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9.1 Employment Development (POLICY EC1)

9.1.1 The District's economy is healthy, with generally affluent communities, low unemployment rates and high activity rates. It has the highest rates of employed residents in senior professional and technical roles in the County; the 7th highest level of home working in England; and 21% of the resident employed population are self-employed⁽³⁷⁾.

9.1.2 However, there are pockets of deprivation and the District's workplace earnings are below the regional and national average. The cost of living in the area is high and the affordability of housing is a key issue for the District. As a result, businesses face skill and labour shortages. The 2011 census shows that the District is relatively self-contained although it is a net importer of labour (a net difference of around 2,000 people), predominantly from adjoining Districts.

9.1.3 Cotswold District Council recognises that, whilst GFirst's Strategic Economic Plan (SEP) does not consider the District to be the key focus for economic growth in the County, it is committed to promoting growth and enhancement of the Gloucestershire economy. The competitive advantage of larger surrounding towns, such as Swindon, Cheltenham and Gloucester is recognised in the relevant Strategic Economic Plans, which identify them as key locations for growth. However, with a highly skilled population and key business assets, Cotswold offers a unique business location that offers a high quality of life in an outstanding natural and historic environment. It also has access to the strategic rail network at Kemble and Moreton-in-Marsh. The Local Plan seeks to support strong and sustainable economic growth while recognising that the District:

- is in a rural location within an Area of Outstanding Natural Beauty;
- is relatively removed from the motorway network and has poor transport links with the rest of Gloucestershire and the M5; and
- is an area where the residual value of commercial development does not support broader private sector or institutional investment.

Policy EC1

EMPLOYMENT DEVELOPMENT

Employment Development will be permitted where it:

- a. supports the creation of high quality jobs in professional, technical and knowledge-based sectors and seeks to support economic opportunities which capitalise on the strength of existing academic and training institutions and research organisations;**
- b. maintains and enhances the vitality of the rural economy;**
- c. enables opportunities for more sustainable working practices, including home-working;**

37 ONS and Annual Population Survey, September 2015.

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- d. supports and improves the vitality and viability of Primary, Key, District and Local Centres; or**
- e. supports sustainable tourism in ways that enables the District to attract higher numbers of longer-stay visitors.**

9.1.4 Policy EC1, the other economic and site specific policies, together with the Development Strategy, form the Economic Strategy of the Local Plan. The Local Plan Economic Strategy seeks to build upon existing strengths by exploiting the competitive advantage of the District's key businesses and seeking sustainable economic growth to maintain and support its current place in the market. To this end, the Strategy focuses growth on Cirencester, the District's largest settlement, service and employment centre, whilst supporting key employment opportunities for growth at Bourton-on-the-Water, Moreton-in-Marsh, Tetbury, Chipping Campden and Lechlade. It also makes provision for specific users such as Campden BRI, Fire Services College, and the Royal Agricultural University.

9.1.5 The Strategy seeks to safeguard established employment sites where they are still attractive to the market, and secure high quality employment sites where there is an identified need for further development opportunities. The Strategy also supports small scale employment development appropriate to the rural area.

9.1.6 The Local Plan will deliver this by:

- allocating land to meet the employment requirement for B-class uses and which has the capacity to provide a range of unit sizes and premises, including for start-ups and small and medium sized enterprises (SMEs);
- wherever possible encouraging the growth and/or expansion of existing businesses in the District;
- safeguarding employment sites for employment use and maximising the potential of existing sites balanced against the environmental and heritage constraints of the District; and
- implementing planning policies that positively guide development proposals for all types of employment-generating development, e.g. retail, tourism, etc.

9.1.7 Cotswold market towns and villages provide the day-to-day shopping and services for residents of the District. However, the District is not self-contained. Larger cities and towns outside of the District, especially Cheltenham, Gloucester and Swindon, draw expenditure out of the District and function as service and employment hubs for many Cotswold residents.

9.1.8 The Local Plan will aim to:

- strengthen the vitality and viability of Town, Key, District and Local Centres set out in a retail hierarchy;
- maintain key local service provision;
- reduce car journeys; and
- retain market share and prevent further expenditure leaving the District.

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9.1.9 Tourism is a major and growing part of the local economy with the ‘Cotswolds’ as an internationally recognised brand. The Local Plan supports the appropriate development of new or extended tourist facilities and visitor attractions whilst protecting the heritage and environmental assets that make the Cotswolds attractive to tourists in the first place. Development that has a low environmental impact, which also addresses an identified weakness or gap in the tourism economy, will be encouraged.

9.1.10 The Local Plan Economic Strategy has been developed through consultation with local business organisations; delivery partners, including GFirst; businesses; and residents. It is consistent with the strategies of other authorities in the Gloucestershire economic market area, and authorities in neighbouring counties.

9.2 Safeguarding Employment Sites (POLICY EC2)

9.2.1 The Employment Land Review (Cotswold Economy Study, PBA 2012) has highlighted that established employment sites, both within and beyond settlements, play a critical role in meeting the District's economic and business needs. Protection of such sites and support for their potential intensification, where appropriate, is critical in ensuring that existing businesses are retained and have the opportunity to grow. This is particularly important as there are few vacant employment sites and premises available to the market.

9.2.2 Viability reports (Hewdons and POS Reports 2014) also demonstrate that the construction costs for new employment development are not redeemed through land values or the rental yields. Therefore it is critical that the best use is made of established employment sites and premises and that they are retained to offer immediate opportunities for businesses to expand and for new business to establish themselves.

