



Fairford Town Council

RCOH Ltd

Fairford Neighbourhood Plan 2016-2031



Landscape & Local Green Space Study

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The River Coln

1.0 Introduction & Purpose

1.1 This Landscape & Green Spaces Study has been undertaken by local residents of Fairford, with the professional support of RCOH Ltd, in the course of preparing a local Neighbourhood Plan. After much local consultation it was decided that the aims of the study should be as follows:

- To protect the rural character of a town which is suffering from sudden, substantial, and unplanned developments;
- To enhance the beauty and sustainability of the town, both for its present and future residents, and for visitors;
- To protect the distinctive sense of place;
- To ensure that existing facilities for play, recreation and community activities are protected;
- To enhance a sense of community;
- To protect the historic patterns of settlement (Fairford and Horcott are two distinct communities);
- To enhance the distinctive characteristics of the different areas of settlement;
- To reduce the risk of flooding, including ground and surface water flooding;
- To enable wildlife to flourish;
- To reduce contributions to, and militate against, the effects of climate change;
- To make a space which is comfortable and liveable;
- To deliver economic benefits from visitors.

1.1.1 The designations proposed in this document for the Fairford Neighbourhood Plan are a crucial component in support of that plan.

1.2 Background

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

1.2.2 Between the town and Milton End to the west is an important rural valley corridor through which the Coln has been canalised as the 'Broadwater'. The finest views of the church are over this open area.'² This 'rural feel' was identified in the questionnaire as a much-valued aspect of town life. The White Report recognises the unique pattern of settlement in Fairford: the edges of Fairford are one of the town's most distinctive features; they are 'visually and physically permeable between the town and the floodplain providing good continuity between the town and its landscape context'³.

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

² 'The White Report': Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.8, p. 62

³ 'Ibid, p. 62

1.2.3 There are several constraints on development which need to be taken into account when deciding on new development sites. As an ancient ford for the River Coln, Fairford is sited on a floodplain and the old medieval town largely developed to the north of the river on higher ground. Horcott to the south, a quite distinct settlement, (see 'A Brief History' para.2.15 of the Fairford Neighbourhood Plan document, and para.1.2.18/19 of the Character and Design Assessment) is bounded by the river, Horcott Hill, the airfield, and several lakes resulting from gravel extraction.

1.2.4 Thus, to the south west and south east are gravel extraction lakes, (Horcott Lakes and the Lake 104 complex); to the south is RAF Fairford; to the north are the Ernest Cook Trust Estate and a protected Special Landscape Area. Squeezed between these areas are the river and the A417 – a trunk road running through the medieval centre of the town, closely bounded by listed buildings. In places the carriageway is less than 4m wide.

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

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

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



1.2. 8 River Coln

2.0 LOCAL GREEN SPACES (FNP10)

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

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

New development will not be permitted on land designated as Local Green Space except in very special circumstances.

2.0.2 All four sites are analysed according to the criteria set out in NPPF Para. 77

'The Local Green Space designation ... should only be used:

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

2.1 The Walnut Tree Field (shown as 'I' on the Policies Map)⁴



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

2.1.2 Questionnaire responses identified this as the most highly valued community green space and it is within the Conservation Area. The land contains the town's children's playground, exercise equipment, tennis courts, skateboard ramp and is much used for community events (eg. Fairford festival). Fairford Preservation Trust has planted several trees and there are hopes that a small area could be set aside for public lavatories. It is owned by the Ernest Cook Trust.

⁴ All blue arrows in this document mark the position from which photographs were taken and the direction faced.

2.1.3 Area: 1.47ha



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



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

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

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

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

Consultation Days comments - 'It is a pleasure to go past the Walnut Tree Field on a nice day, often 40 or 50 people, grandparents, parents and young children using the facility.' 'Definitely need to preserve Walnut field – nice to see improvements there.' 'We very much value the Walnut field as a play space between the school and the main residential areas. It is extremely useful, well positioned and well used.' 'Questionnaire

comments - 'Our grandchildren love going there.' 'For everyone young and old, large community space, it's great for community events and a meeting place.' 'Brilliant for parents and children alike.' '...park very important for children to play in safe area.' In total, 154 people said that they especially valued 'Walnut Tree Field' in response to the question, 'Are there any particular public open/green spaces you especially value and, if so, why?'

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

This is a lovely space, overlooked by the historic dovecote, in one of the most attractive areas of the town. It is bordered by old Cotswold stone walls and Fairford Preservation Society has recently undertaken significant tree planting. The site has a strong relationship with the Special Landscape Area (designated by Policy 8 of the 2001 Local Plan), which extends as far south as Park Street opposite. The open character of the space contributes to the setting of that much larger landscape.

2.2 Upper Green (ii)



2.2.1 Map showing location of Upper Green

2.2.2 Questionnaire responses identified this as highly valued. It is in the centre of the town, within the Special Landscape Area, between the Town Bridge and Mill Bridge. It is one of the most photographed and visible green spaces in the town and forms an essential part of the Special Landscape Area designated by the 2001 Local Plan of the Fairford Conservation Area. Community events are regularly held here, especially on celebratory occasions eg. the Jubilee Beacon. There is a PROW across the land and it is heavily used by walkers.

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

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

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

2.2.5 Area: 2.93ha



2.2.6 Upper Green taken from PROW looking towards Milton Street

2.2.7 Is the green space in reasonably close proximity to the community it serves?

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

2.2.8 Is the green space demonstrably special to a local community and holds a particular local significance?

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

2.2.9 Is the green space local in character and not an extensive tract of land?

Upper Green has been used by the residents of Fairford for many, many centuries. It is, in large part, essentially, a ‘working’ field and cows often graze there, a green in the most ancient sense bringing the living countryside right into the town. Originally much larger it was ‘part of the Milton End common [and] was probably used by the Welsh drovers to pasture their cattle when stopping at the town.’⁵ Although a part of the Special Landscape Area, the space is a distinct space with defined boundaries that give it a local character.

