offer the over 55's a high quality, versatile environment, enabling them to keep their independence and active lifestyles. Our properties are predominantly detached, including bungalows.

Blue Cedar Homes have several sites within Cotswold District Council. A planning permission was achieved at Broadway Road, Willersey in July 2016 and is currently under construction (Application No. 16/01572/FUL). When complete, it will deliver 10 retirement properties. In addition at the end of 2016, Blue Cedar Homes purchased the former Hospital site at Moreton-in-Marsh. An application is due to be submitted imminently and will seek permission for the redevelopment of the site to provide 19 no. retirement dwellings.

The offer accepted for the site at East End, Fairford includes the delivery of the car park and we are willing to ensure this is delivered prior to the occupation of the fourth dwelling.

220 PARK AVENUE  
AZTEC WEST  
ALMONDSBURY  
BRISTOL BS32 4SY  
TEL: 01454 201166

[www.bluecedarhomes.co.uk](http://www.bluecedarhomes.co.uk)



We have carried out significant research in the Cotswolds and are confident that our type of retirement properties will be well suited and indeed much needed in Fairford. The site itself is a most sustainable and ideal location for Blue Cedar Homes. Its central position makes it appropriate for retirement housing.

If considered necessary by the District Council, Blue Cedar Homes are happy to accept a condition to restrict occupation for residents, preferably aged 55 and over. Indeed, Cotswold District Council attached such a condition, Condition No. 13, for the permission of our site at Willersey which states that;

13 Unless otherwise agreed in writing with the Local Planning Authority, occupation of Plots 1-10 inclusive of the development hereby approved shall be limited to residents that are:

- A single person not less than 55 years of age, or
- Joint residents one of whom is not less than 55 years of age, or
- A person not less than 55 years of age living with their partner, spouse or cohabitant, or
- A surviving widow, widower or cohabitant of any resident who was over the age of 55.

Elsewhere in the country, including the Vale of White Horse and North Somerset, a condition restricting occupancy age has been imposed and we are more than happy to accept this.

If you require any further information on our retirement product and operation, please do let me know.

Yours sincerely

A handwritten signature in black ink that reads "S. Tofts".

**Simon Tofts**  
**Planning Manager**

Email: [simon.tofts@bluecedarhomes.co.uk](mailto:simon.tofts@bluecedarhomes.co.uk)

# **APPENDIX D – PRE-APPLICATION RESPONSE (AUGUST 2015)**

## Highways Development Management

Shire Hall  
Gloucester  
GL1 2TH

Katherine Brommage  
Cotswold District Council  
Trinity Road  
Cirencester  
Gloucestershire  
GL7 1PX

email: mark.sweet@gloucestershire.gov.uk

Please ask for: Mark Sweet

Phone: 01452 425530

Our Ref: C/2015/034739

Your Ref:  
15/03728/PAYPRE

Date: 08 October 2015

Dear Katherine Brommage,

### **TOWN AND COUNTRY PLANNING ACT 1990 HIGHWAY RECOMMENDATION**

**LOCATION: Land at East End Fairford**

**PROPOSED: Proposed residential development for up to 9 residential dwellings and parking space and rear amenity garden space. (second option scheme of 7 dwellings)**

I have the following comments on the pre-application enquiry received on the 4th September 2015 for up to 9 dwellings.

#### **Site Context**

The site access is proposed from East End a class 4 residential road off the main London Road A417 subject to a 30mph speed limit.

There has been no reported collisions in the vicinity of the site in the past 5 years according to the police collision database.

There are existing public rights of way footpaths around the site including BFA30 running east to west through the northern edge of the site and BFA28 which runs along the eastern side of the site from East End to join BFA30 in the northeast corner of the site. Finally there is a public footway from Beaumont Place adjoining East End adjacent to the proposed site entrance.

There are regular bus services in Fairford to Cirencester and surrounding areas although slightly distant from the site in the centre of Fairford.



## **Proposed Development**

The pre-application proposals include 3 options for residential development on this site on the south east side of Fairford.

Options 1A and 1B both propose 9 three and four bedroom dwellings on the site. Option 1A proposes a cul-de-sac shared access road with a footpath to linking to some of the dwelling frontages, whilst Option 1B proposes a one way shared access loop road around the development. Option 2 proposes 7 three and four bedroom dwellings accessed via a shared access road into a courtyard parking and manoeuvring area.

All three options involve the demolition of the existing dwelling on the site 'Pengerric' and creation of a new site access from East End road into the site.

## **Development Assessment**

The proposed site access from East End road needs to illustrate visibility splays in accordance with visibility standards in Manual for Gloucestershire Streets (MfGS) of 54m along the nearside carriageway edge from 2.4m inside the centre line of the site entrance. Otherwise the visibility requirements of the junction should be commensurate with the 85th percentile wet weather adjusted recorded vehicle speeds from speed surveys carried out in accordance with TA 22/81 of the Design Manual for Roads and Bridges (DMRB) and annotated on plans. Forward visibility around bends within the layout are required and should be annotated on plans commensurate with design speed as detailed in Manual for Gloucestershire Streets Details of individual dwelling and parking accesses with emerging visibility should also be commensurate with MfGS standing advice.

The proposed vehicular and pedestrian access and internal layout into the site should be designed in accordance with MfGS guidance section 5. All carriageway and footway width needs to be annotated on proposed plans, together with changes in width. Junction radii and vehicle tracking also needs to be illustrated on plans allowing for the largest vehicle regularly expected to access/ the site to pass an estate car with 500mm clearance to adjacent boundaries / solid features and between vehicles. Refuse vehicle tracking should use the size of that used by the Local Waste Authority confirmed with the Cotswold District Council.

The proposed level of parking needs to be justified based on paragraph 39 of the National Planning Policy Framework (NPPF) using local evidence such as census car ownership. The dimensions of parking spaces need to be provided which should be in compliance with MfGS parking standards, generally that spaces should be at least 4.8m by 2.4m and single garages 6m by 3m internally. Sufficient turning spaces and inter-visibility for vehicles to turn into and out of parking spaces also needs to be demonstrated which would normally mean aisle/turning space behind parking spaces of at least 6m.

A non-motorised user context report and audit would be sought to be carried out to in accordance with DMRB HD 42/05 to identify scheme objectives for non-motorised users and review if the design has taken into account for and achieved the user objectives.

Option 1A will therefore need to particularly consider forward visibility around internal access road bends. If a shared surface road is proposed as appears to be indicated then this should be 6.8m in width with any narrowings maintaining a 2m minimum width continuous pedestrian pathway according to MfGS. The carports and refuse store indicated for plots 2-7 may provide insufficient inter-visibility with the site road and turning areas, and appear to provide insufficient clearance from the carriageway edge. Boundary walls also need to be set back to provided clearance and inter-visibility from the carriageway edge including the arched wall openings from the pedestrian street onto the road.

Option 1B will also need to provide sufficient forward visibility within the site layout around bends, and adequate road dimensions as previously stated. Boundary walls and solid structures adjacent will again need to be set back with adequate clearance from the carriageway.

Option 2 will need to ensure emerging visibility from the parking of plot 1 onto the shared access road.

**NOTES:**

**NOTE 1:- This advice is issued without prejudice to any recommendations given to the planning authority at the planning application stage.**

**NOTE 2:- The above will all need to be assessed on their merits at full application stage. This advice is based on the information submitted to me, if there are any material changes/new information provided at full application stage this advice may change.**

**NOTE 3:- The advice given to this pre-application submission is given at Officer level only and does not necessarily represent the position of the County Council.**

Yours sincerely,

Mark Sweet

Senior Technician

## Planning Officer Advice Note

Agent	<b>Grass Roots Planning Ltd</b>
Pre-application Ref	<b>15/03728/PAYPRE</b>
Site Location/Address	<b>Land to the north of East End, Fairford</b>
Date	<b>05.11.15</b>

### Summary and recommended course of action:

**Introduction:** This pre-application note relates to proposed residential development at Land to the north of East End, Fairford. The site is greenfield. The majority of the application site is located immediately adjacent the development boundary of Fairford and in an area designated by settlement protection Policy UT.2. In addition, the site is located within the Fairford Conservation Area. A PROW crosses the rear of the site. To the north lies Morgan Hall, a Grade II-listed country house in addition to other nearby listed buildings.

In respect of the site's planning history it should be noted that in 1995 and 2000 planning applications for single residential properties were refused, principally on grounds of their impact on the Conservation Area. Planning permissions relating to the site are listed below. The history files are available to view at the Council's Offices.

### Relevant Planning History:

CT.0823/R Construction of a detached two storey dwelling, garage and associated access. Refused 20.04.2000.

CT.0823/N Proposed detached house and garage. Refused 21.02.1995.

CT.0823/H Re-siting of existing caravan and existing chemical sewage. Permit 18.12.1975.

CT.0823/G Outline application for the erection of a dwelling and garage. Permit 26.06.1973.

CT.0823/D Siting of five caravans, one to be used as a store. Permit 30.07.1964

CT.0823/C Siting of four caravans. Permit 23.02.1962

CT.0823/B Renewal of consent for siting of two caravans. Permit 01.05.1958

CT.0823/A Renewal of consent for siting of seven caravans. Permit 01.01.1954.

CT.0823 Siting of seven caravans. Permit 24.10.1952.

**Development Plan:** The development plan for the Cotswolds is the adopted Cotswold District Local Plan 2001-2011 (referred to herein as the 'Local Plan'). It is advised that the following policies would be relevant with regard to any future planning application on this site:

## **Cotswold District Local Plan 2001-2011**

Policy 5 – Pollution and Safety Hazards  
Policy 9 – Biodiversity, Geology and Geomorphology  
Policy 10 – Trees, Woodlands and Hedgerows  
Policy 15 – Conservation Areas  
Policy 18 – Development within the Development Boundaries of Cirencester and Principal Settlements  
Policy 19 – Development Outside Development Boundaries  
Policy 21 – Affordable Housing  
Policy 34 – Landscaped Open Spaces and Play Areas in Residential Developments  
Policy 38 – Accessibility to and within New Development  
Policy 39 – Parking Provision  
Policy 42 – Cotswold Design Code  
Policy 43 – Provision for the Community  
Policy 45 – Landscaping in New Developments  
Policy 46 – Privacy and Gardens in Residential Development  
Policy 47 – Community Safety and Crime Prevention  
Policy 49 – Planning Obligations and Conditions  
Policy UT.2 – Settlement Protection Boundaries

All of the adopted Local Plan policies can be viewed via the following link:

<http://www.cotswold.gov.uk/residents/planning-building/planning-policy/local-plan-2001-2011/>

## **National Planning Policy Framework (NPPF)**

The NPPF is a material consideration in the determination of any planning application. The NPPF requires local planning authorities to ‘boost significantly the supply of housing’ (NPPF, paragraph 47) and requires planning decisions for housing to be considered in the context of the ‘presumption in favour of sustainable development’ (NPPF, paragraph 14 and 49).

The NPPF states that “*there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles*”. These are an economic role whereby it supports growth and innovation and contributes to a strong, responsive and competitive economy. The second role is a social one where it supports “*strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations*”. The third role is an environmental one where it contributes to protecting and enhancing the natural, built and historic environment. Paragraph 8 of the NPPF states that the three “*roles should not be undertaken in isolation, because they are mutually dependent*”. It goes on to state that the “*planning system should play an active role in guiding development to sustainable solutions.*”

To this end, it is a necessary requirement to have full regard to economic, social and environmental considerations when assessing proposals for new development.

## **Proposals**

The pre-application proposals include 3 options for residential development on the proposed application site. Options 1A and 1B both propose 9 three and four bedroom dwellings on the site.