Policy EC2

SAFEGUARDING EMPLOYMENT SITES

- 1. Within established employment sites, proposals for B Class employment development, including intensification of the site, will be permitted.**
- 2. Established and allocated employment sites will be retained for B Class employment uses, unless there is no reasonable prospect of the site being used for employment purposes.**

9.2.3 Established employment sites are listed in Appendix E of this Plan. The Cotswold Economy Study (Vol. 1, 2012) reviewed existing employment sites in light of the NPPF paragraph 22, establishing which should be safeguarded and those that could be used for alternative uses. The site list has since been amended to reflect employment monitoring information as of 31 March 2016. These sites are

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considered valuable employment locations and should be safeguarded for that purpose. Sites allocated in the settlement policies of the Local Plan for B Class employment uses are also safeguarded as they are required to enable the delivery of forecast B class job growth over the Plan period.

9.2.4 Cotswold District has many established and successful employment sites both within and outside towns and villages. The established employment sites make an important contribution to the employment stock of the District and Policy EC2 provides a strong steer on how planning applications will be considered to support their continued role and function. In an area with scattered settlements and sensitive environmental considerations, it is important that, wherever possible, established employment sites and premises, in towns and villages especially, should be retained. Maximising the use of these sites reduces the need for the development of new sites particularly on the edge of villages or within the countryside and seeks to maintain and enhance a strong economic community. Therefore Policy EC2 seeks to make better use of the District's established employment sites and safeguards them for employment uses.

9.2.5 There are several well-established employment sites in the wider rural area beyond the Development Boundaries. These are a key element of the District's economy. Therefore Policy EC2 seeks to support these sites by permitting proposals for employment development.

9.2.6 Policy EC2 also seeks to retain sites for local employment. The economic analysis demonstrates that whilst there are a few declining employment sectors, there is an increased land requirement to enable the economic potential of the area to be achieved. The issue, however, is more complex than simple numbers. A number of the larger, well established, industrial estates within the District provide opportunities for a range of employment developments, including those that may not be acceptable within residential areas. They provide the main opportunities for uses such as manufacturing. If lost to other uses, the relocation of such estates elsewhere could be extremely difficult.

9.2.7 The aim, therefore, is to maintain and enhance the role of established employment sites, where they are well located, through the development of further employment uses and the prevention of changes to other uses. The preparation of development proposals that would result in the loss of a site currently used for employment must be made in accordance with policies that support the overall Economic Strategy of the Local Plan.

9.3 Proposals for all types of Employment-Generating Uses (POLICY EC3)

9.3.1 Policy DS1, Policies EC1 and EC2 and settlement specific policies address B Class employment needs through land allocations and specific policies. This provides for a range of employment sites and premises for new B-Class employment development, thus enabling market choice and improvement/retention of existing residents' opportunities to work locally.

9.3.2 However, B class employment represents less than half of job growth in the District. A greater proportion of jobs growth will occur in other sectors, including construction, retail, leisure, hotels, restaurants, transport, education and health. Therefore, provision for job growth in non B Class use sectors of the economy is made through the following set of policies of the Local Plan, which cover:

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- All types of employment generating uses
- Agricultural Diversification
- Town centre uses, including retail
- Tourism facilities, attractions and accommodation

Policy EC3

PROPOSALS FOR ALL TYPES OF EMPLOYMENT-GENERATING USES

1. **Within Development Boundaries, proposals for employment-generating uses on sites that are not currently identified as an established employment site will be permitted in principle.**
2. **Outside Development Boundaries, and outside established employment sites, proposals for small-scale employment development appropriate to the rural area will be permitted where they:**
 - a. **do not entail residential use as anything other than ancillary to the business; and**
 - b. **are justified by a business case, demonstrating that the business is viable; or**
 - c. **facilitate the retention or growth of a local employment opportunity.**
3. **In cases where an ancillary residential use is acceptable, the proposal may be classed as a 'live/work' unit. Restrictions will be applied to such units, including:**
 - a. **the residential floorspace of the live/work unit can only be occupied by the person solely, mainly or last employed in the business occupying that unit; and**
 - b. **the business floorspace of the live/work unit must be finished and ready for occupation before the residential element, and the residential use must not commence before the business use.**

9.3.3 Due to the environmental constraints within the District and the need to locate employment development in the most sustainable locations, it is important that best use is made of sites at the Principal Settlements.

9.3.4 However, the Local Planning Authority (LPA) also recognises the importance of the rural economy to Cotswold District, therefore Policy EC3 enables small-scale employment development appropriate to rural areas. Rural business units represent an important element of the employment portfolio of Cotswold District. The policy encourages the positive development of small rural employment premises

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in appropriate locations. Sensitive, small-scale employment development helps to sustain the rural economy and create local employment opportunities. Proposals, however, must be in keeping in terms of scale, size and function with the location.

9.3.5 Continued demand for rural workspace driven by lifestyle choices, a strong tourism sector, and the footloose nature of small enterprises (brought about by improvements in telecommunications and broadband access) is expected. Self-employment in the Cotswolds is significantly higher than the national average and opportunities for home working need to be strengthened. In addition, superfast broadband and telecommunications are key factors contributing to the success of rural businesses.

9.3.6 Facilitating flexible working practices, such as the integration of residential and commercial uses within the same unit, is therefore an important planning tool to support the local economy. Policy EC3 makes it clear that proposals outside Development Boundaries that have residential use as the principal element of the business will not be acceptable. However, a residential use that is ancillary to the business may be acceptable if the other criteria set out in the policy are met. The restrictions that will be applied to live/work units are set out in Policy EC3.