⁵ Victoria County History vol. 7 p. 72.

2.3 The Short Piece (iii)



2.3.1 Map of The Short Piece location



2.3.2 The Short Piece looking from Fairford towards Horcott from Horcott Road

2.3.3 The Short Piece is another old field and (together with Carters Ground and Coln House Playing Field) is the central site which maintains the separation of Fairford from Horcott and provides a real sense of openness.⁶ Horcott's history is very different from that of Fairford since it only left the parish of Kempford and joined the parish Fairford in 1987; Dilly's Bridge, linking Horcott and Fairford was only installed in 1990. The Short Piece is one of the fields subject to a planning application from Gladman Developments Limited.

2.3.4 It is proposed that this site should also form a part of the Fairford-Horcott Local Gap as it is key to the demarcation of the two very distinct settlements of Horcott and Fairford. However, more importantly, this is one of the very few remaining significant archaeological sites and therefore is of historical significance. It has been proposed as a Non-Designated Heritage Asset due to the significance of its archaeology (FNP15).

2.3.5 Fairford is an area rich in archaeological heritage, recognized by Gloucestershire County Council who write, 'Fairford parish is particularly rich in undesignated heritage assets of archaeological interest, some of which are of equivalent significance to designated assets (NPPF 139)⁷. Over recent years, much of that heritage has been destroyed. Not only have contractors undertaken work without notification (HER 7215, 7216)⁸, but whole sites have been lost: a Romano-British site with Iron Age ditch is now a gravel pit (HER 27768) as is a Romano-British farming settlement including two stone-lined wells (HER 2477); the source of a Neolithic polished flint axe is lost beneath a lake (HER 2490) as is the source of a late Bronze Age socketed spearhead (HER 3333). Much evidence points to an extensive Anglo-Saxon settlement west of the River Coln, from Horcott Lakes to the south, and Pip's Field (now Stoneleigh development) to the north. The serious damage to this part of the town began with the building of the runway for RAF Fairford and then the extensive quarrying at

⁶ See 'The Neighbourhood Area,' Section 2A of the Fairford Neighbourhood Plan, 'A Brief History', 2.22, 2.23 for the history of Horcott.

⁷ Robert Niblett, Planning Officer for Gloucestershire County Council in email, response to Fairford Neighbourhood Plan Pre-Submission Consultations.

⁸ All HER references are to the Historic Environment Record for Gloucestershire:

<http://www.heritagegateway.org.uk/Gateway>

Horcott Lakes and finally with the construction of large housing estates. Very little remains, but one area which does is The Short Piece/Coln House Playing Field.

2.3.6 The archaeological report for The Short Piece (and Carters Ground) site states, 'In terms of artefacts, the period and quality of the Anglo-Saxon finds is such that this signifies a notable site, where the main activity took place ... and so there is a high possibility of the finds assemblage being extensive and, therefore, informative. This site is liable to offer opportunities of closer scientific dating and so improve understanding of occupation sequence within a wider region much favoured for settlement in this period.'⁹ 'Overall, it was apparent that the site contains a significant array of archaeological features that all offer good potential to contribute to a number of research priorities for the wider region.'¹⁰ There is 'evidence for prehistoric activity in the form of possibly Neolithic pits and Anglo-Saxon occupation in the form of sunken feature buildings and post-built structures ...The settlement, probably 5th to 7th or early 8th century in date, comprised up to fifteen possible sunken-featured buildings (SFBs) and a posthole arrangement thought to be the remains of a postbuilt rectangular structure with the potential to be a hall-type building' (HER 45955, 48671). This is clearly a site of significant historical interest.

2.3.7 The response of the Gloucestershire Archaeologist to the survey is disappointing in that whilst acknowledging that 'it is clear that the archaeological remains present on this site have the potential to make a very substantial contribution to our understanding of the archaeology of Gloucestershire, and indeed further afield' he has nonetheless raised no objection to the development of the land with certain provisos. Development would certainly destroy whatever remains, and there would be no opportunity for future generations, with superior methodologies and equipment, to investigate the site. The Council for British Archaeology states, 'The CBA best practice guidelines show that as long as they remain safe then it is better to leave the evidence for future generations to investigate with better techniques and with better-informed questions to ask.'¹¹ These are the principles which should be followed here.

2.3.8 It is understood that this is private land to which local people do not have access. However, a PROW runs along the northern boundary of the site, separated only by a low wall allowing clear, open views; a permissive path runs along the southern boundary (within the Horcott Lakes land); and Horcott Road runs along the eastern boundary. The views across the fields are much appreciated and highly valued. The mature lime trees along Horcott Road, together with the mature avenue of mixed beech and copper beech along The Mere drive, are significant landscape features, a visual amenity which needs protecting for all. In the past local residents used what is now Mere drive to reach Horcott Lakes (the public footpath being impassable), 'My brother in law clearly remembers regularly using this access with other residents, for many years prior to it being 'closed off' to the public' and 'The drive to Mere was one of our main accesses to Totterdown lakes before the new house was built and the path across the fields is a good short cut to the lane to Marston Meysey.' (Pre-submission consultation comments).

2.3.9 The report of RPS CgMs for Gladman Developments Limited, 21 July 2016 describes The Short Piece, accepting that 'The existing gap between Horcott and Fairford on the western side of Horcott Road is already extremely limited...The most southerly Fairford house

⁹ Archaeological Evaluation at land off Horcott Road, Fairford, Gloucestershire by Worcestershire Archaeology. 2016, p. 23

¹⁰ Ibid, p.24

¹¹ Council for British Archaeology: Archaeology Out There website <http://new.archaeologyuk.org/best-practice>

on Horcott Road is only approximately 125m from the most northerly Horcott house.'¹² This makes the remaining gap even more significant and the need for protection even more urgent. It is also worth noting that this report acknowledges the fact that there is a clear 'Horcott' 'Fairford' distinction.

