Draft document for Council governance process July and August 2026

Cotswold Retail & Town Centres Study

Cotswold Local Plan

ON BEHALF OF COTSWOLD DISTRICT COUNCIL

July 2026

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1. Introduction

1.1 This Retail and Town Centres Study ('the Study') has been prepared by Nexus Planning ('Nexus') for Cotswold District Council ('CDC'). It is intended that the Study will provide up to date evidence base information for the emerging Cotswold Local Plan which is being prepared by CDC as the main development plan document for Cotswold District with a lifespan for 2026-2043.

1.2 The emerging Local Plan, when adopted, is intended to replace the Cotswold District Local Plan 2011-2031. It will, amongst other things, set out policies and proposals for land use development in Cotswold District, including a long-term vision for the area, outlining where growth should occur, along with a suite of planning policies to guide decisions on planning applications. This will include a strategy and policies for the delivery of new homes, jobs and infrastructure to meet the needs of the local community and local economy.

1.3 Part of the spatial strategy within the emerging Local Plan will be in relation to the main 'town centres', including the definition of network of centres that meet the needs of the local communities, which will also include planning for new centres to meet the needs of new and expanding communities.

1.4 Preparation of the emerging Local Plan has commenced, with a Vision, Objectives and Development Strategy Options Paper consulted upon between February and March 2024. Following changes in national planning policy in December 2024, including the minimum length for Local Plans[1] and the method for calculating the number of homes needed in each local planning authority area, CDC have recently been consulting upon a series of preferred options for development.

1.5 In order to inform the emerging Local Plan work has been continuing on its evidence base. In order to inform this work, this Study has been commissioned to provide the following evidence base information and assessment work on retail and town centre issues:

a. A review of main settlements in Cotswold District in order to define a hierarchy of centres and support the wider spatial strategy within the Local Plan Review.

b. An assessment of the health of the main town centres across the District, along with main town centre land use provision across the smaller settlements not currently in the retail hierarchy.

c. A review of retail, leisure and town centre trends in order to set the context for the town centres strategy and the need to plan for new retail and main town centre uses across the District.

d. A review of current spending patterns across Cotswold District on retail and food/beverage land uses, including the market share of key destinations/settlements and the amount of spending which local facilities gain from visitor/tourist spending.

e. Assessments of need for retail, food/beverage and other main town centre land use floorspace, including the spatial distribution of provision.

f. Recommendations for retail and town centre planning policies for the Local Plan Review, including the opportunities/requirements for new retail/main town centre land use provision to support strategic development sites.

[1] 15 years

1.6 It is intended that this document will be made available by CDC as part of the forthcoming Regulation 19 consultation for the draft Local Plan, due in August 2026.

1.7 The most recent comprehensive review of retail land use provision and town centre strategy issues was undertaken by GVA for CDC in 2017: the Cotswold Retail Study Update 2016 (June 2017) (hereafter known as 'the 2017 Study'). The 2017 Study covered similar ground as this current Study including a review of the health of the main town centres in the District, an assessment of the need for retail land use floorspace, a review of the key development sites which can accommodate identified needs, along with the recommendations for the content of development plan policy. The recommendations of the 2017 Study informed the retail and town centre elements of the Cotswold District Council Local Plan, adopted in August 2018.

1.8 The preparation of this current Study has been guided by the contents of the current version of the National Planning Policy Framework ('NPPF') published in December 2024[2] and, in particular, Section 7 which details with planning policy. Given the preparation programme for the new Local Plan, it will be examined under the 2024 version of the NPPF. However, it is to be noted that a new draft version of the NPPF was published in December 2025 for consultation. Whilst the content of the new Local Plan will not be Examined in the light of the 2026 NPPF, the content of the new national policy document will nevertheless be a material consideration for future retail and other main town centre land use proposals in the District.

1.9 As part of the assessment of the topics outlined in paragraph 1.5 above, a wide range of data has been collected during the course of preparing this Study. This has included obtaining data on spending patterns across retail and leisure facilities in the Cotswold District area using evidence provided by Experian. This data has helped the Study understand the extent of the shopping and leisure catchments for the main 'town centres' along with out of centre provision and the market share of each settlement. In addition, land use data for the main 'town centres' and main settlements has also been collected in order to provide an up-to-date picture on the diversity of land uses in each of the main locations in the centre hierarchy.

1.10 The remainder of this document is structured in the following manner:

a. Section 2 provides a review of the background and context to the main 'town centres' and retailing issues in Cotswold District, including a summary of the recent stage of consultation on the Local Plan Review. Section 2 also provides a review of current national planning policy for retail and main town centre uses, along with recent legislative changes.

b. In order to provide up-to-date evidence base data for the emerging Local Plan, Section 3 provides a review of retail, leisure and town centre trends, including how the environment for retail and 'town centre' land use issues has evolved in recent years since the preparation of the 2017 Study.

c. Section 4 provides a comprehensive review of the current baseline regarding retail and other main town centre issues across Cotswold District. In particular, a review of the land use profile of existing defined town centres in the development plan hierarchy is provided, along with a review of the provision of main town centre uses in smaller settlements which do not currently have a defined town centre. As part of this review of the main settlements in the District, data on retail and food/beverage spending is reviewed in order to build up a picture of the catchment area of the main settlements.

[2] And updated in February 2025

d. Section 5 provides various strands of work which lead towards a retail and town centres strategy for the emerging Local Plan. In particular, this section provides:

1. An assessment of the need for retail floorspace across Cotswold District, with particular focus upon the main settlements in terms of quantitative and qualitative provision. An assessment for food and beverage floorspace is also provided.
2. Following the baseline assessment of need for retail floorspace, Section 5 also provides a detailed analysis of the spatial aspects of provision. Within this assessment we examine the need to plan for retail and other main town centre land use provision as part of the larger potential strategic development areas to be included in the Local Plan Review.
3. Advice and recommendations regarding the content of strategic and development management policies for inclusion in the Local Plan Review, having regard to the findings of the spatial and need assessments in this Study and the content national planning policy.

e. Finally, Section 6 provides a summary of the content and recommendations of this Study.

1.11 All plans and other documents referred to in the main text of this report are contained in appendices.

2. Background & Context Issues

Introduction

2.1 In order to provide context for this Study and the formulation of the retail and town centre elements of the emerging Local Plan, it is helpful to provide a brief review of main background and context issues for 'town centre' and retail planning issues across Cotswold District and the surrounding area. In particular, this context section provides:

a. A review of current local planning policy towards town centre and retail issues, including the existing Cotswold Local Plan and the content of the 2025 Preferred Options consultation.

b. A summary of the main findings of the 2017 Retail Study regarding retail and town centre issues across Cotswold District.

c. A brief summary of current national planning policy (and guidance) regarding main town centre uses, along with salient parts of the ongoing reform of the planning system.

2.2 Each aspect is discussed in turn below.

Planning Policy and Evidence Base Information for Retailing and 'Town Centre' Issues in Cotswold District

Policy

2.3 The current adopted development plan for Cotswold District is the Cotswold District Local Plan 2011-2031, which was adopted in August 2018. Sections 9.7 to 9.9 of the Local Plan provide the retail and town centre land use strategy for the District. Policy EC7 outlines the town centre hierarchy, across four tiers of centre. These are as follows:

a. Town centre: Cirencester

b. Key Centres:

1. Bourton-on-the-Water
2. Chipping Campden
3. Moreton-in-Marsh
4. Stow-on-the-Wold
5. Tetbury

c. District centres:

1. Fairford
2. Lechlade

d. Local centres:

1. Northleach
2. South Cerney

2.4 The differentiated classification of these settlements for retail and main town centre land use purposes differs from Policy DS1 of the Local Plan which classifies all of these settlements as Principal Settlements for the purposes of the development strategy in the Plan.

2.5 Part 3 of Policy EC7 indicates that provision will be made for 400sq m net of convenience goods and 2,100sq m net of comparison goods retail floorspace within Cirencester over the Local Plan period. None of the other nine settlements in the town centre hierarchy in EC7 are provided with a net additional retail floorspace forecast, with the policy instead noting that support will be given to proposals in defined centres which maintain and enhance provision and the wider health of the centre. In addition, each of the centres listed in the hierarchy in Policy EC7 have a defined town, district or local centre boundary on the Local Plan policies map. Cirencester town centre also possesses primary shopping area and primary/secondary frontage definitions.

2.6 Policy EC8 provides detailed and wide-ranging criteria for the management of retail and other main town centre land use proposals. The policy deals with proposals within town centre boundaries, including how they contribute to the health, role and function of town centres, along with the consideration of proposals outside of the defined town centre boundaries for the centres listed in Policy EC7. This includes the operation of the sequential test, plus a series of assessment criteria in Part 7 of the policy (relating to accessibility, the assessment of the likely impact of proposals on town centre health and investment, impact on choice and competition, plus the contribution of proposals to the attractiveness and character of settlements).

2.7 Following on from Part 8 of Policy EC8, Policy EC9 outlines the approach to the assessment of retail development proposals located outside of the town centres listed in Policy EC7. It notes that retail proposals with a net increase of 100sq m or more, or proposals that relate to floorspace of 100sq m or above, will be assessed against their impact on the health of, and investment within, defined town centres.

2.8 Beyond the overarching policy in EC8, Policy S3 of the Local Plan provides the Cirencester Central Area Strategy, including historic environment, transport/parking/access, and redevelopment opportunities. S3 identifies car parks within the town centre as redevelopment opportunities, particularly the Brewery and Forum car parks. The Policy indicates that redevelopment proposals should be guided by a masterplan for the town centre which will be adopted as a Supplementary Planning Document.

2.9 Policy S1 of the Local Plan identifies four mixed use redevelopment opportunities in Cirencester town centre (Memorial Hospital, Sheep Street, Forum car park and Brewery car park), with the two car park sites identified retail-led development opportunities. None of the other Principal Settlements have identified redevelopment opportunities in the adopted Plan.

2.10 Outside of Cirencester town centre, Policy S2 of the Local Plan allocates a large area of land to the south of Chesterton as a strategic development area (including 2,350 dwellings). This allocation also includes the provision of a new neighbourhood centre as part of a series of community facilities to support the day-to-day needs of this new residential community.

Evidence Base

2.11 As noted in Section 1 of this document, the most recent comprehensive assessment of town centre land use issues across Cotswold District was the 2017 Retail Study. That study examined the town centre hierarchy across the District and included health centre assessment of those settlements which can feature as part of the former ‘town centre’ hierarchy in Policy EC7 of the Local Plan. The 2017 Retail Study also provided an assessment of the quantitative and qualitative need for retail floorspace across the District up to 2031 and provided advice on the main locations which could meet the identified needs. Advice was also provided on the content of strategic and development management policies in the Local Plan, along with town centre boundary areas.

2.12 Alongside the 2017 Retail Study, CDC has commissioned/undertaken a number of different evidence base studies which have covered land use and accessibility issues in Cirencester town centre. These are:

a. Cirencester Town Centre Feasibility Study: Forecast Change in Uses to 2051, Nexus (November 2021)

b. Cirencester Town Centre Health Check Report, August 2021

c. Cirencester Site Assessments, Strategic Housing and Economic Land Availability Assessment (2021)

2.13 A summary of the content of the 2021 Feasibility Study can be found in Section 4 of this report.

National Planning Policy, Guidance & Legislation

National Planning Policy

2.14 The latest version of the NPPF was published in December 2024. This latest version provides a clear statement of the new Labour government intended approach to the planning system, with a particular focus around its objective of delivering 1.5 million new homes by the end of the current Parliament (in 2029).

2.15 The main section of the NPPF which deals with retail and town centre planning policy matters is Section 7: ensuring the vitality of town centres. No changes were made to this section between the 2023 and 2024 versions and the general content of national policy towards retail and town centres has remain relatively unchanged over recent years. The main elements of the current version of the NPPF are as follows:

a. Paragraph 90 asks that planning policies in development plans should:

"a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;

c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;

d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;

e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and

f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites".

b. In relation to development management issues, the two policy tests are the sequential and impact tests.

1. Paragraphs 91 and 92 note, in relation to the sequential test, that:

"*Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.*

When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored".

2. Paragraph 94, in relation to impact assessments, notes that:

"When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date 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 2,500sq m of gross floorspace). This should include assessment of:
a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)".

2.16 Beyond Section 7 the only other change in the December 2024 version of the NPPF which directly relates to main town centre land uses is the inclusion of a new paragraph, No.97 (in Section 8), which relates to hot food take-away and fast-food outlets. It notes:

"Local planning authorities should refuse applications for hot food takeaways and fast food outlets:

a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or

b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social-behaviour".

The Draft National Planning Policy Framework, December 2025

2.17 In December 2025, the Ministry of Housing, Communities and Local Government published a draft version of the new NPPF for consultation[3]. Section 8 of the draft NPPF splits town centre planning policy into two parts: plan-making and decision-taking. Policy TC1 addresses plan-making issues, with the key aspects comprising:

a. From the outset, TC1(1)(a) refers to development plans having a strategy for town centres. Whilst there is long-standing national planning policy support for town centres, the reference to town centre strategies being an integral aspect of plan-making is now proposed to be front and centre of national plan-making policy.

[3] The consultation runs until March 2026.

b. There remains a requirement to define a hierarchy of 'town centres' (TC1(1)(b), although the emphasis now falls upon town centres alone (without the reference to primary shopping areas). There is also a greater emphasis on areas of change, diversity, infrastructure, intensification and public realm, plus specific reference to residential development.

c. It remains the case that national policy expects local authorities to allocate suitable sites in town centres to meet the scale and type of uses needed. In a change to the current NPPF, these allocations should relate to needs over the plan period, and not the current policy of 'looking at least ten years ahead'. There is a subtle change between paragraph 90(e) in the current NPPF and TC1(1)(c) in the proposed draft NPPF. Both contemplate changing town centre boundaries, where there is justification to do so, however it is arguable that TC1(1)(c) is suggesting that local authorities should work harder to accommodate needs on vacant town centre sites and areas suitable for intensification.

d. It will be noted that the proposed new NPPF, like the existing NPPF, does not go into any detail about how 'needs' are to be defined and assessed. Maybe we'll get some guidance on this in future updates to the PPG.

e. Whilst it appears in the development management area of the current NPPF (para 94), there is now proposed to be, in plan-making policy (TC1(1)(e), a clear requirement, where appropriate to do so, to set locally defined floorspace threshold for impact assessments.

f. There is also now proposed to be specific reference to the use of Article 4 Directions, where they are justified in supporting the health and character of town centres.

g. There is also encouragement for local authorities to use design guides, masterplans and design codes to support their vision for town centres. This encouragement, in TC1(2), will no doubt have a relationship with the requirement for town centre strategies in TC1(1)(a).

h. Finally, it is notable that references to 'markets' (para 90(c) in existing NPPF) are proposed to be removed.

2.18 There are three proposed development management policies within the draft NPPF, which are intended to deal with the general policy approach to developments in town centres and also the management of proposals for main town centres uses located outside of town centres. Whilst there has been long-standing support for maintain and enhancing the health of town centres, there is now proposed to be a specific stand-alone national policy: TC2. It is directed specifically at proposals located within town centres, with the singular aim of supporting the overall vitality and viability of the centre. Importantly, it requires the decision maker to give substantial weight to this aspect. There is also specific emphasis on a diversity of uses in the proposed policy, but no specific mention of 'traditional' town centre land uses (i.e. retail, leisure, service uses) although residential uses do get a mention.

2.19 Policy TC3 is intended to deal with the sequential test. It is proposed to retain all the hallmarks of the existing town centre first approach (in paragraphs 91 and 92 of the current NPPF), although the following points should be noted. First, a number of aspects of the current NPPF are not proposed to be changed in the new NPPF. These include:

a. The sequence of locations for the sequential test: town centre, then edge of centre, followed by out of centre.

b. When considering edge and out of centre locations preference should be given to accessible sites that are well connected to the town centre2.

c. When considering the 'availability' of alternative sequentially preferable sites an 'available site' is either available now or expected to become available within a reasonable period.

d. There continues to be an exemption to the sequential test for small scale offices or other small scale rural development.

2.20 With regard to the proposed changes, there are three aspects. First, there is one minor 'clarification' in TC3(1), which now makes it clear that the sequential test will apply to proposals not in an existing centre nor *"in accordance with an allocation for that purpose in an up-to-date development plan".* The proposed change is the use of the phrase: 'for that purpose'. This is a subtle change from the current NPPF, which makes reference to *"not in accordance with an up-to-date plan".* This will, no doubt, be helpful in those cases where there is debate over whether an edge or out of centre proposal on an allocated site is 'in accordance with an up-to-date plan'.

2.21 Second, an element of the current version of the PPG has made its way to the new NPPF. This existing guidance, which would now become policy, states: *"In doing so it is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development proposed".*

2.22 Third, the biggest potential change in the application of the sequential test related to TC3(3). The proposed wording of this part of the sequential test policy states:

> *"In doing so it is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development proposed, <u>and it should be considered whether the type of development proposed could be accommodated across multiple sites</u>".* [our emphasis]

2.23 The reference to 'multiple sites' suggests a requirement to consider, in certain circumstances, the concept of disaggregation in the sequential test. Specific reference to disaggregation was removed from national policy when the first edition of the NPPF was published in 2012. It previously appeared in PPS4 (and the accompanying Practice Guidance) and, in summary, allowed a decision maker to consider whether a proposal, which was constructed of different elements, should be split up and accommodated on suitable and available separate alternative sites. This added an additional level of assessment for proposals involving retail and leisure parks or separate elements.

2.24 Finally, Policy TC4 deals with the assessment of the likely impact of certain development proposals on town centres. TC4 has many similarities with paragraph 94 of the current NPPF, namely:

a. It applies to retail and leisure proposals and not all main town centre land use proposals outside of town centres.

b. In line with the clarification for the sequential test (TC3), proposals for retail and leisure uses outside of centres will only avoid the impact assessment if they on a site allocated for the proposed use.

c. The two limbs of the assessment framework remain: impact on town centre vitality and viability, plus impact on town centre investment.

d. The default threshold for impact assessments is 2,500sq m gross floorspace unless there is an alternative locally-set development plan threshold.

2.25 Looking beyond the main NPPF policies, there is a proposed change in the Glossary which will affect the application of the sequential test, plus how some people approach the impact assessment test: the definition of edge-of-centre. Based upon the current NPPF, a decision on whether a site is either in-centre or edge-of-centre is dictated by its relationship to a defined Primary Shopping Area ('PSA') and the defined town centre boundary depending upon the land use. If it's a retail use, a town centre site is within the PSA. In addition, a retail site will be edge of centre if it is well connected to, and up to 300 metres from, the PSA. For all other main town centre uses, an edge-of-centre location is up to 300 metres from the town centre boundary. Therefore, in theory, the site of a proposed retail development could be edge-of-centre even though it is within a defined town centre boundary. In the draft NPPF, the definition of edge-of-centre becomes more straight-forward: edge of centre is a location that is well connected and within 300 metres of a town centre boundary for all main town centre uses.

2.26 Other proposed changes to the NPPF Glossary include:

a. Within the definition of 'main town centre uses', 'banks' and 'professional services' have been added into the definition (which otherwise lies unchanged).

b. To support the reference to masterplans in the town centre plan-making policies, 'masterplan' is now defined in the Glossary.

c. There are minor changes to the definitions of 'out of centre' and 'out of town', where the word settlement replaces the phrase 'urban area'.

2.27 There are no substantive changes to the definition of a 'town centre' in the draft NPPF.

Planning Practice Guidance

2.28 National policy contained within the NPPF is supported by the contents of the Planning Practice Guidance ('PPG') which is intended to assist with the preparation of development plans and the determination of planning applications. One of the main sections of the PPG covers a range of land use planning issues for town centres and retail uses, including: (a) planning for town centre vitality and viability; (b) permitted development and change of use in town centres; and (c) assessing proposals for edge and out of centre development. Those parts of the PPG which are relevant to the scope and objectives of this Study are summarised later in this document.

Legislation and Other Initiatives

2.29 As part of the **Levelling Up and Regeneration Act 2023**, the secondary legislation was brought into force in 2024 which enables local authorities to progress **High Street Rental Auctions ('HSRAs')**. HSRAs are a new power for local authorities to require landlords to rent out persistently vacant commercial properties to new tenants such as local businesses or community groups. HSRAs provide local authorities with a strong tool to use in places where vacancy rates are a problem and where there is little cooperation between landlords and local authorities, however, they will not be applicable in all cases of vacant high street premises. When considering whether a HSRA will be appropriate, a local authority should consider whether the specific premises in question meets the requirements of the legislation, as well as whether alternatives to High Street Rental Auctions might be more appropriate.

2.30 To qualify for a HSRA, premises need to be situated on a designated high street or in a designated town centre and the local authority needs to consider them to be suitable for a high-street use. The local authority is responsible for designating their streets or areas where a HSRA could be used. The local authority must maintain and make available to the public a list describing, and a map showing, any high streets or areas it has designated. This is similar to the process a local authority would take to designate and display a conservation area. In designating a street or area in which a HSRA could be used, the local authority must be satisfied that the street or area is important to the local economy because of a concentration of premises undertaking high-street uses on the street or area.

2.31 Once a high street designation has been made in the correct manner, monitoring should take place to identify long term vacancies. Properties which have been continuously unoccupied for 365 days, or at least 366 days in a 24 month period, have the potential to qualify for a HSRA (so long as occupation of the premises for a suitable high street use would be beneficial to the local economy, society or environment. Subject to those conditions being met, the HSRA process commences, with the aim of securing a new tenant for the property in question. Further information on HSRAs can be found at: https://www.gov.uk/government/publications/high-street-rental-auctions-non-statutory-guidance/high-street-rental-auctions-non-statutory-guidance.