9.3.7 Generally, Policy EC3 encourages employment proposals which support or restructure the local economy through the provision of incubation space for small-scale rural economic activity.

9.4 Special Policy Areas (POLICY EC4)

9.4.1 The Strategic Economic Plan produced by GFirst sets out ambitious plans to accelerate economic growth by focusing on key drivers of productivity and supporting growth in high value sectors.

9.4.2 Through consultation on the emerging Local Plan, the LPA recognised that a nuanced approach was needed to support some of the District's larger institutions and employers. Over the course of preparing this Local Plan, three substantial organisations approached the LPA with their future growth plans and aspirations. These are Royal Agricultural University, Cirencester; Campden BRI, Chipping Campden and Fire Services College, Moreton-in-Marsh. The extent of these areas are mapped on the relevant Policies Maps. The Council recognise their need for certainty in a fluctuating economic climate, and considered it appropriate to provide support and clarity through the local plan process to ensure that a holistic, long term, approach is taken.

9.4.3 A distinctive Master Plan framework for each of these sites will provide the necessary certainty, whilst helping to deliver both the Local Plan's strategic objectives and the Strategic Economic Plan. The Master Plans would need to be produced with an appropriate level of community participation, as described in the LPA's Statement of Community Involvement.

9.4.4 Each Master Plan will need to ensure that the proposed development is closely and reasonably related to the operation of the organisation. It will be a requirement for them to satisfactorily address all relevant planning considerations relevant to the site, in particular the design and layout of the new buildings, including lighting, and any associated new access, parking and service facilities.

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9.4.5 Ecological surveys and monitoring will be required to be undertaken as part of a biodiversity strategy to establish which areas will be protected and enhanced, and appropriate mitigation measures where necessary. A landscape and visual impact assessment will also be required prior to the preparation of the Master Plan.

Policy EC4

SPECIAL POLICY AREAS

1. **The Special Policy Areas (defined on the Policies Map) will be master-planned and development implemented on a comprehensive basis at the following locations:**
 - **Royal Agricultural University, Cirencester. At this site, proposals for the expansion of the existing University campus, including associated development for educational, training, business and research development, student accommodation and other operational floorspace, will be permitted.**
 - **Campden BRI, Chipping Campden. At this site, proposals for new laboratories, business space, conference, training facilities, staff and visitor facilities, ancillary development, and associated infrastructure to facilitate the use of the site as a food testing and research establishment, will be permitted.**
 - **Fire Services College, Moreton-in-Marsh. At this site, proposals for development of operational fire, rescue and emergency responders' training facilities, ancillary development, and associated infrastructure, will be permitted.**
2. **Master Plans for the respective sites will be produced in consultation with the local community and, subject to the approval of the Local Planning Authority, will provide the framework for determining any full or outline planning application(s).**
3. **With regard to the Royal Agricultural University, Cirencester, the Master Plan will:**
 - a. **ensure that the character of the parkland setting is not compromised on this important gateway to Cirencester;**
 - b. **include the submission of a satisfactory scheme that addresses transport and access issues and maximises opportunities for future development to be designed and phased to ensure maximum practicable integration between the different uses within and near the site, including Deer Park School, Cirencester College and the Strategic Site (Policy S2);**
 - c. **demonstrate that the development supports the vitality and viability of Cirencester Town Centre;**

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- d. take account of the gas pipeline buffer zone; and
 - e. ensure that there is no net loss of playing pitch provision and other outdoor sporting facilities.
4. With regard to the Campden BRI, Chipping Campden, the Master Plan will:
- a. include a plan demonstrating the comprehensive phasing programme for the construction, reuse or demolition of existing redundant buildings and infrastructure within the site;
 - b. demonstrate, in association with the Environment Agency, that all flood constraints are identified and overcome including the implementation of appropriate mitigation measures which can be secured through conditions or separate contractual agreements; and
 - c. incorporate any appropriate safeguarding measures alongside the adjoining railway line to potentially facilitate a new station in accordance with the Local Transport Plan.
5. With regard to the Fire Services College, Moreton-in-Marsh, the Master Plan will:
- a. aim to enhance the setting afforded by this important gateway site to Moreton-in-Marsh;
 - b. demonstrate that a thorough investigation of noise, fumes and smells has been carried out in relation to the use of the operational area, and identify any appropriate safeguarding measures required to satisfactorily address potential impacts on residential areas;
 - c. complete an investigation into land contamination on the site, with any necessary remediation measures required to a standard agreed with the Local Planning Authority;
 - d. set out proposals for the retention, protection and proactive management of the County-designated Key Wildlife site;
 - e. explain how the proposals will safeguard and ensure maximum accessibility and integration between the community leisure uses and playing fields on the site, and their available use for local residents;

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- f. demonstrate how existing trees and other vegetation around the boundary and stretching into the site will be retained and strengthened; and**
- g. include proposals for height limits and location of new buildings to ensure effective screening from view from outside the site, particularly along the approach roads to Moreton-in-Marsh.**

Royal Agricultural University

9.4.6 The Royal Agricultural University (RAU) is a key economic asset both for Cirencester and the wider District. Its future success and continued growth aspirations, identified in the RAU's Corporate Plan 2014 to 2019, are supported. The expansion of the existing campus, including redevelopment for educational, training, business and research development, student accommodation and other operational floorspace, will support the RAU's vision to become an international contributor to the global strategy for sustainable food supply, land management and the built environment.

