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Andrea Pellegram Ltd.

**COTSWOLD DISTRICT LOCAL PLAN REG.18
CONSULTATION:**

**PLANNING POLICIES
NOVEMBER 2015**

RESPONSE BY CIRENCESTER TOWN COUNCIL

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The consultation process and response

1. On 5 November 2015, Cotswold District Council (CDC) as the Local Planning Authority (LPA) opened consultation on **the Local Plan Reg.18 Consultation: Planning Policies November 2015** until 21 December 2015. This report puts forward recommendations for the Town Council to consider as its response.
2. The current consultaion invites comments to be made on the emerging non-strategic development management policies which the LPA will use when determining planning applications. Issues raised in the previous CDC consultation on the development strategy and site allocations undertaken in February 2015 is not currently subject to consultation and any comments made on those matters may be disregarded at this stage.
3. Cirencester Town Council submitted a full response to the CDC consultation on the development strategy in February 2015. That response considered some issues that are brought forward again in this consultation document. Reference to the earlier response will therefore be made where this relates to the current consultation but there will be no reiteration of the principles of the development strategy in this response.
4. Since CTC's response to the February 2015 consultation, considerable work has been undertaken to consider it alongside the Concept Statement with the aim of producing a coherent Planning Statement which sets out CTC's aspirations and policies toward town planning in Cirencester. The Planning Statement will be the benchmark against which the emerging local plan policies are assessed.
5. Andrea Pellegram Ltd. has been commissioned by Cirencester Town Council to prepare a response for submission by the Town Council and also prepared the February 2015 Reg. 18 response and the Planning Statement. The layout of the current response will be slightly different from the February 2015 response due to the more detailed content of the current consultation document.
6. This response to the Reg. 18 consultation planning policies and the Town Council's Planning Strategy have both been considered at a special meeting of the Town Council on 1 December 2015.
7. This response refers to:
 - The Concept Statement
 - CTC's response to the Reg. 18 consultation: Development Strategy and Site Allocations (February 2015)
 - The emerging Cirencester Town Council Planning Statement (for agreement on 1 December 2015)
 - Addendums submitted in support of the Town Council Planning Statement
 - The National Planning Policy Framework
 - Planning Practice Guidance

8. The Town Council, considered and agreed this response on 1 December 2015.

How well the CDC Reg. 18 Consultation document on Planning Policies (November 2015) addresses issues raised in the CTC Planning Statement (December 2015)

9. CTC and CDC have a close working relationship on matters of planning in Cirencester. The Local Plan and the Planning Statement have been prepared concurrently and there has been a significant exchange of ideas and opinions between officers and retained consultants from both organisations as the documents have progressed.
10. Overall, there is a very helpful resonance between the two planning approaches which is set out in the table below. The table shows that for almost all issues raised by CTC, there was a positive response by the LPA.
11. As the Reg. 18 consultation is refined in the Reg. 19 draft, promised studies are refreshed or completed, and the Community Infrastructure Levy (and 123 Infrastructure List) is prepared, more clarity will be provided around how the detailed aspirations in the Planning Statement will be realised in individual development management decisions. It is hoped that the 123 Infrastructure List will contain relevant items from this PS and Appendix 1.

	Fully or almost fully aligned
	Partially aligned but some significant changes were suggested to the Reg. 18 policies
	No mention in the Reg. 18 policies

Town Centre Improvement Area		No mention of outside the ring road
Growth and Development inside and outside the ring road		
Table 1: Urban character inside and outside the ring road		This typology was not referred to and should be part of EC7. The policies addressed inside the Ring Road.
Local economy		This approach is the same except for the term of the test (12 months or 4 years)
Out of centre retail		The approaches are generally in line except the specific concern about S. 73 applications though this could be covered by other policies
Major improvement areas and development opportunities		No mention of design code but this is discussed elsewhere.
Housing for an ageing population		
Co-housing		
Energy resilience		
Flooding		Some issues raised by CTC stakeholders are not reflected
Art and culture		
Community Spaces		
Using design to facilitate good neighbourliness		
Amphitheatre Master Plan		This should be referred to, perhaps in EC9
Archaeological and historical studies		This was not a planning policy

		suggestion and so doesn't directly relate to the consultation.
Wellbeing and Health		
Play		Can be argued to be supported under community infrastructure but much stronger in the Town Centre Strategy
Sports		
Green Infrastructure		
Urban greening		
Cirencester Design Code		Design, local context and streetscape are referred to but there is no specific reference to the Cirencester Design Code which should be included in D1 and 8a.
Street Clutter and Signage		
Development affecting urban permeability		
Key Views		This important policy for Cirencester was omitted.
Cycling		
Sustainable travel		
Meeting the needs of the mobility impaired		
Travel Plans in Cirencester		Reg. 18 policies need to address what happens when promised outcomes don't materialise
Electric Vehicle charging points		