3. Retail & Town Centre Trends

Introduction

3.1 A key part of building the background context for this Study is an examination of retail, leisure and town centre trends. Like any land use sector, economic and commercial market trends, along with external factors, will have an influence on how a local authority will plan for individual land uses and how it will develop strategic planning policies to guide development and other regeneration initiatives.

3.2 Based upon the scope of this Study, two areas should be examined: (a) national economic issues and trends; and (b) local issues in and around Cotswold District. Within these topic areas, it is important to consider events which have occurred since the preparation of the previous evidence base study on retail and town centre issues in 2017 and also the adoption of the Local Plan in 2018, including how actual events may have matched or diverged from previous forecasts and assessments. For the avoidance of doubt, this section of the Study provides 'a point in time' assessment of the UK economy and retail, leisure and town centre sectors. Therefore, its contents should be read and understood with this in mind.

National Trends

Consumer Spending

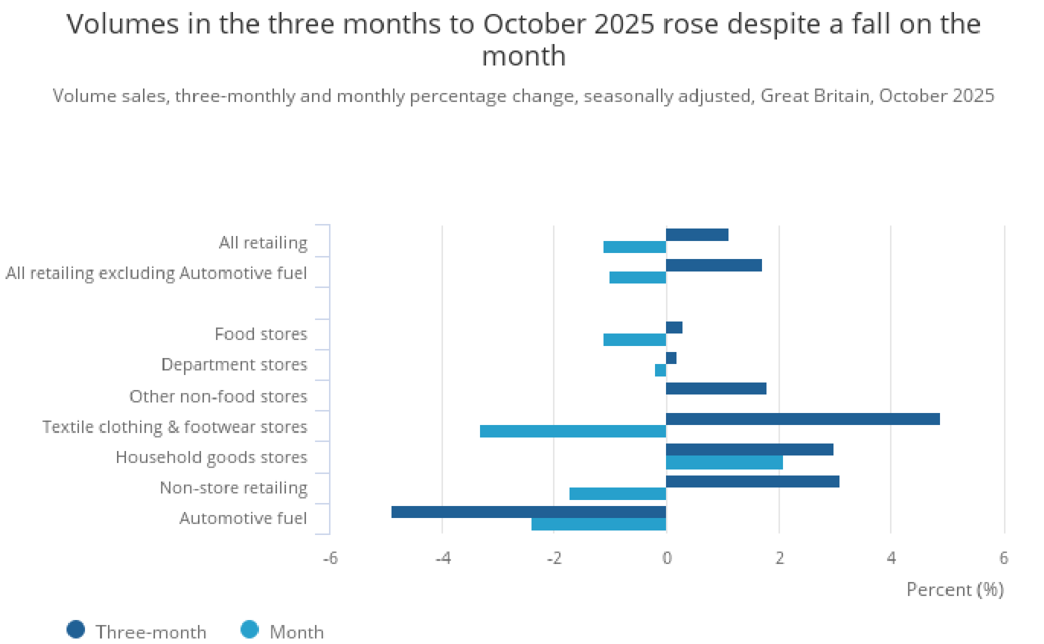
3.3 As consumer spending accounts for around 60% of GDP, the financial health of households and their ability to spend are crucial factors in determining an economy's performance. Traditionally, consumer spending is the driving force behind GDP growth in the UK. In recent years, however, this has not been the case. First, the Covid-19 pandemic and associated lookdowns resulted in temporary large drops in spending and big changes to spending patterns (such as a greater share of spending on goods and less on services). Then, just as spending had recovered to its pre-pandemic level, the period of high inflation in 2022 and 2023 squeezed household budgets, resulting in stagnant spending in real (inflation-adjusted) terms.

3.4 In November 2025, the ONS announced that retail sales had fallen 1.1% in October, which was much worse than commentators had been expecting. This marked a steepening in the decline in retail sales volumes since the summer, following growth of 0.5% in September 2025, 0.7% growth in August and 0.3% growth in June. The sharp fall in sales in October mirrored the 1% contraction in sales in May 2025.

3.5 Figure 3.4 below provides data, from the ONS, on the changes in retail sales per category for October 2025 and the three month period leading up to (and including) October. The ONS reports that sales volumes rose over the three months to October 2025 as a strong summer for clothing stores reached its peak in September 2025. Within other non-food stores, computer and telecommunication retailers performed well, which retailers attributed to new product releases. Non-store retailers continued to rise in the three-monthly series, with retailers commenting on strong demand for gold which boosted online jewellers in September 2025.

3.6 Total sales volumes fell over the month to October 2025, the first monthly fall since May 2025. Supermarket sales volumes fell for the second month in a row. Clothing store sales volumes also fell following a recent peak in September 2025, with retailers reporting that consumers held back in preparation for Black Friday discounts. Online retailers within non-store retailing also dipped on the month, in part because of online clothing retailers. Some online retailers also mentioned delayed spending in the lead up to Black Friday.

Figure 3.4: UK retail sales, three-month and October 2025 change in sales



Source: Monthly Business Survey, Retail Sales Inquiry from the Office for National Statistics

A Closer Look at the Retail Sector

3.7 Taking the above factors into account, Table 3.1 below provides a summary of Experian's 'central case' forecast for retail sales growth and associated floorspace requirements at the UK level over the short to medium term 2023-2032 and the longer term (2023-2040). The figures also take into account the impact of special forms of trading ('SFT') (i.e. internet shopping) and floorspace efficiency gains.

3.8 The table shows that efficiency gains in floorspace are likely to match retail sales growth minus SFT up to 2032, thus leading to a situation where there is negligible growth in retail floorspace. Over the longer term to 2041, the outlook is expected to improve slightly at 0.2% per annum and 7.8% overall from 2025 until 2041.

Table 3.1: retail sales growth, efficiency gains and floorspace requirements

	% p.a. 2025 - 2032	Cumulative Growth, 2025-2032	% p.a. 2025-2041	Cumulative Growth, 2025-2041
Retail sales growth	1.5	12.5	1.7	32.4
Retail sales growth, less SFT adjusted for sales from stores	1.1	9.0	1.3	24.9
Efficiency gains	0.8	7.3	0.9	17.1
% increase in floorspace required after efficiency gains (sales growth less efficiency gains)	0.2	1.7	0.4	7.8

Source: Experian, 2026

3.9 In order to get a broader picture of floorspace requirements, the above figures should also be read alongside vacancy levels across the country. At the present time, the national average rate for vacant retail and service property in town centres in the UK is 14.1%. This rate of vacancy has remained virtually unchanged since the Covid-19 pandemic when national average vacancies stood at 13.8% in 2021-2022. However, these levels are noticeably higher than pre-pandemic levels of 11.3% in 2018 and 12.0% in 2019. This overall picture, where almost one in six units within the UK's retail centres is empty, is a clear cause for concern and is a key indicator of potentially too much retail floorspace within town centres. However, it is also important that this wider UK situation should, however, be compared with local circumstances in Cotswold District, which is covered in the next section of this report.

3.10 Alongside sales growth, it is also important to examine retail spending volumes, as this type of forecast is a key input into local authority retail floorspace capacity assessments, such as those contained in the 2017 Retail Study. In particular, the scale of change in retail spending will have an influence on the turnover of existing retail stores and also help to establish whether there is a case for net additional floorspace to be provided over the course of the development plan period.

3.11 Table 3.2 below compares the forecast annual changes in retail expenditure per head on all comparison goods from the time of the 2017 Study and the latest available (March 2026) forecasts from Experian. The table shows the year-on-year change forecasts over the period 2017-2031. This period matches the assessment timeframe in the 2017 Study and allows for a comparison on a consistent basis with the forecasts used in the 2017 Study and also the latest forecasts from Experian.

3.12 Table 3.2 shows that, at the time of the 2017 Study, the total forecast growth up to 2031 was circa +46%. However, the latest future retail spending (per head) forecasts, published in March 2026, show that the combination of actual and forecast change to amount to +16% between 2017-2031. Therefore, the total level of forecast growth in total comparison goods spending per head has reduced by around two-thirds since the previous evidence base study.

Table 3.2: forecast year-on-year change in per capita comparison goods spending from 2017 until 2031

	Retail Planner 13 (2015) % Growth p.a.	Retail Planner 23 (2026) % Growth p.a.
2017	2.9	4.2
2018	2.7	0.9
2019	2.8	3.0
2020	3.0	-8.1
2021	3.2	8.6
2022	3.1	5.0
2023	3.3	-8.5
2024	3.3	-1.5
2025	3.1	-0.5
2026	3.1	1.2
2027	3.2	1.8
2028	3.1	2.2
2029	3.2	2.5
2030	3.3	2.4
2031	3.2	2.7
Total Change, %, 2017-2031	***+46.5***	***+15.9***

Source: Experian, 2015 and 2026

3.13 The same exercise as contained in Table 3.2 is replicated for convenience goods expenditure per head in Table 3.3 below. This also shows a material difference between the forecasts available at the time of the 2017 Retail Study and the latest comparable forecasts in 2026. Once again, the focus is on the core period of 2017 to 2031.

3.14 Table 3.3 shows that in contrast to the +1.8% growth anticipated at the time of the 2017 Study (for the period 2011-2031), the latest forecasts for convenience goods spending per head show a -6% fall in the level of spending per head over the same period.

Table 3.3: forecast year-on-year change in per capita convenience goods spending between 2015 and 2040

	Retail Planner 13 (2015) % Growth p.a.	Retail Planner 23 (2026) % Growth p.a.
2017	0.3	1.9
2018	0.2	1.6
2019	0.2	-1.3
2020	0.1	7.2
2021	0.1	-1.2
2022	-0.1	-2.8
2023	0.1	-5.1
2024	0.2	-2.8
2025	0.1	-1.5
2026	0.1	-0.5
2027	0.1	-0.5
2028	0.1	-0.2
2029	0.1	-0.2
2030	0.1	-0.3
2031	0.1	-0.2
Total Change, %, 2020-2034	***+1.8***	***-5.9***

Source: Experian, 2015 and 2026

3.15 It should be noted that the expenditure per head figures in Tables 3.2 and 3.3 above are total spending levels, inclusive of spending via special forms of trading (i.e. internet shopping). Therefore, Table 3.4 below compares the total annual change in spending per head for comparison goods against adjusted spending figures which strip out purely internet spend[4]. This comparison includes forecasts which were available at the time of the 2017 Study and the latest forecasts from Experian (2026).

[4] i.e. removing any spending which is not associated with physical stores, in order to distinguish between those sales which are fulfilled by stock held in Class E(a) stores.

Table 3.4: forecast year-on-year change in per capita comparison goods spending between 2015 and 2040

	2017 Study Comparison Goods % Growth p.a. (including online spend)	2017 Study Comparison Goods % Growth p.a. (excluding purely online spend)	2026 Study (2026 forecasts) Comparison Goods % Growth p.a. (including online spend)	2026 Study (2026 forecasts) Comparison Goods % Growth p.a. (excluding purely online spend)
2017	2.9	2.1	4.2	2.7
2018	2.7	1.8	0.9	-1.4
2019	2.8	2.1	3.0	2.0
2020	3.0	2.5	-8.1	-18.3
2021	3.2	3.1	8.6	9.2
2022	3.1	2.9	5.0	9.1
2023	3.3	3.4	-8.5	-11.1
2024	3.3	3.4	-1.5	-1.0
2025	3.1	3.2	-0.5	-1.1
2026	3.1	3.1	1.2	0.8
2027	3.2	3.3	1.8	1.2
2028	3.1	3.1	2.2	1.7
2029	3.2	3.3	2.5	2.0
2030	3.3	3.4	2.4	2.0
2031	3.2	3.3	2.7	2.2
Total Change, %, 2017-2031	***+46.5***	***+44.0***	***+15.9***	***0.0***

Source: Experian

3.16 Table 3.4 shows that, at the time of the 2017 Study, growth between 2017 and 2031 for comparison goods spending per head was circa +44% when purely online sales were removed from the forecasts. In contrast, the latest forecasts show no growth between 2017 and 2031.

3.17 It should be noted that the comparison between the 2017 and 2026 data is heavily influenced by the events of 2020 when comparison goods spending per head fell by 24%. Therefore, if the period 2020-2021 is removed from the comparison between the 2017 and 2026 data, then the (adjusted) growth for 2017-2031 used within the 2017 Study was +38%, whilst the latest forecasts suggest a +9% growth over the same period.

3.18 Table 3.5 below shows the market share of pure online sales for both convenience and comparison goods. Again, a comparison is made between the forecasts used in the 2017 Study and the data which is available at the present time. It will be noted that there is very little difference between the convenience goods spending data, but a much larger difference for comparison goods online spending. At the time of the 2017 Study, it was forecast that purely online sales for comparison goods at 2017 would be 13.1% of total spending. The actual proportion was slightly higher, at 16.6%. However, the forecasts for 2026 are considerably different: 15% online sales (as forecast at the time of the 2017 Study) and 26% online sales (based upon the latest forecasts provided by Experian). This scale of difference in the forecasts is expected to continue to 2031.

Table 3.5: special forms of trading allowances for convenience and comparison goods expenditure, 2017-2031

	2017 Retail Study – Convenience SFT	2017 Retail Study – Comparison	2026 Experian Forecast – Convenience SFT (adjusted)	2026 Experian Forecast – Comparison SFT (adjusted)
2017	3.3	13.1	3.1*	16.6*
2026	5.1	15.0	5.4	26.1
2031	5.8	14.6	6.1	28.0

Notes: 2017 Study data taken from forecasts published by Experian in October 2015. 2025 data based on forecasts published by Experian in March 2025. In both instances, Experian SFT data has been adjusted for sales associated with physical stores. *actual data, rather than forecasts.

The Retail & Leisure Sectors

3.19 Alongside data on retail and leisure expenditure, it is also important to examine trends in retail sector in terms of the presence of retailers and leisure uses in high streets and out of centre locations as this can also help to understand the wider aspects of 'need' from a commercial viewpoint.

The retail sector

3.20 Table 3.6 below provides data, published by Green Street and PwC, on store openings and closures across the UK. It shows that there has been a consistent net loss in store numbers, with circa 5,000 premises lost in 2023 and 3,800 in 2024. The number of store openings has been consistency lower in recent years (2023-2024) than the period 2015-2019, following the Covid pandemic. It is also notable that, since 2018, the net reduction in store numbers has been larger than the pre-2018 period.

Table 3.6: retail store openings and closures, 2015-2024

	Store Closures	Store Openings	Net Change
2015	13,268	12,121	-1,147
2016	14,439	11,806	-2,633
2017	16,274	12,264	-4,010
2018	15,304	8,767	-6,537
2019	17,338	9,690	-7,648
2020	17,532	7,655	-9,877
2021	17.219	7,160	-10,059
2022	11,530	7,903	-3,627
2023	14,081	9,138	-4,943
2024	12,804	9,002	-3,802

Source: Green Street and PwC

3.21 Table 3.7 concentrates upon net closures over the period 2014-2024 and breaks down the available data into separate locations. It shows the rate of change over the past decade and is based upon an indexation of 100 at 2014.

Table 3.7: outlet net closures by location, 2014-2024 (2014 = 100)

	UK Average	Retail Park	Stand Alone Stores	Shopping Centre	High Street
2014	100	100	100	100	100
2015	99	105	99	101	99
2016	99	103	98	100	98
2017	97	103	97	98	96
2018	94	102	95	95	92
2019	91	100	91	91	88
2020	86	97	88	85	83
2021	82	92	85	79	79
2022	81	92	84	78	77
2023	79	93	82	76	74
2024	78	93	81	75	73

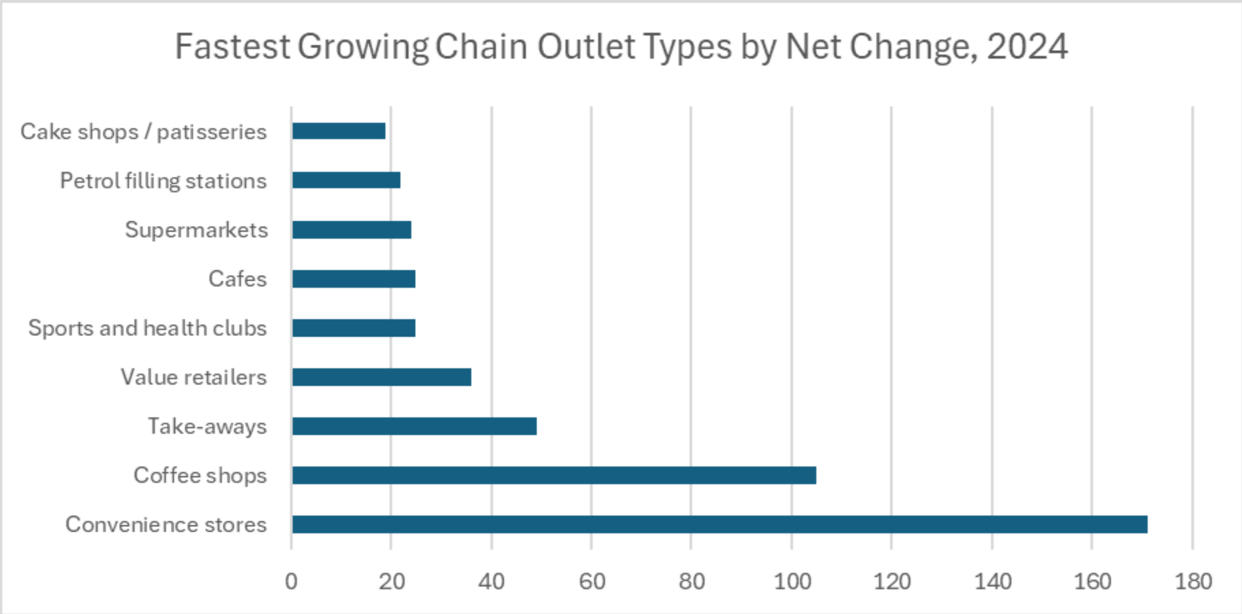
Source: Green Street and PwC

3.22 Against a backdrop of a net loss of stores between 2014 and 2024 across all locations, it is noticeable that a net loss in stores in retail park locations has only occurred since 2019. This is not matched by the other locations, with high street and shopping centre locations losing around one quarter of stores. Given the location of individual stores in shopping centre and high street locations, this has significantly affected the UK average, which has been a 22 point net loss up to 2024.

3.23 Figures 3.3 and 3.4 show the net change in different types of shops and service uses across the UK in 2024. Figure 3.3 shows the fastest growing chain outlets, by use type, in 2024 and indicates that the only two types of outlets which were able to add, on average, a net additional store per week (i.e. net change higher than 52) were convenience stores and coffee shops. However, despite lower levels of growth, the other types of businesses shown below are those which have also been able to make a positive contribution. Unsurprisingly, these include: cafes, sports and health club uses, supermarkets[5], value retailers and take-aways.

[5] Driven by the expansion programmes of ALDI and Lidl

Figure 3.3: fastest growing chain outlet types by net change, UK, 2024

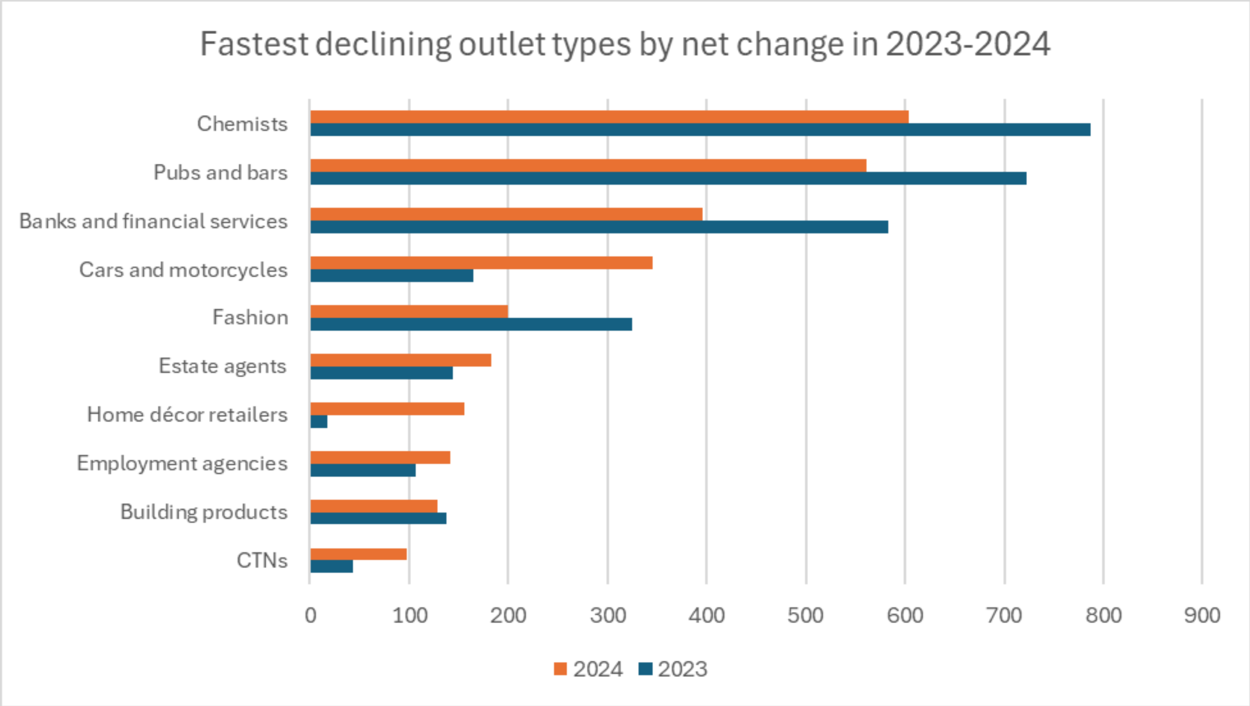


Source: Green Street

3.24 In contrast, the types of businesses shown in Figure 3.4 below are the ones showing the largest levels of decline from 2023-2024. The most notable, but probably not unsurprising ones, are chemists, pubs and bars and banks/financial services. There was a loss of around 600 chemists in 2024, following a larger loss of just under 800 chemists in 2023. In 2024, around 550 pubs/bars closed, which was less than the circa 700 units closing in 2023.