2.3.10 This field, together with Carters Ground, are, quite literally, the last fields on this side of Horcott Road, which separate the two settlements. This is acknowledged in The White Report evaluation of the site as lying 'on the south western edge Fairford on very gently sloping land separating it from Horcott to the south' and 'it provides a green gap between Fairford and Horcott when combined with playing fields along the River Coln corridor to the north east.'¹³ Fewer than two years ago, this gap extended all the way through to the A417. However, unplanned development has eaten away at this and the most recent application, if successful at appeal, would see the closure of the gap. It is vital that this separation be maintained, not only for the present, but also for future generations of residents. 'The site has value in providing the setting to the western end of the Conservation Area which features recessive but attractive traditional buildings which form a positive introduction to the old settlement.'¹⁴

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



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

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

The green space is surrounded by the local community it serves, ensuring that both settlements, Fairford and Horcott, retain their historic identities and tranquil settings.

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

¹² Cotswold District Council Planning Reference: 16/01766/OUT 'Outline with all matters reserved apart from access for up to 92 dwellings (including up to 50% affordable housing) public open space and children's play area and associated works.'

¹³ The White Report for Cotswold District Council, 'Study of Land Surrounding Key Settlements' 2014, Section 8 p.23

¹⁴ Ibid p.23

The grounds on which 'Green Space' designation is sought are those of 'historic significance' and 'tranquility.' This whole area is rich in archaeological, mostly Anglo-Saxon archaeology (see 2.3.6 and report on the adjacent Coln House Playing Field); it should be noted that Fairford parish as a whole is particularly rich in designated and undesignated heritage assets. Although the land is inaccessible the open space and the break between settlements that it provides is highly valued. One of the comments from the informal Consultation Days was, 'Essential to retain separation of Horcott from Fairford. Also to retain amenity for river and country walks'; many other comments were recorded in support of all the local green spaces identified eg. 'Thoroughly agree with the designated green spaces as they are integral to the character of Fairford.' 'The site forms an important green corridor for wildlife between the Coln and the south of Fairford. Bats, birds of prey, otters, snakes and amphibians (toads and newts) have all been observed on adjoining land and as such are likely to exist on [The Short Piece] as well. One resident writes, 'We live right next to The Short Piece and every day we see a huge variety of birds and other wildlife in our garden. This variety is directly attributable to the green space which surrounds us on two sides and means we frequently see blue and coal tits, starlings, chaffinches, blackbirds, sparrows, robins and we also hear woodpeckers in the trees. Other wildlife we have seen include hedgehogs, adders, dormice, moles, voles, squirrels, foxes and bats, along with dragon and damselflies.' (Pre-submission consultation comments).

2.3.15 *Where the green area concerned is local in character and is not an extensive tract of land.*

This is not an extensive tract of land and, by reason of the archaeological history of the site, is certainly local in character. The space works in combination with the adjoining Coln House Playing Field to form part of the setting to the Conservation Area, an essential element of the significance of which is the ability to appreciate the historic group value of buildings in the town centre.

2.3.16 It should be noted that, although all the Local Green Spaces identified are also required as water storage areas, these fields (The Short Piece and Carters Ground) are especially crucial in this role; '... future land management practices should aim to create more flood water storage capacity for storm events.'¹⁵ Water draining off the fields and from the springs to the west of Fairford used to be absorbed into existing fields. Those fields are now covered in about 300 houses and these fields are the last open spaces before more houses at Horcott, some of which are already suffering from flooding and restricted toilet use. So these fields, especially to those residents who have already been flooded twice in 2016, are 'demonstrably special'.

¹⁵ Wild Project Rivers Management Plan for Fairford Parish, May 2016, p.7

2.4 Coln House Playing Field (iv)



2.4.1 Map showing location of Coln House Playing Field



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

2.4.3 The playing field of Coln House has had a long history in Fairford, from Anglo-Saxon settlement, to lunatic asylum to school. Coln House has been a residential school in Gloucestershire for the education and care of pupils who have a primary diagnosis of social, emotional and mental health (SEMH) needs. It appears that the local authority has decided to close the school. Plans for future use are unknown. The land in question is the playing field at the back of the school, in a prominent position. It is tree-lined and surrounded by footpaths, so is a familiar and peaceful local landscape.

2.4.4 In the past plans to extend the school buildings onto this land have had to be abandoned due to significant archaeological finds (the application was 1999 CT0056/J and it was withdrawn in 2000). 'The results of the evaluation suggest the presence of an extensive Anglo-Saxon settlement of late 5th to 9th century date. Any groundworks penetrating to more than 0.32m in depth would destroy significant archaeological deposits.'¹⁶ The case for preserving the archaeological heritage of this area was made in paragraph 2.3.5 in The Short Piece analysis and is equally applicable to these playing field. Thus this field is of historical significance to the area. In 1999 the report on this field stated, 'The most important element in this assemblage is the Anglo-Saxon component. Evidence of Anglo-Saxon occupation is relatively rare and very piecemeal in Gloucestershire...'¹⁷ and it is not unreasonable to suggest that this field, linked with The Short Piece finds, comprise two parts of the same settlement, bisected by the modern Horcott Road. A comment arising from the pre-submission consultation makes the point well: 'Fairford is an area that WAS rich in archaeology which unfortunately has been lost either by gravel extraction or by development ... it could be a future asset to the town if investigated properly.' It has been proposed as a Non-Designated Heritage Asset due to the significance of its archaeology (FNP15).

