COTSWOLD DISTRICT LOCAL PLAN

Regulation 19 Consultation: November 2026

Introduction

Current proposals include significant growth to both Fairford and Lechlade which will impact upon the infrastructure of those communities directly but will also impact upon the life of the residents of Kempsford Parish as they also provide their local services.

For the parish of Kempsford, the main issues arising from the proposals are:

- The lack of any evidence that the impact of potential operations at RAF Fairford on major housing proposals in the area make it impossible to assess the viability of proposed development sites as no assessment has been made upon the impact of noise from RAF Fairford. The lack of such an assessment means that housing may be built in areas that prove dangerous to the mental and physical health of future occupants of those houses with the result that the lack of any assessment in this published Local Plan renders it **UNSOUND**.
- The impact upon the community infrastructure (doctors, library, shops, etc) of the proposed growth in the Principal Strategic Settlements of Fairford and Lechlade which are used by Kempsford Parish residents;
- The direct impact of the proposed growth of Fairford and Lechlade upon the Parish of Kempsford, e.g. because of the increased traffic through Whelford along the C124 as an alternative route to Swindon and the A419;
- The need to retain the current level of community infrastructure, including the school, pub, village halls, etc., within Kempsford Parish in a way that is sensitive to the needs of the community, rather than those needs as assessed by others;

The general principle of allowing controlled growth of Kempsford is welcomed as a means of allowing the community to grow at a rate that, whilst not imposed, allows for existing community facilities to be maintained, organically grown and added to for the benefit of the whole of the community. The priorities for this should however be set in consultation with the community.

Background

Over the last 50 years or so the Parish of Kempsford has grown in the number houses and individuals living in the Parish. However, during that period, the infrastructure that contributes to the sustainability of the community has diminished. One of the two pubs has closed as has the shop/post office. Despite attempts to continue a shop in some form, the current position is that there is a “pop-up” Post Office once a week in Kempsford Village Hall and no shop. The experience of the community is that a shop as a standalone commercial enterprise is unlikely to be viable given the options of internet ordered grocery delivery and

access to convenience shops in Fairford and Lechlade, whose customer base includes residents of Kempsford Parish, and larger supermarkets in either Swindon or Cirencester. Any Kempsford based solution should be based upon the combination of community facilities such as a Village Hall, Community Café, Convenience Store, and a Parish Council office in a single building drawn upon the experience of such places as Down Ampney and Siddington.

The community has a history of wanting/accepting organic growth and has significant experience of encouraging developments that fit with the practical needs of the community – Such as Hazel View. Those attempting initiatives such as the introduction of a Convenience Store should listen to that experience.

Nevertheless, Kempsford has retained a number of important community facilities including:

- An active church based upon the historic church in Kempsford and the smaller chapel in Whelford;
- A burial Ground – although it should be noted that this is close to reaching its capacity and that **a new site needs to be found**;
- A vibrant Public House (The George) in Kempsford;
- Two (**not one as noted in this Local Plan**) Village Halls in each of Kempsford and Whelford;
- Two play areas (**not one as noted in this Local Plan**) one in each of Kempsford and Whelford;
- A CofE Primary School in Kempsford; and,
- The recently added full size Junior Football Pitch, MUGA and play area in Kempsford. It should be noted that this is a shared community asset managed by Kempsford Parish Council with agreed priority use by the School during the School Terms – **not a School only facility as described in this Local Plan**.

Kempsford does not have the following facilities identified in the Local Plan:

- **Cricket Pitch**. The Local Plan identifies Kempsford as having a disused Cricket Pitch that should be retained with the possibility of revival. The Cricket Pitch in Kempsford existed with the agreement of a previous owner of The Manor. With a change of ownership, that agreement was withdrawn. The area that was used by Kempsford Cricket Club is no longer available to them.

Of particular concern is that this growth, particularly the inclusion of the Strategic Site in Fairford, are likely to impact on traffic density in the area and in particular increase the amount of traffic on the Whelford Rd through Kempsford Parish.