3.25 It is also notable that there has been a large number of closures in the clothing/fashion sector, with just over 300 stores closing in 2023 and 200 stores closing in 2024.

Figure 3.4: fastest declining outlet types by net change, UK, 2023-2024



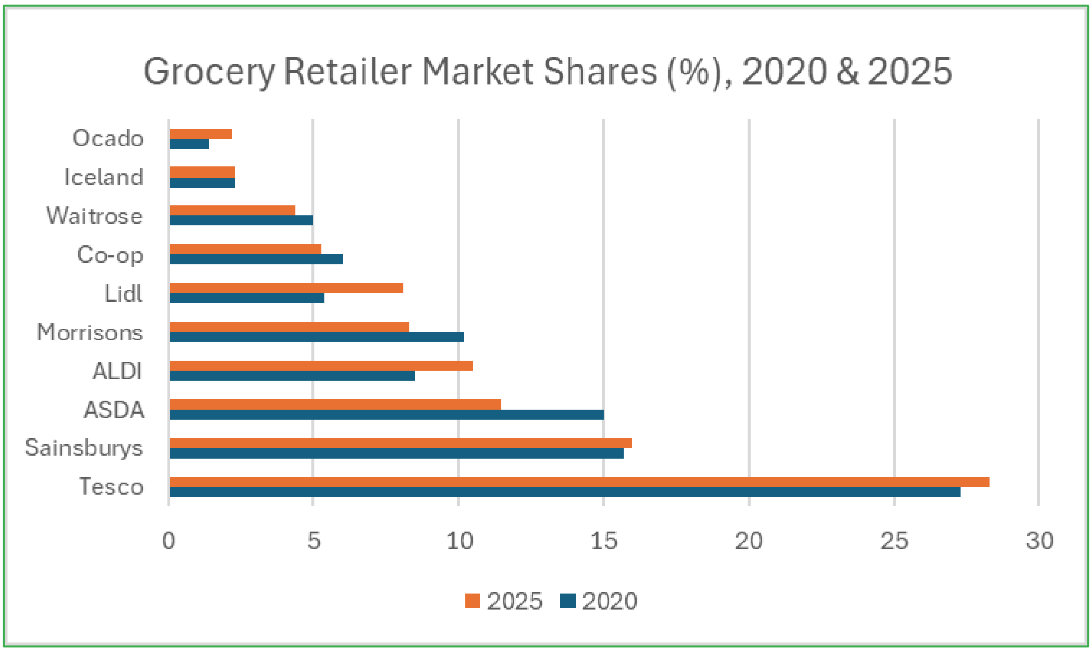
Source: Green Street

The grocery sector

3.26 Within the grocery retail sector, the headline trend over the past five years has been the continued rise of discount stores such as ALDI and Lidl. These operators are now a well-established part of the UK grocery sector and, in combination now (in 2025) control around 19% of the UK grocery market. Indeed, ALDI overtook Morrisons in 2022 to become the UK's fourth-largest grocer by market share.

3.27 Figure 3.5 below outlines the market share of the main grocery retailers in the UK in 2020 and 2025. The growth in market share for Lidl and ALDI is clear, which has largely been at the expense of ASDA and Morrisons. Tesco remains, by far, the largest grocer by market share, with 28.3% of spending in June 2025. The second highest market share is Sainsburys at 16.0%.

Figure 3.5: individual retailer market shares, 2020 & 2025



Source: Kantar

3.28 Looking forward, both ALDI and Lidl have significant continuing expansion plans and continue to be the most active in terms of proposed new store openings. Over the course of 2025, both retailers have opened their 1,000th store.

The leisure sector

3.29 Turning to the leisure sector, the available market data shows a complex picture. The COVID-19 pandemic had a huge effect on the performance of this sector, which led to significant business closures and loss of employment opportunities. The sector has bounced back and, according to research published by Deloitte, confidence reached a two year high in the first quarter of 2024. Since that time, however, recent research published by Deloitte has found that sentiment in 'eating out' and 'drinking in pubs and bars' declined by about 6 percentage points over the remainder of 2024. This has been driven by the cost of living and increasing prices in the leisure sector particularly in the food and beverage sector. In recent years, costs for leisure and hospitality businesses have increased significantly, driven by higher energy and food costs, along with rising wages.

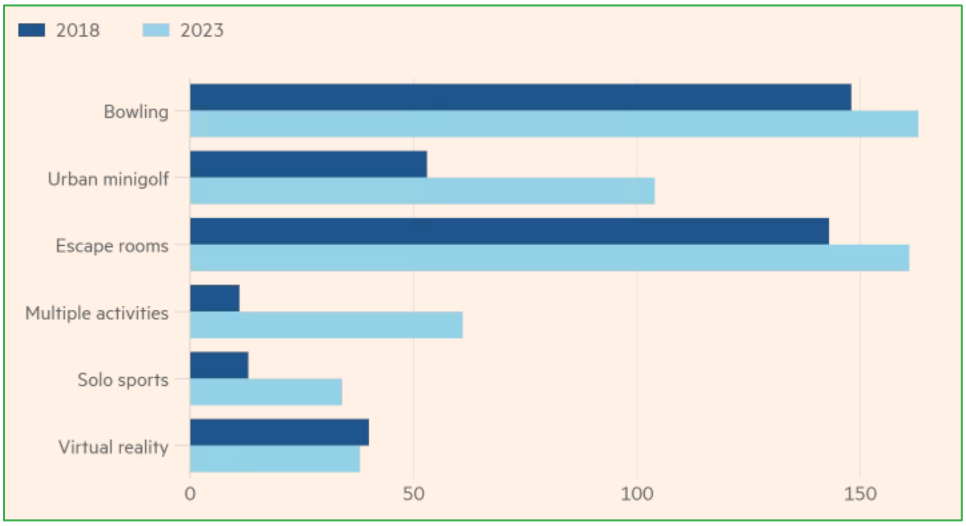
3.30 Data shown earlier in this section[6] indicates the impact of cafes and coffee shops on the occupation of premises on the high street, which is part of a longer-term trend in most city, town and district centres towards more of a service-based offer. Cafes have also been a big part of the evolution of out-of-town retail and leisure parks, which have traditionally focused upon comparison goods retailing and 'big box' leisure facilities (such as multi-screen cinemas and ten-pin bowling premises). With car parking areas under-utilised, and landlords looking for additional sources of income, proposals for stand-alone cafes (sometimes with drive-through elements) are now a common feature at out-of-town facilities; a trend which is also occurring as part of the expansion of discount foodstore operator sites.

3.31 Within the leisure sector, the post-pandemic period has seen some changes within key categories and their demand for space in town centres and out of town locations. In particular, there has been a shift in the types of venue being visited. In October 2024, Hollywood Bowl, the UK's largest ten-pin bowling operator indicated that like-for-like sales were a product of intensifying competition from new emerging leisure sectors, from axe-throwing to mini golf. Whilst 'active

[6] See Figure 3.3

family' venues, such as ten-pin bowling, remain popular, there has been a growth in other activity-focused venues such as darts, cricket, escape rooms, axe-throwing and shuffleboard. According to the real estate adviser Savills the number of UK activity-focused venues has increased by around 40% since 2018 to 600 in 2024. Savills expect that the number of sites will increase further to 800 by 2029. The increase in the types of venue, by activity between 2018 and 2023, is shown in Figure 3.6 below.

Figure 3.6: UK socialising venues, number by segment, between 2018 and 2023 (Source: Savills)



4. The Main 'Town Centres' & Wider Retail and Main Town Centre Land Use Provision

Introduction

4.1 A key foundation for the retail and 'town centre' land use strategy within the emerging Local Plan is a robust set of evidence in relation to land use provision and the wider characteristics of the main 'town centres' in Cotswold District, along with a particular emphasis on retail floorspace provision within and outside of the defined 'town centre' area. Therefore, this section of the Study provides:

a. A review of the land use profile of the defined 'town centre' areas for those settlements included in the existing town centre hierarchy, as defined by Policy EC7 of the Local Plan, along with the main elements of retail floorspace provision outside of these defined boundaries.

b. For the other Principal Settlements (i.e. those without defined town centre boundaries), this section provides a review of the main town centre land uses present throughout these settlements. In addition, the same process has been undertaken for the Non-Principal Settlements.

c. An assessment of current spending patterns and associated market share levels for retail and food/beverage uses across the Principal Settlements, including an analysis of the catchment areas of these settlements and, where applicable, their defined 'town centres'.

Evidence Gathering

'Town Centre' Land Use Data

4.2 An analysis of data on retail, leisure, service and other main town centre uses provides a key contribution to the Study in a number of different ways. First, it provides a key indicator of the current performance, role and function of each defined 'town centre'. Second, it enables an analysis of the land use characteristics of each centre. Third, the land use assessment provides an important contribution to the assessments of retail and food/beverage floorspace need which will be undertaken later in this Study.

4.3 The scope for this Study focuses upon those Principal Settlements who feature as part of the 'town centre' hierarchy in Policy EC7 of the Local Plan, along with the other Principal Settlements (not included in EC7) and a series of Non-Principal Settlements. The scale and extent of information gathered for these settlements is proportionate to their size and place in the 'town centre' hierarchy.

4.4 During November 2025, Nexus undertook a series of land use surveys across main Principal and Non-Principal settlements. The surveys recorded all main town centre uses within the defined town centre boundaries for those settlements included in the Policy EC7 hierarchy, along with notable retail uses outside of these defined boundaries. For those principal and non-principal settlements without a defined town centre, all main town centre uses across the settlement were recorded. In order to assist with the gathering this land use data, town centre research data from Experian GOAD was used for Cirencester, Tetbury and Stow-on-the-Wold.

Spending Patterns Data for Retail & Food/Beverage Uses

4.5 A further key aspect of our evidence base analysis is a review of current shopping and retail spending patterns across the District, including market share data for the main centres and grocery stores. In order to inform this assessment, this

Study has obtained spending data from Experian's Spend Insight ('ESI') database. This is a database of around 4 million debit and credit cards from across the UK and provides data on spending levels at specific shopping destinations and the source of this spending[7].

4.6 The data which has been obtained from Experian is based upon the following parameters:

a. Spending data has been obtained for the key locations across Cotswold District area. This has concentrated on the larger of the Principal Settlements, along with specific foodstores/supermarkets and (for Cirencester) key retail park/warehouse facilities.

b. Spending data has been obtained for grocery stores, comparison goods shops and food/beverage facilities (such as cafes, restaurants, pubs/bars, and take-aways).

c. In order to build up a picture of the shopping catchment area of the main locations, the ESI spending data has been obtained on a zone-by-zone basis. This enables our analysis to show the scale of spending (and associated market share) from defined individual parts of the Cotswold District area. Figure 4.1 below provides a plan of the zones which have been used to organise the ESI data. These zones are based upon postcode sector areas and are consistent with the zones used in the 2017 Retail Study. Table 4.1 below provides a list of those postcode sectors that comprise each zone. A plan of the study area is also contained at Appendix A to this report.

d. In addition to the expenditure which is flowing to specific destinations in Cotswold District area from each of the eleven study area zones, the ESI data also provides an estimate of spending attracted by Cotswold retail and food/beverage facilities from outside of the study area[8].

e. The spending data provided by ESI is based upon the calendar year 2024.

[7] For the avoidance of doubt, the ESI data does not record cash sales and, therefore, for the purposes of this assessment, patterns of cash sales are assumed to follow the same distribution as credit/debit card sales.
[8] Non-study area UK spending only.

Figure 4.1: plan showing study area used for the collection of Experian Spend Insight data

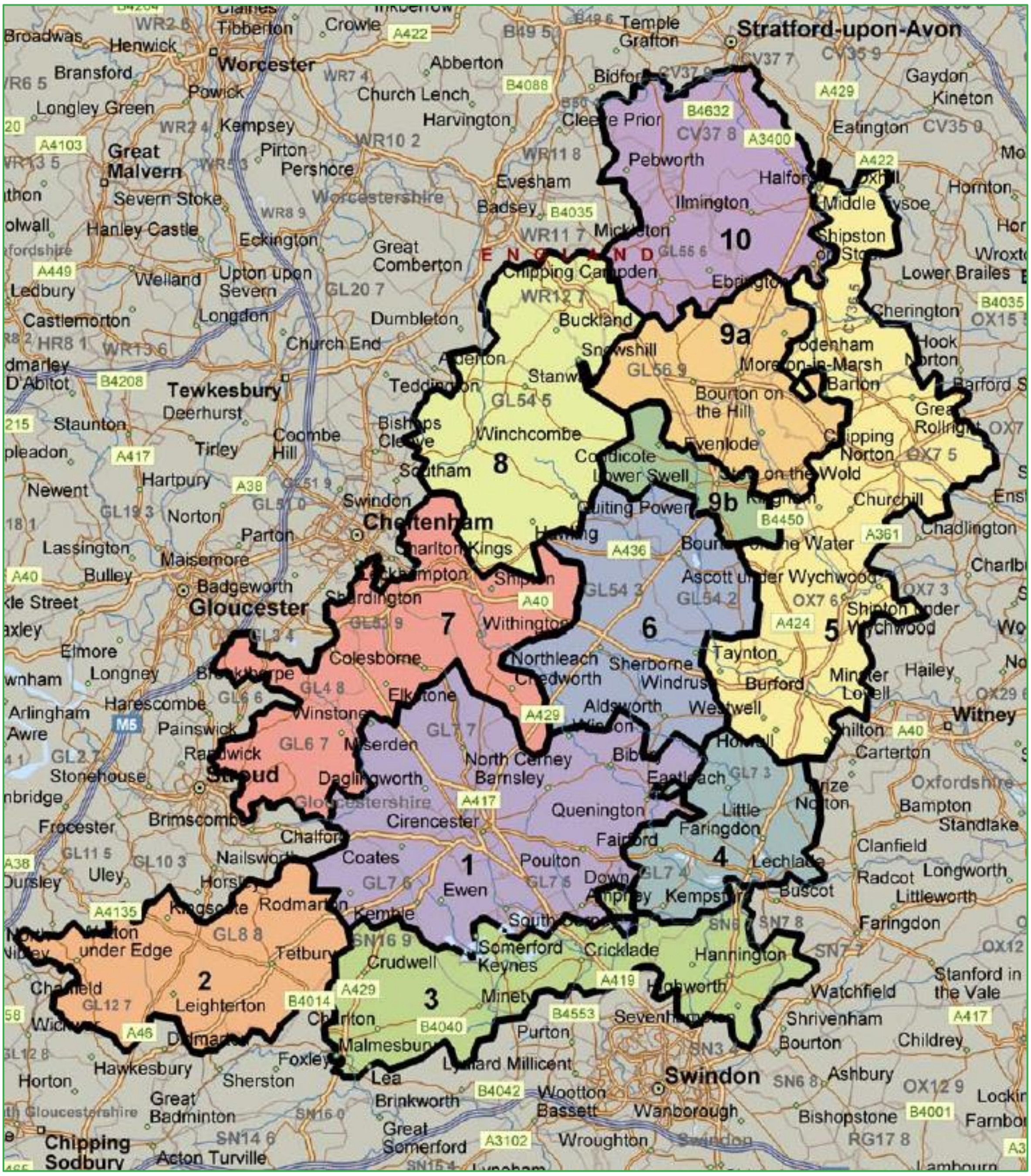


Table 4.1: study area zones and their constituent postcode sectors

Zone	Postcode Sectors
1	GL7 1, GL7 2, GL7 5, GL7 6, GL7 7
2	GL8 8, GL12 7
3	SN6 6, SN6 7, SN16 9
4	GL7 3, GL7 4
5	OX7 5, OX7 6, OX18 4
6	GL54 2, GL54 3
7	GL4 8, GL6 7, GL53 9, GL54 4
8	GL54 5, WR12 7
9a	GL56 0, GL56 9
9b	GL54 1
10	CV36 4, CV37 8, GL55 6

4.7 In order to turn the raw ESI spending data sample into market share levels for the various retail destinations in the Cotswold District area, the level of spending at each specific destination/area is expressed as a proportion of the overall spending (at all destinations) within each zone. The result of this process is shown in the market share data contained within Tables 4, 6 and 8 at Appendix B. These tables have been structured to provide the following information:

a. Across all of the tables, the market share of the main centres and other key destinations is shown on a zone-by-zone basis. For convenience goods retail provision (Table 4), data for all the main grocery stores in each settlement is provided, along with the main 'town centre' areas and an 'other' category for each main settlement.

b. A similar approach is taken for comparison goods shopping (Table 6), although the data concentrates upon a single market share figure for each settlement (apart from Cirencester[9]).

c. The market share assessment for both convenience and comparison goods spending also includes the following information:

   1. The proportion of retail spending, within each category, which is flowing to destinations outside of Cotswold District; and
   2. The proportion of spending on convenience and comparison goods which is being directed via online shopping[10].

d. The structure of the food/beverage market share data in Tables 8 (Class E(b) food/beverage) follows the structure of the comparison goods retail data.

[9] Where in-centre and edge/out-of-centre data is provided.
[10] The market share data for online shopping shown in Tables 4 and 6 at Appendix C comprises all online purchases for convenience and comparison goods. When reading this market share for each study zone it should be appreciated that the goods purchased via some of these online sales will be sources from physical bricks and mortar Class E(a) stores in the local area. This will be particularly true for grocery shopping online orders, where a large proportion of the order is sourced from the closest large foodstore/supermarket (rather than being sent from a Class B8 warehouse from elsewhere in the UK)

4.8 The market share data referred to for each of the main centres can be found in the following tables at Appendix B to this document:

a. Table 4 – convenience goods market share levels

b. Table 6 – comparison goods market share levels

c. Table 8 – market share levels for Class E(b)[11] and sui generis food/beverage uses[12]

4.9 Tables 5a, 7a and 9a translate the market share data for the various Cotswold District retail and food/beverage destinations into annual turnover forecasts for 2026 by applying the corresponding market share data to total available expenditure within each of the study area zone. This analysis is the first step in the wider quantitative need assessment which is described in Section 5 of this report.

4.10 These tables also provide an estimate of the amount of potential 'expenditure inflow' which is attracted by each of the main convenience, comparison and food/beverage destinations across the Cotswold District area. 'Expenditure inflow' comprises the amount of spending that destinations in the District are estimated to attract from customers residing outside of the study area. It has been calculated on the basis of the proportion of spending that the ESI data indicates is being spent by non-study area customers.

4.11 Further information regarding the data inputs into the quantitative assessment of spending patterns can be found in Section 5 of this report.

Review of Main Settlements within Cotswold District

4.12 Tables 4.1 and 4.2 on the following pages provide an overview of the main settlements in the District in relation to their place in the 'town centre' and settlement hierarchy, whether they currently benefit from a defined 'town centre' boundary and also a summary of the key land use data for each settlement.

4.13 The contents of Tables 4.1 and 4.2 below provide the following information:

a. The total number of retail and service uses still generally conform with the three existing elements of the Principal Settlement classification (in Policy EC7). The largest town centre in the District remains, by some considerable margin, Cirencester (with 313 retail and service units) followed by (in descending order): Stow-on-the-Wold, Tetbury, Moreton-in-Marsh and Bourton-on-the-Water (each of which are defined as 'key centres').

b. In most cases, there is a notable separation between the amount of retail/service uses present in those Principal Settlements which currently feature as part of the centre hierarchy in Policy EC7 and those settlements which are not within EC7. The only area where the boundaries between the two different classifications become blurred is for South Cerney and Mickleton, which contain a similar number of these uses.

c. It will also be noted that the number of retail and service uses with a number of the Non-Principal Settlements is of a similar scale to a number of the Principal Settlements. However, despite a similar scale of

[11] Cafe and restaurant uses
[12] Drinking establishments and take-aways

provision in many cases, it will be noted that all of the Principal Settlements not currently included in EC7 contain at least one convenience store whilst many of the Non-Principal Settlements do not.

d. It should be noted that the above characteristics are confined to the existing scale of retail and service land use provision across the main settlements within the District. There will be other factors which will influence the scale of provision in individual settlements, including the size of the settlement itself and the proximity of other settlements (which may have their own retail/service provision).