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

¹⁶ An Archaeological Evaluation at Coln House School, Fairford, Gloucestershire, for Mr. Geoff Albrow, County Property Services (1999, p. 13)

¹⁷ Ibid p.12

were worked by the residents as therapy; the asylum closed in 1944. Since then, as a school facility (opened 1949), it has seen fetes, hog roasts, parties and various festival activities. It is bordered on two sides by heavily walked PROWs, both important routes into Fairford for Horcott residents. In particular, the children of Horcott use these paths as crucial parts of safe routes into school. The open ground of this playing field is a significant feature of these walks and the tranquility it provides is highly valued.

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

2.4.7 Coln House Playing Field, directly opposite The Short Piece (iii), also forms an important part of the Local Gap between Fairford and Horcott. The White Report of 2014 made specific mention of the importance of the 'Open land between Fairford and Horcott in order to maintain the separate identity of the settlements.'¹⁸

2.4.8 Environment Agency Flood Map for Planning: flood zone 3 runs across the south-eastern corner of the site (see F&LYFC maps)

2.4.9 Area: 3.03 ha



2.4.10 Coln House Playing Field taken from Horcott Road

2.4.11 Is the green space in reasonably close proximity to the community it serves?

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

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

2.4.12 Is the green space demonstrably special to a local community and holds a particular local significance?

The playing field is within the curtilage of a listed building which dates at least from 1806, and which has served a social function ever since 1816, well integrated into the local community. This, together with its considerable archaeological importance (2.4.4), means that the field is of historic significance.

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

2.4.14 Quite apart from school events, the field is well used by local residents for sports and quiet contemplation, well attested to by pre-submission consultation comments. 'On Saturday and Sunday we watch men and juniors play their soccer and rugby there supported my friends and parents. This is a beautiful area with great views across to the old town and church.' 'I walk the dogs along the river bank daily and enjoy watching the birds in the Coln House field and the ducks sun bathing in the summer. My husband has fond memories of playing sport there when it was used as the sports field for the old Farmors school in the market place.' 'The field is used by local sports teams on a regular basis. I worked at Coln House for nine years some time ago and am very fond of the large open space it gives.' 'The Coln House field has been there as long as I remember. I grew up in Fairford and played football there.' 'Due to its proximity to the river we often sit and watch the abundance of nature and wildlife, from ducks and moorhens to dragon flies and on one occasion we saw a kingfisher.' 'It provides a valuable space for recreational activity ... with the majority of other sport facilities located on the North and East side of the town.'

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

2.4.16 Is the green space local in character and not an extensive tract of land?

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

3.0 THE FAIRFORD – HORCOTT LOCAL GAP (FNP11)

3.0.1 The Fairford - Horcott Local Gap aims

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

3.0.2 As well as this, the Local Gap proposed will provide a valuable source of green infrastructure which will offer important recreational and landscape benefits to the local community as well as nature conservation value. The White Report recognizes the value of this gap, identifying it as unsuitable for development as it is, 'Open land between Fairford and Horcott [needed] in order to maintain the separate identity of the settlements.'¹⁹ The open land here is also needed in order to maintain the essential rural character of both settlements which is so valued by both the White Report and local residents. The fields protect lovely views of the Conservation Area, the church tower and the river. Indeed, this green band, at root, settles both communities in their ancient landscape.

3.0.3 The open nature / sense of separation between these settlements cannot be retained by other policy designations and is essential to help preserve the distinctive settlement pattern. In addition, in this particular case, the proposed local gap is vital for the protection of the town from future flood events, from groundwater and surface water flooding, a problem which has been exacerbated in recent years by the construction of hundreds of houses uphill of the sites in question. The slope uphill is gentle but it is nonetheless significant, draining down over 200m from Withington at the head of the water catchment area.

3.0.4 NPPF Section 10 states: 'Plans should ... [take] account of the impacts of climate change, by: ... 'safeguarding land from development that is required for current and future land management'²⁰.

3.0.5 Cotswold Water Park reports clearly identify Horcott as a settlement separate from Fairford: 'Other settlements in the area include Horcott, a small linear village located at the north-west base of Horcott Hill.'²¹ It is not without significance that the Historic Environment Record lists all the Horcott HER references under 'Kempsford', the parish it was part of until 1987 (see para. 1.2.3)

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

¹⁹ The White Report: 'Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.12, p. 63

²⁰ National Planning Policy Framework, Section 10, 'Meeting the challenge of climate change, flooding and coastal change', p. 24, para. 100,

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

- 3.0.7 The Fairford - Horcott Local Gap consists of:
- a) Old Piggery Paddock;
 - b) 2 fields linking Old Piggery Paddock and The Short Piece;
 - c) Carters Ground;
 - d) The Short Piece (also a proposed Local Green Space);
 - e) Coln House Playing Field (also a proposed Local Green Space);
 - f) Fairford and Lechlade Youth Football Club (F&LYFC); and
 - g) Floodplain extending along the River Coln.



3.0.8 Map showing location of Fairford – Horcott Local Gap

3.1 Old Piggery Paddock



3.1.1 Map showing position of Old Piggery Paddock and 2 fields

3.1.2 This is a site that was the subject of some debate during the 2014 Appeal by Gladman Developments against the decision to refuse planning permission on what is now Bloor 2 building site (see map below). This Appeal was won by Gladman Developments but the value of this particular site was recognised and was mentioned positively several times in the Section 'Effect of the development on the setting of the town of Fairford' ²². Additionally, during the course of the appeal it was accepted that development of the appeal site should not make the Old Piggery Paddock more vulnerable to development as an 'infill' site.