Legal Compliancy and Soundness – The Issue of Noise from RAF Fairford Operations

Historically, the use of RAF Fairford (The Base) has varied between being a fully operational airbase with aircraft "permanently" stationed on rotation at it to having fewer or no aircraft permanently based there. During the period of permanent occupation there is clear evidence that the issue of noise was taken seriously with some houses being fitted with (e.g.) soundproofing to windows. Since then, the usage and growth of usage of RAF Fairford has been of low impact upon the community as flying has largely been restricted to daily U2 flights and exercises involving a limited number of bombers with minimal night activity. This latter period was marked by the withdrawal of all military personnel and facilities retained on a "standby" basis with a minimal civilian support. More recently we have seen the expansion of the use of The Base with the deployment on a permanent and rotational basis of military personnel, the (near) completion of major infrastructure projects (including the Multi-Use Hangar) and plans for further infrastructure improvements indicating the future more intense use of The Base.

The recent extended deployment of some 12 to 24 B52s and B1-Bs was a reminder to the community that operations may return to The Base and of the impact that would have. The B1-B has a noise level of 140dBA and during the recent deployment sound levels of 100dBA were recorded, with the assistance of CDC Environmental Health, inside of properties close to RAF Fairford during the night.

One of the main issues cited for "doing nothing" at the moment has been described as being because RAF Fairford functions as a standby **deployment and contingency airfield**, rather than a base with permanent UK based flying squadrons, it lacks the baseline of continuous, daily domestic training flights required to generate a standard, active annualised noise (and presumably air pollution) contour map. However, as the deployment continued the need for foundational data that can be used to assess the impact upon the mental and physical health of residents became increasingly important. As far as can be ascertained, there is no JSP418 Environmental Assessment nor current RAF Fairford Military Aviation Noise Contour (MANC) assessment/map - although all other military aviation bases in the UK do have these. Such a MANC assessment/map is needed in order to ensure that the adoption of Development Sites within the Local Plan remain reasonable given the potential environmental hazard to future occupants of those sites by the adoption of appropriate sound mitigation measures that cannot be assessed without a MANC assessment/map showing that those noise levels might be mitigated at reasonable cost to the developer and sufficiently to ensure the mental and physical health of their future occupants is not affected.

Although somewhat dated, in 2008 a similar exercise was undertaken in the USA at Ellsworth Air Force Base (AFB), the Air Installation Compatible Use Zone (AICUZ) study (see HERE) that sought to identify those planning zones impacted by noise and by potential crash risk.

Ellsworth AFB remains a main operating base for the B1-B, one of the aircraft types recently operating from RAF Fairford. Whilst the detail of this report is set in an American context, it lays out the principles of a process that identifies areas that are incompatible with Development or in which other measures, such as building codes, should be adopted in order to achieve a maximum interior noise level of 45dBA or lower. It is noted that this mapping appears to rely upon the known noise of the aircraft operating from the Airfield and not absolute readings. In the context of RAF Fairford it is suggested that this should be the B1-B given the noise of this aircraft and its likely deployment to RAF Fairford on what may be a recurring/extended basis under the terms that allow United States Visiting Forces (USVF) to use RAF Fairford.

In the context of the UK and based upon the requirements laid down in JSP418, it is understood that responsibility for such an assessment, including producing a MANC assessment/mapping, lies with the Defence Infrastructure Organisation (DIO) within the Ministry of Defence (MOD). The Local Planning Authority should then work with the DIO to interpret it in order to ensure that the safety of and impact upon future residents of any nearby Development Site is considered as part of the site selection process. The completion of a MANC assessment map and crash risk assessment should be considered a key part of that site selection process.

JSP418 has not been followed and a MANC assessment/map has not been produced for RAF Fairford so this assessment cannot be made.

Affected proposed development sites include those at Down Ampney (Strategic Site 5) but may also impact upon smaller developments, such as that at Kempsford (R203A-C) where its position relative to the runway may mean that sound mitigation measures might suffice. However, standard building designs cannot mitigate the severe low-frequency noise and vibration spikes associated with B-52 and B-1B operations. The plan fails to prove that acceptable indoor and outdoor living amenities can actually be achieved on sites, including that at Kempsford, in the vicinity of RAF Fairford

Without a full JSP418 environmental assessment, including a military aviation noise contour (MANC) assessment/map to be made based upon the aircraft types most likely to use RAF Fairford for extended periods of time or to be assigned to RAF Fairford at some point in the future allowing for the reasonable assessment of the suitability of proposed development sites in the vicinity of RAF Fairford this Local Plan submission is **UNSOUND**.;

Legal Compliancy and Soundness – The Duty to Cooperate

Whilst this Local Plan has considered a number of aspects relating to adjacent planning authorities, Kempsford Parish Council is concerned that the cumulative impact of Quarries at and to the west of Kempsford along the C124 have not been considered. Many of these Quarries, such as the adjacent Blackburr Farm Quarry, lie in Wiltshire as do sections of the C124. The C124 is along much of its length a minor road already under pressure from heavy

quarry and commercial transport vehicles as well as cars transiting from the A417 to the A419. No assessment appears to have been made as to whether the increase in traffic as a consequence of developments in Fairford and Lechlade as well as the increase in heavy quarry lorries as more quarries are opened should require an upgrade to this shared road.