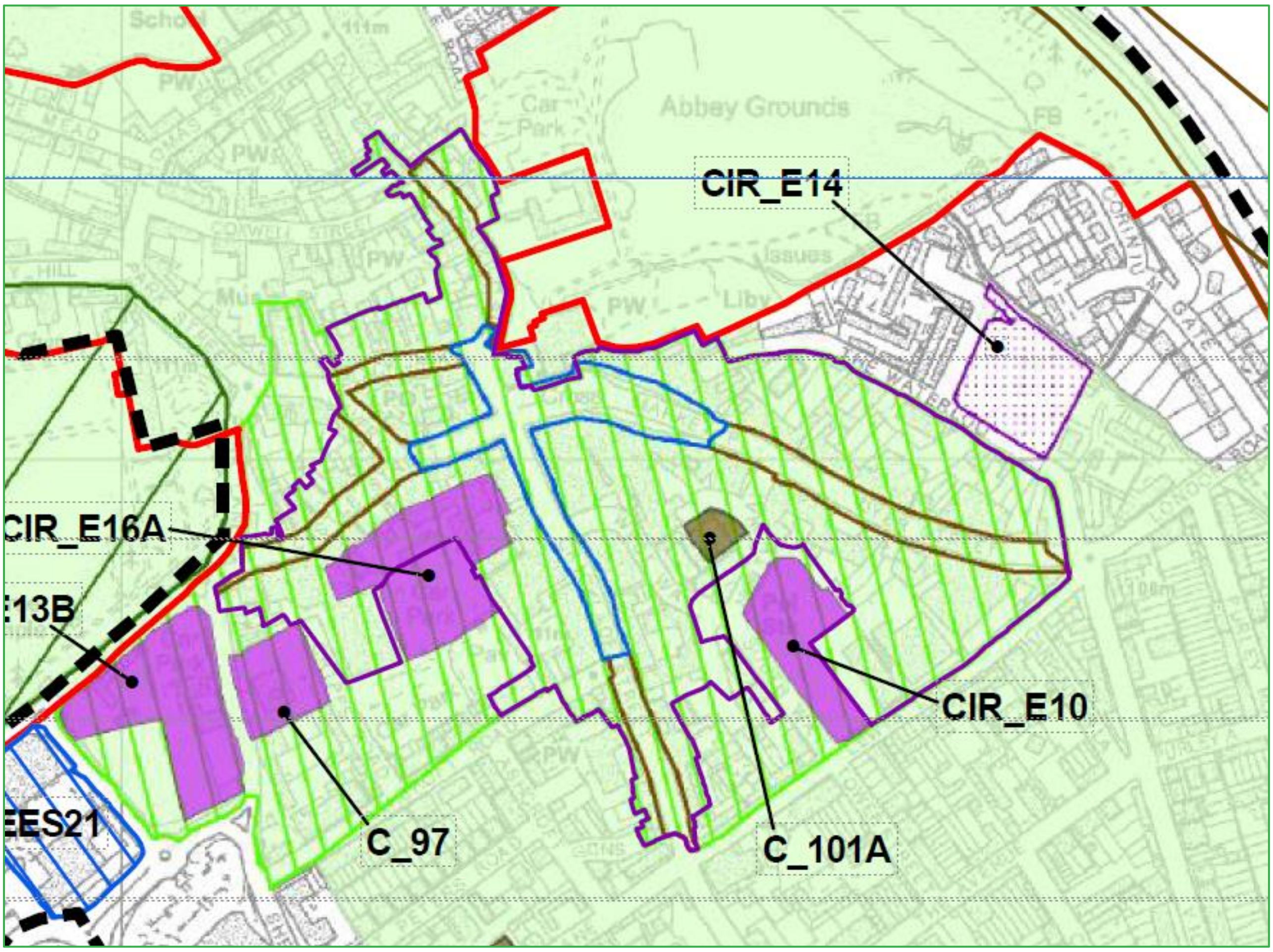
4.14 The information in Tables 4.1 and 4.2, along with the detailed information and analysis in the remainder of this section, will provide a baseline assessment of provision which will inform the future retail and main town centre land use strategy recommendations later in this Study.

4.15 A summary of the main characteristics of all of the main settlements can also be found in Section 6 of this document.

Cirencester

4.16 Cirencester is, by some margin, the largest defined town centre in Cotswold District. It is the only Principal Settlement to be classified as a Town Centre in the adopted Local Plan, a document which defines the following areas within the town centre: (a) town centre boundary[13]; (b) primary shopping area[14]; (c) primary frontage[15]; and (d) secondary frontage[16]. These areas are shown in the extract from the adopted policies map in Figure 4.2 below.

Figure 4.2: extract from adopted policies map for Cirencester town centre



4.17 Following the 2017 Retail Study, the Council commissioned Nexus to undertake a further study of Cirencester town centre in 2021: Cirencester Town Centre Feasibility Study: Forecast Change in Uses to 2051 ('the 2021 Cirencester Study'). The study was commissioned to consider anticipated future changes in the composition of Cirencester's 'high street' to 2051. The study reached the following conclusions:

a. At the time of 2021 assessment, it was forecast that there may be a need for an additional 1,300sq m (net) and 1,900sq m (gross) of additional convenience goods floorspace in the town centre at 2051. The estimated

13 Green vertical lines on plan in Figure 4.2
14 Area edged in purple in Figure 4.2
15 Area edged in blue in Figure 4.2
16 Area edged in brown in Figure 4.2

comparison goods requirement over the same timeframe is more modest, equating to 600sq m net and 800sq m gross.

b. In terms of the service sector, the 2021 assessment identified that 900sq m of retail service floorspace and 2,000sq m of leisure service floorspace could potentially be supported at 2051. It was also forecast that the quantum of floorspace occupied by the financial and business service sector may remain broadly similar going forward.

c. Extracts from the 2021 Cirencester Study, showing the forecast change in land use floorspace between 2021 and 2051 are shown in Figures 4.3 to 4.4 below.

Figure 4.3: forecast change in floorspace by retail and service land use, 2021-2051

Sector	2021 Floorspace (sq.m)	Changes in Floorspace to 2026 (sq.m)	2026 Floorspace (sq.m)	Changes in Floorspace to 2031 (sq.m)	2031 Floorspace (sq.m)	Changes in Floorspace to 2036 (sq.m)	2036 Floorspace (sq.m)
Comparison	19,510	-900	18,610	+0	18,610	+400	19,010
Convenience	4,030	+600	4,630	+300	4,930	+200	5,130
Financial Service	5,270	+0	5,270	+0	5,270	+0	5,270
Leisure Service	10,700	+0	10,700	+500	11,200	+300	11,500
Retail Service	5,080	+0	5,080	+200	5,280	+200	5,480
Vacant	6,420	+300	6,720	-1,000	5,720	-1,100	4,620
Total	**51,010**	**+0**	**51,010**	**+0**	**51,010**	**+0**	**51,010**

Sector	Changes in Floorspace to 2041 (sq.m)	2041 Floorspace (sq.m)	Changes in Floorspace to 2051 (sq.m)	2051 Floorspace (sq.m)
Comparison	+500	19,510	+800	20,310
Convenience	+200	5,330	+600	5,930
Financial Service	+0	5,270	+0	5,270
Leisure Service	+400	11,900	+800	12,700
Retail Service	+200	5,680	+300	5,980
Vacant	-1,300	3,320	-2,500	820
Total	**+0**	**51,010**	**+0**	**51,010**

Figure 4.4: proportion of floorspace by retail and service use, 2021 & 2051

Sector	Composition of Floorspace at 2021 (%)	Composition of Floorspace at 2051 (%)
Comparison	38.2%	39.8%
Convenience	7.9%	11.6%
Financial Service	10.3%	10.3%
Leisure Service	21.0%	24.9%
Retail Service	10.0%	11.7%
Vacant	12.6%	1.6%
Total	**100.0%**	**100.0%**

d. The 2021 Study also indicated that, in commercial terms, the key opportunities for Cirencester town centre related to:

1. the potential to bring forward a cinema within Cirencester, which would likely be of a 'boutique format' in order to be accommodated on a town centre site;
2. the potential to supplement the hotel offer in the town centre;
3. the quantitative need which exists towards the end of the reporting period to support a further moderately-sized supermarket in the town, which could be brought forward in the centre (subject to format and site availability); and
4. the potential to improve the leisure and cultural economies, which are perhaps not as substantial as we would expect given the wider role and function of the town (and its ability to attract visitors to the area).

4.18 For the purposes of this Study, the land use profile of Cirencester town centre has been updated via land use surveys undertaken by Nexus in Autumn 2025. The results of the 2025 surveys are shown in shown in Table 4.2 below and have been arranged to show the change in the number (and proportion) of retail and service land uses in the centre between 2021 and 2025. Table 4.2 also shows the amount of floorspace occupied by each of these land use sectors in 2021 and 2025.

Table 4.2: land use profile of Cirencester town centre, 2021-2025 (units and floorspace)

Sector	2021				2025			
	Units		Floorspace (sq m gross)		Units		Floorspace (sq m gross)	
	No.	%	No.	%	No.	%	No.	%
Convenience	20	6.0	4,030	7.9	22	6.3	2,820	5.5
Comparison	138	41.1	19,510	38.2	153	44.1	22,020	42.5
Retail Service	55	16.4	5,080	10.0	49	14.1	4,200	8.1
Leisure Service	51	15.2	10,700	21.0	61	17.6	12,240	23.6
Financial Service	35	10.4	5,270	10.3	28	8.1	3,840	7.4
Vacant	37	11.0	6,420	12.6	34	9.8	6,680	12.9
Total	**336**	**100**	**51,010**	**100**	**347**	**100**	**51,790**	**100**

Source: 2021 Cirencester Study, Table 3.1 and 2025 Experian GOAD updated by Nexus. Figures may not add due to rounding.

4.19 The contents of Table 4.2 indicate that the amount of convenience goods retail units has remained relatively static between 2021 and 2025, with a small rise from 20 to 22 units. Over this period convenience goods retailers have occupied around 6% of all surveyed units in the town centre, with a below the 2025 national average for convenience goods units in town centres of 9.4%. However, the amount of floorspace occupied by convenience goods retail provision has fallen by around one quarter between 2021-2025. This fall has been caused primarily by the closure of the Tesco store in the centre, with convenience goods floorspace now comprising 5.5% of all occupied retail and retail service floorspace. This proportion of occupied space is well below the 2025 national average for town centre convenience goods floorspace provision of 15.3%.

4.20 Between 2021 and 2025 the number of comparison goods units rose from 138 to 153. This represents 44.1% of all surveyed units and is well above the (2025) national average of 26.0%. Not only is this proportion of units well above the national average, but the increase in units between 2021-2025 (41% in 2021 to 44% in 2025) is in contrast to the national trend which has seen a decline the proportion of comparison goods retailers in UK town centres (from 27.0% in 2021 to 26.0% in 2025). In line with the increase in the number of occupied comparison goods units, Table 4.2 also shows an increase in the amount of floorspace occupied by comparison goods retailers, from 19,500sq m in 2021 to 22,000sq m in 2025. This level of floorspace comprises 42.5% of all surveyed floorspace and is also well above the national average of 28.7%.

4.21 Table 4.2 also shows that the amount of retail and financial/business service uses in Cirencester town centre has declined over the period 2021-2025. The proportion of units occupied by these uses (14.1% and 8.1%) is however, similar to their respective national averages (15.8% and 7.9% respectively). The drop in the proportion of financial/business services in the town centre mirrors national trends, with this sector experiencing a significant level of decline in town centres over the past several years.

4.22 In contrast to the fall in retail and financial/business service uses, the amount of leisure service uses in the centre has increased between 2021-2025, from 15.2% to 17.6% of all surveyed units. Despite this rise, the proportion of leisure service uses in the centre remains well below the national average of 26.6%. A similar picture emerges for the amount of floorspace occupied by leisure service floorspace, although provision of occupied floorspace (23.6%) is also below the national average of 27.6%.

4.23 Vacant units in the town centre fell over the past few years, from 37 in 2021 to 34 in 2025. At 2025, the proportion of vacant units in the town centre comprised 9.8% of all surveyed units and which is well below the national average for town centre vacancies of 14.1%. Over the same period, the amount of vacant floorspace rose very slightly to circa 6,700sq m (gross) across the town centre. This comprises around 13% of all surveyed floorspace and is slightly below the national average equivalent of 14.3%. A large (new) contributor to this amount is the vacated former Tesco unit.

4.24 Following the closure of the Tesco store on Castle Street/Brewery Court, the largest town centre grocery store is a Marks & Spencer Simply Food on Dyer Street. As a consequence, the main elements of grocery retail provision in Cirencester can be found in edge or out of centre locations. There is a large Waitrose store a short walk to the southern edge of the centre (on Sheep Street), along with three foodstores (in out of centre locations) to the east of the centre: Lidl (Midland Road), ALDI and Tesco (both on Cricklade Road). Table 4.3 below draws upon information contained within the quantitative need assessment prepared for this Study and outlines the current trading performance of the larger grocery stores in Cirencester. Data is provided to show the amount of turnover which each store attracts from residents of the study area, along with expenditure which is associated with visitors/tourists. A comparison between the current forecasts turnover and the company benchmark turnover for each store is also provided.

Table 4.3: study area, total and benchmark turnover of grocery stores in Cirencester

	Study Area Turnover (£m)	Expenditure Inflow (£m)	Total Turnover (£m)	Benchmark Turnover (£m)	Forecast Actual Turnover as a % of Company Benchmark (%)
Marks & Spencer	4.73	1.49	6.22	4.03	+54
Waitrose	29.13	9.17	38.30	32.46	+17
Lidl	7.67	1.45	9.12	10.06	-9
ALDI	9.17	1.46	10.63	9.79	+26
Tesco	49.66	10.88	60.54	48.10	+20

Source: Tables 5a and 10a, Appendix B

4.25 The contents of Table 4.3 indicate that there is not a significant level of widespread trading above company average across the grocery retail sector in Cirencester. The M&S, Waitrose, ALDI and Tesco stores trade above average, whilst the Lidl store trades slightly below average. The above data also shows that the main grocery stores in Cirencester are able to attract a reasonably large proportion of their turnover from outside of the study area. For the Waitrose and M&S stores, this is in the region of one third of total turnover, whilst it is closer to one fifth of total turnover for the Tesco, ALDI and Lidl stores.

4.26 Table 4 at Appendix B shows the market share of the main foodstores in Cirencester. It shows that Zone 1 of the study area[17] forms the primary catchment area for convenience goods shopping provision in the town, with all convenience goods stores attracting 64% of in person till receipts from residents of this zone. Of the remaining spending associated with Zone 1 residents, 17.5% is directed to online shopping, part of which will also be associated with local stores (as online orders from Tesco and Waitrose are likely to be fulfilled from their stores in the town), with a further 15% spent outside of Cotswold District[18].

4.27 Table 4 at Appendix B also shows that grocery stores in Cirencester are also able to attract convenience goods spending from other parts of the study area. Those zones which the town is able to gain a reasonable market penetration rate are Zones 3, 4, 6 and 7 (14%, 21%, 11% and 10% respectively)[19].

4.28 Table 6 at Appendix B shows the market share levels for comparison goods stores across the District. For Cirencester, the data shows that 24% of person spending from residents of Zone 1 is directed towards stores in the town. The majority of the remainder of Zone 1 comparison goods spending is directed to online purchases (47%), followed by spending outside of the District (24%). Table 4.4 below outlines the combined market share of all comparison goods retailers in Cirencester across the eleven study area zones, along with the retail expenditure equivalent levels. The table also indicates the amount of comparison goods expenditure which stores in Cirencester gain from visitors from outside of the study area.

Table 4.4: market share and turnover levels, Cirencester, 2025

	1	2	3	4	5	6	7	8	9a	9b	10	Inflow	Total
Market Share (%)	23.7	5.2	7.1	8.8	0.3	4.9	3.7	0.8	0.4	0.9	0.1	43*	-
Turnover (£m)	46.2	4.4	9.4	5.1	0.3	3.0	3.3	0.8	0.2	0.2	0.1	42.7	115.5

Source: Excluding Dobbies garden centre, Siddington. Figures may not add due to rounding. *Experian data indicates that total turnover of comparison goods stores in Cirencester comprises expenditure inflow.

4.29 The above data indicates that the primary catchment area for comparison goods stores in Cirencester is focused upon Zone 1, with a secondary catchment which includes Zones 2, 3, 4, 6 and 7. In addition, it will also be noted from the contents of Table 6 at Appendix B that, whilst the market share of Cirencester in these five (secondary catchment) zones may appear low they are the highest market share for any Cotswold town centre. The data also shows that around 40% of the total turnover of comparison goods stores in Cirencester derives from spending associated with visitors travelling from outside of the study area.

[17] The zone in which Cirencester is located.
[18] This is likely to be associated with a combination of occasional grocery trips in surrounding areas (such as Stroud, Cheltenham and West Oxfordshire) along with grocery spending associated with day trips and vacations elsewhere.
[19] Zones 3, 4, 6 and 7 cover: Cricklade (3), Lechlade/Fairford (4), Northleach/Bourton-on-the-Water (6) and the rural area between Gloucester, Cheltenham and Cirencester (7).

4.30 Table 9a at Appendix B outlines the patterns of trade draw to the main settlements in Cotswold District for food/beverage facilities (i.e. cafes, restaurants, drinking establishments, and take-aways). It shows that the total turnover of food/beverage facilities in Cirencester town centre is circa £56.6m, with all over half of this total (£32.7m) deriving from expenditure inflow from outside of the study area. Of the £23.9m of expenditure which is attracted from study area residents, three-quarters (£18.3m) of this expenditure derives from residents of Zone 1[20].

4.31 The contents of Tables 5a, 7a and 9a indicate that the comparison goods retail sector makes the highest contribution to spending within the town centre, closely followed by the food/beverage sector, with the convenience goods sector a distant third.

Bourton-on-the-Water

4.32 Whilst many of the settlements in Cotswold District play a significant role in attracting visitors to the local area, Bourton-on-the-Water is arguably the most well-known of these centres, due to its unique built and natural environment. This role has been recognised in previous town centre-related development plan evidence base studies (such as the 2017 Retail Study), which can be characterised by a defined 'town centre' which caters for tourists and visitors more than it does for local residents. This was recognised by the shopping patterns survey information commissioned to inform the 2017 Retail Study and which is reinforced by more up to date household survey information which has been submitted in support of a current planning application for a new ALDI foodstore on the western side of the village area.

4.33 The main change in retail provision in Bourton-on-the-Water since the completion of the 2017 Retail Study has been the completion (and opening) of a new Co-op foodstore on Station Road outside of the defined 'town centre' boundary. For many years, Co-op operated a modest-sized foodstore on Station Road although the store was dated and was not able serve a wide range of local needs[21]. At the time of the 2017 Retail Study there was an aspiration that the replacement Co-op store would be able to retain a larger amount of locally-generated grocery shopping trips, although the Experian Spend Insight data commissioned for this Study suggests that the previous situation, as described in the 2017 Retail Study, has not materially changed. Table 4 indicates that grocery stores in Bourton (primarily the Co-op) retain just 18% of convenience goods expenditure from Zone 6 (the zone in which Bourton lies), with substantial leakage of expenditure to stores in Stow-on-the-Wold, Cirencester and Moreton-in-Marsh.

4.34 Table 5a at Appendix B forecasts that the Co-op store on Station Road has a (2026) study area derived convenience goods turnover of £8.7m which is boosted by a further £2.6m of expenditure drawn from beyond the study area. At £11.3m, this total turnover is slightly below the national company average for Co-op (£14.61m, for this size of store[22]). The data in Tables 5a and 10a also suggests that the small Budgens store, which gains over half of its turnover from visitors from beyond the study area, is also trading at reasonably modest levels (and slightly below company average (£2.3m)).

4.35 Comparison goods retailers comprise circa 40% of all main town centre land uses in the defined 'town centre' area in Bourton. Gift shops, and similar retailers catering for the tourist/visitor sector, predominate within this sector, with very few other businesses catering for the day-to-day needs of the local community. Table 7a (at Appendix B) indicates that three-quarters of the annual comparison goods turnover of comparison goods stores in Bourton derives from customers who reside outside of the study area. The comparison goods sector has a forecast total turnover of £11.2m, of which £8.4m is forecast to derived from spending from outside the study area.

4.36 The balance between study area generated spending and expenditure inflow is even more pronounced for food/beverage outlets in Bourton. Around 85% of all spending in cafes, restaurants and other hospitality premises in Bourton is forecast to come from visitors/tourists. The total turnover of food/beverage facilities is forecast by Table 9a to be £28.5m, of

[20] With lower levels of expenditure being drawn from Zones 2, 3, 4 and 7.
[21] As evidenced by shopping patterns evidence.
[22] Taken from Table 10a, Appendix D

which £24m is attributable to visitors/tourists. The total level of annual turnover suggests that food/beverage uses contribute three times as much expenditure to the local economy as comparison goods retail facilities.

4.37 Outside of the defined 'town centre' area in Bourton, the main town centre land uses which are present comprise mainly of hotel and other types of visitor accommodation. The is, as noted above, a current planning application for a new ALDI foodstore and food/beverage outlet on land at Bourton Industrial Estate (close to the A429). Whilst a detailed assessment of this proposal has not been undertaken for the purposes of this Study, it would appear likely that, in addition to trade diversion from the Co-op store in Bourton, there would be a sizable amount of trade diversion from existing medium to large foodstores in Stow-on-the-Wold, Moreton-in-Marsh and Cirencester.

Chipping Campden

4.38 Chipping Campden is one of the larger Principal Settlements in the District in terms of the size of its defined 'town centre' area. Our latest land use survey indicates that there are 48 main town centre land uses, including 4 convenience goods stores and 23 comparison goods retail outlets. In relation to convenience goods retail provision, Chipping Campden has relatively small-scale grocery stores including Co-op and One Stop stores on the High Street. Along with other small scale independent operators, Table 5a at Appendix B indicates that grocery stores in Chipping Campden attract £2.2m of convenience goods spending from residents of the study area, which is boosted by around £1.2m of expending inflow (from tourists/visitors) to provide a total forecasts turnover (at 2026) of £3.4m. Over three-quarters of study area derived turnover is drawn from residents of Zone 10, which is the home zone for Chipping Campden. Table 4 at Appendix B indicates that grocery stores in Chipping Campden attract only 2% of spending from residents of Zone 10, whilst around 70% of spending flows to grocery stores outside of the District (the majority of which is likely to flow to Evesham).

4.39 The comparison goods retail sector is the largest of the retail and service sectors in the defined 'town centre', with a range of provision which is orientated towards the furniture, homewares, art and antiques sectors. There are also a number of clothing stores, plus a bookshop which lies outside of the defined 'town centre' boundary. Table 7a at Appendix B forecasts that comparison goods stores in Chipping Campden will have a total turnover of £2.95m in 2026. Around one quarter of this total will be drawn from residents of the study area, with the other three-quarters comprising expenditure from visitors/tourists travelling from elsewhere.

