



Neighbourhood Planning
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX

12 December 2022

Our ref: RCA108aad

SENT VIA EMAIL

neighbourhood.planning@cotswold.gov.uk

Dear Sir/Madam,

RE: Fairford Neighbourhood Plan Regulation 16 Pre-examination Consultation Representation
Land at Fairford Town FC for Piper Group

- 1 We make this representation on behalf of our client Piper Group, who are promoting part of the land at the Fairford Town FC site for residential development (the southern parcel as shown on the below site plan).



- 2 We do not respond to all sections of the FNP, only those which we consider relevant to our client and the site they are promoting.



- 3 We are disappointed that the site is not proposed for allocation for residential development in the FNP. The Site Assessment Report supporting the FNP discounts the site for development on the basis that there are concerns about how the relocation of the club could be achieved, concerns about access, and concerns about loss of trees and hedgerows. These concerns are all erroneous as set out below. A request for pre-application advice containing further, more detailed information has also recently been submitted to Cotswold District Council for their consideration, to demonstrate the deliverability of the site.
- 4 On the basis of the erroneous initial assessment of the site, a detailed site assessment was not carried out and the site was not carried forward through the site selection process, so was not properly assessed against the other available sites or considered as part of the Sustainability Appraisal for the FNP, to ensure the most sustainable options received allocations. We consider this to be a serious flaw in the site selection process and object to the allocations contained within the FNP on this basis. It is noted that failing to fully consider all available evidence, all reasonable alternatives and overall demonstrate a positive contribution to sustainable development were some of the failings of the previously withdrawn FNP and we are disappointed that the new FNP still fails to be robust in its approach.
- 5 The Cotswold District Local Plan allocates two sites in Fairford totalling 61 units, noting that these are assumed to come forward towards the end of the Plan Period (2031). As noted at paragraph 3.9 of the FNP, these sites are now considered unlikely to come forward at all and as such the FNP should allocate sufficient land for at least 61 new homes to remain in conformity with the CDLP. An approach which provides robust and flexible options for sustainable development in Fairford is clearly required.
- 6 However the FNP appears to allocate a single site under Policy FNP14 for a “new low carbon community” of “around 80 homes” in a location at the northern-most extent of the settlement in a location which relates poorly to existing facilities and services in the settlement, is contrary to the existing pattern of development of the settlement and would require an illogical extension to the development boundary to contain it. Whilst the concept of a low-carbon community is lauded, the proposed allocation is not of a sufficiently large quantum of development to justify proposing it in such a relatively unsustainable location, and the amount of pre-conditions imposed by policy FNP14 may well hinder timely and viable delivery of development. We therefore object to this proposed allocation as the sole allocation provided for by the FNP.
- 7 We feel that proposals by Piper Group at Fairford Town FC would make a valuable contribution towards meeting the local and district-level housing need in a sustainable location as well as retaining and enhancing recreational sports facilities in the Town. We would therefore like to highlight the positive attributes of the site and our client’s proposals that make the site suitable for residential allocation in the FNP and request that the site is reconsidered for inclusion in the FNP on this basis, either in preference to or in addition to the proposed allocation FNP14.
- 8 The Fairford Town FC ground is made up of two almost separate rectangular parcels with a small gap in the hedgerow to allow pedestrian access between them – the northern parcel fronts London Road with access off Morecombe Way, and contains two sports pitches. The southern parcel is

accessed off Cinder Lane and contains a football pitch with spectator seating, changing rooms and a social club room. The total site area is 3.9 hectares.