Option 1A proposes a cul-de-sac shared access road with a footpath linking to some of the dwellings whilst Option 1B proposes a one way shared access loop road around the development. Option 2 proposes 7 three and four bedroom dwellings accessed via a shared access road into a courtyard parking and manoeuvring area.

All three options involve the demolition of the existing dwelling on the site 'Pengerric' (to be 'replaced') and creation of a new site access from East End road into the site.

**Officer Comments on Proposals:**

This note includes comments in respect of the following matters:

- 1) Principle of Development
- 2) Heritage Considerations
- 3) Landscape Considerations
- 4) Biodiversity
- 5) Trees
- 6) Archaeology
- 7) Access/Transport
- 8) Flood Risk and Drainage
- 9) Contamination and Environmental Health
- 10) Refuse and Recycling Provision
- 11) Planning Contributions
- 12) Conclusion
- 13) Public Consultation
- 14) Information Requirements
- 15) Planning Performance Agreement

**Officer Comments:**

**1) Principle of Development**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. The development plan is therefore the starting point. In this case the development plan is the adopted Cotswold District Local Plan 2001 – 2011.

The majority of the application site is located outside a Development Boundary as designated in the aforementioned Local Plan. Development on the site is therefore primarily subject to Policy 19: Development Outside Development Boundaries of the current Local Plan. Criterion (a) of Policy 19 has a general presumption against the erection of new build open market housing (other than that which would help to meet the social and economic needs of those living in rural areas) in locations outside designated Development Boundaries.

The provision of the open market dwellings proposed in this instance would therefore typically contravene the guidelines set out in Policy 19. Notwithstanding this, the Council must also have regard to other material considerations when reaching its decision. In particular, it is necessary to have regard to guidance and policies in the National Planning Policy Framework (NPPF). Paragraph 2 of the NPPF states that the Framework 'is a material consideration in planning decisions.'

The NPPF has at its heart a 'presumption in favour of sustainable development'. It states that 'there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a

number of roles'. These are an economic role whereby it supports growth and innovation and contributes to a strong, responsive and competitive economy. The second role is a social one where it supports 'strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations'. The third role is an environmental one where it contributes to protecting and enhancing the natural, built and historic environment.

Paragraph 8 of the NPPF states that the three 'roles should not be undertaken in isolation, because they are mutually dependent'. It goes on to state that the 'planning system should play an active role in guiding development to sustainable solutions.'

Paragraph 47 of the NPPF states that Councils should identify a supply of deliverable sites sufficient to provide five years' worth of housing. It also advises that an additional buffer of 5% or 20% should be added to the five year supply 'to ensure choice and competition in the market for land'. In instances when the Council cannot demonstrate a five year supply of deliverable housing sites Paragraph 49 states that the 'relevant policies for the supply of housing should not be considered up-to-date'.

In instances where the development plan is absent, silent or relevant policies are out-of-date the Council has to have regard to Paragraph 14 of the NPPF which states that planning permission should be granted unless;

- ' - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in the Framework indicate development should be restricted.'

In the case of sites located within the Cotswolds Area of Outstanding Natural Beauty the second bullet point above is applicable by virtue of Footnote 9 accompanying Paragraph 14.

The land supply position has recently been considered at a Public Inquiry in relation to a proposal to erect up to 90 dwellings on Land to the east of Broad Marston Road, Mickleton (APP/F1610/A/14/2228762, CDC Ref 14/02365/OUT). In his decision the Planning Inspector stated 'I consider that a 5-year supply of deliverable housing land is demonstrated.' He stated 'the agreed supply of housing would be sufficient to satisfy the 'objectively assessed housing need' of 380dpa over almost the next 9 years'. The Inspector also stated that he considered that the Council was no longer a persistent under deliverer of housing and that 'it is thus inappropriate to apply the 20% buffer now.'

On this basis it is considered that the Council can demonstrate a robust 5 year supply of housing land in accordance with Paragraph 49 of the NPPF and is subject to a 5% buffer. In such circumstances Officers consider that the adopted Local Plan policies that cover the supply of housing (eg Policy 19) are not automatically out of date in the context of Paragraph 49.

Notwithstanding this, it does remain pertinent for a decision maker to consider what weight should be attributed to individual Local Plan policies in accordance with Paragraph 215 of the NPPF. Paragraph 215 states that 'due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the framework, the greater the weight they can be given)'. There will therefore be instances where new open market housing outside existing Development Boundaries can constitute sustainable development as required by the NPPF.

The blanket ban on new open market housing outside such boundaries is therefore considered to carry little or no weight when assessed against Paragraph 215. In the

Mickleton appeal previously referred to the Inspector considered that Policy 19 was 'time-expired, conforms to a superseded strategy, fails to reflect the advice in the Framework (NPPF) in severely restricting rather than significantly boosting the supply of housing and conflicts with the emerging strategy.' He considered that Policy 19 'can only be regarded as out of date.' The Inspector went on to state that Paragraph 14 of the NPPF indicates that the proposal 'must be considered in the context of the presumption in favour of sustainable development and permission granted unless tests derived from specific policies in the Framework (or material considerations) indicate otherwise or any adverse impact of granting permission would significantly and demonstrably outweigh the benefits of the scheme when assessed against the Framework as a whole. Those are the tests that I apply here'.

Officers have taken further legal advice on this matter and it is deemed that Policy 19 is out of date in the context of the NPPF and as such the tests set out in Paragraph 14 are applicable when determining this application.

In addition to the above, it must also be noted that even if the Council can demonstrate the requisite minimum supply of housing land it does not in itself mean that proposals for residential development outside existing Development Boundaries should automatically be refused. The 5 year (plus 5%) figure is a minimum and as such the Council should continually be seeking to ensure that housing land supply stays above this minimum in the future. As a result there will continue to be a need to release suitable sites outside Development Boundaries identified in the current Local Plan for residential development. If such sites are not released the Council's housing land supply will soon fall back into deficit. At an appeal for up to 15 dwellings in Honeybourne in Worcestershire (APP/H1840/A/13/2205247) the Planning Inspector stated 'the fact that the Council do currently have a 5-year supply is not in itself a reason to prevent other housing sites being approved, particularly in light of the Framework's attempt to boost significantly the supply of housing.'

The need to release suitable sites for residential development is therefore a material consideration that must be taken into fully into account during the decision making process.

It is however, necessary to have full regard to the economic, social and environmental roles set out in the NPPF when assessing this application. It is also pertinent to consider the weight attributed to the provision of open market housing. Notwithstanding the Council's current land supply, of particular relevance in this case is the requirement to balance the social need to provide new housing against the potential environmental impact of the proposed scheme. These issues are considered in more detail below.

## **2) Heritage Considerations**

### **Legislation and Policy Guidance**

The proposed application site lies within close proximity to, and within the setting of Morgan Hall, a Grade II-listed country house, formerly to the east of, but now on the edge of Fairford. In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses, in accordance with Section 66(1) of the Planning (Listed Buildings & Conservation Areas) Act, 1990.

The site has also been included within the Fairford Conservation Area, wherein the Local Planning Authority is statutorily obliged to pay special attention to the desirability of preserving or enhancing the character or appearance of the area, in accordance with

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Section 12 of the National Planning Policy Framework asks that Local Planning Authorities should take account of the desirability of sustaining or enhancing the significance of heritage assets. Paragraph 132 states that when considering the impact of the proposed works on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It also states that significance can be harmed through alteration or development within the setting. Paragraph 134 states that where proposals will cause harm to the significance of a designated heritage asset that is less than substantial harm, that harm should be weighed against the public benefits of those works.

Section 7 of the NPPF requires good design. Paragraph 58 states that decisions should ensure that developments: function well in the long term and add to the overall quality of an area; establish a strong sense of place, creating attractive and comfortable places; and respond to local character and history, reflecting the identity of the surroundings and materials, whilst not stifling innovation. Paragraph 60 states that local distinctiveness should be promoted or reinforced and Paragraph 61 that connections between people and places, with the integration of new development into the built and historic environment.

Policy 15 of the Cotswold District Local Plan states that development within or affecting a conservation area must preserve or enhance the character or appearance of the area as a whole, or any part of that area. Uses that create additional traffic, noise or other nuisance, which would adversely affect the character of the area, would not be permitted. But development may be permitted if it can be demonstrated that the proposals can help an area to remain alive and prosperous, without compromising its character or appearance. It states that development will be permitted unless: it involves the demolition of a building, wall or other structure that makes a positive contribution; new or altered buildings are out-of-keeping with the special character or appearance of the area in general or in a particular location (in siting, scale, form, proportions, design or materials); or there would be the loss of open spaces that make a valuable contribution. Finally, it states that although minor householder development is likely to be acceptable proposals that cumulatively adversely affect an area may not be permitted, that reinstatement or enhancement of historic features (such as boundary walls) will be sought, and that new dwellings or other substantial structures (especially those covering more than one plot) are unlikely to be acceptable.

Policy 42 of the Local Plan requires that development should be environmentally sustainable and designed in a manner that respects the character, appearance and local distinctiveness of the Cotswold District with regard to style, setting, harmony, street scene, proportion, simplicity, materials and craftsmanship.

### **Principle of development**

The site lies immediately to the south of the grade II-listed Morgan Hall, a modest country house that was originally to the east of Fairford but which, due to the expansion of the town, is now on the edge of it. Nevertheless the historically open setting of the building has been substantially preserved to the north, east and south.

The southern setting comprises a formal trapezoidal walled garden, part of the immediate historic curtilage and wider heritage asset, the walls of which would also be curtilage listed. Beyond this is the current site, which has been left open despite development to the east and further south, and which forms an open buffer between the complex of Morgan Hall and the modern development of Beaumont Place and East End.

The open, undeveloped nature of the site therefore contributes positively to the setting and significance of Morgan Hall, and as the listed building falls within and is a significant and



important feature of the designated conservation area, the site therefore contributes positively to its character and appearance, and comprises an important open space within it.

The National Planning Practice Guidance (NPPG) states that: “*The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.*” (Historic Environment section, paragraph 13) however, in this case, there are public footpaths along two sides of the site.

Consequently, it is considered that the principle of any development in this space would harmfully erode the setting of the listed Morgan Hall, and would therefore neither preserve nor enhance the character and appearance of the Conservation Area, thereby failing to sustain the significance of either designated heritage asset.

### **Design**

Notwithstanding the aforementioned in principle objection to any development on this site, given the nature of the context, there is a varying degree of significance across it, ranging from the lowest level in the south-west corner (furthest from the listed building to the north and the open space to the east), to the highest level towards the north-east (nearest to them).

Should the decision be made to proceed with a development proposal, despite the harm to the historic environment, it may be possible to mitigate this to a degree by containing the development within the south-western half of the site, and retaining the north-eastern half as both open, and left as a ‘semi-rural, paddock-like’ space, rather than a more manicured, urban public space.

Such a direction would necessarily suggest a more modest level of development, and a form that is a sensitive contemporary interpretation of the type of modest quasi-agricultural outbuildings that often clustered around the edge of settlements may be appropriate (rather than large traditional barns).

### **3) Landscape Considerations**

Section 11 of the National Planning Policy Framework encourages the conservation and enhancement of the natural environment. Paragraph 109 states that the planning system should protect and enhance valued landscapes. Paragraph 115 states that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty.

Policy 42 states that development should be environmentally sustainable and designed in a manner that respects the character, appearance and local distinctiveness of the Cotswold District.