4.40 In relation to service use provision, the data at Appendix B indicates that there are 3 retail service uses, 14 leisure service business and 4 financial/business service uses. Whilst leisure service uses are the second largest category of main town centre land use in the centre, this total is not as large (on a proportionate basis) as a number of the other large Cotswold towns.

4.41 The importance of the food and beverage sector, which is the main component part of the leisure services land use category, is demonstrated by the contents of Table 9a at Appendix B. Table 9a forecasts that food and beverage outlets have an annual (2026) turnover of £14.4m, which is broadly split between one third (£4.5m) from study area residents and two thirds (£9.9m) from expenditure inflow. The turnover of food and beverage uses in Chipping Campden is around four times as high as its grocery stores and five times as high as its comparison goods stores.

Moreton-in-Marsh

4.42 Moreton-in-Marsh is the 4th largest town centre in Cotswold District in terms of the number of main town centre land uses present in the defined 'town centre' boundary. During the land use surveys conducted for this Study in November 2025, 90 uses were recorded including 5 convenience goods retailers and 25 comparison goods retailers. The convenience goods retailers present in the town centre include a large Co-op foodstore at the northern end of the centre, which extends to circa 1,500sq m net sales and sells a reasonably wide range of convenience goods. The store is also served by a large off-street surface level car parking area. The other four convenience goods retailers in the centre include a Tesco Express convenience store, two bakeries and a cheese shop.

4.43 A significant element of the convenience goods retail sector in Moreton is the ALDI store, which is located in an out of centre location (on the Fosse Way, close to North Cotswolds Hospital and Fosseway Garden Centre). The store was constructed several years ago. It is of a similar size to the town centre Co-op store, with a more focused range of grocery products which are associated with the value orientated ethos of the store.

4.44 Table 4 at Appendix B provides market share information for convenience goods retailers in Moreton. It shows that around 30% of convenience goods expenditure generated by residents of Zone 9a (the zone in which Moreton lies) is retained by stores in the town. This is split between the ALDI (14%), Co-op (10%), Tesco Express (3%) and other smaller town centre stores (4%). Table 4 shows that convenience goods stores in Moreton also draw spending from Zones 5, 6, 9b and 10, with the ALDI store possessing the highest market penetration in these zones (particularly Zones 6 and 9b). Table 4.5 below outlines the study area and total turnover levels of convenience goods stores in Moreton, along with their respective company average turnover levels. It shows that, whilst the out of centre ALDI store is forecast to trade close to its national company average sales density level, the Co-op and Tesco Express stores trade below their respective average levels (particularly the Co-op[23]).

Table 4.5: study area, total and benchmark turnover of grocery stores in Moreton-in-Marsh

	Study Area Turnover (£m)	Expenditure Inflow (£m)	Total Turnover (£m)	Benchmark Turnover (£m)	Forecast Actual Turnover as a % of Company Benchmark (%)
Tesco Express	1.3	0.7	2.0	2.20	-9
ALDI	11.4	2.0	13.4	12.19	+10
Co-op	5.2	1.7	6.8	15.39	-56
Other convenience goods stores	2.9	2.3	5.2	-	-

Source: Tables 5a and 10a, Appendix B

4.45 Comparison goods retailers comprise around one quarter of all main town centre uses in the defined centre, with the retail 'offer' of this sector heavily orientated towards furniture, art, homewares and antiques. This specialist nature of provision is reflected in the pattern of trade draw of comparison goods expenditure to stores in the town, with one half of total turnover (£14.4m out of £27.6m) deriving from shoppers outside of the study area[24]. Of the £13.2m of comparison goods expenditure drawn from residents of the study area, Table 7a forecasts that around one third is derived from residents of Zone 9a, with around 15% apiece from Zones 5 (Chipping Norton), 6 (Bourton-on-the-Water & Northleach) and 10 (Chipping Campden).

4.46 Service uses are the largest grouping of main town centre land uses, with just under half of all recorded uses[25]. The largest element are leisure uses, with a varied collection of food and beverage uses (restaurants, cafes and public houses). Table 8 at Appendix B indicates that food and beverage uses in Moreton-in-Marsh attract 11% of expenditure on food/beverage trips from residents of Zone 9a of the study area (the zone in which Moreton lies), along with circa 3% of expenditure from residents of Zone 9b. These market shares translate to a draw of £2.9m of expenditure from Zone 9a and £0.2m from Zone 9b, which contribute to an overall study area turnover of £4.5m (see Table 9a at Appendix B). The

[23] The 2017 Retail Study also forecast a comparatively poor performance for the Co-op store (formerly badged as a Budgens store), although other forecasts for this store (produced in associated with the planning applications for the ALDI store) have varied.
[24] See Table 7a at Appendix D.
[25] 42 occupied units (17 retail service uses and 25 leisure service uses).

data from Experian Spend Insight indicates that the food and beverage sector in Moreton-in-Marsh attracts two-thirds of its turnover from visitors travelling from outside of the study area. This is equivalent to circa £9.2m, out of a total annual forecast turnover of £13.7m (see Table 9a).

Stow-on-the-Wold

4.47 The latest land use survey of the defined town centre at Stow-on-the-Wold indicates that it contains 137 retail and leisure uses (see the land use profile in Section 4). Within this total there are 15 convenience goods retailers, including 6 bakers/confectioners and 4 grocery/delicatessen stores. This large number of convenience goods stores is influenced by the role and function of Stow-on-the-Wold as one of the key centres in the District for visitors and tourists, with convenience goods influenced by high-end/niche/visitor-orientated products. The main 'standard' grocery store in centre, which serves both the local population and visitors to the town centre is a Co-op on The Square. The modest product range of the Co-op indicates that it is orientated toward top-up and frequent modest-sized basket shopping trips.

4.48 The main grocery store in Stow-on-the-Wold is a large Tesco supermarket, located on the northern edge of the town. This store caters for both main and top-up food shopping trips and draws grocery trips from a wider catchment. Table 4 at Appendix B indicates that the Tesco store attracts 36% of convenience goods expenditure from residents of Zone 9b of the study area[26]. In addition to Zone 9b (the zone in which Stow sits), the Tesco store also attracts 11% of in-person grocery spending from residents of Zone 6 (Bourton-on-the-Water / Northleach) and 9a (Moreton-in-Marsh). In contrast, the catchment area for the town centre Co-op store is very much centred on Zone 9b, where the store has a 4.4% share of convenience goods spending. A similar picture emerges for other convenience goods retailers in Stow town centre, who have a 3.2% share of spending amongst Zone 9b residents, along with a 1.2% share spending in Zone 9a[27].

4.49 In addition to the study area derived market share levels, the contents of Table 5a at Appendix B also provide useful information regarding the source of spending in convenience goods stores in Stow. The table indicates that stores in the town centre draw a significant proportion of their turnover from non-study area shoppers, which emphasises the key role and function of the town centre as a visitor/tourism destination. Table 5a indicates that £0.6m of the Co-op store's total turnover (£1.4m) comprises 'expenditure inflow' which is equivalent to 77% of total turnover. The proportion of 'expenditure inflow' for other convenience goods stores in the centre is even higher at 94%. In contrast, 26% of the Tesco's convenience goods turnover is derived from non-study area residents. Whilst this is still a sizable part of the store's turnover, it is clear from this collection of data how the Tesco store has a primary role in serving the role of Cotswold District residents.

4.50 The largest retail/service sector in Stow town centre is the comparison goods retail sector, with 66 surveyed units (around half of the total number of units). Retailers are mainly local independents, with a particular focus upon antiques, art, homewares, clothing and gifts. Table 7a at Appendix B forecasts that comparison goods stores in Stow have a total annual turnover of £17.4m, with around two-thirds (£11m) deriving from visitor spending. The study area derived turnover of the centre is forecast to be £6.4m, which is drawn from a number of zones rather than the just the local area (Zone 9a)[28].

4.51 56 of the 137 surveyed retail and service uses in Stow town centre are service uses. The leisure service sector accounts for the majority of these units (36), which is a sector dominated by food and beverage outlets. The contribution of food/beverage outlets, particularly cafes and restaurants, to the financial performance of the town centre is clear from the contents of Table 9a at Appendix B. This shows that the total turnover of food/beverage outlets in Stow is £28.9m, which is around two-thirds higher than the turnover of comparison goods retail stores in the centre and around six times

[26] This level of market share is based upon in-store in-person spending, excluding any spending associated with the 17% online market share for Zone 9b residents which may be fulfilled via purchases from Tesco.
[27] Morton-in-Marsh
[28] Around one fifth of the study area derived turnover is drawn from Zone 9a, with £0.77m from Zone 9a (Moreton-in-Marsh), £0.76m from Zone 6 (Bourton-on-the-Water) and £0.86m from Zone 5 (Burford / Chipping Norton).

as much as the turnover of town centre grocery stores. Table 9a also shows that four-fifths of the turnover of food/beverage businesses in Stow is gained from spending from visitors, rather than the local population within the study area.

Tetbury

4.52 Tetbury lies in the southern part of Cotswold District and has the joint third largest collection of retail and leisure uses, alongside Moreton-in-Marsh and behind Cirencester and Stow-on-the-Wold. The land use profile data at Appendix B indicates that there are 94 retail and service uses in the defined 'town centre' boundary. At the time of the most recent survey, there were nine convenience goods retailers in the centre, including bakeries, a delicatessen and a Co-op foodstore. Table 5a at Appendix B indicates that, as a whole, convenience stores in the town centre attract £2.1m of expenditure from study area residents and have a total annual turnover of £3.9m. The majority of the study area derived turnover for convenience stores is drawn from Zone 2 of the study area, with very limited additional expenditure from Zones 1, 2 and 7. The Co-op store is forecast to have a modest trading performance (£1.4m), well below its national company average (£2.55m), whilst the remaining parts of the convenience goods sector have a collected turnover of £2.5m. This is also considered to be a modest trading performance.

4.53 The grocery retail sector in Tetbury is dominated by a large Tesco foodstore. Table 5a forecasts this store to have an annual total convenience goods turnover of £18.9m which is also below the Tesco company average performance for this size of store (£23.5m).

4.54 Like a number of other large Cotswold towns, Tetbury is also known for its antiques, furniture and homeware stores and this type of business make a significant contribution to the 53 comparison goods uses in the town centre. Comparison goods retailers comprise over half of the total number of surveyed retail/service units in the town centre, with Table 7a forecasting a total turnover for the comparison retail sector of £6.1m. Over half of this forecast turnover is drawn from spending by visitors to the town (from outside of the study area), although the forecast level of spending in the centre as a whole is surprisingly low. A contributary factor to this low forecast is the low market share for Tetbury within its primary catchment area (Zone 2), at just 2.5%. Table 6 at Appendix B indicates that 91% of comparison goods expenditure generated by residents of Zone 2 is either spent online or any destinations outside of the study area. In terms of the latter destinations in South Gloucestershire, Bristol and Bath are likely to be particularly attractors.

4.55 The contents of Table 9a (when compared with Tables 5a and 7a) indicates that the food/beverage sector in Tetbury is, by some margin, the largest contributor to the financial performance of its town centre. Table 9a indicates that £16.0m of expenditure is attracted by the town's food and beverage outlets, £10.4m of which is spending from visitors travelling from outside of the study area. Whilst Tetbury lies close to the southern edge of the study area (and therefore trips from South Gloucestershire, Stroud District and Wiltshire residents are likely to account for some of this expenditure, the level of 'expenditure inflow' is a sign of Tetbury's importance to the tourism/visitor industry in the District. Unlike some of the other main Cotswold settlements, the number of leisure service uses in Tetbury is not significant, which demonstrates the strong level of trading performance which is being achieved by those businesses present in the town.

Fairford

4.56 Fairford lies within Zone 4 of the study area and Tables 5a, 7a and 9a at Appendix B provide the following spending forecasts for retail and food/beverage uses in Fairford:

a. Convenience goods stores: total turnover of £5.1m, including £4.3m from residents of the study area.

b. Comparison goods stores: a total annual turnover of £2.3m, including £1.8m of spending derived from residents of the study area.

c. Food and beverage uses: £3.0m of expenditure derived from residents of the study area, as part of a total annual turnover of £6.8m.

4.57 In line with a number of other of the Principal Settlements in the District, the food and beverage sector in Fairford has a highest annual turnover although the scale of contribution of 'expenditure inflow' is not as great as some of the more tourism/visitor orientated towns and villages. Spending by visitors/tourists accounts for over half of the food and beverage turnover in Fairford, whilst the proportions for convenience and comparison goods retail are 16% and 27% respectively.

4.58 Within the convenience goods sector, Fairford has modest sized Budgens and Co-op convenience stores which are of a size more suited to top-up and small scale grocery shopping trips. Overall, grocery stores in Fairford attract a 8% market share of spending from Zone 4 residents. This is a similar market share to grocery stores in Lechlade, which is located nearby and also within Zone 4 of the study area. Table 4 at Appendix B indicates that there is a large 'leakage' of convenience goods expenditure from Zone 4, primarily to stores in Cirencester[29] (23%), along with stores outside of the District (likely to be stores within Swindon). Table 5a indicates that the Budgens store has a total forecast turnover of £2.6m, whilst the turnover of the Co-op store is £1.6m.

4.59 The data at Appendix B indicates that 16 of the 27 main town centre land uses are service uses. There are 8 leisure service uses (including two cafes, four take-aways and two restaurants). The five retail service uses in the defined 'town centre' boundary include four hair salons, whilst the financial/business service sector includes two officers and an estate agent.

Lechlade

4.60 Lechlade lies a short distance to the east of Fairford, on the south-eastern corner of the District. The data contained within Appendix B indicates that the defined 'town centre' boundary contained 35 main town centre land uses, split between 3 convenience goods retailers, 8 comparison goods retailers and 20 service uses. Like most other Cotswold towns, the largest service sector are leisure services (with 10 occupiers).

4.61 The main convenience goods retailer within Lechlade is a Budgens store, located on the corner of Burford Street and High Street. This store caters for small scale grocery shopping trips, particularly top-up food shopping. Table 4 at Appendix B indicates that grocery retailers in Lechlade attract circa 9% of spending on convenience goods from residents of Zone 4, with little market penetration within the other study area zones. Table 5a forecasts a study area derived turnover of all convenience stores of £4.4m per annum, which is boosted by a further £2.4m of spending from visitors/tourists travelling from outside of the study area.

4.62 Lechlade attracts around 5% of comparison goods spending from residents of Zone 5, which is notably higher than the other Principal Settlement in Zone 4: Fairford. Lechlade also attracts 1% of spending apiece from residents of Zones 1 and 3 of the study area. Overall, and as shown in Table 7a, Lechlade is forecast to attract £6.5m of comparison goods expenditure from the study area. The same table also shows that the town attracts a similar amount of comparison goods expenditure from visitors/tourists travelling from outside of the study area, giving a total comparison goods turnover for the town of £13.3m.

4.63 Table 8 indicates that food and beverage outlets in Lechlade attract a 4.6% share of spending amongst residents of Zone 4. This can be compared to 9.5% market share associated with nearby Fairford. Food and beverage businesses in the town also attract a small amount of spending from residents of Zones 1, 3 and 5 in the study area, with the overall study area derived (food/beverage) turnover for the town forecast to be £1.6m. Table 9a indicates that this study area derived

[29] Waitrose, Tesco and ALDI in particular

expenditure comprises around one third of total food/beverage turnover £4.6m in Lechlade, with £3.0m of expenditure associated with visitors/tourists.

Northleach

4.64 The land use surveys undertaken for this Study indicate that Northleach has 8 main town centre land uses within its defined 'town centre' boundary, along with a further 6 uses elsewhere in the town. Convenience goods stores comprise a Budgens, which sells a modest range of pre-packages and fresh grocery goods, with a sales area of 200sq m, along with a butcher (on Market Place). The leisure services sector is the largest sector, with three units, comprising pub/hotel, bar and café. There is also a beauty salon and a pharmacy. Outside of the defined 'town centre' boundary, there are a further three leisure service uses, including the Wheatsheaf Inn.

4.65 Tables 5a and 7a at Appendix B indicate that Northleach attracts very little comparison goods expenditure, which is unsurprising given the lack of comparison goods retail businesses[30]. Table 5a indicates that convenience goods store attract £1.7m of expenditure from residents of the study area, two-thirds (£1.1m) of which is spent at the Budgens store. Convenience goods stores are also forecast to attract a further £0.4m of expenditure from outside of the study area, which is equivalent to 19% expenditure inflow.

4.66 In relation to food/beverage expenditure, Northleach attracts £2.3m from residents of the study area, boosted by £2.6m from visitors travelling from beyond this area. Two thirds of the study area derived expenditure at facilities in Northleach is associated with residents of Zone 6.

South Cerney

4.67 South Cerney is the smallest of the proposed Principal Settlements in terms of main town centre land use provision. There are 8 main town centre uses within the defined 'town centre' boundary, comprising a bakery, pharmacy, hair salon, two public houses, a café, plus two take-aways. The defined boundary lies on either side of the northern part of Clarks Hay.

4.68 There are four further retail and service uses located outside of the defined centre boundary in South Cerney. These comprise a Co-op convenience store and Royal Oak public house on High Street, plus a One Stop convenience store on Broadway Lane and an outdoor sports store located close to Cotswold Water Park. The importance and popularity of the Co-op store to South Cerney is shown within our quantitative assessment (Table 5a) which forecasts a study area derived turnover of £2.1m for this store, which is boosted by a further £1.2m of expenditure from outside of the study area. The forecast turnover of the other convenience goods stores in South Cerney is £0.46m. The primary catchment area of the Co-op store is centred upon Zone 1, which contributes three-quarters of the store's study area derived turnover.

4.69 Table 7a indicates that the total forecast comparison goods turnover for stores in South Cerney is £6.9m. Given the lack of comparison goods stores, within the defined 'town centre' it is likely that a large part of this turnover will be associated with the outdoor clothing and sports store close to Cotswold Water Park. Overall, comparison goods floorspace within South Cerney gains around three-quarters of its turnover from outside of the study area.

4.70 A similar picture emerges for the forecast turnover of food and beverage floorspace in South Cerney. Table 9a at Appendix B forecasts an annual turnover of £14.1m, with £4.6m deriving from residents of the study area. Again, this pattern of trade draw is likely to be due to the presence of Cotswold Water Park. £3.3m of the £4.6m of food and beverage expenditure derived from the study area is attributable to residents of Zone 1.

[30] The only existing comparison goods retailer is a pharmacy, located within the defined 'town centre' boundary.

Other Principal Settlements

4.71 The other settlements proposed to be Principal Settlements in the emerging Local Plan are Mickleton, Upper Rissington, Blockley, Siddington, Kemble and Andoversford. None of these settlements have a defined 'town centre' boundary in the adopted Local Plan and our survey of main town centre uses reveals that each location has up to 10 main town centre uses. The key characteristics of these settlements are as follows:

a. All of these settlements have at least one convenience goods store, which comprise between one quarter and one half of all provision in these settlements. Mickleton has the largest amount of provision – 3 convenience retailers (one convenience store, one butcher and one deli – which account for one third of all the main town centre uses in the village. In the other settlements, provision is focused upon one convenience store / village shop.

b. Only two of the settlements (Mickleton and Upper Rissington) have comparison goods stores, which reflects the role of these locations within the retail hierarchy. A similar trend is found for retail services, which are only found in Kemble and Mickleton.

c. The largest single category within the other Principal Settlements is 'leisure services'. Apart from Upper Rissington (which does not have any leisure service uses) leisure service uses account for between one quarter and half of all uses in this grouping of settlements.

5. Towards a Retail and Town Centres Strategy for Cotswold District

Introduction

5.1 Having set out the baseline context for retail and main town centre land use provision within Cotswold District, this section of the Study turns to an assessment of the need for retail and food/beverage land use floorspace across the different parts of the District, followed by an assessment of the potential locations to meet the identified needs. The combined content of these assessments will provide an important contribution to the retail and town centres policy strategy in the new Local Plan.

5.2 In addition, as part of our assessment, this section of the Study also provides advice on the content of retail and town centre policies for the new Local Plan, taking into account the current version of the NPPF (which is the version of national planning policy under which the new Local Plan will be examined).

5.3 The remainder of this section is split into the following sections:

a. An assessment of the need for retail and food/beverage floorspace across Cotswold District, including assessments for convenience and comparison goods floorspace. Our assessment has considered quantitative and qualitative aspects of need.

b. As part of our qualitative assessment of need, this section also contains an assessment of the spatial aspects of need. This focuses upon specific needs which may arise as a result of strategic residential-led Local Plan allocations, including their relationship to the pattern of existing retail and defined 'town centre' provision across the District area.

5.4 Finally, this section provides advice around the content of retail and town centre land use policies for inclusion in the new Local Plan, taking into account the findings of our needs and spatial assessments and the requirements of national planning policy.

Quantitative Assessment

5.5 At the present time, national planning policy and guidance does not prescribe the specific nature of an assessment of 'need' for town centre land uses. However, it has been common practice for an element of these assessments to consider 'need' in quantitative terms via an analysis of expenditure capacity within a defined area. Such assessments consider the scale of available expenditure capacity and its ability to support existing retail and food/beverage floorspace and the potential for net additional floorspace over a prescribed period. This approach was adopted in the 2017 Retail Study and has been repeated for the purposes of this current evidence base study in relation to both Class E(a) retail floorspace and Class E(b) / sui generis food and beverage land use floorspace.