9.4.7 Facilitating new, improved facilities and associated development will help the RAU's long-term growth strategy and this would be supported by the production of a comprehensive Master Plan to guide development to 2026 and beyond. The Master Plan will need to clearly identify these needs and aspirations balanced against the site's sensitive parkland setting, AONB landscape, and heritage constraints.

9.4.8 The Local Plan allocates mixed use development of a strategic scale on a neighbouring site to the south of Chesterton. The Master Plan should aim to develop a strategy to maximise opportunities for shared infrastructure and the potential for a complementary relationship between the research at the University and related spin-off business development at the Strategic Site. The commercialisation of research opportunities would support the productivity and growth aspirations set out in the Strategic Economic Plan.

Campden BRI, Chipping Campden

9.4.9 Campden BRI is a food research and development institution near Chipping Campden where national and international food testing and research is completed. It has seen significant growth in business, with food security being a key issue for both private and public sector members. Campden BRI currently has 2,100 members from 70 countries across the world, including Pepsi, Kelloggs, and Warburtons. It holds conferences and training events for 17,000 visitors per year. The company employs 300 staff at Chipping Campden.

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9.4.10 The existing site comprises a series of ad hoc buildings and facilities which no longer meet modern standards of design or efficiency for a research and development institution. Campden BRI requires a positive framework which supports investments in new laboratories, business space, and supporting infrastructure to fulfil its growth aspirations whilst recognising the environmental and landscape constraints.

9.4.11 The LPA recognises that the wider Campden BRI site needs to be conceptualised and planned as a comprehensive redevelopment to secure the future of the organisation within the District. The overriding constraint is the site's location within Flood Zone 3b, and Campden BRI is working with the Environment Agency to resolve this issue. Further significant constraints, in particular those relating to access and the location within the AONB, must be addressed through the master planning process.

Fire Services College, Moreton-in-Marsh

9.4.12 The Fire Services College is a leader in fire and emergency response training and one of the world's largest operational fire and rescue training facilities. It specialises in providing dedicated training for fire and rescue services, emergency responders and a wide spectrum of commercial and public sector clients globally.

9.4.13 In March 2013, the College moved from government to private ownership in order to help secure future investment to maintain the College as a pioneering facility for the fire and rescue services, both in the UK and overseas. Significant infrastructure and supporting facilities are required to ensure that the College remains at the forefront of training provision.

9.4.14 The site is over 100 Hectares on the edge of Moreton-in-Marsh. It is hugely significant to the town's future. Consequently, the development of the site needs to be planned in a holistic manner to secure the long term future of the College and achieve benefits to the local community. For example, the College has recreational facilities that are not available in Moreton-in-Marsh. The Master Plan should aim to secure public access to these facilities on a permanent basis.

9.5 Rural Diversification (POLICY EC5)

9.5.1 Agriculture underpins the District's rural economy and supports a considerable number of ancillary businesses. Changes in agriculture have made diversification increasingly important to the economic viability of farm units. The range of diversification proposals, however, is so varied that it is difficult to establish specific policies for every potential use. Instead, the Local Plan sets out policy criteria against which individual proposals will be judged.

Policy EC5

RURAL DIVERSIFICATION

Development that relates to the diversification of an existing farm, agricultural estate, or other land-based rural business will be permitted provided that:

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- a. the proposal will not cause conflict with the existing farming operation including severance or disruption to the agricultural holding that would prejudice its continued viable operation;**
- b. existing buildings are reused wherever possible; and**
- c. the scale and design of the development contributes positively to the character and appearance of the area.**

9.5.2 If suitable buildings become available on a holding, it is important that these are used in preference to new-build development. New buildings, where justified and acceptable, should be well integrated with the existing holding to help them harmonise with the surrounding environment.

9.5.3 There is a potential policy conflict between rural diversification and the need to reduce reliance on the private car. Proposals would be more acceptable where they would only give rise to modest additional daily traffic movements, or where the impact on minor roads would not be significant.

9.5.4 Diversification proposals should contribute effectively to the business and more generally to the rural economy while integrating new activities into the environment and the rural scene. Planning applications for development related to diversification should be seen within the context of the future business plan for the holding as a whole. Change that has not been properly thought through will be of little long-term benefit to the holding or to the rural economy. Whole farm business plans should, therefore, be submitted with applications for significant agricultural diversification proposals to help ensure that a coherent approach is undertaken, and to build-in some certainty about the future activities of holdings. Such plans would not be a requirement in every case, but may be requested before considering an application.

9.5.5 Proposals that constitute substantial changes to a farm or agricultural estate will be assisted by the submission of a whole farm plan. Information provided within the whole farm plan should include:

- the history of the farm and its locality;
- existing buildings and their uses;
- features of biodiversity or landscape interest;
- archaeological sites, information on the historic landscape of the farm, the reasons for diversification and the viability of the proposal; and
- details of the proposal's projected employment, environment and traffic implications.

9.5.6 A proposal that avoids conflict with the existing farming operations will be well integrated with the existing operation, and will not give rise to any conflict with the agricultural or forestry operation of the farm or estate. For example, farms may cause environmental health problems to some high quality business use developments, or a new industrial use could lead to outdoor storage requirements, causing circulation problems on the farm.

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9.5.7 The continued viability of farm holdings is important to the rural economy. Where proposals affect a significant part of the farm holding, information may be requested on its extent, and what is proposed for the remainder of the holding. In some cases, this may include evidence that, following the proposed development, the holding will continue to operate viably.