Policy 45 of the Local Plan states that high standards of appropriate landscaping should be required in all developments and any attractive, existing landscape features, such as trees, hedgerows and other wildlife habitats should be retained and integrated into all landscaping schemes.

The application site is not located within the Cotswolds Area of Outstanding Natural Beauty (AONB). However, having regard to the relevant planning policies above, it is considered imperative that any proposals for development on this site fits with its context. In addition to the comments above, regarding the proposals’ heritage impact, there is also a concern regarding the proposals impact on the landscape setting of Fairford. The purpose of Policy UT.2 is to define areas around settlements in order to protect residential amenity and

landscape setting. As identified about the application falls within this policy area. Any potential future application submission would therefore need to have regard to this. As a minimum, if a proposal were to be brought forward, then a Landscape Assessment will be expected to be submitted that contains sufficient detail to be able to assess the landscape and visual impacts of the proposed development, including from surrounding Public Rights of Way (PROW).

#### **4) Biodiversity**

The Biodiversity Officer has confirmed that the application site is 745m from the Cotswold Park SSSI and adjacent to an area of woodland pasture & parkland. A Phase One Habitat survey will be required for the site to identify the habitats on site and an ecological assessment to assess the importance of these habitats and the potential for them to support any reptiles, amphibians, bats or birds. As well as data search from the local records centre GCER. The adjacent features such as woodland, hedgerows trees etc. and the potential for the development to adversely affect any priority habitats should also be assessed.

Mitigation and enhancements will need to be shown as part of the proposed development, in accordance with Local Plan Policy 9 and paragraphs 109 and 118 of the NPPF. Enhancements should be integral to the scheme and include potential for green roofs or integral bat and bird boxes. Native planting should also be considered for inclusion.

#### **5) Trees**

The proposed application site is located within the Fairford Conservation Area. As such, any trees on, or adjacent to the site, will be protected. Trees to the northeast of the site are also protected by a Tree Preservation Order. Accordingly, Local Plan Policies 10 and 15 of the Local Plan apply. Local Plan 45 of the Local Plan also applies with regard to existing landscape (trees).

The Council's Tree Officer has been consulted and has confirmed that whilst there are no significant trees within the site, the trees to the northeast are important. Having considered the plans it appears that the access and services (including sewage) will enter the site somewhere through the existing property 'Pengerric'. Whilst there is no objection on arboricultural grounds (providing adjoining TPO trees are not at threat) it should be noted that:

- 1) The site may be important with regard to local use and being a green area that appears to be regularly accessed. There are footpaths that lead to/go through the site.
- 2) If the site is developed, a landscape scheme must be submitted. The landscape should include some significant trees (e.g. Oak), that can grow on to maturity to become skyline features. Obviously if this is considered then room for future growth must be allowed for.

A landscape scheme will therefore be required.

#### **6) Archaeology**

The County Archaeologist has checked the application site against the County Historic Environment Record and has confirmed that there is no record of any previous archaeological investigation on this land and no archaeology is currently known to be present. However, Fairford is known to contain extensive archaeological remains, with the early prehistoric, later prehistoric, Roman and Anglo-Saxon periods being well represented.

Aerial photographic cropmark evidence indicates the presence of extensive settlement

remains dating to the Iron Age and Roman periods, which extend to within 60m of the east side of the site. The settlement was found to extend southwards beyond the area where cropmarks are visible during the insertion of service trenches some years ago and the same may apply to the west of the known extent.

It is considered therefore, that there is high potential for significant archaeological remains to be present on the site, obscured from view by later soils. Accordingly, it is recommended that a programme of assessment and evaluation is undertaken to investigate the archaeological potential of the land in question, the results of which should be made available prior to the determination of any planning application.

The County Archaeologist would be happy to provide or assist in the preparation of a brief for the works. Please contact [charles.parry@gloucestershire.gov.uk](mailto:charles.parry@gloucestershire.gov.uk).

## **7) Access/Transport**

Local Plan Policy 38 and 39, in addition to Section 4 of the NPPF, requires development proposals to be provided sustainably and with safe access and adequate parking.

Gloucestershire County Highways have provided a technical response to the initial proposals and this is attached in full for your perusal (**Appendix 1**). It is recommended that prior to the submission of any planning application that further discussions are had with the Highway Authority to ensure that safe and inclusive access can be demonstrated.

## **8) Flood Risk and Drainage**

According to the Environment Agency's Interactive Flood Map (online), the site is situated within Flood Zone 1 and is therefore located within an area at very low risk of fluvial flooding. However, the northern end of the site is susceptible to 1 in 1000 year surface water flooding and the surrounding road network, including at the proposed access, is susceptible to 1 in 100 and 1 in 1000 year flooding.

The Council's Drainage Engineer has confirmed that there is no record of the site being previously flooded. However, the Council's records show that two properties on the opposite side of East End to the site were flooded by sewage (on one in December 2013 and another in March 2014). Thames Water foul water sewer runs eastwards then southwards along East End, close to these properties. Digdat shows that a new surface water sewer is being proposed along the north side of East End which may help to alleviate this problem.

There is no watercourse within 20m of the site however, the site has a susceptibility to groundwater flooding of between 50% and 75%. It should also be noted that the application site is located within an area covered by the Strategic Flood Risk Area. Given that flooding is a local concern it would be in the applicant's interests to prepare and submit a detailed surface water drainage strategy as part of the application, as a minimum.

The Drainage Engineer has confirmed that surface water drainage should be in accordance with Sustainable Urban Drainage System (SUDS) principals, with soakaways and permeable paving used where infiltration is sufficient. Groundwater levels will also need to be taken into consideration as part of the drainage strategy. Finished floor levels should take account of the site's susceptibility to surface water flooding and safe entry / exit should also be considered due to the main road's susceptibility to surface water flooding.

The Drainage Engineer has also confirmed that an exceedance flow routing plan for flows above the 1 in 100 +30% event will be required as part of the proposal. The proposed

scheme shall identify exceedance flow routes through the development based on proposed topography with flows being directed to highways and areas of public open space. Please note that flow routes through gardens and other areas in private ownership will not be permitted.

Standing advice and guidance has been prepared by the LLFA to assist developers with their preparation of Flood Risk Assessments and Drainage Strategies. Further information can be obtained via the following web link:

<http://www.gloucestershire.gov.uk/extra/sudsplanning>

## **9) Contamination and Environmental Health**

It is not considered that there would be any harm to the residential amenity enjoyed by existing residents as a result of the proposals, so long as appropriate separation distances are maintained to protect privacy and residential amenity.

The Contamination Officer has confirmed that there are no serious concerns in relation to the proposals. A review of the Council's historical map suggests that the proposed development site has remained undeveloped. However, given the proposed residential development it is likely that a condition relating to the reporting of unexpected contamination would be recommended.

## **10) Refuse and Recycling Provision**

Please note that the Council's contractor will only normally collect waste from roads adopted by Gloucestershire Highways Authority. Where a road is waiting to be adopted or is privately owned and maintained, householders will either be required to take their waste to the nearest adopted highway (often to a pre-agreed collection point) or alternatively up to date indemnity cover must be provided to indemnify the council's waste collection contractor from any damage caused to the road surfaces. Householders are required to present their waste containers at the kerbside.

As part of the layout you may therefore wish to consider bin store areas as part of scheme. The Council's contractor will collect waste or recycling from designated stores so long as there is adequate access to enable this to be done safely. Under Building Regulations (2010) developers need to ensure that householders do not have to carry waste containers further than 30m so this should be noted when deciding on the location of such storage areas. With new developments there is also a requirement that containers should be able to be collected without being taken through a building (unless through a garage, car port or similar open covered space).

It should be noted that Cotswold District Council operates a 'no side waste policy.' This means contractors will only collect refuse presented in either a 120ltr or 180ltr bin or in a 660ltr or 1100ltr communal bin as outlined above. Therefore communal bin stores must provide enough space to house the appropriate number of bins for the number of dwellings it is designed to serve. Where properties are required to use beige refuse sacks, instead of a bin, the storage area must be able to accommodate this.

It is recommended that a distance of 150mm should be allowed between and around containers.

Further information can be found in the Council's "Requirements for refuse and recycling provision at new developments" (July 2014) Guidance. A copy can be emailed on request.

Please note that the above applies to residential households only and that separate

arrangements will need to be made directly with a relevant contractor for commercial waste.

## **11) Planning Contributions**

### **Affordable Housing**

Local Plan Policy 21 states that the Council will seek a proportion of affordable housing on any significant sites in Cirencester, Tetbury, Moreton-in-Marsh, Bourton-on-the-Water and **any** site elsewhere. In accordance with the Local Plan Policy 21 therefore, the Council would expect 50% provision of affordable housing on this development, based on need and subject to viability.

If less than 50% of the homes will be affordable then the applicant will need to provide a full viability assessment demonstrating why 50% is not feasible. This should be submitted as soon as possible (preferably before the application is submitted) to allow time for an external assessment and any subsequent negotiation.

The Council considers different sources of information when assessing need. A recent search of the housing register has shown that 178 households with a connection to the Cotswold district are registered for social rented housing in Fairford. At least 96 of these households also have an identified relevant local connection with Fairford or the surrounding parishes. However, it is important to remember that the Housing Register provides a snapshot view of the current need for rented accommodation only. These figures will slightly underestimate the number of people with connections because some households will have family and work connections which will not have been identified by this search.

The latest district wide Housing Needs Assessment (HNA) found an annual requirement for 535 additional affordable housing units in Cotswold District. The Fairford sub-area was assessed as having a gross annual need for an extra 119 affordable homes.

In accordance with the latest district wide Housing Needs Assessment, the Council would normally be seeking the following mix:

- o 25% x 1 bedroom
- o 45% x 2 bedrooms
- o 20% x 3 bedrooms
- o 10% x 4 or more bedrooms

In respect of this proposal, the following onsite provision is suggested, with an additional commuted sum relating to 0.5 dwellings:

9 unit scheme:

- 2 x 2 bedroom 4 person houses of not less than 75m<sup>2</sup> for rent
- 1 x 3 bedroom 6 person houses of not less than 95m<sup>2</sup> for rent
- 1 x 2 bedroom 4 person houses of not less than 75m<sup>2</sup> for shared ownership

7 unit scheme:

- 1 x 2 bedroom 4 person houses of not less than 75m<sup>2</sup> for rent
- 1 x 3 bedroom 6 person houses of not less than 95m<sup>2</sup> for rent
- 1 x 2 bedroom 4 person houses of not less than 75m<sup>2</sup> for shared ownership

It would be preferable to have on plot parking, off an adopted road, and not shared driveways or parking courts with open market homes. This is to avoid management and maintenance issues and service charge costs on what are intended to be affordable homes.

The details of tenure, number of bedrooms and size of units should be included in the negotiated S106 agreement. The District Council's Affordable Housing Supplementary Planning Document (SPD) contains a template for this document. The SPD includes the following requirement in relation to the size of homes to be provided:

- o one bedroom 2 persons flats of not less than 45 sq metres;
- o two bedroom 3 persons flats of not less than 55 sq metres;
- o two bedroom 3 persons bungalows of not less than 65 sq metres;
- o two bedroom 4 persons houses of not less than 75 sq metres;
- o three bedroom 5 persons houses of not less than 85 sq metres;
- o three/four bedroom 6 persons houses of not less than 95 sq metres;

Please note that the development should be tenure blind with the affordable homes being distributed across the site and should comply with all of the other requirements of the SPD.

Housing Strategy will need to agree the locations of the affordable properties. The local connection cascade as set out in the S106 template would also apply. The affordable homes should also comply with the appropriate HCA and current construction standards.