5.6 Our quantitative assessment which has adopted the following step by step methodology:

a. Setting a study area for the quantitative assessment which help guide the analysis local retail expenditure levels and shopping patterns.

b. Calculating the total level of available retail expenditure which is generated by residents of the different parts of the study area, using up to date local population estimates and local per capita retail expenditure forecasts.

c. Assessing local retail spending patterns in order to build up a detailed picture of the market share of the main convenience and comparison goods shopping destinations across the Cotswold District administrative area.

d. Applying these market share levels to available expenditure to forecast existing and future store / centre turnover levels.

e. Assessment of existing and future quantitative need levels by comparing the total turnover potential of existing floorspace against benchmark turnover levels (also taking into relevant retail floorspace commitments).

Structure of the quantitative assessment

5.7 Our quantitative assessment can be found at Appendix B to this Study and is structured in the following manner:

a. Table 1 – population levels within the study area, by zone

b. Tables 2a-2c - per capita expenditure, by study area zone, for retail and food/beverage purposes

c. Tables 3a-3c – total spending on retail and food/beverage purposes, by study area zone

d. Table 4 – convenience goods shopping market share levels within the study area

e. Tables 5a-5d – convenience goods study area derived turnover levels, plus expenditure inflow

f. Table 6 – comparison goods shopping market share levels, by study area zone

g. Tables 7a-7d – comparison goods study area derived turnover levels, plus expenditure inflow

h. Table 8 – food and beverage facility market share levels, by study area zone

i. Tables 9a-9cd – study area derived turnover (plus expenditure inflow) for food and beverage facilities

j. Table 10a – convenience goods floorspace benchmark turnover levels

k. Table 10b – retail floorspace commitments

l. Tables 11a-11l – quantitative need forecasts for convenience goods retail floorspace (main settlements(

m. Tables 12a & 12b – quantitative need forecasts for comparison goods retail floorspace (Cotswold District & Cirencester)

n. Tables 13a – food/beverage floorspace quantitative need forecasts (Cotswold District).

5.8 The various data inputs and methodological principles which have informed the above stages are explained in turn below.

Study Area

5.9 In order to enable a detailed assessment of shopping patterns and spending at retail and food/beverage outlets, the quantitative assessment is governed by a study area, a plan of which is attached at Appendix A to this report and also in shown in Figure 4.1 (at the start of the previous section of this document).

5.10 The study area covers the whole of Cotswold District and extends into surrounding administrative areas, including: West Oxfordshire, Stroud, Cheltenham, Tewkesbury and parts of south Warwickshire.

5.11 In order to allow the quantitative need assessment, along with other parts of this Study, to understand localised shopping patterns across Cotswold District area, the study area has been sub-divided into 11 individual zones. These zones match the zones used in the study area for the 2017 Retail Study.

Timeframe for the quantitative need assessment

5.12 The time period for the quantitative need assessment has been set with a base year of 2026 (the current year) and an end date of 2043, in order to match the time period for the Local Plan Review. In order to provide a picture of how levels of quantitative need change over time, our assessment provides interim forecasts for 2031 and 2036. This is also useful given that the reliability of economic forecasts will reduce over time, where more weight can be given the 2031 forecasts (whilst the 2036 and 2043 figures should be used as a guide).

Population

5.13 A key part of the assessment of quantitative need is the scale and distribution of population across the study area. The population levels for the eleven study area zones used within this assessment are contained in Table 1 at Appendix B.

5.14 In order to provide a basis for the quantitative need assessment which matches the development strategy in the emerging Local Plan, our assessment utilises a mixture of population forecasts (and associated data) from Experian, CDC and other parts of the evidence base for strategic planning across Gloucestershire. Examination of Experian's population forecasts for the study area reveals that they are likely to under-estimate population growth (based on planned house-building) in several of the study area zones[31]. As a consequence, for these specific zones we have used the population growth forecast for Cotswold District provided by the draft Gloucestershire Housing and Economic Needs Assessment and apportioned part of the forecast growth to Zones 1, 4, 6, 9a and 9b based upon the likely scale of house-building to be included in the new Local Plan[32].

5.15 Based upon this approach, Table 1 at Appendix B shows a 26% growth in the population levels across the study area. In light of the likely extent of house-building planned for the new Local Plan, the largest areas of proportionate growth between 2026-2043 in Cotswold District are forecast to be Zone 1 (Cirencester and the surrounding area) at 55%, 33% growth in Zone 4 (Fairford and Lechlade), Zone 9a (Moreton-in-Marsh) and Zone 10 (including Mickleton).

Per capita retail expenditure

5.16 Per capita spending on retail and food/beverage purposes for each of the study area zones has been obtained from Experian[33]. Use of separate forecasts for each zone enables the quantitative assessment to be informed by a socio-economic characteristics of the individual parts of the Cotswold administrative area, in order to provide a more accurate picture of local retail and town centre performance.

5.17 The spending data which has been obtained from Experian has a base date of 2024. This base data has been projected forward on the basis of forecasts contained within Experian's Retail Planner Briefing Note 23[34]. The forecasts which have been used are based upon Experian's annual adjusted convenience and comparison goods data. This version of the retail expenditure forecasts adjusts total growth/change to exclude purely online retail sales, given that the focus of

[31] These are Zones 1, 4, 6, 9a and 9b.
[32] The distribution of proposed house-building used in our assessment was set prior to the final draft Local Plan strategy and therefore may need to be updated in due course.
[33] Obtained in April 2026.
[34] Published in March 2026

this need assessment is on 'bricks and mortar' retail floorspace provision across Cotswold District[35]. The annual growth forecasts for convenience and comparison goods are shown in Table 5.1 below.

Table 5.1: % change per annum for per capita spending on convenience and comparison goods, plus food & beverage uses, 2026-2043

Year	Convenience Goods Spending per Head (% change p.a.)	Comparison Goods Spending per Head (% change p.a.)	Food & Beverage Spending (% change p.a.)
2026	-0.6	0.8	0.9
2027	-0.7	1.2	0.9
2028	-0.4	1.7	0.9
2029	-0.4	2.0	0.9
2030	-0.5	2.0	0.9
2031	-0.3	2.2	0.9
2032	-0.3	2.2	0.9
2033	-0.3	2.1	0.9
2034	-0.3	2.1	1.0
2035	-0.3	2.1	1.0
2036	-0.3	2.1	1.0
2037	-0.3	2.1	1.0
2038	-0.3	2.1	1.0
2039	-0.2	2.2	1.0
2040	-0.3	2.1	1.0
*2041**	-0.3	2.0	1.0
*2042**	-0.3	2.0	1.0
*2043**	-0.3	2.0	1.0

Source: Experian Retail Planner Briefing Note 23 (March 2026)

5.18 The above data shows that Experian are currently forecasting a year-on-year decline in spending per head on convenience goods up to 2041[36]. This decline will counteract part of any growth in population levels in the study area and therefore subdue the amount of additional convenience goods expenditure which will be made available to support both existing and net additional floorspace over the period 2026-2043. Comparison goods retail spending is expected to grow over the assessment period settling at an annual growth rate of circa +2% after 2029. Food and beverage spending is expected to experience annual growth of around +0.9% / +1.0% between 2026 and 2043.

5.19 The total levels of change for each of the ten study area zones can in found in Tables 2a-2c at Appendix B to this report.

[35] Experian note that "many stores sell online but source sales from regular stores rather than warehouses, implying an increase in required store floorspace to cater for rising internet sales". Therefore, it is not appropriate to use total retail spending to calculate future demand for retail space; nor is it satisfactory to use retail spending excluding all online sales. Therefore, Experian calculate growth rates for convenience and comparison goods that take into account the proportion of online trading using traditional floorspace.
[36] Experian's forecasts for retail and leisure spending extend to 2040 and therefore, for the purposes of this quantitative assessment we have assumed that the annual forecasts for 2039 & 2040 continue up to 2043.

Retail spending / shopping patterns data

5.20 A key part of the quantitative need assessment is the analysis of current shopping and food/beverage trip spending patterns. This data provides the basis for the assessment of current store turnover levels, the catchment area definition of these stores and also provides a starting point for the assessment of future levels of quantitative need.

5.21 For the purposes of assessment, we have utilised data from Experian's Spend Insight database. This is a database of around 4 million debit and credit cards from across the UK and provides data on spending levels at specific shopping destinations and the source of this spending. The ESI data has been provided separately for grocery stores, comparison goods stores and food/beverage destinations.

5.22 In order to create market share levels for the main retail destinations in Cotswold, all available spending data from the ESI database has been obtained for the key settlements for the 2024 calendar year. These settlements are Cirencester, Tetbury, Moreton-in-Marsh, Fairford, Bourton-on-the-Water, South Cerney, Lechlade, Chipping Campden, Mickleton, Upper Rissington, Northleach, Blockley, Stow-on-the-Wold and Siddington. Where available, data has also been sought for Kemble, Willersey, Andoversford, Down Ampney, Bibury, Coln St Aldwyn, Hatherop, Quenington, Driffield, Preston and Ampney Crucis.

5.23 The data which has been obtained from ESI provides a total sample spend at each of the chosen destinations / areas, which is then split into its constituent parts based on the eleven study area zones and the remaining amount attributable to expenditure inflow. This raw data is then translated into market share levels by expressing the sample spending/turnover for each destination as a proportion of all available spending in that particular zone. The resultant market shares for convenience and comparison goods, plus food/beverage destinations, are shown in Tables 4, 6, 8 at Appendix B.

5.24 The market shares in Tables 4, 6 and 8 are then applied to total available spending in each of the study area zones in order to provide a study area derived turnover estimate for each of the key Cotswolds settlements / areas. These can be found, for 2026 spending levels, at Tables 5a, 7a and 9a. Each of these tables also provide an estimate of the likely amount of spending which is drawn to each of the main destinations / areas in the District from outside of the study area. This estimate is based upon the proportion of spending which the raw ESI spending data indicates is drawn from outside of the study area. For the purposes of the quantitative assessment, it has been assumed that this proportion of turnover gained from 'expenditure inflow' remains constant over the assessment period.

5.25 The use of ESI provides an improvement over the 2017 Retail Study in relation to the forecasting of expenditure inflow in the study area, as the ESI data is able to record actual spending from those UK residents who are visiting the stores and centres in Cotswolds District. Whilst the ESI does not extend to international spending, providing better quality data on visitor/tourist spending is particularly important for this Study given the important of this customer group to the health of town centres across the District.

5.26 The market share levels in Tables 4, 6, 8 and 10 have been described in Section 4 of this document insofar as they relate to the picture that they build up in terms of the main catchment areas of each key settlements in the District.

5.27 The forecast turnover levels for the main convenience goods stores in Cotswold District are summarised in Table 5.2 below. Alongside these forecast turnover levels, Table 5.2 contains an indicative estimate of company average performance for each store, in order to provide a comparison of current indicative trading performance.

Table 5.2: forecast current total convenience goods turnover for the main foodstore/supermarkets in Cotswold District, 2026

Store / Centre	Forecast Turnover (£m)	Company Average Turnover (£m)
Marks & Spencer, Cirencester town centre	6.22	4.03
Waitrose, Cirencester	38.30	32.46
Tesco, Kings Meadow, Cirencester	60.54	48.10
ALDI, Cirencester	10.63	9.79
Lidl, Cirencester	9.12	10.06
Tesco Express, Chesterton	2.52	2.10
Co-op, Burford Road, Cirencester	5.52	1.87
Tesco, Tetbury	18.85	23.54
Co-op, Tetbury	1.39	2.55
Co-op, Moreton-in-Marsh	6.81	15.39
ALDI, Moreton-in-Marsh	13.37	12.19
Budgens, Fairford	2.63	1.80
Co-op, Fairford	1.60	1.52
Co-op, South Cerney	3.29	2.55
Co-op, Bourton-on-the-Water	11.33	14.61
Budgens, Bourton-on-the-Water	1.50	2.27
Co-op, Chipping Campden	1.86	1.98
Tesco, Stow-on-the-Wold	21.30	25.24
Co-op, Stow-on-the-Wold	1.43	1.41

Source: Tables 5a and 10a, Appendix B

5.28 The contents of Table 5.2 indicate a generally good level of trading performance for the larger foodstores in Cirencester, with many trading above company average. Trading performance in the stores in Moreton-in-Marsh, Bourton-on-the-Water, Stow-on-the-Wold and Tetbury is below average.

5.29 Table 5.3 below provides a summary of the comparison goods turnover of those settlements in Cotswold District which attract a large amount of expenditure from the study area and/or expenditure inflow. This data is broken down into study area derived turnover, the amount of comparison goods expenditure attracted from non-study area UK residents and total turnover levels. The total turnover of Cirencester is far in excess of any other of the main settlements in the District, with a total turnover of circa £115m[37]. The next highest turnovers can be found in Moreton-in-Marsh and Stow-on-the-Wold. However, one key theme which does emerge from the data contained in Table 5.3, which is taken from Table 7a at Appendix B, is the large proportion of turnover which comparison goods stores attract from outside of the study area (from UK visitors and tourists).

[37] Turnover of town centre and out of centre comparison goods stores.

Table 5.3: comparison goods turnover (£m) of the main centres in Cotswold District, by study area and inflow, 2026

Settlement	Turnover from Study Area (£m)	Turnover from Beyond Study Area (£m)	Total Turnover (£m)
Cirencester Town Centre	45.89	33.53	79.42
Cirencester	72.84	42.68	115.52
Tetbury	£2.60	£3.52	£6.12
Moreton-in-Marsh	£13.18	£14.39	£27.57
Fairford	£1.79	£0.48	£2.27
Bourton-on-the-Water	£2.81	£8.36	£11.17
South Cerney	£1.99	£4.88	£6.87
Lechlade-on-Thames	£6.48	£6.77	£13.25
Chipping Campden	£0.75	£2.20	£2.95
Upper Rissington	£1.52	£0.22	£1.74
Stow-on-the-Wold	£6.43	£11.01	£17.44
Siddington (Dobbies)	£6.84	£5.73	£12.57

Source: Table 7a, Appendix B

5.30 A similar exercise is undertaken for spending associated with food/beverage facilities across the main settlements. Whilst Cirencester attracts the highest volume of expenditure, the gap between its annual turnover and the turnover of other main settlements (such as Bourton-on-the-Water, Chipping Campden and Stow-on-the-Wold) is much smaller. One of the most distinctive elements of the food/beverage analysis is the proportion of spending attracted from outside of the study area: in all cases the proportion is above 100%. At South Cerney, Lechlade and Chipping Campden the proportion is close to 200%, whilst it is 375% at Stow-on-the-Wold and 589% for Bourton-on-the-Water.

Table 5.4: turnover of food and beverage facilities in Cotswold District derived from within and outside of study area

Settlement	Turnover from Study Area (£m)	Turnover from Beyond Study Area (£m)	Expenditure Inflow as a % of Study Area Turnover
Cirencester Town Centre	£23.87	£32.72	137%
Cirencester	£12.65	£14.91	118%
Tetbury	£5.60	£10.37	185%
Moreton-in-Marsh	£4.48	£9.20	205%
Fairford	£3.03	£3.75	123%
Bourton-on-the-Water	£4.13	£24.34	589%
South Cerney	£4.56	£9.55	209%
Lechlade-on-Thames	£1.58	£2.99	189%
Chipping Campden	£4.48	£9.87	220%
Mickleton (Cotswold)	£1.40	£1.87	134%
Northleach	£2.33	£2.64	113%
Blockley	£1.19	£2.01	168%
Stow-on-the-Wold	£6.09	£22.83	375%
Siddington	£0.82	£0.72	87%
Kemble	£0.27	£0.44	164%
Willersey	£0.10	£0.18	182%
Andoversford	£0.18	£0.43	245%
Bibury	£0.11	£1.56	1341%
Ampney Crucis	£0.92	£4.16	352%

Benchmark retail floorspace turnover levels

5.31 In order to compare the demand for, and supply of, retail floorspace with the Cotswold administrative area it is necessary to set benchmark turnover levels for convenience and comparison goods floorspace. The assessment takes two alternative approaches to benchmark turnover in order to reflect the characteristics of each retail sector.

5.32 For convenience goods retail floorspace, benchmark turnover is set by a mixture of: (a) calculating the specific benchmark turnover for individual larger stores based upon their existing net sales floorspace area and national company average trading performance; and, alternatively (b) for other small stores (particularly local independents) setting benchmark turnover at the same level as existing trading performance.

5.33 The calculation of individual store benchmark performance for the named larger foodstores/supermarkets is performed at Table 10a at Appendix B and summarised in Table 5.2 above. Data on floorspace levels has been obtained from various sources including planning application data, Valuation Office data, Experian GOAD and the previous 2017 Retail Study. Data on national average sales density levels for each of the named operators is provided by GlobalData, based upon their latest (December 2025) research. Table 10a also shows the remainder of stores/locations which are subject to the alternative calculation of benchmark turnover – i.e. benchmark turnover at 2025 equals current trading performance[38].

5.34 For the avoidance of doubt, these benchmark turnover levels are intended to be an indicative guide to help understand the overall trading performance of retail stores in a particular area, including whether there are clear and obvious levels of good or poor trading performance.

5.35 For the comparison goods retail floorspace assessment, the 'current turnover performance equals current benchmark turnover' approach is applied to all floorspace. This is a common approach to quantitative need assessments across Wales and England and is reflective of the large number of comparison goods retailers present in any one given study area and the lack of available data on company average performance levels for many of these retailers. This was also the approach taken for the 2017 Retail Study.

Allowances for floorspace efficiency / productivity

5.36 A further key part of the quantitative need assessment, as it moves forward across the assessment period, between 2026 and 2043, is the need to make an allowance for retail floorspace efficiency / productivity. This is important for a number of reasons:

a. In addition to the allowance for benchmark turnover levels at the start of the assessment (2026) baseline floorspace performance levels have the ability to change over time as the retail space is used in different ways in order to display and sell products to customers. Where this occurs, an allowance should be made within the quantitative assessment over the period 2026-2043.

b. There is also the ability to use the quantitative assessment to pursue specific planning policy objectives around maintaining and enhancing the vitality and viability of defined 'town centres'. The use of allowances for productivity/efficiency is a way of supporting this objective through assigning part of the growth in available retail expenditure to existing floorspace, in order to allow it to improve its performance over time.

5.37 Based upon the above principles, the following allowances for productivity/efficiency have been adopted[39]:

Table 5.5: forecast (%) changes in floorspace efficiency / productivity between 2026 and 2043

	2026 & 2027 (% change per annum)	2028-2032 (% change per annum)	2032-2041 (% change per annum)
Convenience goods floorspace	0.0	0.0	-0.1
Comparison goods floorspace	+1.6 & +1.8	+2.3	+2.3
Food & beverage floorspace	-0.2	+0.2	+0.2

Source: Experian Retail Planner Briefing Note 23 (March 2026) & Briefing Note 23 (Leisure)

[38] Taken from Table 5a at Appendix C.
[39] Allowances for productivity/efficiency have been applied to existing floorspace, floorspace commitments and the indicative sales density for new retail and food/beverage floorspace.

Commitments & Current Proposals

5.38 When assessing future quantitative need it is important to have regard to any substantial pipeline development which may have the ability to soak up available expenditure / floorspace capacity[40]. At the present time, there are no substantial retail or food/beverage floorspace commitments such need to be taken into account.

5.39 However, it is worth noting that, at the time of preparing this Study there are two current planning applications for foodstore development in the District. The first is a proposal for a new ALDI foodstore on the western edge of Bourton-on-the-Water. The proposed store extends to 1,912sq m gross / 1,154sq m net and would, if permitted, provide for a second large main and top-up food shopping destination in Bourton-on-the-Water. This proposal also includes provision for a 167sq m (gross) food/beverage unit.

5.40 The second application is for a mixed use development, including retail and residential uses in Chipping Campden town centre. The proposed retail floorspace element of the proposal extends to 579sq m (gross) and would accommodate a new modest sized foodstore.

Quantitative need forecasts

5.41 Quantitative expenditure/floorspace forecasts have been prepared for convenience goods floorspace in all of the main settlements across the District, including: Cirencester, Tetbury, Moreton-in-Marsh, Fairford, Bourton-in-the-Water, South Cerney, Chipping Campden, Mickleton, Northleach, Upper Rissington and Stow-on-the-Wold. These locations reflect the centres which feature in the current retail hierarchy in the development plan and two settlements (Mickleton and Upper Rissington) which are defined as Principal Settlements in the development plan settlement hierarchy[41]. For comparison goods retail floorspace, our quantitative assessment at Appendix B concentrates upon a forecast for the whole of Cotswold District along with Cirencester. The decision to concentrate upon Cirencester as the only individual location which attracts a large amount of retail expenditure[42]. A similar approach is taken for food/beverage floorspace.

5.42 Tables 11a-11l at Appendix B are structured in a consistent manner. Each table shows the amount of convenience goods expenditure which each location attracts from residents of the study area, along with the separate amount of expenditure which the ESI data is predicting is being attraction from visitors from across the UK. For the purposes of the assessments at Tables 11a-11l the current market share of convenience goods stores in each settlement is held at a constant level over the assessment period (2026-2043). As a consequence, this should be seen as one starting point for the wider assessment of need, as other separate factors will need to be taken into account. These are discussed later in this Study, although can be summarised as follows:

a. There may be a need to consider changes in the future market share for retail provision in particular settlements. This may be based upon:

   1. The impact of new retail floorspace provision. In some cases, the provision of a new retail store in a settlement may have a material (upwards) impact upon the market share of that settlement within the study area. In turn, this may also lead to a consequential reduction in the market share of those surrounding settlements which currently attract trade from the area where the new store is to be

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41 There are a number of other settlements which are defined as Principal Settlements which have not been included within the quantitative assessment due to their small size and lack of retail floorspace/turnover. These include: Blockley, Kemble, Willersey, Andoversford and Down Ampney.

42 The other centres included in the development plan retail hierarchy also attract comparison goods expenditure. However, these are generally very modest amounts which are unlikely to inform a meaningful quantitative need assessment for comparison goods floorspace provision in these locations.

located. In such circumstances, this may lower the amount of expenditure capacity in these surrounding settlements.