The Plan completely fails to calculate the cumulative transport and safety impacts of routing domestic traffic onto the C124—a highway already structurally compromised and severely constrained by over 450 consented HGV movements per day from Down Ampney Airfield, Whetstone, Kempsford, and Blackburr quarries. Without a holistic, cross-boundary cumulative transport assessment between Gloucestershire and Wiltshire, this allocation is undeliverable and unsafe. This Local Plan is **UNSOUND** in lacking this detail.

Legal Compliancy and Soundness – The Design Code

Kempsford Parish Council considers the Design Code to be a critical part of the revised Local Plan and notes that it is being prepared as a Supplementary Plan and has not yet been issued. As such, Kempsford Parish Council consider this Regulation 19 consultation to be fundamentally flawed and therefore **UNSOUND**.

The allocation of 149 homes to Kempsford (a Non-Principal Settlement) is **UNSOUND** and ineffective unless the strict environmental and spatial layout rules of the emerging Cotswold Design Code Supplementary Plan are adopted concurrently. Without a legally binding, finalized design code in place from day one, Kempsford is entirely vulnerable to developments that fail to mitigate the intense local constraints of the acoustic disruptions of RAF Fairford.

Kempsford Parish Council have the reasonable expectation that *no development can take place* within the Parish until the emerging **Cotswold District Design Code Supplementary Plan** is formally adopted with bespoke, non-negotiable acoustic engineering and structural insulation standards specifically tailored to the unique impacts of RAF Fairford.

Legal Compliancy and Soundness – Infrastructure and Transport Policies

The Draft Local Plan 2026–2043 fails to be positively prepared because it treats the **Fairford to Lechlade Multi-Use Path (MUP)** as an isolated corridor rather than an integrated regional network. Specifically, the plan makes no policy provision to bridge the severe infrastructure gap between the village of **Kempsford** and this proposed multi-use network.

To create a truly cohesive sustainable transport strategy, the plan must formalise the physical connection from Kempsford village north-eastward via **Dudgrove Lane to the Thames Path National Trail**, which directly interfaces with the southern alignment of the planned Fairford–Lechlade multi-use path. Without protecting and mandating this network linkage, the plan relies on fragmented rural infrastructure and fails its own strategic objectives for decarbonisation and non-motorised transit.

Currently, residents of Kempsford wishing to access the emerging multi-use path or the Thames Path are forced to use narrow, high-speed rural lanes with poor visibility. Dudgrove Lane provides a crucial, direct, and logical connection point to the river and the wider Water Park network.

This version of the Local Plan fails to secure this infrastructure link directly contradicts the Gloucestershire Local Transport Plan (LTP) Active Travel Priorities (which specifically mandate improvements to the Cirencester–Fairford–Lechlade corridor) and ignores the ongoing Gloucestershire Rights of Way Improvement Plan (ROWIP).

Substantial sand and gravel extraction permissions and subsequent restoration schemes are slated for the land adjacent to Dudgrove Lane and Manor Farm. By omitting explicit policies to safeguard a continuous, dedicated multi-use bridleway linkage during these land restorations, the Local Plan is *ineffective* at utilizing development to achieve community infrastructure benefits.

Kempsford Parish Council therefore consider that without amendment to INF1 (Sustainable Transport), INF2 (Infrastructure), and Chapter 10 (South Cotswolds / Fairford & Lechlade Development Strategy Frameworks) the plan remains **UNSOUND** as it has not been **Positively Prepared** and is **Ineffective** in its strategic delivery of active travel and rural connectivity.

It is requested that the Local Plan Policies Map be amended to explicitly identify and protect an active travel safeguard zone extending from Kempsford along to Dudgrove Lane and the Thames Path.

Legal Compliancy and Soundness – Thames and Severn Canal

Kempsford Parish Council note that the Old Canal corridor as a key green infrastructure feature, delivering habitat enhancement, recreational opportunities and landscape connectivity and that sufficient land should be safeguarded adjacent to the Old Canal corridor to support future restoration opportunities and only allow development in keeping with the canal where appropriate.