If you have any queries regarding affordable housing provision or current need, then it is recommended that such matters are discussed with the Housing Enabling Officer directly who is contactable at: [housing.enabling@cotswold.gov.uk](mailto:housing.enabling@cotswold.gov.uk) .

### **Education**

The County Council Community Infrastructure team has been consulted on the proposals but have not as yet provided a response. A response will be sent on as soon as it is received.

However, please note that typically, education contributions are required for both primary and secondary education where the local school does not have the planned capacity to accommodate the school age children likely to be generated from the proposals.

Notwithstanding, pupil forecasts are constantly changing and could have changed by the time the planning application is submitted. Such matters will therefore be addressed in more detail at the planning application stage.

### **Library Provision**

The Council seeks contributions towards library provision for sites over 25 units. Either proposal will therefore fall below this threshold.

### **Public Open Space**

Attention is drawn to Local Plan Policy 34. It is encouraged that regard is had to the provision of appropriately located and landscaped open spaces. In respect to children's play areas the application should have regard to national standards and should consider the proposals' impact on existing facilities that are within a reasonable walking distance of the proposed development.

The applicant should be aware that the Council does not adopt areas of public open space or children's play space. Parish Council's should be given first refusal on whether or not they would like the land to be transferred but, if that option is not available, then the Council will expect a private management company to be set up in accordance with a S106 Legal

Agreement.

## **12) Conclusion**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. It is acknowledged that the site is located adjacent the adopted development boundary of Fairford, however, the majority of the site is located outside of the development boundary and therefore, Local Plan Policy 19 would apply. It must therefore be acknowledged that the proposals would be contrary to the development plan in this regard (with the exception of the 'replacement' of Pengerric).

Notwithstanding, it is acknowledged by the Council that regard should be had to the NPPF and, in particular, the presumption in favour of sustainable development. Furthermore, it is accepted by the Council that whilst the Council considers itself to be able to demonstrate a deliverable five year housing land supply that the adopted Local Plan is 'out of date' in the context of Paragraph 14, as found by the recent Planning Inspector at Mickleton.

It is not in dispute that Fairford is a sustainable settlement. The question is therefore whether the proposals are sustainable in the context of Fairford. On the basis of the issues raised above it is considered that the proposals would cause significant harm, particularly to the Conservation Area and the setting of Morgan Hall, both of which are designated heritage assets. On this basis it is considered unlikely that officers will be able to support the proposals, with the exception of the 'replacement' of Pengerric.

## **13) Public Consultation**

Please note that the site falls within the jurisdiction of Fairford Town Council. At the very least, it would be beneficial to discuss the proposals with the Town Council prior to submission of a planning application should the decision be taken to proceed. The contact details for the Town Clerk are as follows:

### **Fairford Town Council**

Mrs Vanessa Lawrence  
[clerks@fairford-tc.co.uk](mailto:clerks@fairford-tc.co.uk)

The Ward Members contact details are as follows:

### **Councillor Coakley**

Email: [sue.coakley@cotswold.gov.uk](mailto:sue.coakley@cotswold.gov.uk)

### **Councillor Andrews**

Email: [stephen.andrews@cotswold.gov.uk](mailto:stephen.andrews@cotswold.gov.uk)

Officers would also advise consultation to be undertaken with those local residents likely to be affected by the proposals. Since the site appears to be well used for recreation purposes by the community then the applicant may wish to consider undertaking wider public consultation prior to the submission of an application.

## **14) Information Requirements**

The below list sets out the minimum requirements for validation in addition to the usual standard requirements (i.e. forms, plans etc. – see weblink above). Please note that this advice does not preclude the Council from requesting further information, either at the validation stage or during the determination process.

<http://www.cotswold.gov.uk/residents/planning-building/planning/making-a-planning-application/planning-forms/>.

1. Design and Access Statement
2. Heritage/Historic Environment Statement
3. Extended Phase 1 Habitat Survey, plus other recommended surveys as appropriate
4. Archaeological Evaluation
5. Landscape Scheme
6. Flood Risk Assessment/Drainage Strategy
7. Phase One Habitat Survey and Ecological Assessment
8. Landscape Assessment
9. Supporting highways information (see Appendix 1)

Please note that without the above, the Council will not be in a position to validate the planning application.

### **Environmental Impact Assessment (EIA)**

Despite the site's location within the Fairford Conservation Area and proximity to listed buildings, it is noted considered that the impacts of the development would be so significant that an Environmental Impact Assessment would be required. However, you may wish to submit an EIA Screening Request for this to be established formally in advance of submitting a planning application.

### **15) Planning Performance Agreement**

It may be beneficial to sign up to a Planning Performance Agreement. The benefits of PPAs include:

- better overall project management at pre-application, application and post-application stages (e.g. when dealing with conditions)
- early identification of critical issues and improved quality of development improved collaboration between all parties
- agreeing and meeting more realistic and stricter timetables as a result of removal from the statutory deadlines
- greater accountability and transparency

Further information is provided on the Council's website (see weblink below) and I would be pleased to discuss this further prior to submission of the planning application(s).

<http://www.cotswold.gov.uk/residents/planning-building/planning/making-a-planning-application/planning-performance-agreements/>

### **Please note:**

Any advice given by Council officers, whether verbal or in writing, for pre-application enquiries does not indicate any formal decision by the Council as local planning authority. Any views or opinions expressed are given in good faith, and to the best ability, without



prejudice to the formal consideration of any planning application following statutory public consultation, the issues raised and evaluation of all available information.

You should therefore be aware that officers cannot give guarantees about the final formal decision that will be made on your planning or related applications. However, this advice note will be considered by the Council as a material consideration in the determination of the future planning related application(s), subject to the proviso that circumstances and information may change or come to light that could alter that position.

It should be noted that the weight given to pre-application advice notes will decline over time.

**APPENDIX E – LETTERS SENT OUT TO LOCAL  
RESIDENTS, INCLUDING PREVIOUS  
MASTERPLAN (JULY 2016)**



Grass Roots Planning Ltd  
Unit 106  
86-88 Colston Street  
Bristol  
BS1 5BB

t: 01179300413 m: 07813091861  
e: [matthew@grassroots-planning.co.uk](mailto:matthew@grassroots-planning.co.uk)  
w: [www.grassroots-planning.co.uk](http://www.grassroots-planning.co.uk)

To the Occupier

Our Ref: 292/A1/MJK/CC  
29<sup>th</sup> June 2016

Dear Neighbour

**PROPOSED DEVELOPMENT ON LAND TO THE NORTH OF EAST END, FAIRFORD**

On behalf of our client, Clifton Homes, we are submitting proposals for the erection of 8 dwellings (4 detached houses and 4 apartments) on land that lies to the north of East End which also includes land currently occupied by a dwelling known as Pengerric.

As near neighbours to the site we are contacting you to make you aware of the proposals and give you the opportunity to make any comments you may have on the emerging plans so we can incorporate these into any finalised proposals.

Accordingly we enclose a copy of the emerging layout for this site along with street scene elevations. The main thrust of the design has been to produce a low density development that can respect adjacent residents by providing buffer zones between the new housing and existing properties (i.e. by locating the access road on the boundary to the west and providing large rear gardens). We are also proposing a large area of publically accessible open space in the north of the site to provide an attractive walk through the site along the existing footpath.

We hope you will appreciate the efforts made to sensitively design the proposed development in the style of a Cotswold Farmstead with large barn style buildings and the fact that it is far removed from high density lower value new homes that could have been proposed here.

If you wish to make any comments on the attached or require any further information please do not hesitate to contact via email or post. Alternatively we would be very happy to meet you in person on the site to answer any questions you may have.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Matthew Kendrick".

**MATTHEW KENDRICK**  
Director

Note:

Copyright is retained by Big Picture Design.

Legend



Site boundary



NORTH



**BIG  
PICTURE  
DESIGN**

**CLIENT:**  
Clifton Homes

**PROJECT:**  
Land at East End, Fairford

**DRAWING TITLE:**  
Sketch Site Layout

**SCALE:** 1:500@A3  
**DATE:** 08/02/2016  
**DRAWN:** JNM  
**DRAWING NUMBER:** 13086/SK01  
**REVISION:** A

# **APPENDIX F – ECOLOGICAL ASSESSMENT (JULY 2016)**

# ECOLOGICAL IMPACT ASSESSMENT

Clifton Homes

Land north of East End  
Fairford

---

**Ref: 1060**  
**July 2016**

This report has been prepared for the client for the purposes of accompanying this planning application. Any dissemination beyond this purpose is not permitted, without the written consent of Grass Roots Ecology Ltd.

## CONTENTS

1.	INTRODUCTION	1
2.	METHODOLOGY	2
3.	ECOLOGICAL BASELINE AND EVALUATION	5
4.	IMPACTS, RECOMMENDATIONS AND MITIGATION	11
5.	SUMMARY AND CONCLUSIONS	13

## PLANS

PLAN GRE 1      HABITAT PLAN

## **1. INTRODUCTION**

### **Background**

- 1.1 Grass Roots Ecology has been commissioned on behalf of Clifton Homes Ltd to carry out an ecological assessment on land north of East End, in Fairford (the 'application site'), pursuant to informing development proposals seeking detailed planning consent for eight residential dwellings, public open space and associated ancillary works (the 'development proposals').

### **Objectives**

- 1.2 This ecological impact assessment also sets out the findings of a desk study and phase 1 habitat survey undertaken at the application site and in doing so:
- a) evaluates the ecological value of the application site;
  - b) assesses the ecological impact of the development proposals; and
  - c) identifies appropriate enhancement measures and any mitigation which may be required.
- 1.3 It also serves to present all the necessary information pertaining to ecological matters to allow Cotswold District Council to determine the planning application.



## 2. METHODOLOGY

- 2.1 This ecological impact assessment has been prepared with due regard to the recent guidance for ecological report writing produced by the Chartered Institute of Ecology and Environmental Management (CIEEM)<sup>1</sup>.
- 2.2 It has been undertaken by a 'suitably qualified ecologist' with over seven years experience as a practising ecological consultant and more than 11 years experience within the environmental assessment and development planning sectors. The author also holds both Bachelor of Science and Master of Science degrees in ecology related subjects, is a full member of CIEEM and possesses relevant European Protected Species licences with both Natural England and Natural Resources Wales.
- 2.3 Both desk and field survey elements have informed its content, as detailed below.

### Desk Study

- 2.4 Gloucestershire Centre for Environmental Records (GCER) was contacted in July 2016 to provide information on protected/notable species and ecologically designated sites within a 2km search radius of the application site. Data received has informed this ecological impact assessment where required and (subject to any confidentiality restrictions) is available on request.
- 2.5 Additional information on protected species and statutory designated sites relating to a wider search area was also obtained where appropriate from inspecting the online National Biodiversity Network (NBN) Gateway<sup>2</sup> and Multi-Agency Geographic Information for the Countryside (MAGIC)<sup>3</sup> databases respectively.
- 2.6 This ecological impact assessment has also been informed where required by priority species and habitats as set out within the UK Biodiversity Action Plan (BAP)<sup>4</sup> and the Gloucestershire BAP<sup>5</sup>.
- 2.7 Development plan and national planning policy has also been reviewed to provide information on policies relating to ecological matters and further inform this ecological impact assessment where required.