9.6 Conversion of Rural Buildings (POLICY EC6)

9.6.1 In an area of high quality built and natural environment, it is important to keep new building in rural areas to a minimum. The large, but diminishing, stock of rural buildings in the Cotswolds should be used in the most positive way possible to assist in sustaining the rural economy. For the most part, these buildings were originally built as workplaces, or to support the business or community needs of the area. This function should, wherever possible, continue so that rural buildings are given a new lease of life.

9.6.2 The re-use of existing rural buildings, which have become surplus to requirements, or are no longer suitable for their original use, can help to reduce demands for new building in the countryside.

Policy EC6

CONVERSION OF RURAL BUILDINGS

The conversion of rural buildings to alternative uses will be permitted provided:

- a. the building is structurally sound, suitable for and capable of conversion to the proposed use without substantial alteration, extension or re-building;**
- b. it would not cause conflict with existing farming operations, including severance or disruption to the holding that would prejudice its continued viable operation; and**
- c. the development proposals are compatible with extant uses on the site and existing and planned uses in close proximity to the site.**

9.6.3 This policy applies to the conversion of all rural buildings, whether of modern or traditional construction. There are also other policies that are likely to be relevant to proposals for the conversion of rural buildings, including H6 (Removal of Occupancy Conditions), EC11 (Tourist Accommodation) and EN13 (Conversion of Non Domestic Historic Buildings (Designated and Non designated Heritage Assets)).

9.6.4 It is important to ensure that new uses are sympathetic to the rural character of the area, respecting local building styles and materials, in keeping with their surroundings, without creating adverse environmental effects due to, for example, nuisance or traffic generation.

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9.6.5 For proposals which do not meet the specifications for permitted development buildings should be physically capable of being converted in terms of their size, soundness and structural stability, without recourse to extensive rebuilding, alteration or extension. The conversion should be just that, and not a pretext for what would be tantamount to the erection of a new building in the countryside.

9.6.6 Where an extension or significant alteration is proposed, then it will need to be demonstrated that the building is capable of conversion on its own merit. Subject to this, extensions or alterations will be permitted where they do not significantly harm the character of the building, its setting, and/or the character and appearance of the landscape.

9.7 Retail (POLICY EC7)

9.7.1 Retail is an inherent part of the economy of the local area. Cotswold market towns and villages provide the day to day shopping and services for residents of the District, and in doing so create employment for people living around them. However, larger towns and cities, especially Cheltenham, Gloucester and Swindon, can provide competition functioning as service and employment hubs for many Cotswold residents drawing expenditure out of the District.

9.7.2 To ensure the retail evidence base is robust and relevant an update of the 2012 retail study has been prepared - the Retail Study Update 2016. The approach to retail and town centre development is in alignment with the latest employment and housing figures and includes an updated assessment of the need for retail floorspace across the 10 larger, more sustainable, Principal Settlements that form the Retail Hierarchy identified in Policy EC7. A wider assessment of provision is also made across all 17 Principal Settlements, as identified in Policy DS1.

9.7.3 Arising out of the content and recommendations of the Retail Study Update 2016, the town centres and retail strategy makes provision for 400sqm (net) of convenience goods and 2,100sqm (net) comparison goods floorspace within Cirencester over the Plan period including the Neighbourhood Centre at the Strategic Site south of Chesterton (and subject to the provisions of Policy S2). Within the other nine settlements in the retail hierarchy there are, due to the nature of retailing within these settlements, no quantitative floorspace targets and instead a strategy to maintain and enhance retail provision within their defined central areas, supporting the role of each centre in servicing its local community and, in some instances, visitors and tourists to the District. Retail development will take place in accordance with the Retail Hierarchy. The hierarchy reflects the scale, nature and role of the centres and their importance within the retail offer in the District. Provision will be made through site allocations in Cirencester (see policies S1, S2, and S3) and the policies set out below.

Policy EC7

RETAIL

- 1. The retail hierarchy in Cotswold District is set out below and will be the focus for the provision of main town centre uses:**

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- **Town Centre: Cirencester;**
 - **Key Centres: Bourton-on-the-Water, Chipping Campden, Moreton-in-Marsh, Stow-on-the-Wold and Tetbury;**
 - **District Centres: Fairford and Lechlade;**
 - **Local Centres: Northleach and South Cerney.**
2. **In settlements that are not listed in clause 1, proposals for small local shops and services will be permitted if they would enhance a settlement's viability and help to meet the needs of, and are conveniently accessible to, the local community.**
 3. **Provision will be made for 400sqm (net) of convenience goods and 2,100sqm (net) of comparison goods retail floorspace within Cirencester over the Plan period (in accordance with policies S1, S2 & S3). Within the other nine settlements identified in the retail hierarchy, the retail strategy supports proposals in their defined centres which maintain and enhance retail provision and the wider health of the centre.**

9.7.4 'Main town centres uses' are defined in the NPPF (Annex 2: Glossary). The uses include: retail development, leisure, entertainment facilities, intensive sport and recreation uses, offices and arts, culture and tourism development.

9.7.5 The concentration of a variety of shopping and other services within a Centre is a major component of maintaining its vitality and viability. Growth and enhancement in these locations is considered to be the most effective strategy for improving the overall economic performance and competitiveness of the District.

9.7.6 Cirencester will continue to be the District's dominant centre for retailing though the strategy allows the opportunity for a focused approach in the other selected settlements.