However, the Parish Council notes that the current wording of SP3 fails to explicitly safeguard the historic footprint of the canal that has been in-filled over time. In Kempsford, significant stretches of Phase 2 of the restoration project (connecting the Cotswold Water Park to Inglesham) consist of in-filled channels. Without explicit protection for the entire historic alignment—regardless of its current physical state—the policy is ineffective at preventing permanent, obstructive development that would sever the route forever.

Kempsford Parish Council consider the current wording to be **UNSOUND** and would wish to see with SP3 the historic alignment of the Thames and Severn Canal, **explicitly including all currently in-filled, culverted, or dry sections within Kempsford Parish**, to be strictly

safeguarded from any development that would prejudice its future restoration to navigable water standards or its interim use as a wildlife and active travel corridor.

Legal Compliancy and Soundness – Historic Rights of Way on RAF Fairford

Kempsford Parish Council considers the Publication Version of the Cotswold District Local Plan 2026-2043 **UNSOUND** because it fails to adequately safeguard, restore, and plan for long-term sustainable transport infrastructure and public accessibility in relation to major strategic and institutional land holdings. Specifically, the current draft plan lacks necessary spatial foresight regarding the historic, severed roads and Public Rights of Way (PRoW) network intersecting **RAF Fairford**.

National planning policy explicitly dictates that planning policies should protect and enhance public rights of way and access (including taking opportunities to provide better facilities for users). By failing to proactively address the legacy of severed networks at RAF Fairford, the Plan fails this proactive standard.

While RAF Fairford remains an active military infrastructure asset, the Local Plan period extends to 2043. A sound, positively prepared plan must account for all reasonable long-term infrastructure contingencies, including the eventual disposal, decommissioning, or master planning of large-scale institutional sites. Leaving the restoration of historic road and path networks unaddressed ignores a vital element of the district's long-term sustainable transport and green infrastructure framework.

At present, historic roads and public paths traversing the airbase boundary are fractured. While physical access is restricted under military security protocols, the underlying legal rights of way have historically integrated Kempsford parish with surrounding communities. Failing to acknowledge and safeguard these historic routes in the event of future baseline land changes creates a severe risk that these public assets will be permanently lost during post-military land disposals or speculative layout designs.

Kempsford Parish Council therefore considers that without the inclusion of a specific safeguarding clause within the Infrastructure or Sustainable Transport Chapters that this Local Plan is **UNSOUND**. An acceptable wording might be:

> Where large-scale institutional, infrastructure, or military land holdings—specifically including RAF Fairford—undergo substantial change of use, master planning, decommissioning, or disposal within the plan period, any historic road or public rights of way or strategic active travel corridors previously severed, physically obstructed, or legally suspended by the site perimeter must be proactively identified, safeguarded, and fully integrated into the subsequent site design, layout, and restoration frameworks.

Support to Fairford Town Council Submission

Fairford is the closest Principal Settlement to Kempsford and as such provides a number of important local service and support functions to the Residents of Kempsford. These concerns include:

- An inadequately tested spatial strategy and alternatives;
- Flawed or conflicting evidence about Fairford's services, retail capacity and development options that are shared by Kempsford. Of particular concern is Primary Care and insufficient capacity at the current surgery site;
- Unmodelled transport impacts and uncertain/unclear mitigation, including upon the local road network and the C124 in particular;
- Insufficient water-supply and wastewater capacity, with pollution risks, especially to the River Coln which flows through Kempsford Parish;
- Potential harm to protected habitats, valued landscapes and agricultural land, including to the protection of the SSSIs from increased footfall;
- Retail proposals that may undermine the existing town centre leading to a "hollowed out" historic centre that lacks vibrancy;
- Infrastructure funding and viability shortfalls, in particular the necessary investment in Fairford STW that might be needed to protect the River Coln, which flows through Kempsford Parish, from pollution;
- Reliance on a changing Infrastructure Delivery Plan and unresolved delivery arrangements.

Local Plan Impact within Kempsford Parish

Kempsford Parish has neither a Neighbourhood Development Plan nor a Neighbourhood Priority Statement. It does however have clear sense of self that accepts the need for periodic development. Historically this has been at the rate of about 30 or so houses every 5-10 years. This has helped it to retain amongst other things its pub, a vibrant Village Hall and the number of pupils at the village primary school. This approach has most recently allowed for the creation of a junior football field, play area, MUGA and car park for use by the community.