---

<sup>1</sup> Chartered Institute of Ecology and Environmental Management (CIEEM) (2015) *Guidelines for Ecological Report Writing*, CIEEM, Technical Guidance Series, accessed at: [http://www.cieem.net/data/files/Resource\\_Library/Technical\\_Guidance\\_Series/Guidelines\\_for\\_Ecological\\_Report\\_Writing/Guidelines\\_for\\_Ecological\\_Report\\_Writing\\_and\\_Appendices\\_May2015.pdf](http://www.cieem.net/data/files/Resource_Library/Technical_Guidance_Series/Guidelines_for_Ecological_Report_Writing/Guidelines_for_Ecological_Report_Writing_and_Appendices_May2015.pdf)

<sup>2</sup> <https://data.nbn.org.uk>

<sup>3</sup> <http://magic.defra.gov.uk>

<sup>4</sup> At the UK level the UK BAP has been replaced by the UK Post-2010 Biodiversity Framework (2012) (Joint Nature Conservation Committee and DEFRA) with all UK BAP species and habitats now known as habitats and species of principal importance or 'priority habitats / species'. The UK BAP contains 1,150 priority species which have been identified based on criteria relating to international importance, rapid decline and high risk. It also contains 65 priority habitats.

<sup>5</sup> Accessed at <https://www.southglos.gov.uk/documents/pteo80o88.pdf>

### **Phase 1 Habitat Survey**

- 2.8 An extended Phase 1 habitat survey of the application site was undertaken initially in September 2015 and further updated where required in July 2016.
- 2.9 The habitat surveys were performed in line with the methodology set out by Joint Nature Conservation Committee (JNCC)<sup>6</sup>, as recommended by Natural England, where all habitats types were mapped (as shown on Plan GRE 1) with flora quantified in line with the DAFOR scale of abundance<sup>7</sup>. Using this technique any habitat areas of greater potential that would require further more detailed survey could then be ascertained.

### **Ecological Evaluation and Impact Assessment**

- 2.10 The value of the habitats within the application site and nearby designated sites have been assessed as part of this ecological impact assessment with due regard to the latest guidelines for ecological evaluation published by CIEEM<sup>8</sup>. These guidelines also set principles for identifying and determining the magnitude of impacts.

### **Faunal Survey**

- 2.11 Particular attention was given during the habitat surveys for the presence of protected, notable or priority species, with specific consideration given to the following groups/species.

#### **Bats**

- 2.12 Given the full legal protection<sup>9</sup> afforded to all UK bat species under schedule 5 of The Wildlife and Countryside Act 1981 (as amended) and schedule 2 of The Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations), all buildings and any trees likely to be affected by the development proposals were appraised for their potential to support roosting bats. This survey element was undertaken in line with current survey guidance<sup>10</sup>.
- 2.13 A general assessment of the value of the wider habitats within the application site for foraging and navigating bats was also made.

---

<sup>6</sup> Joint Nature Conservation Committee (JNCC) (2010) *Handbook for phase 1 habitat survey – a technique for environmental audit*

<sup>7</sup> DAFOR scale: D – dominant, A – abundant, F – frequent, O – occasional, and R – rare

<sup>8</sup> CIEEM (2016) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal, 2nd edition*. Chartered Institute of Ecology and Environmental Management, Winchester

<sup>9</sup> where both the species and its habitat (roosting sites) are protected.

<sup>10</sup> Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3<sup>rd</sup> edn)*, The Bat Conservation Trust, London; Joint Nature Conservation Committee (2004) *Bat Workers' Manual*, 3<sup>rd</sup> Edition; English Nature (2004) *Bat mitigation guidelines*, A. J. Mitchell-Jones

## Badger

- 2.14 Given the legal protection afforded to Badger *Meles meles* under the Protection of Badgers Act 1992, particular attention was given to any evidence indicating activity, such as the presence of a sett, well-worn paths/push-throughs, footprints, latrines and foraging signs. Where possible, this search extended to 30m from the application site boundary.

## Birds

- 2.15 Any birds were recorded, either visually or by call, as part of the habitat surveys. Habitats within the application site were also appraised for their suitability for foraging and nesting birds.

## Other protected or notable species

- 2.16 Habitat considered to offer suitable opportunities for other species afforded legal protection under The Wildlife and Countryside Act 1981 (as amended) and Habitats Regulations (for example Great Crested Newt *Triturus cristatus* and UK reptile species<sup>11</sup>) was also identified where appropriate as part of the habitat surveys.

---

<sup>11</sup> Common Lizard *Zootoca vivipara*, Slow-worm *Anguis fragilis*, Grass Snake *Natrix natrix* and Adder *Vipera berus*

### 3. ECOLOGICAL BASELINE AND EVALUATION

#### Context and surrounding habitats

- 3.1 The application site is located on the edge of Fairford with existing built development situated to the north, south and west. Land to the east largely represents open countryside under agricultural land use.

#### Statutory designated sites

- 3.2 The nearest statutory designated site is Cotswold Water Park Site of Special Scientific Interest (SSSI) which is located at its nearest point approximately 700m to the southeast of the application site. It is designated for its diverse plant communities and breeding/wintering bird populations.
- 3.3 At further distance, located approximately 1.2km to the southeast, is Whelford Meadow SSSI which is designated for the presence of several uncommon and two nationally rare plant species (Downy-fruited Sedge *Carex tomentosa* and Snake's Head Fritillary *Fritillaria meleagris*).
- 3.4 There are no other statutory designated sites within 2km of the application site.

#### Non-statutory designated sites

- 3.5 The nearest non-statutory designated site is Cotswold Water Park Key Wildlife Site (KWS) situated approximately 600m to the east of the application site at its nearest point. It is recognised for its bird and invertebrate interest.
- 3.6 Broadwater Lake KWS is located approximately 850m to the northwest of the application site and is recognised for its lake habitat.
- 3.7 In addition, two areas of semi-natural ancient woodland (The Grove KWS and Lea Wood KWS) are located approximately 1km and 1.9 to the northwest and north of the application site respectively.
- 3.8 No other non-statutory designated sites are known within 2km of the application site.

#### Habitats within the application site

- 3.9 Plan GRE 1 shows the habitats within the application site as mapped following the habitat surveys.

### Semi-improved grassland

- 3.10 The majority of the application site comprises managed semi-improved grassland. Some areas are grazed intensively by Rabbit with other areas observed to support a longer sward.
- 3.11 False Oat-grass *Arrhenatherum elatius* dominates along with frequent to occasional occurrences of Perennial Rye-grass *Lolium perenne*, Cock's-foot *Dactylis glomerata*, Timothy *Phleum pratense*, Yorkshire-fog *Holcus lanatus*, Red Fescue *Festuca rubra* and Smooth Meadow-grass *Poa pratensis*. Herbaceous species were restricted to Ribwort Plantain *Plantago lanceolata*, Cow Parsley *Anthriscus sylvestris*, Spear Thistle *Cirsium vulgare*, Hop Trefoil *Trifolium campestre*, Common Vetch *Vicia sativa*, Field Bindweed *Convolvulus arvensis*, Dandelion *Taraxacum officinale* agg., Cut-leaved Crane's-bill *Geranium dissectum*, Creeping Thistle *Cirsium arvense* and Meadow Buttercup *Ranunculus acris*.
- 3.12 Common Ragwort *Senecio jacobaea* dominates in areas and ruderal species such as Common Nettle *Urtica dioica* have established themselves around the boundaries of the application site.
- 3.13 The semi-improved grassland is nothing unusual in botanical terms and its ecological value is judged to be correspondingly low.

### Hedgerows

- 3.14 H1 represents a native hedgerow forming part of the eastern boundary of the application site. Early semi-mature Elm *Ulmus procera* (some of which is dead) dominates with rare occurrences of Elder *Sambucus nigra* and immature Yew *Taxus baccata* also present.
- 3.15 H2 represents an amenity hedgerow comprising semi-mature Leyland Cypress *Cupressus × leylandii* which forms the boundary of a neighbouring residential property.
- 3.16 H1 is afforded some value in the context of the application site, principally for the opportunities it offers faunal groups (e.g. birds) rather than for any botanical interest.

### Trees

- 3.17 Occasional immature to early semi-mature trees are also present across the application site. Species present include Hornbeam *Carpinus betulus*, Hazel *Corylus avellana*, Cherry *Prunus* sp. Elm and Leyland Cypress. A number of trees also overhang the boundaries of the application site in places.

- 3.18 The trees are afforded some ecological value, but only for the minor opportunities they offer faunal groups such as bats and birds.

#### Other

- 3.19 A single storey residential property and associated amenity garden is present in the south of the application site. The building comprises brick, render and wooden clad elements and supports a flat felt-lined roof.
- 3.20 In addition, a dry-stone wall forms the northern and western boundaries of the application site. Some incidental areas of Bramble scrub also occur alongside these boundaries.
- 3.21 These habitats are considered to be of negligible value.

### **Fauna utilising the application site**

#### Bats

- 3.22 GCER returned records for a number of bat species within the requested data search area and included Soprano Pipistrelle *Pipistrellus pygmaeus*, Noctule bat *Nyctalus noctula*, Greater Horseshoe bat *Rhinolophus ferrumequinum*, Natterer's bat *Myotis nattereri* and Long-eared bat *Plecotus* species.
- 3.23 None of the trees within the application site were identified as offering features capable of supporting roosting bats. However, along with the hedgerows, they do offer some apparent foraging opportunities for local bat populations.
- 3.24 The building within the application site is not known to support a roof void and the roof structure was observed to be in good condition with no obvious gaps/crevices observed which could provide ingress opportunities of roosting bats. As such, this building is considered to have very low potential to support roosting bats and therefore no further considered is given in this ecological impact assessment.

#### Badgers

- 3.25 No records for Badger were returned by GCER within the data search area. Whilst this does not preclude populations being present in the local area no evidence to suggest usage of the application site was found during the habitat survey visits. As such, this species is not considered to present a constraint to the development proposals and is therefore given no further consideration in this ecological impact assessment.

## Birds

- 3.26 BRERC returned a number of recorded for notable bird species<sup>12</sup> within the requested data search area and included Hobby *Falco subbuteo*, Brambling *Fringilla montifringilla*, Cetti's Warbler *Cettia cetti*, Osprey *Pandion haliaetus*, Barn Owl *Tyto alba*, Red Kite *Milvus milvus*, Little Gull *Hydrocoloeus minutus*, Peregrine *Falco peregrinus*, Grey Wagtail *Motacilla cinerea*, Ringed Plover *Charadrius hiaticula*, Ruff *Philomachus pugnax*, Redwing *Turdus iliacus*, Fieldfare *Turdus pilaris*, Whimbrel *Numenius phaeopus*, Yellowhammer *Emberiza citrinella*, Spotted Flycatcher *Muscicapa striata*, Yellow Wagtail *Motacilla flava*, Starling *Sturnus vulgaris*, Herring Gull *Larus argentatus*, Song Thrush *Turdus philomelos*, House Sparrow *Passer domesticus*, Corn Bunting *Emberiza calandra* and Black-tailed Godwit *Limosa limosa*. None of these species are considered to be solely reliant on habitats within the application site.
- 3.27 During the habitat surveys Blue Tit *Cyanistes caeruleus*, Robin *Erithacus rubecula*, Magpie *Pica pica*, Wren *Troglodytes troglodytes*, Chaffinch *Fringilla coelebs*, Blackbird *Turdus merula* and Dunnock *Prunella modularis* were all observed within the application site. A Buzzard was also observed overhead to the east of the application site in September 2015.
- 3.28 The hedgerows and trees within the application site provide some occasional foraging and nesting opportunities for a variety of songbirds. The semi-improved grassland also provides some open foraging habitat for a range of common garden bird species.