9.7.7 Cirencester will be promoted and enhanced as needed to attract increased expenditure from within and outside the District. There are a number of potential opportunities for new retail development within the Town Centre at Cirencester. Development of these sites could potentially provide modern A1 retail space that is currently lacking in the town centre as well as a range of evening and leisure uses. The Cirencester Central Area Strategy (see Policy S3) provides further detail and guidance.

9.7.8 Beyond Cirencester, the five Key Centres have the widest variety of shops, facilities and services. The vitality and viability of the Key Centres will be promoted and enhanced as locations in the District for main 'town centre' uses.

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9.7.9 The vitality and viability of the District Centres of Fairford and Lechlade will be maintained and enhanced by providing a complementary focus for main town centre uses in the District. These Centres function as important service centres for the majority of needs of their respective localised catchment areas, which is particularly important for those, such as the elderly, where travelling further afield is less likely. This complementary focus should enable these centres to meet the majority of the needs of people in their local catchments, while relying on Cirencester or other Key Centres to provide those services which cannot reasonably be catered for locally because of issues of scale. The District Centres, whilst also providing shops, facilities and services, are more limited in both number and range.

9.7.10 Although the two smaller Local Centres provide a more limited range of services and facilities within their centres, they play an important role in providing for the daily needs of the settlement and surrounding rural area.

9.7.11 Small local shops and services (including public houses, post offices and surgeries) in the other 7 Principal Settlements and also in more rural settlements are recognised as important economic assets but also as a focus for wider social and community activities. Proposals which would result in the loss of services and facilities should be avoided where this would damage the viability of a settlement or increase car travel by local residents

9.8 Main Town Centre Uses (POLICY EC8)

Policy EC8

MAIN TOWN CENTRE USES

1. **The preferred sequence of locations for Main Town Centre Uses in Cirencester are the:**
 - a. Primary Shopping Area
 - b. Town Centre
 - c. Edge of Centre
 - d. Out of Centre
2. **The preferred sequence of locations for Main Town Centre Uses in the other Principal Settlements listed in the Retail Hierarchy (Policy EC7) are the:**
 - a. Centre (Key/District/Local)
 - b. Edge of Centre
 - c. Out of Centre

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- 3. Only if there are no suitable sites available within the Primary Shopping Area and Centre (Town/Key/District/Local) boundaries identified on the Policies Maps, or on the Edge of Centre, will Out of Centre sites be considered.**
- 4. All proposals for main town centre uses should:**
 - a. be consistent with the strategy for the settlement;**
 - b. help maintain an appropriate mix of uses in the Centre; and**
 - c. contribute to the quality, attractiveness and character of the settlement, including the Centre, and the street frontage within which the site is located.**
- 5. Within the Centre boundaries identified on the Policies Maps Class A1 uses and other main town centre uses will be permitted where they would complement and enhance the retailing offer of the Centre. The loss of main town centre uses will be resisted, and, other than A1 uses, concentrations of single uses will not be permitted, where this would adversely affect the vitality and viability of the Centre or harm wider town centre investment, or cause amenity problems. Where the loss of a main town centre use is proposed, evidence must be submitted to demonstrate that the property has been continually, actively and effectively marketed for at least 12 months and that the use is no longer of commercial interest.**
- 6. Proposals for residential development will be permitted on the upper floors of premises in the Centre.**
- 7. When considering proposals for main town centre uses beyond the identified Centre boundaries, (in edge of centre or out of centre locations), proposals will be permitted that are:**
 - a. accessible and well connected to the Centre by public transport, walking and cycling;**
 - b. contribute to the quality, attractiveness and character of the settlement and the street frontage within which the site is located;**
 - c. maintain or improve, where possible, the health and wellbeing of the District's residents through increased choice and quality of shopping, leisure, recreation, arts, cultural and community facilities; and**
 - d. except where the proposal is in conformity with an allocation for main town centre uses elsewhere in the Plan, comply with the sequential test, by demonstrating that there are no sequentially preferable sites or premises to accommodate the proposed development, taking into account the need for flexibility in the scale and format of proposals.**

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- 8. In addition to Clause 7 criteria (a)-(d) proposals for retail, leisure and office uses outside of defined centres will be assessed in relation to their impact on:**
- a. the vitality and viability of those defined town centres within the catchment area of the proposal; and**
 - b. existing, proposed and committed town centre investment in defined centres within the catchment area of the proposal.**

Such assessments should, where appropriate, extend to an assessment of the cumulative effects, taking into account other committed and recently completed developments.

9.8.1 References to each of the Town, Key, District and Local Centre Boundaries should be taken to mean 'town centre' in terms of the NPPF definition. The defined Centre boundaries for the Key, District and Local Centres are also the same as the 'Primary Shopping Area' in terms of the NPPF. In Cirencester, the Primary Shopping Area is specifically defined and lies within the wider Town Centre Boundary (see Policy S3 clauses 2-4).

9.8.2 Policy EC8 and the requirements for a sequential test and impact assessment will apply to proposals for main 'town centre uses' beyond the identified centre boundary. The requirement will not apply to proposals which are consistent with site allocations for main town centre uses in the Plan.

9.8.3 The LPA will support proposals that improve the retail offer within any of the centres as set out in Policy EC7. Firstly seeking to focus development within the centre itself, or on suitable sites located at the edge of centre, followed by out of centre sites which may be appropriate in a considered sequential approach. By supporting a concentrated variety of shops and services, the vitality and viability of the Centres can be protected and enhanced, and 'main town centre' uses (Policy EC8) can contribute to healthy and lively centres and communities. What constitutes an adverse effect on the vitality and viability of, and investment within, a Centre will be based on the circumstances of each case. The cumulative impact of the proposal considered together with recent developments and committed floorspace may also be a relevant consideration for the impact assessment. Further guidance on the indicators which will be taken into account in assessing adverse effects is provided in the Retail Study Update 2016 and the PPG.