Whilst this Local Plan allows for some relatively modest, in terms of other settlements, expansion there are concerns that certain detailed aspects proposed have not yet been raised with Kempsford Parish Council and are more suitably addressed at the time of a

Planning Application either through an s106 agreement or a Unilateral Undertaking. These include:

- Suitability of Whelford Road housing development Site (R203A-C) [Comment: Appendix c-1 pp77-78];
    - The impact of current plans (19/02325/SCR) for development of a Deployable Air Base System (DABS) which in very broad terms calls for the replacement of the Earth Covered Bunkers along the Whelford Road with warehousing. It is suggested that this will introduce a more industrialised streetscene to the North of this proposed development specifically requiring appropriate screening in order to maintain views from the village.
    - A number of planning restrictions exist because of RAF Fairford that should be explicitly referred to;
    - The north of the site (R203C) in particular lies close to aircraft dispersal sites and to the eastern end of the runway. Whilst the assessment of the site refers to the possible need for noise mitigation measures it should be noted that the degree of need for this cannot be assessed without completion of a full JSP418 Environmental Assessment including a Military Aviation Noise Contour (MANC) assessment/map that indicates the noise levels that are to be planned for;
    - A key concern of residents over previous applications (17/02224/FUL, 23/01665/OUT) for the southern part of the development site (R203A) was access to the developed site. The concern centred around it not being through an existing estate with unsuitable roads for additional traffic and the consequent increase in traffic along the High Street past the school at critical times of the day. Particularly given the increase in numbers of dwellings in this proposal, access to the developed site must be off of the Whelford Road.
    - The inclusion of Community Infrastructure is in general terms welcome but appears to be developer driven rather than community led. These points need to be negotiated with the village through the Parish Council. Unmentioned, is the need for a new Burial Ground. Mentioned, is the idea of a local convenience store. This has been examined and attempted a number of times but no commercial business case has been found that works given the options of internet ordered grocery delivery and access to established convenience shops in Fairford and Lechlade, whose customer base includes residents of Kempsford Parish, and to larger supermarkets in either Swindon or Cirencester. However, given the need for a rebuild of the Village Hall, a viable case might possibly be made for a solution based upon the combination of community facilities such as a Village Hall, Community Café, Convenience Store, and a Parish Council office in a single building drawing upon the experience of such places as Down Ampney

and Siddington. In any case, acceptance of this requirement should be demonstrated by a business case showing long term sustainability of the business;

- The density of the build should be specified as being similar to adjacent areas; and,
- The need to retain characterisation of site and views onto the village and in particular the Church, mentioned elsewhere in this Local Plan, should be repeated as an explicit requirement.

- Suitability of housing development Horcott Site (F53A). [Comment: Appendix c-1 pp74-76] It should be noted that this site, whilst adjacent to Fairford, lies wholly within Kempsford Parish].
    - Consideration of water and drainage should extend to consideration of the impact of water flows into the Horcott Lakes and the Dudgrove Brook. The site forms part of the Dudgrove Brook catchment area which takes water from the Horcott lakes and the surrounding area through the RAF Fairford site and under the Whelford Road. Any increase in surface water runoff may otherwise impact the current management of the Dudgrove Brook.
- Kempsford Parish Council would wish that for any development within its Parish, an offer should be made to the Parish Council for it to manage any public open space in advance of arrangements being made with any Management Company.

Local Plan Examination Participation

Kempsford Parish Council wishes to participate in the Local Plan examination with particular focus on the **UNSOUNDNESS** of the proposed Local Plan in relationship to:

- The production of a JSP418 Environmental Assessment including a MANC assessment/map in order to assess the viability of proposed sites in the vicinity of RAF Fairford;
- The duty to cooperate, particularly in respect of the cumulative impact of proposed housing development taken together with current and consented quarry sites in both Gloucestershire and Wiltshire along the C124;
- The lack of a Design Code that can be read in conjunction with the proposed Local Plan;
- The need for Infrastructure and Transport Policies in providing for active travel and rural connectivity of Kempsford with Fairford and Lechlade;
- The need to more precisely safeguard the route of the historic Thames Severn Canal through Kempsford Parish; and,

- The need to protect historic roads and Public Rights of Way across RAF Fairford.