3.1.3 An example of one of the comments made by the Appeal Inspector:
'I agree that, on this side of the road, there is an aesthetically pleasing transition from the Old Piggery to the countryside, via the adjoining paddock with its stone wall and the appeal site. ... The relationship with the countryside still exists, and indeed the edge of the conservation area is very strongly rural in character. This reflects the historical role of Fairford as a market town set in the countryside landscape.'²³

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

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



3.1.6 The Old Piggery Paddock

3.2 Two Fields

3.2.1 These modest fields allow a 'through view' of the countryside from the A417 and from Horcott Road, and therefore are instrumental in emphasising the rural setting and clearly

²² 13/03097/OUT | Erection of up to 120 dwellings (all matters reserved other than means of access) | Land Parcel South Of Home Farm Cirencester Road Fairford. para. 50 onwards

²³ Ibid, para 68.

indicating the separation of the two settlements. A section of the smaller of the two fields is currently used to store caravans. In addition, a PROW crosses these fields using a series of old stone stiles which have been proposed as Non-Designated Heritage Assets. The hedgerows should be restored and maintained. 'If a hedge ceases to be valued, then the land it is on is usually reclaimed ...'²⁴

3.2.2 The Conservation Area boundary runs along the edges of these two fields (Map 3.2.6) and they are clearly important to the setting of the buildings in the Conservation Area. Their position is such that they naturally form a part of the gap which provides the open, rural setting for both Fairford and Horcott.

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



Photograph 3.2.4
2 fields between Old Piggery Paddock and The Short Piece

Photograph 3.2.5

3.2.6 Map showing 2 fields position relative to Conservation area

3.3 Carters Ground



3.3.1 Map showing Carters Ground with The Short Piece to the NE, Bloor developments to the W and Horcott Lakes to the SE

3.3.2 Carters Ground is an old field which contains a historic early C19th Cotswold stone field barn which is proposed as a Non-Designated Heritage Asset (FNP15) due to its archaeological significance. It is used by 7 species of bats²⁵. The south east corner of the

²⁴ John Wright 'A Natural History of the Hedgerow' 2016 p.3

²⁵ fpcr: Ecological Appraisal for Gladman Developments Ltd. Land off Horcott Road, Fairford 2016, para. 4.41 p.38 (CDC Application No.16/01766/OUT).

site is subject to surface water flooding – this is recognised on the Environment Agency Surface Water Flooding Map. The field is rich in wildlife.



3.3.3 Views across Carters Ground from Horcott Lakes permissive path

3.3.4

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

3.3.6 Running alongside the southern boundary of this field is the ditch which takes run-off water from fields and developments to the north of the A417 and from the development to the immediate west of the field. The ditch runs underneath the Mere driveway and into the Horcott Lakes site. Drainage runs via the Dudgrove Ditch from Horcott Lakes, across the runway of RAF Fairford (which does flood) to the nearby settlement of Whelford. This is one of the fields subject to a planning appeal from Gladman Developments Limited.

3.3.7 This site forms the western end of the Fairford – Horcott Local Gap and is therefore crucial for the demarcation of the two very distinct settlements of Horcott and Fairford at its narrowest point. As has been noted in The Short Piece analysis, consultants for Gladman Developments Limited accept that the gap here is narrow, but it is, nonetheless, a gap, and its protection has become more imperative. The developer's suggestion is that the fields south of The Old Piggery would maintain an 'additional green gap'²⁶ but this is to make a nonsense of the 'gap' concept since development here would eliminate any sense of there being two separate and distinct settlements. At this point (Carters Ground), housing would extend, literally uninterrupted, from Horcott to the A417.

3.3.8 The Fairford - Horcott Local Gap has to be a coherent, interconnected partition which clearly separates Fairford from Horcott, allowing open views across the fields to the Conservation Area if coalescence of the two settlements is to be prevented. This is recognised by Cotswold District Council: 'The flat lowland qualities and open pastoral character are typical of this landscape character type. I consider that these qualities along with attractive landscape features such as established hedgerows, low stone walls and

²⁶ Cotswold District Council Planning Reference: 16/01766/OUT 'Outline with all matters reserved apart from access for up to 92 dwellings (including up to 50% affordable housing) public open space and children's play area and associated works.'

mature roadside trees make an important and pleasing contribution to the rural setting of the village which should be preserved. This can be appreciated from a number of local viewpoints.¹²⁷

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

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

3.4 The Short Piece

3.4.1 See Local Green Space discussion

3.5 Coln House Playing Field



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

3.5.2 See Local Green Space discussion

²⁷ Cotswold District Council Planning Reference: CT.9172, 16/01/66/OUT: Development Services – Landscape Response, KS, p. 3

3.6 Fairford and Lechlade Youth Football Club (F&LYFC)



3.6.1 Map showing location of F&LYFC



3.6.2 Environment Agency flood map for F&LYFC fields²⁸

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

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

3.6.5 The fields mark the start of the Coln River Valley floodplain at Fairford. The Environment Agency Flood Map for Planning: flood zone 3 extends some way across these fields (see 3.6.2). The White Report of 2000 has identified areas 'where development is not suitable' One is 'The floodplain due to the intrinsic scale, character and quality of the landscape, its contribution to the town's setting and because of its flooding characteristics.'²⁹

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

²⁸ Environment Agency Flood Map for Planning: <http://maps.environment-agency.gov.uk/wiyby/wiybyController>

²⁹ 'The White Report:' Study of land surrounding Key Settlements in Cotswold District: June 2000, para.10.12, p. 31

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

3.6.8 Area: 2.43 h



3.6.9 Fairford and Lechlade Youth Football Club Ground, taken from Horcott / Fairford footpath

3.7 The Floodplain extending along the River Coln

3.7.1 A sinuous line of green fields **and gardens** combines to create linked vistas throughout the whole length of the town.' The flood plain to the south consists of a variety of smaller meadows and larger arable fields away from the river to the east. The meadows are enclosed by outgrown hedges with fences ... The floodplain is an important element of the landscape setting to the town.'³⁰

3.7.2 'The area is heavily used as a recreational resource e.g. dog walking.'³¹ From the Fairford - Horcott Local Gap, to the fields which run along the River Coln and form the River Walk, all the way to Lake 104. These are nearly all in the floodplain. Some of the views have been affected by development at both the west and east end of the town, which makes the remaining landscape so much more precious. 'The floodplain is an important element of the landscape setting to the town.'³² The floodplain anchors the Fairford – Horcott Local Gap on the river, leading from Bull Island and Dilly's Bridge down to the fields opposite the working Horcott Farm; from one river crossing down to the next, Cutlers Ford, which permits the passage of farm vehicles, as well as children paddling in the summer heat.