2. A similar set of principles would apply where the retail and town centres strategy plans for specific new retail provision in an area of high growth / qualitative need. In such circumstances, qualitative and spatial need factors would influence quantitative need forecasts.

b. There may also be circumstances where greater weight is placed upon indicators of need such as town centre health, spatial assessments of need and qualitative needs. In such circumstances, non-quantitative indicators may well guide the overall assessment of need, rather than specific floorspace forecasts.

5.43 A summary of the (constant market share) quantitative need forecasts for convenience and comparison retail plus food/beverage floorspace can be found in found in Table 5.6 below.

Table 5.6: summary of quantitative capacity forecasts, 2026-2043, convenience and comparison retail floorspace, plus food/beverage floorspace (excluding pipeline development) – constant market share scenario for all main settlements

	2026 (sq m net)	2031 (sq m net)	2036 (sq m net)	2043 (sq m net)
Convenience goods floorspace				
Cirencester	1,851	3.136	4.535	6,464
Tetbury	-	-	-	-
Moreton-in-Marsh	-	-	-	95
Fairford	145	179	218	271
Bourton-on-the-Water	-	-	-	-
South Cerney	62	95	132	183
Chipping Campden	-	-	13	34
MIckleton	-	-	-	-
Northleach	55	56	59	63
Stow-on-the-Wold	-	-	-	-
Upper Rissington	-	-	-	-
Lechlade	-	40	86	149
Comparison goods floorspace				
Cotswold District	-	3,369	6,604	10,794
Cirencester	-	2,096	4,141	6,823
Food & beverage floorspace*				
Cotswold District	-	4,143	8,355	14,752

Source: Tables 11-13, Appendix B. *Floorspace capacity forecasts for food/beverage floorspace are gross floorspace figures. Other floorspace forecasts are net sales area.

5.44 The summary quantitative capacity forecasts outlined above most settlements across the District have either nil or limited surplus capacity for net additional convenience goods floorspace. This is primarily due to two factors: (a) the small size of settlements, which limits the amount of available expenditure capacity; and (b) reasonably high levels of existing grocery floorspace provision in some of the larger towns (Tetbury, Moreton-in-Marsh, Stow-on-the-Wold and Bourton-on-the-Water).

5.45 The one settlement will a high level of net additional convenience goods floorspace capacity, based upon the continuation of current market shares, is Cirencester. At the current year (2026), there is forecast capacity of circa 1,850sq m net sales floorspace, equivalent to a medium foodstore such as ALDI or Lidl. However, over the assessment period net additional quantitative capacity is set to grow significantly to 3,100sq m net by 2031, 4,500sq m net by 2036 and 6,400sq m net by 2043. When reading and understanding these forecasts, three factors should be noted:

a. the forecasts are based upon Cirencester maintaining its current market share over the assessment period;

b. Cirencester currently benefits from grocery shopping trips from surrounding settlements, such as Fairford and Northleach. As a consequence, improvements in the quantity and quality of grocery provision in those settlements will reduce the amount of convenience goods expenditure attracted to stores in Cirencester; and

c. the level of growth in net additional quantitative capacity is driven to a significant extent by planned strategic housing allocations in the new Local Plan. These include both urban extensions to Cirencester and new communities a short distance from the town. As a consequence, meeting the identified capacity, subject to points (a) and (b) above, plus qualitative considerations, may well be in separate locations around Cirencester and not just the town itself.

5.46 As noted above, there are some settlements whose catchment population travel to stores in other towns for their grocery shopping needs. This is, in part, likely to be a product of the relatively small size of the settlement in question. However, some of these settlements have the potential to see a large increase in the resident population of their local catchment of the new Local Plan period. The qualitative and spatial needs associated with this development plan strategy are explored in the next sub-section of this chapter and it is likely that any material increase in market share within these settlements would lead to a consequential reduction in future capacity in settlements such as Cirencester.

5.47 With regards to quantitative need factors associated with comparison goods floorspace provision, it will be noted from the contents of Table 5.6 that around two-thirds of the overall district-wide quantitative capacity is associated with Cirencester. Whilst medium to longer term capacity forecasts are less reliable, there is an estimate net additional capacity for circa 4,100sq m net by 2036 and 6,800sq m net by 2043. Shorter term capacity is estimated to be circa 2,100sq m net by 2031. Whilst there will be a particular focus on Cirencester town centre as a first choice location for additional provision, particularly in light of its current role as the main comparison goods shopping location in the District, it is likely that some comparison goods provision will be associated with new foodstores to serve new and expanding communities along with other small scale provision.

5.48 The scale of potential net additional food/beverage floorspace (Class E(b) / sui generis) is forecast to be reasonably high at circa 4,100sq m by 2031 and 8,300sq m 2036. This reflects a combination of forecast strong population growth in 4 key locations (Cirencester, Mickleton, Fairford and Moreton-in-Marsh) along with consistent growth in per capita spending at food/beverage outlets. The forecasts shown in Table 5.6 are District-wide and therefore will translate into relatively modest amounts on a settlement by settlement basis. In addition to the standard town centre first approach, a particular priority will be appropriate sized provision in new local centres (see next sub-section).

Qualitative and Spatial Assessment

General qualitative considerations

5.49 A common theme which runs through the qualitative assessment is the influence of commercial trends within the retail, leisure and town centre sectors, along with the characteristics of Cotswold District. In particular: the influence of surrounding centres (including Cheltenham, Swindon and Bristol/South Gloucestershire), size of many of the Principal Settlements (and their catchments), the role and function of these settlements (including the focus on day-to-day retail and service provision and the strong influence of the tourism/visitor market). All of these factors lead to a limit on the amount of provision which can be provided in certain sectors in parts of the District. This is likely to be particularly true for comparison goods retailing where only Cirencester has a significant level of provision, with much of the remainder of the District relatively limited and split between local and visitor needs. As a consequence, this leads to a situation where qualitative needs are focused upon grocery provision and a requirement to meet local day-to-day retail and service needs.

5.50 With regards to grocery retail provision, Section 4 of this Study outlined current shopping patterns across the District, some of which suggest the potential for qualitative improvements. Apart from Cirencester, which has a good range of provision, a number of the other Principal Settlements possess a large foodstore capable of meeting main and top-up food shopping needs (Moreton-in-Marsh, Tetbury, Stow-on-the-Wold and Bourton-on-the-Water). In some circumstances this scale and type of provision does not always translate into high levels of grocery trip retention, which can be caused by the inter-relationship of a number of the settlements. As a consequence, there is not, in our view, any pressing need for the new Local Plan to address any qualitative improvements in Tetbury, Moreton-in-Marsh, Bourton-on-the-Water and Stow-on-the-Wold via any specific allocations. Instead, the new Plan should allow for qualitative improvements to be achieved via the development management process via suitable sites where new provision does not harm the health of existing 'town centres'. The same will apply for the smaller Principal Settlements which may not be of a size which can realistically accommodate a new larger foodstore unless they are subject to new strategic development areas (see next sub-section).

Location-specific needs

5.51 As part of the overall assessment of need, it will be important to consider whether there are any location-specific needs arising out of the emerging development plan strategy for Cotswold District. In particular, whilst the preceding quantitative assessments are able to identify potential current imbalances between demand and supply for convenience goods floorspace and future town-wide needs for retail and food/beverage and use floorspace, there may also be location-specific needs which should be addressed. A key theme for these location-specific needs will relate to the main areas of residential land use growth to be included in the new Local Plan.

5.52 In recent month, CDC has consulted upon a series of spatial options for the development strategy in the new Local Plan. Based upon the content of the consultation document, along with the representations received by the Council between November 2025 and January 2026, CDC are now finalising the Regulation 19 Local Plan for further public consultation. The spatial and location-specific needs assessment within this Study has been informed by the current preparation of the emerging Local Plan, with the following areas being identified as likely key areas of growth:

a. The Cirencester area, including urban extensions to the Cirencester urban area (southern extension at The Steadings) plus new residential development in Siddington[43] and Preston[44].

b. Land surrounding Down Ampney

c. Land south of Driffield

d. Land north-east of Fairford

e. Land south-west of Kemble

[43] Land south-west of Siddington
[44] Land east of Kingshill Lane Preston, plus land south-east of Cirencester and south of Preston

f. Land north and west of Mickleton

g. Land north, east and south of Moreton-in-Marsh

5.53 The potential needs associated with strategic residential development in each of these locations have been assessed with reference to the following factors:

a. The scale and location of potential residential development in each area

b. The scale, type and location of existing retail and main town centre land use provision in each area

c. Where potential existing / future gaps in provision exist, we provide an assessment of the potential scale and type of main town centre land use provision (including the need to identify planned new 'local centres'[45]).

5.54 When making an assessment of each of the above locations, we have undertaken a basic assessment of their 'ring fenced' expenditure / floorspace capacity. This is based upon the number of new homes in each area, which is multiplied by an average 'persons per dwelling' factor[46] and an average 'spend per head' for convenience goods retail floorspace[47]. These calculations provide a total spending capacity for convenience goods floorspace for each location, which is then translated into a floorspace capacity equivalent (using an average sales density for each type of use). The assessment concentrates upon convenience goods floorspace as this will comprise the main element of day-to-day needs for local communities.

5.55 It should be noted that this is a crude exercise given that, in reality, the expenditure / floorspace capacity in each location cannot be 'ring fenced' and will instead be subject to varying inflow and outflow influences. However, this basic assessment is nevertheless useful in providing some preliminary high-level guidance on the scale of grocery floorspace which residents of a particular strategic development area/allocation can support.

5.56 A summary of our recommends for the new Local Plan, in relation to the planned strategic development areas in Kemble, Cirencester, Preston, Fairford, Down Ampney, Driffield and Mickleton, are as follows.

[45] As part of this assessment, consideration is given the role and place of a new 'centre' in the District's 'town centre' hierarchy.
[46] Ratio of 2.1, based on CDC data.
[47] For each of the strategic development areas, we have based our assessment on the broad quantum of potential new homes to be allocated in the new Local Plan, multiplying this number by an average of 2.3 persons per dwelling and an average convenience goods spend per head of £3,234 (which is the average spend per head for the whole of the study area, used in our quantitative need assessment).

Table 5.1: summary of retail and main town centre land use elements for the potential strategic development areas

Settlement / Area	Recommended Provision	Notes
Land east of Kingshill Lane, Preston	Planned new Local Centre, to contain a small convenience store (circa 300sq m net sales) and several small Class E units.	Provision of new Local Centre to meet the needs of the planned new community and address shortfall in provision on the eastern side of Cirencester. New centre should be placed in heart of new development area and should not become a roadside facility.
Preston (land south-east of Cirencester and south of Preston)	Planned new Local Centre to contain convenience store / small foodstore (up to 1,000sq m), along with several small Class E units.	New local centre should be large enough to meet the day-to-day retail, service, food/beverage and community land use needs of a new community at Preston. New centre should be placed in heart of new development area and should not become a roadside facility.
Land north and west of Mickleton	Planned new Local Centre to contain small to medium foodstore (circa 1,000sq m) and several small Class E units (recommended to be between 75-250sq m gross) within an overall centre size of up to 3,500sq m gross.	Planned new centre likely to be placed with strategic residential development area. Recommended that the new Local Plan contains a strategy for the co-ordination of the new centre with existing local provision (including possible re-locations / consolidation).
Land south-west of Kemble	Planning new Local Centre to contain small to medium sized foodstore (circa 1,000sq m) and several small Class E units.	Planned new centre likely to be placed with strategic residential development area and to provide physical relationship with the mainline railway station.
Land surrounding Down Ampney	Planned new Local Centre to contain convenience store / small foodstore (up to 1,000sq m), along with several small Class E units.	New centre should be placed in heart of new development area and should not become a roadside facility.
Land north-east of Fairford	Provision of medium sized foodstore within strategic residential development area.	Medium sized foodstore to provide role/function which retains a larger proportion of grocery trips in Fairford. Size of store should be in the region of 1,500sq m net, with exact size to be determined via an impact assessment. No requirement for new local centre within the strategic development area, as spending/needs associated with planned residential growth should be used to support existing defined 'town centre'.
Land south of Driffield	Planned new Local Centre to contain convenience store / small foodstore (up to 1,000sq m), along with several small Class E units.	New centre should be placed in heart of new development area and should not become a roadside facility.

5.57 Following text explains the rationale for these recommendations.

Cirencester

5.58 The Cirencester area is likely to be a focus for additional residential development in the new Local Plan. This is likely to comprise several component parts. First, extensions to the existing main urban area of the town. Second, separate new communities or the enlargement of smaller settlements (such as Preston, Siddington, Driffield and Down Ampney).

5.59 With regards to **Cirencester** itself, we understand that the main areas of focus for additional residential land use development will be on the south-western edge, as an extension to The Steadings development, and to the east of the town (between the existing urban area and the A417. The Steadings development (previously known as Chesterton) is a large-scale urban extension currently under (phased) construction and which will provide its own local centre. This scale of development sought to pursue a strategy which retained Cirencester town centre as the main focus for many retail, service and other main town centre land use needs whilst allowing for a modest scale of day-to-day retail, service and food/beverage land use provision within the heart of the Steadings urban extension area.

5.60 It is understood that a potential extension to The Steadings development would add around 585 additional dwellings within the new Local Plan period. On a 'ring fenced' basis, residents of those additional homes would collectively generate around £4m of convenience goods expenditure which would be equivalent to 280-400sq m (net) of convenience goods floorspace. Given that only part of this floorspace could be retained within the immediate area, along with permission of a new local centre in the original part of the Steadings development, there is no obvious requirement for the next phase of the Steadings development to provide additional neighbourhood-level retail/service uses.

5.61 The other potential urban extension for Cirencester lies on the eastern side of the town, on land to the east of Kingshill Lane (to the north of Preston). The potential for circa 610 new dwellings in this area are currently being assessed by CDC. At this level of development, a 'ring fenced' convenience goods spending capacity of £4.1m could be generated. At that level of spend, between 300-410sq m (net) convenience goods floorspace could be supported. Part of this spending would be attracted to the existing larger grocery stores in Cirencester, particularly the Tesco Extra, Lidl and ALDI stores which lie on the eastern side of the settlement.

5.62 Apart from a small convenience store on Upper Churnside, there is a general lack of day-to-day grocery shopping facilities in this part of Cirencester (to the east of Swindon Road and south of Burford Road). As a consequence, any planned new residential development in this area has the opportunities to provide new neighbourhood-scale retail provision. This would have the dual purpose of meeting the needs of new residents within the allocated area and also addressing a current deficiency in this part of the town.

5.63 Indeed, given the scale of these combined areas, we would recommend that CDC considers planning for a new local centre as part of the eastern extension to Cirencester. This should contain a new modest sized convenience goods store of circa 300sq m net sales, plus a range of other Class E units which are able to accommodate service, food/beverage and other main town centre land uses. It is also recommended that any new local centre is located in such a way that its primary purpose is to serve residents of the new development area and also be accessible to the existing residential areas to the south of Burford Road and east of Swindon Road. We strongly recommend that a location which is primarily focused upon pass-by / road-side trade is avoided.

5.64 **Siddington** is a small village with lies a short distance to the south of the main Cirencester urban area. The village has a post office and convenience store along with a public house, both of which serve local needs. Given the proximity of Cirencester, its retail and other main town centre land uses will have a significant influence over existing and future residents of Siddington. As a consequence, this relationship will place a natural limit on the ability to provide additional main town centre uses in the village.

5.65 At the present time, CDC are currently exploring the potential to allocate land at south-west Siddington for circa 380 new homes. On a 'ring fenced' basis, the population associated with these new homes could generate up to £2.7m of convenience goods expenditure. Given the factors described above, it is likely that a large majority of this expenditure would be lost to larger grocery stores in Cirencester. This would constrain the amount of available expenditure to support grocery floorspace in Siddington, which we consider would be better directed at support existing facilities.

Preston

5.66 The Preston lies to the south-east of Cirencester. It is a small village which lacks any existing retail or main town centre use provision. CDC are currently considering whether to plan for a new community to the south and south-east of the existing village, which would comprise circa 1,300 new homes in the new Local Plan period to 2043. The development area to sit between Cirencester Road and the A419. Existing retail provision comprises the large Tesco Extra store and ALDI store at Cricklade Road, along with the large Dobbies garden centre (to the south of the A419).

5.67 Given the scale of potential residential area in the Preston area, along with the reasonably poor accessibility characteristics associated with the Tesco and ALDI stores, we consider that there is a strong case for a new local centre to be provided as part of this strategic development area. The 'ring fenced' convenience goods expenditure capacity for circa 1,300 new homes is equivalent to £8.7m and 620-870sq m net convenience goods floorspace. Given the attractiveness of the nearby Tesco Extra and ALDI stores, all of these capacity would not be retained within this area. As a consequence, spending from residents of the new community may only be able to support a modest size grocery store of up to 500sq m net. However, qualitative factors, plus the need to ensure an element of self-sufficiency, could support a large level of grocery provision which is able to provide for a range of top-up food shopping needs and part of local residents' wider weekly grocery needs. We have also given consideration to whether retail provision in the Preston area could help to serve the needs of the surrounding area, although the separation of the Preston area from other parts of Cirencester (including the potential Cirencester East urban extension) suggests that this is not a reasonable possibility.

5.68 Given the scale of the strategic allocation at Preston we would recommend that the allocation in the new Local Plan includes provision for a new local centre. The allocation should set a series of clear parameters for the planned new centre including:

a. The provision of a centre which lies in the heart of the new residential community and not on its edge[48].

b. A centre which is anchored by a modest sized small foodstore / large convenience store (up to 1,000sq m gross), which has a function focused on serving the grocery shopping needs of the local population (and not a store with a wider catchment).

c. A centre which is able to provide several separate units for a range of Class E and other main town centre uses.

Driffield

5.69 We understand that CDC is giving consideration to the potential for a strategic land allocation to the south of Driffield, between the existing village and the A419. It is understood that the residential development capacity of this area is circa 1,090 units within the new Local Plan period. At the present time, Driffield does not accommodate any local retail or day to day service uses.

5.70 The closest large settlement to Driffield is South Cerney 3.5 miles[49] to the south (on the opposite side of the A419), which provides small scale grocery stores and a small range of service, food/beverage and other main town centre land uses. Cirencester is located circa 7 miles to the north-west, with potential strategic development allocation at Preston lying between Cirencester and Driffield.

[48] Adjacent to either the A419 or Cirencester Road
[49] Distance by road.

5.71 In the absence of any local facilities in Driffield, residents of a large new community in this area are likely to travel to South Cerney or Cirencester for their top-up food shopping needs and Cirencester for their main food requirements. As a consequence, there is a strong case for the provision of an appropriate scale of retail and other main town centre land use facilities within a strategic allocation. The scale of potential residential development (circa 1,090 units) would produce a 'ring fenced' convenience goods expenditure capacity of £7.4m, which would be equivalent to a convenience goods floorspace capacity of 530-740sq m (net). An element of this spending would naturally be lost to large grocery stores in Cirencester, although given the location of the potential allocation we consider that there is a reasonable quantitative and qualitative case for a convenience store of circa 500-1,000sq m gross.

5.72 In line with the recommendations for the new community at Preston, the grocery store should be of a size which allows the local community to fulfil their top-up / day-to-day grocery shopping needs along with the ability for a proportion of weekly shopping needs to also be met. The grocery store should form an anchor use of a planned new local centre, which also contains a modest amount of several small-scale separate Class E uses. It will also be important for a planned new local centre at Driffield to be placed in the geographical heart of the new community and not on the edge where it would become unnecessarily attractive to pass-by / road-side trading.

Down Ampney

5.73 Down Ampney is also a small village lying to the north of South Cerney and the A419. At the present time, the village has limited existing facilities for the local population and Cirencester, South Cerney and Fairford are likely to attract retail and other trips from the local population. As a consequence, much of the analysis provided for Driffield (above) is also likely to be applicable to Down Ampney.

5.74 We understand that CDC are currently consider the potential for a circa 1,660 residential unit allocation on land surrounding Down Ampney. This would provide for a significant expansion of the village and create significant levels of convenience goods spending capacity. On a 'ring fenced' basis, this capacity equate to circa £11.3m and is equivalent to between 800-1,100sq m net convenience goods net sales floorspace. Much of this spending power will be lost to large foodstores and supermarkets in Cirencester, although a combination of qualitative, sustainability and quantitative capacity factors suggest that the provision of a large convenience store, which is able to serve a range of top-up food shopping and wider grocery needs as part of a planned new local centre, should be accommodated. Our recommendations regarding the scale, role, location and function of a planned new local centre at Down Ampney are similar to those already outlined in relation to Preston and Driffield.

Fairford

5.75 Fairford is currently being assessed by CDC in terms of its potential to accommodate strategic residential-led strategic development. It is understood that the potential provision of circa 1,125 new residential units (to the north-east of Fairford) is being assessed. This level of new residential development is equivalent to a 'ring fenced' capacity of £7.6m of convenience goods expenditure. In floorspace terms, this is equivalent to between 550-760sq m net (convenience goods) sales area.

5.76 This level of potential quantitative capacity should be considered alongside several other characteristics of Fairford. First, Fairford is a reasonably large settlement which benefits from a reasonably range of retail, food/beverage, service and other Class E land use floorspace, much of which is located within a defined 'town centre' boundary along High Street and London Road. Grocery retail provision is focused upon Co-op and Budgens stores which concentrate upon top-up food shopping needs. These stores are popular, although are not of a size which make them attractive to main food shopping trips. As a consequence, 'leakage' of trips is likely to occur to Cirencester and Swindon for this type of shopping.