9.8.4 The importance of parking as a key issue in town centres is recognised in Policy INF5: Parking Provision. Furthermore, the Local Planning Authority will, as part of the approach to retail and town centre development, put measures in place to:

- Review town centre parking;
- Continue to improve and enhance public realm and streetscape;

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- Deliver traffic management improvements; and
- Support and promote markets.

9.8.5 Proposals for retail, leisure and office uses outside of defined centres will, besides Clause 7 criteria (a)-(d), be subject to the provisions of Policy EC9.

9.8.6 The loss of an active retail use cannot be prevented and changes from an active main town centre use to other uses can make the centre less attractive and convenient. The LPA considers that a robust marketing exercise is the most transparent way of demonstrating that retail facilities are no longer viable. To demonstrate that the marketing activity is proportionate and effective it should be undertaken continually for at least a 12 month period. All details of marketing activity and enquiries should be provided to the LPA together with full reasons why any offers have not progressed.

9.8.7 It is important to define the boundaries of the Centres identified in the Retail Hierarchy (Policy EC7) as the primary location of retail development, maintaining a concentration of Class A1 uses which are important to the attractiveness of the centres. These are designated as Town / Key / District and Local Centres on the Policies Map. Within these boundaries, proposals for ground floor non-retail uses will only be permitted if the development does not harm the retail focus on these frontages. On upper floors, there will be support for a diverse range of uses such as residential and office space, as the use of upper floors adds vitality to town centres without fragmenting the retail and services available on the ground floor. The LPA will seek to ensure that local residents have access to a range and choice of A1 shops.

9.8.8 With the exception of Cirencester, it is considered that the Centres identified in the Retail Hierarchy (Policy EC7) are too small to define secondary and primary frontages within the Centre boundaries. The Cirencester Town Centre Strategy (Section 7.1.1) sets out policies (Policy S3) relating to Cirencester's primary and secondary frontages.

9.8.9 The extent of the Town / Key / District / Local Centres are shown on the relevant Policies Maps.

9.9 Retail Impact Assessments (POLICY EC9)

Policy EC9

RETAIL IMPACT ASSESSMENTS

Proposals for retail development with a net increase of 100sqm or more, or, proposals that relate to floorspace of 100sqm net or above, which lie outside an identified Town / Key / District or Local Centre, will be assessed against their impact on the health of, and investment within, defined Centres and planning applications will be accompanied by a Retail Impact Assessment.

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9.9.1 The NPPF requires that when assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally-set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500sqm).

9.9.2 The impact test applies to retail, office and leisure proposals (for the latter two uses, the default national threshold will apply). The scope and level of detail required will vary according to local circumstance. For clarity, the impact assessment test applies to proposals in established employment sites and those within the identified Development Boundaries, as supported in principle by policies EC2 and EC3, and in these cases a proportionate approach can be taken. For main town centre uses, including B1 office use, where the proposed use is in conformity with the allocation, and as such is considered suitable and in accordance with the plan, no impact assessment is required. Impact assessments will not be limited to new build retail development; they will also be required for extensions, redevelopment and the variation of conditions and Section 106 Agreements where proposals relate to 100sqm or more of floorspace or there is a net increase in floorspace of 100sqm or more. Retail impact assessments should be scoped out with the LPA prior to the submission of planning applications.

9.9.3 The majority of retail applications submitted to Cotswold District Council are less than 100sqm, reflecting the type and characteristics of the District's market towns and rural settlements, and very few applications have historically exceeded this total. Proposals for retail developments up to 100sqm net will generally be regarded as being of a scale that would not result in significant adverse impacts. Accordingly, the default retail impact assessment threshold set out in the NPPF is lowered to 100sqm net to reflect the type and scale of the existing retail offer and ensure that, when considering a planning application, the Local Planning Authority has a full understanding of the impact of new proposals on the existing retail offer. Where impact assessments indicate significant adverse impacts on the vitality and viability of an existing centre, development will be refused. Where the evidence shows there is no significant adverse impact the positive and negative effects of the proposal will be balanced, together with locational and other considerations, to reach an overall judgement.

9.10 Development of Tourist Facilities and Visitor Attractions (POLICY EC10)

9.10.1 Tourism is a key employment sector in the District, with an estimated total spend of £83 million in 2010⁽³⁸⁾. In 2013, there were 6,000 jobs in tourism-related sectors in Cotswold. This represented 21.3% of all tourism jobs in Gloucestershire and 15.2% of all jobs in the District. The main categories of visitor spend are: accommodation; shopping; food and drink; attractions and entertainment; and travel⁽³⁹⁾. Cultural activity also has high economic value and brings in tourist trade.

9.10.2 The Destination Management Plan for Tourism Across the Cotswolds, April 2014 vision is '*To ensure that the Cotswolds is a vibrant year round destination where visitors enjoy high quality, authentic experiences and tourism makes an increasing contribution to the economic, social and environmental sustainability of the local economy.*'

38 South West Tourism Alliance - Value of Tourism 2010

39 Employment Study 2012 (Paragraph 3.2.19)

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9.10.3 A SWOT analysis in the Destination Management Plan highlights a significant range of challenges and opportunities that the Local Plan could help to address. Opportunities include: converting day visits to staying visits by product development; Cotswold Canal expansion; increasing the range of outdoor activities; supporting local and independent shops; and doubling the railway track of the 'Cotswold line'. Weaknesses include: lack of low cost accommodation; poor road signage; limited conference facilities; concentration of tourism in honeypot destinations with little to offer younger people and families; and limited parking.