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

³⁰ The White Report: ' Study of land surrounding Key Settlements in Cotswold District: Update 2014 para.12.6, p. 62

³¹ Ibid, p. 62

³² Ibid, para 12.8, p. 62

3.7.4 A Cotswold Water Park report on this area states, 'The broad riparian corridor and floodplain area will provide additional benefits through management of parts of this area for wildlife as well as for water control thereby ensuring more effective water storage in the Upper Thames as well as helping to protect settlements downstream.'³³ 'One of the key strands to this vision is that built development should not, and cannot be undertaken on the floodplain; this will protect settlements elsewhere in the Upper Thames, will prevent inappropriate developments and will also safeguard these areas for wildlife.'³⁴

3.7.5 All these areas are unsuitable for development as they are either in the River Coln floodplain, or are at the highest risk of groundwater flooding according to the Gloucestershire Groundwater Management Plan³⁵. The data provided includes Fairford observation wells and 'indicate many exceedances of the ground level recorded [...] There is clear indication of an upward trend in groundwater level at ...and Fairford'.³⁶ Appendix C. Groundwater Level Data chart p.52 for Fairford shows ground water levels between 1996 and 2010 with multiple exceedances above ground level.



3.7.6 The Fairford – Horcott Local Gap – Policies Map

³³ Cotswold Water Park; Integrated Landscape Character Assessment: Final Report 2009 'Ecological Character' 6.0 Section 6.0 p.33

³⁴ Cotswold Water Park Biodiversity Action Plan 2007-2016, Section 31, p. 24

³⁵ Gloucestershire Groundwater Management Plan, Groundwater Immediate Assessment – South Gloucestershire District April 2015 Map p.35, Chart p. 52.

³⁶ Ibid, p. 12

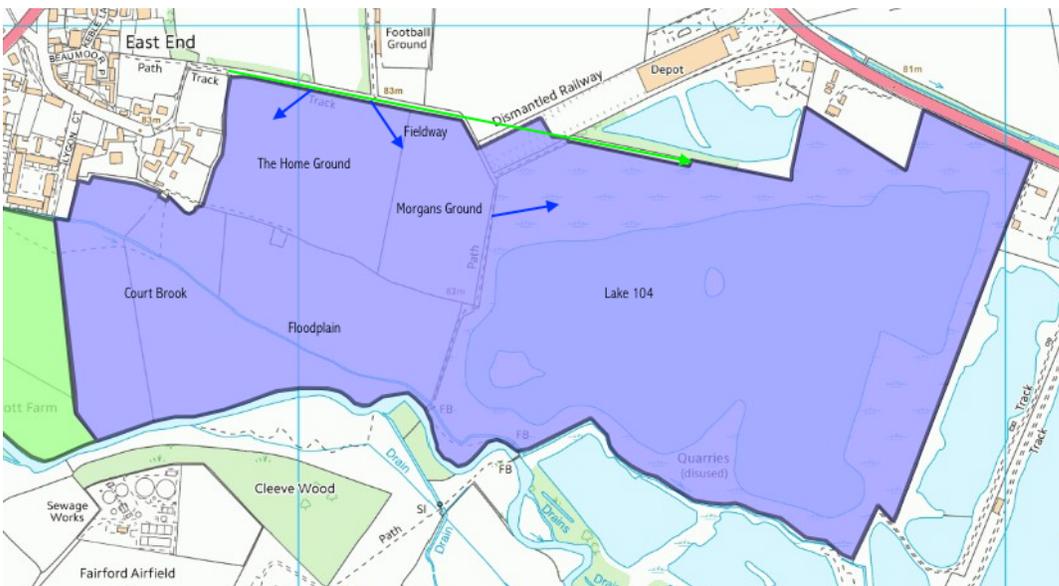
4.0 AREA OF SPECIAL LANDSCAPE VALUE (FNP12)

4.0.1 The Area of Special Landscape Value aims:

- a) to recognise, safeguard and enhance the local landscape;
- b) to promote a sense of pride in the area and encourage a sense of place;
- c) to acknowledge the quality and character of the new landscape - the result of recent, extensive gravel extraction;
- d) to encourage active water management activities.

4.0.2 The Area of Special Landscape Value will consist of:

- a) Fields running between Fieldway and the River Coln floodplain;
- b) River Coln floodplain, from the end of the Fairford – Horcott Local Gap to the western edge of Lake 104;
- c) Lake 104.



4.0.3 Annotated policy map showing the full extent of the proposed Area of Special Landscape Value

4.1 Fields between Fieldway and the River Coln Floodplain



4.1.1 Map showing location of fields between Fieldway and River Coln Floodplain

4.1.2 These fields (The Home Ground and Morgans Ground) lead out of the floodplain and are important as a visual amenity; they will also be needed if one of the Fairford

Neighbourhood Plan's desired projects (reinstatement of the water meadows) is to be completed. They form the first river terrace coming down from the ancient 'Fieldway' path. As can be seen from the map, they are the only remaining fields where such restoration is possible.