## Great Crested Newts

- 3.29 Consideration has also been given to the potential for the application site to support Great Crested Newts.
- 3.30 It is widely appreciated that without barriers to dispersal Great Crested Newts can traverse distances of up to 500m from their respective breeding ponds and suitable terrestrial habitat within this distance *could* be utilised, but suitable habitat at much closer distance will be more commonly used. Historically, when Great Crested Newt mitigation schemes were in their infancy, this distance from a development site was taken as the maximum distance at which Great Crested Newts could be relevant to a development scheme. However, more recent guidance has demonstrated that this zone of influence is in reality typically much smaller. For example, a research report<sup>13</sup> undertaken by English Nature (now Natural England) in 2004 concluded that "... *the most comprehensive mitigation, in relation to avoiding disturbance, killing or injury is appropriate within 50m of a breeding pond. It will also always be necessary to actively capture newts*

---

<sup>12</sup> those species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) and included on the Red List in *Birds of Conservation Concern 4 (2015)*, published by RSPB *et al*.

<sup>13</sup> English Nature (2004) *Research Report Number 576: An assessment of the efficiency of capture techniques and the value of different habitats for great crested newt Triturus cristatus*, English Nature Research Reports

*50-100m away. However, at distances greater than 100m, there should be careful consideration as to whether attempts to capture newts are necessary or the most effective option to avoid incidental mortality. At distances greater than 200-250m, capture operations will hardly ever be appropriate."*

- 3.31 There is no aquatic habitat within the application site and from consulting 1:25,000 OS mapping no ponds are known to be present within 500m of the application site. Whilst records for this protected species were returned by GCER corresponding to a pond located approximately 1.8km to the south of the application site, Great Crested Newts are not considered to be utilising terrestrial habitat within the application site on account of the absence of nearby ponds. As such, the likelihood of encountering Great Crested Newts in terrestrial habitat within the application site is considered to be extremely low and no further consideration is therefore given in this ecological impact assessment.

#### Reptiles

- 3.32 GCER confirmed records for Slow-worm and Grass Snake within the requested search area. Whilst no areas of tussocky or rank grassland were observed within the application site, areas which have escaped Rabbit grazing do exhibit a longer sward and therefore offer some suitability for this group.

#### Other

- 3.33 Following the habitat survey and desk-based exercise, no other protected/notable species are considered to be utilising habitats within the application site.

### **Planning policy relevant to the development proposals**

#### National Planning Policy Framework

- 3.34 Chapter 11 of the National Planning Policy Framework (NPPF) (Conserving and enhancing the natural environment) sets out the Government's policies on biodiversity, landscape and geological conservation. Insofar as ecology and biodiversity is concerned, NPPF requires that the planning system and development planning policies should:

- minimise impacts on biodiversity and provide net gains in biodiversity where possible;
- recognise the wider benefits of ecosystem services;
- explore and encourage opportunities to incorporate biodiversity in and around developments;
- refuse planning permission if significant harm cannot be avoided, adequately mitigated, or, as a last resort, compensated for;



- not normally lead to planning consent where proposed development on land within or outside a SSSI would likely to have an adverse effect on the SSSI (either individually or in combination with other developments); and
- refuse planning permission if development will result in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

3.35 In relation to developments that could have a significant effect on European designated sites, the 'presumption in favour of sustainable development' as set out in paragraph 14 does not apply.

3.36 In terms of elements which are of relevance to the developments proposals, the following considerations have informed this ecological impact assessment and are dealt with where appropriate in the following section:

- minimising adverse impacts on habitats and species;
- seeking gains for biodiversity; and
- avoiding adverse impacts on a SSSI and European designated sites.

Cotswold District Local Plan (adopted 2006)

3.37 Saved policy 9 (biodiversity, geology and geomorphology) is considered to be of relevance to the development proposals. Parts 7 and 8 are relevant in that they relate to species protection. Protected species and their habitats are to be safeguarded with appropriate measures secured through planning conditions or obligations. Retention and management of any significant species and habitats will also be sought with actions taken to enhance habitats and populations of species.

### **Implications for the development proposals**

3.38 In line with the planning policy framework discussed above, consideration of potential impacts on nearby statutory and non-statutory designated sites and protected and priority species and habitats have been given due regard in this ecological impact assessment. Measures to help achieve a net gain in biodiversity are also proposed in the following section.

## 4. IMPACTS, RECOMMENDATIONS AND MITIGATION

### Designated sites

- 4.1 Due to the distance of the closest designated sites (statutory and non-statutory) from the application site and the small-scale nature of the development proposals, there are predicted to be no significant potential impacts during construction.

### Habitats

- 4.2 The development proposals would result in the loss of a proportion of the semi-improved grassland, demolition of the building, including loss of the associated amenity garden and a number of immature trees. The hedgerows would be retained. The component of semi-improved grassland being retained would form part of the public open space in the north of the application site.
- 4.3 To safeguard the retained semi-improved grassland it is recommended that appropriate protective measures are adopted during construction activities in order to prevent damage from encroachment of machinery.
- 4.4 The retained semi-improved grassland within the public open space would be managed to maximise its botanical value through an appropriate 'hay meadow' management regime. This would involve cutting no more than twice a year with the first cut to be undertaken in late July in order to allow the flowers to set seed.
- 4.5 A range of new tree and shrub planting is also proposed within the application site and it is recommended that these are native species of local provenance.

### Fauna

#### Bats

- 4.6 Loss of the semi-improved grassland is not considered to be significant and retention of the boundary hedgerows coupled with new planting would maintain opportunities for local populations. To retain opportunities for bat species which are less tolerant to artificial lighting (e.g., *Myotis* species) it is recommended that a sensitive lighting scheme be developed at the detailed design stage in order to reduce light spill within the open space area. This could involve the use of low-level bollard lighting to the adjacent car parking area/access road.
- 4.7 Consideration should be given to installing bat boxes along the northern gable elevations which front the open space. Schwegler 1WI summer and winter bat box or Type 27 bat brick can both be installed within new brickwork and these should be sited as high up as possible and positioned in a sheltered location

away from direct lighting and strong winds and only exposed to the sun for part of the day. A number of raised bat access could also be installed on new roofs to provide further enhancements for roosting bats.

#### Birds

- 4.8 Given the legal protection afforded to birds whilst nesting under schedule 1 of The Wildlife and Countryside Act 1981 (as amended), it is recommended that trees and any dense areas of vegetation/scrub scheduled for removal are only removed outside of the nesting bird season (March to August inclusive). However, if removal is required within the nesting bird season then a check survey for nesting birds should be undertaken immediately prior to the works taking place and a safe method of clearance would be recommended by a suitably qualified ecologist. If any nesting birds are identified then a suitable cordon may be required (depending on the species encountered) and works would cease until young have fledged.
- 4.9 House Sparrow are known in the local area and it is specifically recommended that House Sparrow nesting boxes (i.e. Schwegler's Vivara Pro Woodstone House Sparrow nest box) are incorporated within the brickwork of new buildings where appropriate.

#### Reptiles

- 4.10 The northern part of the application site provides some suitable habitat for common reptile species. On the basis that a large area of informal open space will be provided in that area of the application site it is considered appropriate to provide a suitably worded condition to require a reptile survey prior to any consented works commencing. If reptiles are found then a mitigation strategy can be drawn to be agreed to the satisfaction of Cotswold District Council. This approach is considered wholly appropriate in this instance as the open space would be sufficient in size to support any relocated population.

## **5. SUMMARY AND CONCLUSIONS**

- 5.1 An ecological assessment has been undertaken on land north of East End, in Fairford, pursuant to informing development proposals seeking planning consent for eight residential dwellings, public open space and associated ancillary works.
- 5.2 The application site is considered to be of low ecological value, being dominated by semi-improved grassland which is nothing unusual in botanical terms. The grassland may support common reptile species and given a large area of informal open space would be provided it is considered appropriate in this instance to condition a survey and any mitigation strategy which may be required.
- 5.3 A number of enhancement measures in relation to bats and birds have also been recommended.
- 5.4 Following adoption of the mitigation and recommendations set out in this ecological impact assessment, it is considered that there would be no overriding ecological constraints that would preclude development of the application site.

# **APPENDIX G – GEOPHYSICAL SURVEY (MARCH 2017)**

# GEOPHYSICAL SURVEY REPORT

# sumo

## Survey

**GEOPHYSICS FOR  
ARCHAEOLOGY &  
ENGINEERING**

## **Land North of East End, Fairford, Gloucestershire**

Client  
**Longman Archaeology**

Survey Report  
**11005**

Date  
**March 2017**

Incorporating  
**GSB PROSPECTION LTD**

and

**STRATASCAN LTD**

SUMO Services Ltd  
Cowburn Farm  
Market Street  
Thornton  
Bradford  
BD13 3HW  
T: 01274 835016

SUMO Services Ltd  
Vineyard House  
Upper Hook Road  
Upton upon Severn  
Worcestershire  
WR8 0SA  
T: 01684 592266

[geophysics@sumoservices.com](mailto:geophysics@sumoservices.com)  
[www.sumoservices.com](http://www.sumoservices.com)

## GEOPHYSICAL SURVEY REPORT

Project name:  
**Land North of East End, Fairford,  
Gloucestershire**

SUMO Job reference:  
**11005**

Client:  
**Longman Archaeology**

Survey date:  
**2 March 2017**

Report date:  
**23 March 2017**

Field co-ordinator:  
**Stephen Weston BA**

Field Team:  
**Adam Clark BA**

Report written by:  
**Rebecca Davies BSc**

CAD illustrations by:  
**Rebecca Davies BSc**

Project Manager:  
**Simon Haddrell BEng AMBCS PCIfA**

Report approved by:  
**Dr John Gater BSc DSc(Hon) MCIfA FSA**

## TABLE OF CONTENTS

1	SUMMARY OF RESULTS	1
2	INTRODUCTION	1
3	METHODS, PROCESSING & PRESENTATION	2
4	RESULTS	3
5	DATA APPRAISAL & CONFIDENCE ASSESSMENT	3
6	CONCLUSION	3
7	REFERENCES	4

Appendix A Technical Information: Magnetometer Survey Method

Appendix B Technical Information: Magnetic Theory

## LIST OF FIGURES

Figure 1	1:25 000	Location plan of survey area
Figure 2	1:1000	Referencing, greyscale plot of data and interpretation

## DIGITAL CONTENT (Archive Data)

- Minimally Processed Greyscale Images and XY Trace Plots in DWG format
- DWG Viewer
- Digital Copies of Report Text and Figures (both PDF and native formats)



## 1 SUMMARY OF RESULTS

A detailed gradiometer survey was conducted over approximately 0.5ha of grassland. No archaeological anomalies have been identified, though ridge and furrow is visible across the site. Other responses detected including uncertain linear anomalies, a service and disturbance from ferrous objects.

## 2 INTRODUCTION

### 2.1 Background synopsis

**SUMO Surveys** were commissioned to undertake a geophysical survey of an area outlined for residential development. This survey forms part of an archaeological investigation being undertaken by **Longman Archaeology** on behalf of **Grass Roots Planning Ltd.**

### 2.2 Site details

<b>NGR / Postcode</b>	SP 158 008 / GL7 4BH
<b>Location</b>	The site is located to the east of Fairford, Gloucestershire. The site is bound by residential housing to the west and south.
<b>District</b>	Cotswold
<b>Parish</b>	Fairford CP
<b>Topography</b>	Slightly undulating
<b>Current Land Use</b>	Grassland
<b>Weather Conditions</b>	Dry, sunny
<b>Geology</b>	Solid: Cornbrash Formation - Limestone. Superficial: Northmoor Sand and Gravel Member, Lower Facet – sand and gravel (BGS 2017).
<b>Soils</b>	Badsey 2 Association (511i), calcareous, fine loamy soils over limestone gravel (SSEW 1983).
<b>Archaeology</b>	<i>“Aerial photographic cropmark evidence indicates the presence of extensive settlement remains dating to the Iron Age and Roman periods, which extend to within 60m of the east side of the site. The settlement was found to extend southwards beyond the area where cropmarks are visible during the insertion of service trenches some years ago and the same may apply to the west of the known extent.</i>  <i>It is considered therefore, that there is high potential for significant archaeological remains to be present on the site, obscured from view by later soils.”</i> (Cotswold Planning Authority (CPA) 2017).
<b>Survey Methods</b>	Magnetometer survey (fluxgate gradiometer)
<b>Study Area</b>	0.5 ha

### 2.3 Aims and Objectives

To locate and characterise any anomalies of possible archaeological interest within the study area.