Policy EC10

DEVELOPMENT OF TOURIST FACILITIES AND VISITOR ATTRACTIONS

New or extended tourist facilities and visitor attractions (excluding accommodation) will be permitted provided the proposal:

- a. has a functional relationship and special affinity with the historic and natural heritage of the area;**
- b. is well related to the main tourist routes;**
- c. is an identified opportunity that is not met by existing facilities; and**
- d. as far as possible, use is made of existing buildings, particularly agricultural buildings in the countryside, with the number and scale of new buildings kept to a minimum.**

9.10.4 The Local Plan ensures that new tourism development is effectively and appropriately controlled to protect the high quality natural and built environment of the District, especially in the AONB. The term 'special affinity' has been used in order to protect the character of Cotswold towns and the countryside. Attractions for which there is no special justification for their location in that particular area, will not normally be permitted. The nature of the attraction should rely on its location within the Cotswolds. The A-roads of the District tend to form the main tourist routes.

9.10.5 Development which helps to address current weaknesses in the tourist economy should be encouraged where appropriate. For example, low cost accommodation and low impact family attractions, such as farm activity visits.

9.10.6 The area's popularity with visitors is not sufficient justification, in itself, for the location of new tourist attractions. Any large-scale visitor development will generally be considered to be unacceptable if it would harm the landscape or features of historic interest, or have a harmful impact on the transport network.

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9.11 Tourist Accommodation (POLICY EC11)

Policy EC11

TOURIST ACCOMMODATION

Hotels and Serviced Accommodation:

1. New hotels and other serviced accommodation will only be permitted where the proposal:
 - a. is provided through the change of use of existing buildings, especially where this would involve the conservation of a listed or other historic building; or
 - b. is appropriately located within Development Boundaries.
2. Exceptionally, proposals for a new hotel that is directly associated on-site with a tourist attraction, and required to sustain the viability of the tourist attraction, will be acceptable.

Self-Catering Accommodation:

3. Proposals for self-catering accommodation, will only be permitted where it:
 - a. is provided through the conservation and conversion of existing buildings, including agricultural buildings; or
 - b. is appropriately located within Development Boundaries.
4. Exceptionally, proposals for new-build, short stay, self catering units that are directly associated on-site with a tourist attraction, and required to sustain the viability of the tourist attraction, will be acceptable.

Removal of occupancy conditions – holiday lets

5. Applications for the removal of occupancy conditions on holiday accommodation that has been built or converted for that purpose outside Development Boundaries will not be permitted.
6. Applications will be permitted where the original building was used as a dwelling or the building is located within Development Boundaries.

Touring Caravan and Camping Sites:

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- 7. Proposals for the development of new, or the expansion of, existing touring caravan and camping sites, will be permitted provided that the proposal:**
- a. is well related to the main tourist routes; and**
 - b. makes use of any converted or potentially convertible agricultural buildings that may be available with the number and size of any associated new buildings kept to the minimum necessary.**

Static Caravan and Holiday Parks:

- 8. Proposals for the expansion, upgrading or redevelopment of existing accommodation at static caravan and holiday parks will be permitted provided that it addresses an identified weakness in the local tourist economy.**

9.11.1 Generally, hotel accommodation in the District is considered to be adequate, but with scope for the upgrading of existing facilities and further development of conference facilities. Hotels and other serviced accommodation will normally be acceptable within settlements as well as extensions to existing facilities. Other serviced accommodation includes residential conference centres, guest houses and bed and breakfast accommodation where these require planning permission. New-build hotel development outside settlements will only be acceptable where it is directly associated with a tourist attraction and it is required to help sustain the viability of that attraction. Hotels in rural areas can be provided successfully by the conversion and improved use of existing buildings.

9.11.2 Self-catering is particularly popular in rural areas, with high season and short-break holidays offering attractions for a significant number of holiday-makers. It can make a valuable contribution to the rural economy.

9.11.3 As part of rural diversification schemes, the provision of self-catering units can often be a valuable alternative use for traditional agricultural buildings. Although quality standards still need to be high, self-catering holiday units will often not need to be designed to the same requirements as permanent homes. Many of the trappings of residential use, such as garages, fenced garden areas, sheds and greenhouses, are not necessarily needed and the internal layout can be simpler. The result can be a more sympathetic and architecturally successful conversion.

9.11.4 In countryside locations of high environmental quality, the conversion of existing property may well be the only acceptable way of providing self-catering accommodation. Elsewhere, the creation of new-build units that are directly linked on site with a tourist attraction and are required to help sustain the viability of the attraction will be acceptable in principle.

9.11.5 For the avoidance of doubt "self-catering accommodation" is taken to include holiday lodges where permanent residential occupation has been excluded.

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9.11.6 As identified above, a weakness in the tourist economy is the lack of lower cost accommodation. There are relatively few permanent sites for touring caravans and camping in the District, although there are some, for example, near Moreton-in-Marsh; at the former Notgrove railway station; and in Cirencester Park. The Local Plan offers the opportunity to encourage the development of lower cost accommodation, such as caravan and camping sites, in order to improve the tourist offer and encourage day visitors to stay longer, thus increasing the benefits to the local economy. Consideration should be given to proposals that incorporate more innovative and a variety of camping opportunities.