4.1.3 This site also has historic, as well as natural, value. A part of this site is mentioned in the Historic Environment Record 2480 DESCRIPTION: 'Cropmarks of a settlement site consisting of circles & irregular enclosures & ditches were seen from the air in 1942, south-west of Fairford railway station.' Elsewhere the record states, 'Two probable Prehistoric or Roman hut circles were seen as cropmarks and mapped from good quality air photographs. The hut circles are centred at SP 1601 0077 and SP 1600 0076 [Morgan's Ground] and are 11m and 12m in diameter. They are joined together by a double ditched linear feature 8m long which has been interpreted as a trackway.' Such archaeological finds should be preserved (see 2.3.5 – much of the archaeological record in this area has been lost to gravel pits and development).

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

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

4.1.6 These are sites at the highest risk of groundwater flooding according to the Gloucestershire Groundwater Management Plan, Groundwater Immediate Assessment – South Gloucestershire District April 2015 Map p.35, Chart p. 52. WILD Project Rivers Management Plan for Fairford Parish May 2016, p.7, states, '...future management practices should aim to create more flood winter storage capacity for storm events.'

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

4.1.8 Pre-submission consultation comments indicate the importance of this area of land to the local community. 'Wildflowers, Wild Animals, Birdlife. I walk north, south & east of this land and have personally encountered and watched; roe deer, 30 different bird species, several types of orchids.' 'This area is crucial to keep wildlife in the town by providing a natural habitat. Also a great space for exercising dogs.' 'Recreational value – encourages walking. Richness of its wildlife. Natural environment essential to wellbeing'. 'Every spring on the eastern edge of

Morgan's Ground there are dozens of grass snakes emerging from hibernation – a privileged sight. In the summer skylarks are seen and heard in the sky above the cereal growing in these and neighbouring fields.' .They [the fields] form part of a rich corridor for wildlife, areas which we are fast losing.' 'This is a great wild life corridor, with nest birds and mammals in spring, but in the winter it comes into its own being a great area for winter thrushes, finches and buntings – all declining species.'

4.1.9 Agricultural Land Classification: 3 Good to Moderate



4.1.10 Towards The Home Ground from Fieldway

4.1.11 Towards Morgans Ground from Fieldway

4.2 River Coln floodplain, from the end of the Fairford – Horcott Local Gap to the western edge of Lake 104

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

4.3 Lake 104

4.3.1 Lake 104 is unique in having public rights of way round the full perimeter of the lake, providing a truly rural open landscape with no houses, roads or traffic, but a wide stretch of water with many trees, shrubs and wildlife which promote a sense of remoteness and tranquillity. The large number of footpaths entering the area (5 public access points) gives an indication of the importance to the town

4.3.2 Lake 104 forms part of a group of 6 interlinked lakes: 102, 102a which are both SSSI lakes, 103, 103a, 104 (the largest with a perimeter of c.750mx500m, or c.2 miles) and 105, used for water-skiing and sporting activities. They were all formed from gravel extraction in the 1980's; they are all part of the Cotswold Water Park, and serve a vital function as flood reservoir for Fairford. The lakes are groundwater fed but also receive overspill from the River Coln when the water level is high, as well as from the Court Brook. The Court Brook is a minor

watercourse draining from Fairford which runs at a lower level between the river and lake 104, and channels surplus water into the lake in times of flood.

4.3.3 This area has long been highly valued by the residents of Fairford. Before gravel extraction there were open fields here and the Broad Boards Meadow was the summer playground of the children of Fairford. After gravel extraction the area reverted to its traditional role, the PROW around Lake 104 becoming a favourite walking route. A jetty out into the lake (since removed) was also a favourite resting place.

4.3.4 The area adjacent to Lake 104 and the river by the Broad Boards was formerly Glebe land, belonging to the church and much used by the community for recreation, picnics, church outings etc, and this is the place where local children learnt to swim. In 1983, when the gravel extraction was completed, Fairford Town Council discussed acquiring the land as an amenity area, noting, "the main advantage is that it is easily accessible to the whole town by foot. It is an area that has been walked and enjoyed by the community for generations". When the land was sold and fenced off in 2007, the loss was so keenly felt that an unsuccessful attempt was made to have the area registered as a Village Green.

4.3.5 After a long battle, outline consent for development was granted in 2010 and full consent in July 2013 for a leisure centre and car park at the NE corner of lake 104, and 140 holiday homes and apartments around lakes 103 and 103a, at the eastern end of Lake 104.

4.3.6 The open PROW was closely fenced and the surface of the path deteriorated – but in spite of this the area continues to be appreciated by local residents as is evidence by the questionnaire (several respondents specifically named Lake 104 as a valued open space in Question 3)).

4.3.7 Planning permissions protect most of Lake 104 and the PROW and this protection should be upheld, as should the views both from the PROW and over to the PROW. Lake 104 is unique in being the only lake in the eastern Water Park which has a PROW completely encircling the lake. The appeal inspector writes, 'I consider that the site, particularly that part containing lake 104 with its attractive qualities of rural character and unspoilt open space, the expanse of water fringed with trees and enhanced by the various bays, promontories and islands and populated by water birds, and the wider backdrop of the River Coln corridor and elements of mature woodland, constitutes an attractive rural landscape.'³⁷ '...it is the combination of the landscape character of the site together with its location in relation to Fairford and the public accessibility it enjoys which results in its main amenity value.'³⁸

4.3.8 'The location of Lake 104 so close to Fairford and easily accessed from the town via a variety of public footpath routes, the attractive, peaceful, rural character and setting of lake 104, and the existence of a 'natural' circular route around the lake which also links into the network of paths within the River Coln corridor combine to create an important asset which clearly is highly valued by the local community.'³⁹

³⁷ Lake 104, 103, 103a Appeal Ruling APP/F1610/A/07/2043652/NWF, para. 234

³⁸ Ibid. para. 237, p.32

³⁹ Ibid, para. 237, p.32



4.3.9 Looking east from the track beside Morgans Ground. The trees to the south mark the edge of Lake 104.

5.0 Responses to Pre-submission consultation comments

5.1 In general responses from the statutory consultees were supportive of these proposals. Both Gloucestershire County Council and Cotswold District Council were concerned for the future of the archaeology of Fairford, specifically in relation to Non-Designated Heritage Assets, but also applicable in this study. 'Fairford parish is particularly rich in undesignated heritage assets of archaeological interest, some of which are of equivalent significance to designated assets (NPPF 139) which are not considered.' (GCC response), and the NDHA 'list could be expanded to include archaeological and other historic environment features, such as Fairford Park'.