### 3 METHODS, PROCESSING & PRESENTATION

#### 3.1 Standards & Guidance

This report and all fieldwork have been conducted in accordance with the latest guidance documents issued by Historic England (EH 2008) (then English Heritage) and the Chartered Institute for Archaeologists (IfA 2002 & ClfA 2014).

#### 3.2 Survey methods

Detailed magnetic survey was chosen as an efficient and effective method of locating archaeological anomalies.

Technique	Instrument	Traverse Interval	Sample Interval
Magnetometer	Bartington Grad 601-2	1.0m	0.25m

More information regarding this technique is included in Appendix A

#### 3.3 Data Processing

The following basic processing steps have been carried out on the data used in this report:

*De-stripe*  
*De-stagger*  
*Interpolate*

#### 3.4 Presentation of results and interpretation

The presentation of the results for each site involves a grey-scale. Magnetic anomalies are identified, interpreted and plotted onto the 'Interpretation' drawings. The minimally processed data are provided as a greyscale image in the Archive Data Folder with an XY trace plot in CAD format. A CAD viewer is also provided.

When interpreting the results, several factors are taken into consideration, including the nature of archaeological features being investigated and the local conditions at the site (geology, pedology, topography etc.). Anomalies are categorised by their potential origin. Where responses can be related to other existing evidence, the anomalies will be given specific categories, such as: *Abbey Wall* or *Roman Road*. Where the interpretation is based largely on the geophysical data, levels of confidence are implied, for example: *Probable*, or *Possible Archaeology*. The former is used for a confident interpretation, based on anomaly definition and/or other corroborative data such as cropmarks. Poor anomaly definition, a lack of clear patterns to the responses and an absence of other supporting data reduces confidence, hence the classification *Possible*.

## 4 RESULTS

### 4.1 *Probable/Possible Archaeology*

No magnetic responses have been recorded that could be interpreted as being of archaeological interest.

### 4.2 *Agricultural – Ploughing, Land drains*

Widely spaced, slightly curved, parallel linear anomalies are visible across the site. These are likely a result of medieval ridge and furrow cultivation.

### 4.3 *Natural / Geological / Pedological / Topographic*

A small number of amorphous magnetic responses in the south of the area are likely to be of natural origin, possibly a result of natural pitting within the underlying limestone geology.

### 4.4 *Uncertain*

Two weak linear anomalies are oriented approximately north-south and these may be related to former cut features, such as ditches. However, this interpretation is tentative at best and is based solely on the high archaeological potential of the site. The responses may simply be a result of agricultural activity or equally, be of natural origin.

### 4.5 *Ferrous / Magnetic Disturbance*

A negative linear anomaly is likely to be related to a non-ferrous service or service trench.

Ferrous responses close to boundaries are due to adjacent fences and gates. Smaller scale ferrous anomalies ("iron spikes") are present throughout the data and their form is best illustrated in the XY trace plots. These responses are characteristic of small pieces of ferrous debris (or brick / tile) in the topsoil and are commonly assigned a modern origin. Only the most prominent of these are highlighted on the interpretation diagram.

## 5 DATA APPRAISAL & CONFIDENCE ASSESSMENT

English Heritage Guidelines (EH 2008) Table 4 states that the typical magnetic response over limestone is good, with superficial deposits of sand and gravel providing variable results. The detection of ridge and furrow, along with linear anomalies of uncertain origin, suggests that this survey is likely to have been effective in detecting buried archaeological features. One concern is that the data are noisy and this could mask weaker responses.

## 6 CONCLUSION

The survey at Fairford has not identified any responses of archaeological origin, despite the high potential for archaeological remains outlined in the site history. Evidence of ridge and furrow is visible across the area and two linear anomalies of uncertain origin have been detected. The remaining responses include a service and magnetic disturbance from nearby ferrous objects.

## 7 REFERENCES

- BGS 2017 British Geological Survey *website*:  
(<http://www.bgs.ac.uk/opengeoscience/home.html?Accordion1=1#maps>)  
Geology of Britain viewer [Accessed 23/03/2017].
- ClfA 2014 *Standard and Guidance for Archaeological Geophysical Survey*. Amended 2016.  
ClfA Guidance note. Chartered Institute for Archaeologists, Reading  
[http://www.archaeologists.net/sites/default/files/ClfAS%26GGeophysics\\_2.pdf](http://www.archaeologists.net/sites/default/files/ClfAS%26GGeophysics_2.pdf)
- CPA 2017 *Planning Officer Advice Note – Pre-Application Red: 15/03728/PAYPRE*
- EH 2008 *Geophysical Survey in Archaeological Field Evaluation*. English Heritage, Swindon  
<https://content.historicengland.org.uk/images-books/publications/geophysical-survey-in-archaeological-field-evaluation/geophysics-guidelines.pdf/>
- IfA 2002 *The Use of Geophysical Techniques in Archaeological Evaluations*, IFA Paper No 6,  
C. Gaffney, J. Gater and S. Ovenden. Institute for Archaeology, Reading
- SSEW 1983 *Soils of England and Wales. Sheet 5, South West England*. Soil Survey of England  
and Wales, Harpenden.

## Appendix A - Technical Information: Magnetometer Survey Method

### Grid Positioning

For hand held gradiometers the location of the survey grids has been plotted together with the referencing information. Grids were set out using a Trimble R8 Real Time Kinematic (RTK) VRS Now GNSS GPS system.

An RTK GPS (Real-time Kinematic Global Positioning System) can locate a point on the ground to a far greater accuracy than a standard GPS unit. A standard GPS suffers from errors created by satellite orbit errors, clock errors and atmospheric interference, resulting in an accuracy of 5m-10m. An RTK system uses a single base station receiver and a number of mobile units. The base station re-broadcasts the phase of the carrier it measured, and the mobile units compare their own phase measurements with those they received from the base station. This results in an accuracy of around 0.01m.

Technique	Instrument	Traverse Interval	Sample Interval
Magnetometer	Bartington Grad 601-2	1m	0.25m

### Instrumentation: **Bartington Grad 601-2**

Bartington instruments operate in a gradiometer configuration which comprises fluxgate sensors mounted vertically, set 1.0m apart. The fluxgate gradiometer suppresses any diurnal or regional effects. The instruments are carried, or cart mounted, with the bottom sensor approximately 0.1-0.3m from the ground surface. At each survey station, the difference in the magnetic field between the two fluxgates is measured in nanoTesla (nT). The sensitivity of the instrument can be adjusted; for most archaeological surveys the most sensitive range (0.1nT) is used. Generally, features up to 1m deep may be detected by this method, though strongly magnetic objects may be visible at greater depths. The Bartington instrument can collect two lines of data per traverse with gradiometer units mounted laterally with a separation of 1.0m. The readings are logged consecutively into the data logger which in turn is daily down-loaded into a portable computer whilst on site. At the end of each site survey, data is transferred to the office for processing and presentation.

### Data Processing

Zero Mean Traverse	This process sets the background mean of each traverse within each grid to zero. The operation removes striping effects and edge discontinuities over the whole of the data set.
Step Correction (De-stagger)	When gradiometer data are collected in 'zig-zag' fashion, stepping errors can sometimes arise. These occur because of a slight difference in the speed of walking on the forward and reverse traverses. The result is a staggered effect in the data, which is particularly noticeable on linear anomalies. This process corrects these errors.

### Display

Greyscale/ Colourscale Plot	This format divides a given range of readings into a set number of classes. Each class is represented by a specific shade of grey, the intensity increasing with value. All values above the given range are allocated the same shade (maximum intensity); similarly, all values below the given range are represented by the minimum intensity shade. Similar plots can be produced in colour, either using a wide range of colours or by selecting two or three colours to represent positive and negative values. The assigned range (plotting levels) can be adjusted to emphasise different anomalies in the data-set.
--------------------------------	---

## Interpretation Categories

In certain circumstances (usually when there is corroborative evidence from desk-based or excavation data) very specific interpretations can be assigned to magnetic anomalies (for example, *Roman Road, Wall, etc.*) and where appropriate, such interpretations will be applied. The list below outlines the generic categories commonly used in the interpretation of the results.

<i>Archaeology / Probable Archaeology</i>	This term is used when the form, nature and pattern of the responses are clearly or very probably archaeological and /or if corroborative evidence is available. These anomalies, whilst considered anthropogenic, could be of any age.
<i>Possible Archaeology</i>	These anomalies exhibit either weak signal strength and / or poor definition, or form incomplete archaeological patterns, thereby reducing the level of confidence in the interpretation. Although the archaeological interpretation is favoured, they may be the result of variable soil depth, plough damage or even aliasing as a result of data collection orientation.
<i>Industrial / Burnt-Fired</i>	Strong magnetic anomalies that, due to their shape and form or the context in which they are found, suggest the presence of kilns, ovens, corn dryers, metal-working areas or hearths. It should be noted that in many instances modern ferrous material can produce similar magnetic anomalies.
<i>Former Field Boundary (probable &amp; possible)</i>	Anomalies that correspond to former boundaries indicated on historic mapping, or which are clearly a continuation of existing land divisions. Possible denotes less confidence where the anomaly may not be shown on historic mapping but nevertheless the anomaly displays all the characteristics of a field boundary.
<i>Ridge &amp; Furrow</i>	Parallel linear anomalies whose broad spacing suggests ridge and furrow cultivation. In some cases, the response may be the result of more recent agricultural activity.
<i>Agriculture (ploughing)</i>	Parallel linear anomalies or trends with a narrower spacing, sometimes aligned with existing boundaries, indicating more recent cultivation regimes.
<i>Land Drain</i>	Weakly magnetic linear anomalies, quite often appearing in series forming parallel and herringbone patterns. Smaller drains may lead and empty into larger diameter pipes, which in turn usually lead to local streams and ponds. These are indicative of clay fired land drains.
<i>Natural</i>	These responses form clear patterns in geographical zones where natural variations are known to produce significant magnetic distortions.
<i>Magnetic Disturbance</i>	Broad zones of strong dipolar anomalies, commonly found in places where modern ferrous or fired materials (e.g. brick rubble) are present. They are presumed to be modern.
<i>Service</i>	Magnetically strong anomalies, usually forming linear features are indicative of ferrous pipes/cables. Sometimes other materials (e.g. pvc) or the fill of the trench can cause weaker magnetic responses which can be identified from their uniform linearity.
<i>Ferrous</i>	This type of response is associated with ferrous material and may result from small items in the topsoil, larger buried objects such as pipes, or above ground features such as fence lines or pylons. Ferrous responses are usually regarded as modern. Individual burnt stones, fired bricks or igneous rocks can produce responses similar to ferrous material.
<i>Uncertain Origin</i>	Anomalies which stand out from the background magnetic variation, yet whose form and lack of patterning gives little clue as to their origin. Often the characteristics and distribution of the responses straddle the categories of <i>Possible Archaeology / Natural</i> or (in the case of linear responses) <i>Possible Archaeology / Agriculture</i> ; occasionally they are simply of an unusual form.