5.77 As a consequence, there is, in our opinion, already a qualitative case for improving the scale and type of grocery provision in Fairford. This would be achieved via the provision of a larger foodstore which is able to retain a greater proportion of main food trips from the local population. This qualitative case would also be supported by quantitative factors if a new store was able to raise the convenience goods shopping market share of Fairford.

5.78 In our opinion a particular constraint on this scenario being achieved will have been the overall size of the Fairford shopping catchment. Its size has been unable to attract commercial market interest in the provision of a larger medium-sized foodstore. However, these circumstances may well change with provision of circa 850 new homes in Fairford via a strategic development allocation. We consider that all of these factors/circumstances point to a situation where there is potential to provide a new medium-sized foodstore for Fairford.

5.79 The identification of a suitable location for a new foodstore will need to follow the sequential approach to site selection, starting with the defined 'town centre' and then edge of centre locations. Based upon our review of the structure of Fairford, we are not aware of any in-centre or edge-of-centre locations which are large enough to accommodate a medium-sized foodstore. Sites which have been promoted for development via the 'call for sites' for the new Local Plan are in out-of-centre locations and, as a consequence, the strategic development area(s) which have been identified to meet housing needs are likely to comprise an appropriate location for mixed use development including a foodstore.

5.80 The exact size of a new store will need to be tested via detailed assessment of its likely impact on Fairford 'town centre', although a store of circa 1,500sq m net sales area should be used as a general guide and starting point for future assessments.

5.81 Given the concentration of existing retail, service and other Class E / main town centre land uses within the defined 'town centre' in Fairford, we do not recommend that a new strategic development area should be required to provide a range of Class E uses in a new local centre. Instead, new provision should be limited to a medium size foodstore with the additional spending capacity generated by the growing local population used to reinforce existing uses in the defined centre[50].

Moreton-in-Marsh

5.82 Moreton-in-Marsh is currently being considered for the provision of circa 1,900 new homes over the lifetime of the new Local Plan. It is understood that these will be provided in development areas in different locations on the edge of the town's urban area, primarily to the north, east and south.

5.83 At the present time, Moreton has a reasonably large town centre which provides a wide range of retail, service, food/beverage and other Class E uses. The town has two medium-sized foodstores, one of which (Co-op) lies within the town centre boundary. The other foodstore (ALDI) lies to the south of the centre in an out of centre location. Our quantitative assessment of retail floorspace capacity indicates that there will be an over-provision of convenience goods floorspace over the new Local Plan period to 2043.

5.84 Therefore, whilst the provision of circa 1,900 new homes has the potential to add a significant amount of retail expenditure to the local area[51] the current under-performance of existing stores will soak up a large part of this new spending capacity. This is reinforced by qualitative factors which do not point towards a particular qualitative

[50] It should also be noted that one further consequence of providing a new foodstore within Fairford will be a reduced flow of grocery shopping trips to Cirencester which will, in turn, reduce its future convenience goods market share and potential net additional convenience goods floorspace requirements.
[51] Which, if ring fenced and made available in its entirety, could support 900-1,300sq m net convenience goods floorspace.

deficiency in convenience goods floorspace provision. There is also the potential for a new foodstore in Bourton-on-the-Water (if approved) to reduce the wider market share of Moreton-in-Marsh across the wider study area.

5.85 A further factor to consider is the disaggregated nature of the likely house-building areas across the town. There are a handful of large potential strategic allocations, although not one single location which is capable of becoming a large focused new community. As a consequence, we do not consider that there is a strong case for the provision of a planned new local centre in Moreton-in-Marsh during the new Local Plan period up to 2043. In our opinion, the retail, service and food/beverage land use strategy for the town should be based upon the following:

a. The majority of additional demand created by the town's growing population should be used to support retail, service and other main town centre uses in the existing town centre area;

b. The ability to provide a small convenience store within the larger of the proposed strategic development areas should not be ruled out, although this should be tightly controlled to a small top-up food shopping store which lies within the heart of the planned new residential communities and limited in size to under 300sq m net sales area.

Mickleton

5.86 Mickleton is a large village with modest amount (top-up food shopping orientated) grocery retail provision and a number of food/beverage uses. Larger surrounding settlements such as Evesham, Stratford and Moreton-in-Marsh are likely to attract a significant amount of grocery retail trips from local residents, with the size of the village likely to be a constraining factor on the amount of retail and other main town centre land use which can be supported.

5.87 As part of the preparation of the draft Local Plan, CDC are considering the potential to allocate land for the provision of circa 1,240 new dwellings to the north and west of Mickleton. It is also noted that there are a number of current planning applications for residential development on the western side of the village which (in combination) proposed over 300 new dwellings. Based upon the total amount of dwellings being considered by CDC for Mickleton, the 'ring fenced' spending power associated with residents of these new (circa 1,240) homes (£8.4m) equates to a convenience goods net floorspace capacity of between 600-840sq m net.

5.88 Whilst some of this expenditure capacity will not be available to support convenience goods floorspace in Mickleton, the combination of (a) the ability to retain a larger level of locally generated expenditure and (b) the spending capacity associated with the scale of new residential development, suggests that there is likely to be a quantitative and qualitative case for the provision of a medium sized foodstore.

5.89 It is understood that none of the current suite of (undetermined) planning application on the western side of the village contain retail or other Class E/main town centre uses. Therefore, opportunities for new retail and main town centre land use provision are likely to be concentrated in the new Local Plan land allocations. At the present time, Mickleton does not have a defined 'town centre' boundary, with existing facilities spread across the village. The scale of residential land use growth will lead to a requirement for further main town centre uses and it is therefore recommended that the development strategy for Mickleton puts into place a policy framework for how retail and main town centre land use provision in the village will develop over the lifetime of the new Local Plan[52]. This should include a planned new local centre within the northern land allocation, with the centre anchored by a medium sized foodstore along with several separate smaller units capable of accommodating a range of Class E and other main town centre uses. It is recommended that the new centre includes provision for a new medium sized foodstore of circa 1,000sq m

[52] For example, given that new retail, Class E and main town centre uses will be placed within the new strategic development areas, consideration should be given to whether it is appropriate to allow existing main town centre uses to relocate in order to form a co-ordinated single focus for Mickleton.

net sales area, plus several smaller Class E / main town centre land use units ranging between 75-250sq m gross. This would provide for a new centre of around 3,000-3,500sq m gross floorspace.

Kemble

5.90 CDC are currently assessing the potential to allocate land for circa 1,000 new residential units at south-west Kemble. This would provide for a significant expansion in the size of the village which currently accommodates only a modest amount of retail and service facilities for the local population. This situation is likely to be influenced by the limited catchment and existing spending capacity of the local population, with the majority of the local community likely to look towards Cirencester for their grocery and day-to-day retail and service needs.

5.91 The provision of circa 1,000 new homes in the village is likely to offer the opportunity to increase the amount of local retail and service facilities which can be supported by local residents. The presence of the mainline railway station, on the line between London and Cheltenham/Gloucester, also offers the potential to increase available spending to support local facilities.

5.92 The provision of circa 1,000 new homes in Kemble provides a ‘ring fenced’ convenience goods spending capacity of £6.8m which could support 490-680sq m. Some of this expenditure will not be genuinely available to support grocery floorspace in Kemble due to the attractiveness of large grocery stores in Cirencester, however two factors suggest that there is likely to be a location-specific need for the provision of modest-sized grocery provision: (a) the potential to retain a larger amount of existing expenditure; and (b) the available convenience goods expenditure associated with planned housing growth. In addition to opportunities for appropriately-sized grocery provision, we would also recommend that a strategic household allocation of circa 1,000 new homes is accompanied by a planned local centre which is anchored by a convenience goods store and several Class E land use units.

Policy Analysis and Recommendations

5.93 At the present time, within the adopted Local Plan, there are three ‘town centre uses’ policies: EC7, EC8 and EC9:

a. Policy EC7 outlines the various tiers in the formal ‘town centre’ hierarchy in the District, along with guidance for the provision of small shops and services in other settlements not listed in the hierarchy. EC7 also outlines the scale of net additional retail floorspace to be provided in Cirencester over the lifetime of the Local Plan.

b. EC8 sets out: (a) the framework for the application of the sequential test; and (b) provides (separate) development management policy criteria for proposals within and outside of the defined ‘town centre’ boundaries.

c. Policy EC9 outlines the circumstances where an impact assessment is required for retail land use proposals and the content of such assessments.

5.94 In addition, a further related policy is INF2 (social and community infrastructure) which deals with the provision and protection of community facilities including shops and services.

5.95 Consideration has been given to how the content of how policies EC7-9 should evolve for inclusion in the new Local Plan Review, taking into account the content of the current version of the NPPF and the findings of earlier parts of this Study.

5.96 Overall, we consider that there is merit in retaining the basic structure of current Local Plan town centre policies which separate out the town centre hierarchy (and related policy) from the detailed development management policies associated with the sequential and impact policy tests. Separate policies for these topics should continue and we recommend that CDC consider re-organising and adding to these policies (including reference to the planned new 'local centres' within the strategic development allocations).

Policy EC7

5.97 At the present time Policy EC7 sets out a four-tier hierarchy of defined 'town centres' in the District. All these centres possess a defined 'town centre' boundary on the Local Plan policies map. The current tiers (town centre, key centres, district centres and local centres) provide different terminology to Policy DS1 of the Local Plan. DS1 outlines the development strategy for the District which defines all of the centres listed in EC7 as Principal Settlements.

5.98 It is understood that CDC is minded to retain (and update) the list of Principal Settlements in the new Local Plan Review. As a consequence, we consider that, in the interests of consistency, all defined 'town centres' attract the same classification in the town centres chapter. In particular, whilst earlier parts of this Study have identified the individual and unique characteristics of the main town centres, there are no fundamental differences between many of these locations in town centre land use terms. These settlements are: Cirencester, Bourton-on-the-Water, Chipping Campden, Moreton-in-Marsh, Stow-on-the-Wold, Tetbury, Fairford, Lechlade, Northleach and South Cerney.

5.99 The only exception to this will be for those Principal Settlements which do not possess the characteristics to attract (at the present time) a defined single existing 'town centre' boundary, due to the low level of dispersed main town centre uses in these settlements. These are Kemble, Mickleton, Blockley and Siddington. The approach to the provision of main town centre land uses in these settlements will, therefore, be the same as other settlements in the District, which would be a continuation of Part 2 of EC7.

5.100 Part 2 of EC7 is currently focused upon small local shops and services in those settlements which are not within the formal 'town centre' hierarchy. This provides conditional support for shops and services which enhance a settlement's viability, meet the needs of (and are accessible to) the local community.

5.101 It is recommended that Part 2 of EC7 should remain, although in order to address the differences between the different types of settlements caught by this element of policy it is recommended that this part of the policy is updated to provide a clear criteria-based approach which reflects the role, scale and function of each settlement. This criteria-based approach will also need to recognise that two of the four Principal Settlements (Mickleton and Kemble) are recommended to accommodate planned new local centres as part of a strategic development area allocation.

5.102 On the subject of planned new local centres, it is recommended that the updated version of EC7 includes a new section confirming the location of these new centres and the approach to designing their scale and content. As set out in the previous sub-section of this chapter, the six new planned new centres are located at: Kemble, Mickleton, Preston, Driffield, Down Ampney, Cirencester East. The criteria-based approach for designing these new centres should include: (a) a requirement to adhere to the scale, type and format described within the relevant strategic development site policy; (b) the need for new centres to be located where they would facilitate sustainable choice for new residents and the surrounding community; (c) the need to ensure that each new centre is of a scale and type which does not undermine the vitality, viability, role and function of existing centres in the town centre hierarchy.

Policy EC8

5.103 Policy EC8 in the current (adopted) Local Plan outlines the current application of the sequential test, along with: (a) the general approach to all main town centre land use proposals; (b) the assessment of proposals within the defined town centre boundaries; and (c) the approach to assessing main town centre land use proposals outside of defined 'town centre' boundaries.

5.104 In our opinion, all three of these elements should remain an important part of town centre planning policy for the new Local Plan Review. However, their format and location should, in our opinion, be revised. We recommend that the sequential test element of EC8 should be taken forward in its own policy, whilst the general main town centre elements of EC8 should be moved to an expanded town centre policy (i.e. the replacement policy for EC7 – see above).

5.105 A key area of update will be Part 5 of EC8, which focuses on proposals within the defined 'town centre' boundaries. The policy was prepared and adopted prior to the introduction of Use Class E and therefore amendments are required to remove reference to Class A1 retail uses. In addition, changes in the mix of land uses which contribute to the health and attractiveness of 'town centres' indicate that a change in emphasis in this policy is also required. These changes will also need to acknowledge the important role that residential uses play in town centre environments and how they may be introduced alongside (and not at the cost of losing) Class E and other main town centre land uses.

5.106 The approach to assessing proposals within defined 'town centre' boundaries will also need to take into account a requirement in the current NPPF to define a primary shopping area within town centres. The current approach in the adopted Local Plan is to define a primary shopping area boundary for Cirencester which is separate and smaller than the wider town centre boundary. In all of the other defined 'town centres' in the hierarchy in EC7 a separate primary shopping area boundary does not exist. Based upon the characteristics of the Principal Settlements recommended for the 'town centre' hierarchy in the successor policy to EC7 we remain of the view that Cirencester is the only one of the Cotswold towns to require a separate primary shopping area boundary. This is due to the size of the town centre, the number of commercial premises present in the centre and the importance of retail land uses[53].

5.107 The extent of the primary shopping area boundary for Cirencester is discussed later in this sub-section, with the policy approach for this area need only be subtly different from the wider town centre area due to the characteristics and parameters of Use Class E. Indeed, the draft version of the new NPPF proposes to remove the requirement to define a primary shopping area in town centres. Whilst the new Local Plan Review will not be examined under the new NPPF (due for publication later in 2026), any changes to national policy which will affect how primary shopping areas are used as part of the development management system will be of interest and relevance to how policies in the Local Plan Review are cast.

5.108 Therefore, when considering updates to Parts 5, 6 and 7 of EC8 and their relocation to the successor policy to EC7, we recommend the following:

a. Part 5 is amended to focus upon strong support for Class E and other main town centre uses in defined 'town centre' boundaries, particularly those which maintain and enhance the vitality and viability of centres.

b. There is a stronger focus of the promotion of Class E uses within Cirencester's primary shopping area, with a requirement for proposals to avoid harm to the shopping function of this defined area.

c. In addition to a district-wide set of criteria for main town centre land use proposals, it is recommended that a focused set of policy criteria is provided for main town centre land use proposals in settlements outside of the 'town centre' hierarchy (in order to ensure that an appropriate scale of land use provision is accommodated).

d. The existing approach of encouraging residential uses is retained, alongside an assessment of residential and other non-main town centre land use proposals within the defined town centre boundaries.

[53] We recommend that the Local Plan and the accompanying policies map make it clear that where there is not a separate Primary Shopping Area boundary within the 'town centre' (i.e. all centres apart from Cirencester) the PSA is the same as the town centre boundary.

e. The existing set of policy criteria for assessing all main town centre land use proposals, in any location, is retained.

5.109 Following the relocation of the town centre and general main town centre land use policies to the successor policy to EC7, the replacement for Policy EC8 should concentrate upon the sequential test. We consider that there are opportunities for a simplified version of this element of EC8 and recommend the following elements:

a. The focus of the policy will remain on all main town centre land use proposals outside of defined centres, unless one or more 'exclusions' apply:

1. The proposal relates to a site which is allocated in another part of the Local Plan Review for the same purpose.
2. The proposal is small scale (as defined by the updated version of EC7).

b. The policy retains a clear description of the sequence of preferred locations (in-centre, then edge-of-centre, then out-of-centre) and that sequentially preferable locations should be assessed on their ability to offer suitable and available alternatives.

c. The updated version of the sequential test policy should made it clear that the assessment of alternatives should require the demonstration of flexibility in scale and format.

d. Given the potential change in national policy in relation to the sequence of preferred locations around town centre and primary shopping area boundaries, it is recommended that Parts 1 and 2 of Policy EC8 are streamlined.

e. It is recommended that the new policy makes it clear that planned new centres across the District should also feature as part of the sequential test (both prior to and following implementation) in order to ensure that these new centres capture proposed investment opportunities in main town centre uses in those areas where they are proposed.

Policy EC9

5.110 At the present time, retail proposals of 100sq m net sales area or greater, and located outside of the 'town centres' listed in Policy EC7, are required to be accompanied by a retail impact assessment. In order to adhere to current national policy, it is recommended that the land uses relevant to this policy are widened to retail and leisure.

5.111 With regards to whether the existing (100sq m) floorspace threshold should continue for the updated policy we taken into account guidance within the PPG and considered factors such as: (a) the scale of proposals relative to town centres; (b) the existing viability and vitality of town centres; (c) cumulative effects of recent developments; (d) the likely effects of development on any town centre strategy; and (e) the impact on planned investment.

a. <u>The scale of development</u>. Our review of the main 'town centres' across the District indicates that the average unit size across all centres is reasonably small. Floorspace data is available for Stow-on-the-Wold, Tetbury and Cirencester and this shows that average (retail and service) unit sizes of 90sq m, 130sq m and 150sq m respectively. The other main centres across the District have a similar profile of units and are more likely to be similar to the average size of unit in Tetbury and Stow-on-the-Wold. Therefore, the existing threshold is at the lower end of this range and, therefore, any update to the threshold needs to strike a reasonable balance between the actual retail floorspace within the defined centres and concentrating upon larger edge and out of centre proposals which are proportionately larger than town centre provision. This suggests that the threshold could be increased to 200sq m gross, which would allow development management decisions to concentrate upon edge and out of centre proposals which are most likely to compete with the larger component of units will provide the most support for the role, function and attractiveness of defined 'town centres'.

b. Cumulative impact factors. The need for this level of floorspace threshold is also reinforced by factors such as cumulative impact issues, the health of defined centres and the development plan strategy for the centre. In relation to cumulative impact, whilst it might be the case that the individual impacts associated with a circa 200sq m retail proposal do not cause any particular cause for concern, the combined effects of this proposal plus others (of a similar size) may well start to become significant. Therefore, the Council must consider how the cumulative build-up of a certain scale of development could affect the health of town centres. In other words, if it is considered that the individual impacts of say a 200sq m retail proposal are unlikely to ever be significant then this would allow all future 200sq m proposals to avoid the assessment of cumulative impact. Should several of these come forward then this would equate to circa 1,500-2,000sq m of new retail and leisure floorspace which would have avoided any consideration of impact despite it being over the national impact threshold.

c. The health of town centres. With regards to town centre health, it may well be the case that the health, role and function of a particular centre may not rely on just one retailer but, instead, a handful of retailers. Therefore, it may be the case that one specific edge/out-of-centre proposal would not lead to detrimental impacts, but when the cumulative build-up comprises a range of proposals selling different types of goods then the longer-term effects on the health of a centre could become an issue. This would be reinforced where there is potential for store relocations. As a consequence, this reinforces the need for an impact assessment policy whose floorspace threshold is proportionate enough to properly deal with the above circumstances.

d. Investment in existing and planned new centres. A further factor to consider is the impact of edge and out of centre retail and leisure proposals on town centre investment and related development plan strategy issues. In particular, some proposals may be of a type and scope which could attract retail and leisure operators which would otherwise have occupied new investment projects in existing and planned new centres. A key example of this will be occupiers who would be ideally suited to occupy the planned new centres in the strategic residential development allocations in the new Local Plan. Similarly, the potential for relocations away from existing centres should also be considered. Given the importance of new planned centres within these strategic development areas, we consider that this is a further clear reason why a proportionate impact assessment threshold should be set (with many of these planned new centres likely to accommodate small sized units).

5.112 Therefore, we consider that there is clear evidence and justification for the new Local Plan to continue with an impact assessment threshold which is below the national default threshold of 2,500sq m gross. There is evidence to demonstrate why the current threshold of 100sq m gross could remain, although raising it slightly to 200sq m gross would be reasonable based on the latest evidence provided by this Study. It would also show some flexibility and proportionality with the development management framework for retail and leisure uses in the new Local Plan.

5.113 When an impact assessment is required, the basic topic areas contained within Policy EC9 remain consistent with national planning policy: (a) impact on town centre vitality and viability; and (b) impact on town centre investment. As a consequence, these should remain within the updated version of EC9 and be expanded to make reference to:

a. The need to provide an assessment of cumulative impact in a scenario where there are committed and/or recently completed retail/leisure developments in the catchment area of the proposal.

b. The need to ensure that the 'impact on investment' strand of the policy includes reference to an assessment on the delivery of planned local centres within the catchment of the proposal.

6. Summary and Conclusions

6.1 This Retail and Town Centres Study report has been prepared by Nexus Planning for Cotswold District Council as an evidence base document for the new Cotswold Local Plan. This Study has provided new evidence, analysis and recommendations regarding the following issues associated with the retail and town centres land use strategy for Cotswold District:

a. A review of the current baseline position for retail and other main town centre uses in the main settlements in the District, including the land use profile of the main 'town centres' and main town centre land use provision across the Principle and Non-Principal Settlements.

b. A review of recent and current trends in the retail and leisure sectors, including the changes which have taken place since the preparation of the previous district-wide town centre evidence base study in 2017.

c. Assessment of current shopping patterns and retail spending levels across the main settlements in Cotswold District, including analysis of the shopping and food/beverage catchment areas for the main settlements.

d. Assessment of the need for retail and food/beverage floorspace across the main settlements, including spatial and location-specific assessments of need in relation to the Local Plan's strategic development areas.

e. Advice on the content of planning policy for town centres, including town centre boundaries and specific site allocations for retail and main town centre uses.

6.2 The following pages of this section provide a summary of our findings, analysis and recommendations regarding the main settlements across the District.

Appendix A: Study Area

Appendix B: Market Share & Quantitative Assessment

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