5.2 Whilst reference to the archaeology of the various sites here (Coln House Playing Field, The Short Piece, Carters Ground and Morgan's Ground) were included in the original submission these have been strengthened and made more explicit.

5.3 Natural England recommended, 'A specific Neighbourhood Plan policy requiring green infrastructure creation and preservation,' and the proposals in this document should go some way towards this end.

5.4 Objections came from landowners' representatives who would be adversely affected by the proposals in that, if accepted, the proposals would inhibit developments on their land.

5.5 The most extensive objections were from Gladman Developments Ltd. And relate to the proposal to designate The Short Piece as Local Green Space (FNP10) and part of the Fairford-Horcott Local Gap (FNP11). They make 5 basic assertions:

1. the land is not recreational;
2. the land has no public access;
3. the land is not demonstrably special;
4. the land is not of any particular scenic quality;
5. the area is an extensive tract of land.

5.6 The requirement for land to be recreational is only one possible example of several given in the NPPF para.77. The crucial requirement is that it be 'demonstrably special to a local community and holds a particular local significance'. Our contention is that The Short Piece is demonstrably special on the grounds of its 'historical significance' and 'tranquility'.

5.7 We have expanded our argument as regards 'historical significance' by providing a) more context to explain why the archaeology of this area is particularly important to local residents in para. 2.3.5 and b) more information about the archaeology of the site in question in para. 2.3.6. It should be noted that the importance of the archaeology of the area is recognised in the Gloucestershire County Council and Cotswold District Council responses in the Pre-Submission Consultation.

5.8 In addition, the claim for 'tranquility' has been emphasised by the responses of local residents in the pre-submission consultation, some of which have been included in para. 2.3.13 (All consultation responses are to be found in the 'Consultations' section of the submission).

5.9 It is not quite clear why the fact that the PROW is 'located the opposite side of a wall' is significant, particularly since that wall does not in any way impede open views across The Short Piece. However, this point has been clarified in para. 2.3.7.

5.10 An aesthetic appreciation of 'scenic quality' is necessarily subjective and the fact that an LVA commissioned by Gladman Developments has found that the 'area is not of any particular scenic quality' is therefore unsurprising. To set against this, is the testimony of local residents who clearly enjoy the tranquil view, the wildlife and the rural atmosphere of this area.

5.11 The Short Piece is not an 'extensive tract of land'. At 3.2 hectares it is smaller than 3 of the 4 examples supplied: Seldlescombe 4.4ha, Oakley and Deane 5ha and Alrewas 3.7ha. The final example, Alrewas 2.4ha, was not rejected solely on

grounds of size, but also due to the examiner's view that 'no compelling evidence has been presented to demonstrate that each of the specific green areas are demonstrably special to the local community and that each specific green area holds a particular local significance.'⁴⁰ We hope that this proposal has provided that 'compelling evidence' for Fairford/Horcott, both for the Local Green Spaces and for the Fairford-Horcott Gap.

5.12 Gladman Developments Ltd. also object to the policy which will 'Protect the Fairford – Horcott Local Gap. They cite CDC's decision to consider Horcott 'an integral part of Fairford' but this is a description in the emerging CDC Local Plan which has been challenged. It has no basis or justification in history or geography. The distinction between the two settlements is made clearly in this document, in the historical introduction to the proposed Fairford Neighbourhood Plan and in the supporting Character and Design Assessment.

5.13 Gladman Developments Ltd have also drawn attention to the use of the word 'create' in 'to create a visual break between old and new ...' in the Policy aims (para. 3.0.1). This has been replaced with the word 'preserve' which, it is agreed, more properly represents the aims of the policy.

5.14 Finally, Gladman Developments Ltd have raised objections to the proposal for an 'Area of Special Landscape Value' on the grounds that, essentially, 'an area's pleasant sense of openness and the presence of views across an area to open countryside cannot on their own amount to a valued landscape' and it is hoped that the detailed analyses of the various separate elements of this landscape has made it clear that the reasons for this designation are far more than simply because it is 'an area of farmland on the edge of a settlement'.

5.15 The history and evidence of the importance of the Area of Special Landscape Value and the Fairford – Horcott Gap have been expanded.

5.16 Moore, Allen and Innocent, writing on behalf of the Cole Family Trust, has expressed an interest in developing the fields between Fieldway and the River Coln Floodplain (4.1) but no specific objections to the Area of Special Landscape Value designation were raised.

5.17 The owners of one of the 2 fields identified in section 3.2, photograph 3.2.4 have objected on the grounds that they intend to submit 'a Certificate of Lawfulness application in respect of the land with regard to its established use for storage purposes' and that it cannot therefore be regarded as 'green space'. In addition they reject the idea that it forms part of a 'gap' between Horcott and Fairford and would be prepared to develop the site at some future date.

5.18 There is no objection to the established use of the land for storage purposes and the inclusion of the field in no way seeks to impede this use. However, the

⁴⁰ Alrewas Neighbourhood Plan: Examiner's Report, p.26

position of the field on the boundary of the Conservation Area (para. 3.2.2) does mean that it has a dual function in protecting the setting of the Conservation Area and in maintaining the open, rural landscape in which the settlements sit.

6.0 Summary

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

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