Where appropriate some anomalies will be further classified according to their form (positive or negative) and relative strength and coherence (trend: weak and poorly defined).

## Appendix B - Technical Information: Magnetic Theory

Detailed magnetic survey can be used to effectively define areas of past human activity by mapping spatial variation and contrast in the magnetic properties of soil, subsoil and bedrock. Although the changes in the magnetic field resulting from differing features in the soil are usually weak, changes as small as 0.1 nanoTeslas (nT) in an overall field strength of 48,000 (nT), can be accurately detected.

Weakly magnetic iron minerals are always present within the soil and areas of enhancement relate to increases in *magnetic susceptibility* and permanently magnetised *thermoremanent* material.

Magnetic susceptibility relates to the induced magnetism of a material when in the presence of a magnetic field. This magnetism can be considered as effectively permanent as it exists within the Earth's magnetic field. Magnetic susceptibility can become enhanced due to burning and complex biological or fermentation processes.

Thermoremanence is a permanent magnetism acquired by iron minerals that, after heating to a specific temperature known as the Curie Point, are effectively demagnetised followed by re-magnetisation by the Earth's magnetic field on cooling. Thermoremanent archaeological features can include hearths and kilns; material such as brick and tile may be magnetised through the same process.

Silting and deliberate infilling of ditches and pits with magnetically enhanced soil creates a relative contrast against the much lower levels of magnetism within the subsoil into which the feature is cut. Systematic mapping of magnetic anomalies will produce linear and discrete areas of enhancement allowing assessment and characterisation of subsurface features. Material such as subsoil and non-magnetic bedrock used to create former earthworks and walls may be mapped as areas of lower enhancement compared to surrounding soils.

Magnetic survey is carried out using a fluxgate gradiometer which is a passive instrument consisting of two sensors mounted vertically 1m apart. The instrument is carried about 30cm above the ground surface and the top sensor measures the Earth's magnetic field whilst the lower sensor measures the same field but is also more affected by any localised buried feature. The difference between the two sensors will relate to the strength of a magnetic field created by this feature, if no field is present the difference will be close to zero as the magnetic field measured by both sensors will be the same.

Factors affecting the magnetic survey may include soil type, local geology, previous human activity and disturbance from modern services.

Reproduced from Ordnance Survey's 1:25 000 map of 1998 with the permission of the controller of Her Majesty's Stationery Office. Crown Copyright reserved. Licence No: AL 50125A  
 Licencee:  
 Stratascan Ltd.  
 Vineyard House  
 Upper Hook Road  
 Upton Upon Severn  
 WR8 0SA

OS 100km square = SP



03

02

01

99

98



Survey Area

14

15

16

17

18



Title:

LOCATION PLAN OF SURVEY AREA

Client:

LONGMAN ARCHAEOLOGY

Project:

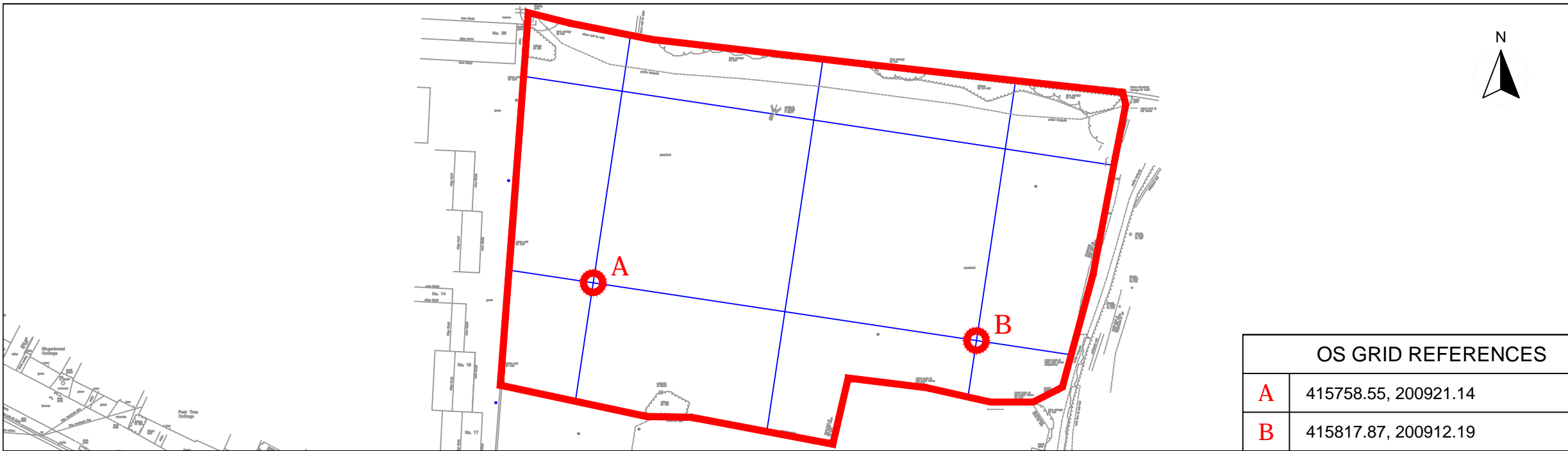
11005 - LAND NORTH OF EAST END,  
 FAIRFORD, GLOUCESTERSHIRE

Scale: 1:25000 @ A3

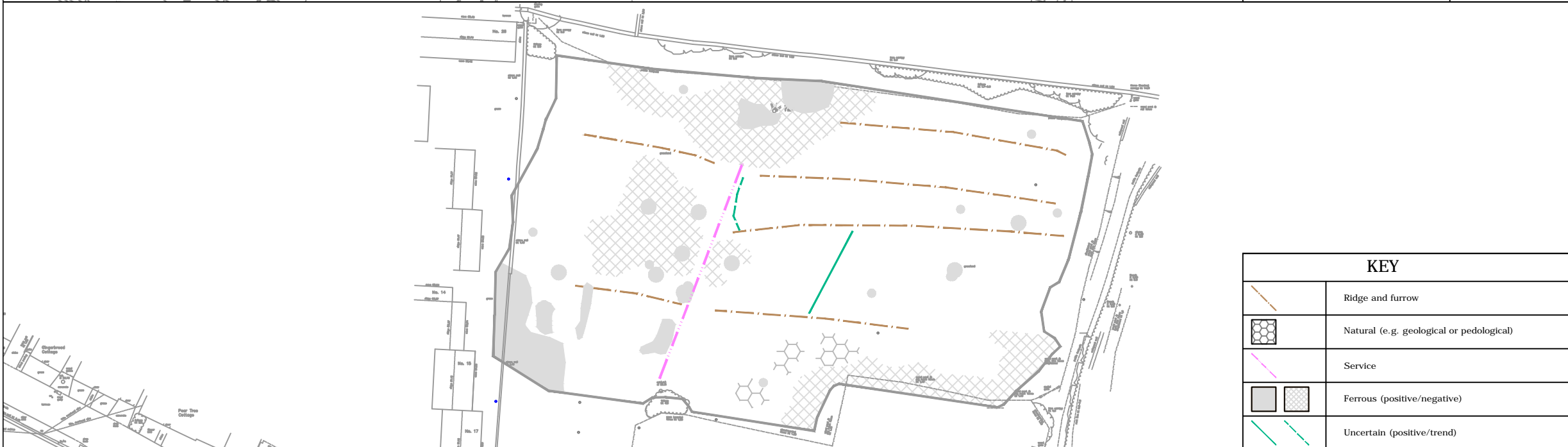
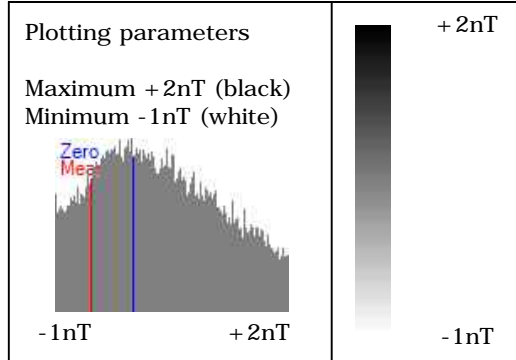
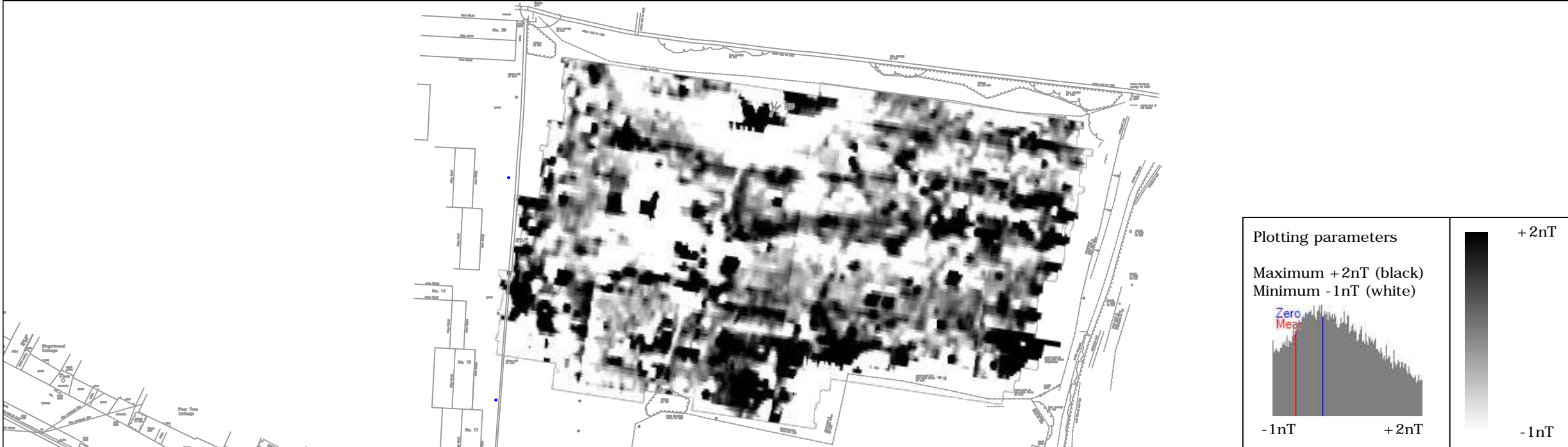


Fig No:  
 01





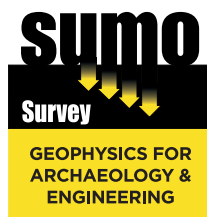
OS GRID REFERENCES	
A	415758.55, 200921.14
B	415817.87, 200912.19



KEY	
	Ridge and furrow
	Natural (e.g. geological or pedological)
	Service
	Ferrous (positive/negative)
	Uncertain (positive/trend)



Title: REFERENCING, PLOT OF PROCESSED GRADIOMETER DATA & INTERPRETATION  
 Client: LONGMAN ARCHAEOLOGY  
 Project: 11005 - LAND NORTH OF EAST END, FAIRFORD, GLOUCESTERSHIRE  
 Scale: 1:750 @ A3  
 0m 5 15 30m  
 Fig No: 02



- Archaeological
- Geophysical
- Laser Scanning
- Measured Building
- Topographic
- Utility Mapping

SUMO Services Ltd, incorporated under the laws of England and Wales,  
Company Registration No.4275993.  
Registered Office Unit 8 Hayward Business Centre, New Lane, Havant, Hampshire, PO9 2NL