- 9 The current Development Boundary for Fairford has a rather contrived segregation to artificially omit the site from the settlement, despite it being surrounded by residential development. FNP Policy FNP1.1 amends the Development Boundary at Fairford yet fails to correct this. We object to the omission of the site from the amended Development Boundary – the site is clearly an integral part of the settlement and should lie within its boundaries. Furthermore we object to Policy FNP1.1 and its blanket exclusion on new-build open market housing “outside the development boundaries unless it is in accordance with other policies that expressly deal with residential development in such a location”, since this precludes development coming forward where materials considerations and the planning balance demonstrates that development would be sustainable despite lying outside a development boundary.
- 10 Our client’s proposals would introduce residential development on the southern parcel of the site, which covers some 1.6 hectares and could accommodate up to 39 new homes. It would be accessed from the existing residential development to the east of the site at Trubshaw Way/Austin Abbey Close. The northern parcel would then retain its current use as sports pitches but with enhancements to the facilities on offer.
- 11 The site is not located within the Green Belt, AONB or Special Landscape Area, is not within a Conservation Area (although it abuts a Conservation Area to its western boundary, which comprises the ground of Grade II Listed Morgan Hall).
- 12 The site is entirely located within Flood Zone 1, with no known surface water flooding issues at the site. The FNP states that flooding is a local concern and this site would assist in directing development to sites with lowest flood risk.
- 13 The site is mostly flat and surrounded by trees and hedgerows (no known TPOs), therefore there would be very limited visual impact as a result of development of the site. These boundary features could be largely retained to ensure minimal biodiversity loss on site.
- 14 It is acknowledged that the site currently contains playing fields and the proposals would result in the loss of this private recreational sport use on the southern field. We do however object to the inclusion of the site as a Community Facility at Policy FNP3 and Map D. Whilst we do welcome the recognition of the value of the facility at the site, this is a private facility with no public right of access, and no consultation has taken place with the landowners in connection with designating the site as a Community Facility.
- 15 However, as part of the proposals, the recreational and sports provision on the northern field would be improved to more than compensate for the loss of the southern pitch. We therefore request that Policy FNP3 and Map D be amended to retain only the northern parcel of land as a Community Facility. Given that this policy relates to the viability of community facilities, we would expect the FNP to reflect the fact that residential development of the southern parcel would effectively be enabling development for the enhancement of the recreational sport facility on the northern parcel.

- 16 It is proposed to provide a 4G artificial pitch on the northern field. Currently the nearest 4G pitch is some 9 miles away at Cirencester. The Cirencester facility has very high usage and little capacity to accept bookings at peak times. The next closest is then Swindon, which again is well used and longer travel times (12 miles). A 4G pitch in Fairford would bring a highly desirable facility to the Town and would also serve demand to the east, north and south of Fairford.
- 17 The 4G pitch would also improve the facilities enjoyed by Fairford Town FC itself. A flood lit 4G pitch would allow more training sessions and matches to be hosted during the winter months and negate the need for the Club to travel to and pay for hire of the 4G pitches at Cirencester and Swindon, which would benefit all of the teams who use the Club as their home base. The 4G pitch could also be made available to local schools and could offer a training facility to the local Rugby Club as well. Relocating the main facilities to the northern field would also allow for the much-needed improvement of the current changing and social facilities for the club.
- 18 It is therefore considered that the loss of the existing football pitch on the southern field would be more than mitigated by the provision of a 4G pitch on the northern field, which would allow much-needed housing to be delivered on the southern parcel, as a natural continuation of the existing residential development around the site.
- 19 The site would offer a highly sustainable location for residential development in the settlement whilst providing enhanced recreational sports facilities. We consider that the site would have scored highly against the sites which have been proposed for allocation, had it been carried forward and included in the site selection process and sustainability appraisal. It is available for development now, in a single ownership, with a developer promoting the site to secure timely delivery. Its inclusion in the FNP would provide certainty and lead to a more robust and flexible approach to residential allocations.
- 20 For the reasons highlighted above, we ask that this site be reconsidered for residential allocation in the FNP.
- 21 We also highlight an apparent error on the Policies Map – the key does not appear to contain the correct policy numbers for some of the proposed sites and these errors require correction to ensure the designations on the Policies Plan are clear and unambiguous.

Yours sincerely,

Katie Parsons LLB Msc (Hons)

Director

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