Introduction

Development Boundaries

Development Within Development Boundaries (DS1)

Background

13. In this section, the LPA sets out the development boundaries that will determine where development will occur – development will be generally expected to fall within the development boundaries and not outside. The boundaries define the outside envelope for the 17 towns and villages (Principle Settlements) where most of the local plan policies will apply. “The boundaries essentially define the existing built-up areas”.
14. In 1.0.20 the document states “The development boundaries however exclude sites that are proposed for employment development”.
15. The NPPF sets out the purpose of planning as a means to achieve sustainable development and “an economic role” is part of the definition of what this means. It is therefore contrary to the principles and letter of the NPPF to exclude economic development sites from the development boundaries where local plan policies will apply.
16. Most development is expected to occur within the development boundaries of Cirencester and the Principle Settlements. Some exceptions (such as Rural Exception Sites for affordable housing) are specifically addressed in other policies of the document.

Implications for Cirencester

17. In its response to the February 2015 Reg. 18 Consultation, CTC set out its clear concerns regarding the need to retain and enhance local employment opportunities.
18. The Cirencester Development boundary clearly delineates Cirencester from neighbouring settlements such as Siddington, Preston and Stratton. Existing employment uses west of Cirencester that clearly related to Cirencester are excluded. All existing employment sites that fall outside the development boundaries have the potential to contribute to Cirencester's employment base and should be afforded the same policy incentives and protection as those within the boundaries. Employment uses should form part of the definition of the development boundaries under the principles of Sustainable Development.
19. The supporting text has given no justification why this stance was taken.
20. The wording of Policy DS1 says “... applications ...will be permitted provided that the development conforms with the uses proposed in an allocation (emphasis added).” Employment land was allocated in the Development Strategy policies in February 2015.

Specific comments

Reference	Comment
1.0.20; 2.1.2 Development Boundaries	The definition of "Development Boundaries" should be consistent with the principles of sustainable development set out in the NPPF; should include employment land; and should be applied consistently across the District (i.e. should define the existing built-up areas).
2.1.4	amend: "...include sites specifically allocated for residential and economic development
2.1.5	amend: "...development of poorly designed housing and commercial premises...

Residential Development Outside Cirencester and the Principle Settlements (DS2)

Background

21. Residential development in small villages and rural areas is constrained by this policy which seeks to restrict new residential development to locations where certain criteria apply: the existence of a shop, post office or school. Effectively, this will restrict new housing development to only a few possible locations in the District, leaving many smaller hamlets unable to take new housing development.
22. The NPPF (para 55) notes that where there are groups of smaller settlements, development in one village may support services in a nearby village. This policy with its restrictions is therefore contrary to the NPPF.

Implications for Cirencester

23. In its response to the February 2015 Development Strategy consultation, CTC questioned the allocation of 83% of the District's future housing to Cirencester. The methodology for the housing allocation was also questioned and CTC questioned whether it was reasonable for the LPA to consider that residents in need of housing from villages in other parts of the District would wish to move to Cirencester.
24. The wording of this policy further restricts the capacity of smaller villages to provide housing in the District and will put additional pressure on Cirencester, effectively justifying the 83% allocation of new housing on one site. Every opportunity should be afforded to smaller settlements (those that are not Principle Settlements) to have access to new housing. The wording of this policy needs to reflect the NPPF to enable smaller villages to also have new housing.

Specific comments

Reference	Comment
DS2	The policy should be brought in line with Para. 55 of the NPPF and exclusions a-c should be removed. Reference to the way that one village can support another should be included in the policy to encourage modest developments in all non-Principle Settlements.

Housing

Affordable Housing (H1)

Background

25. This policy seeks to ensure that affordable housing will meet projected demand. Evidence shows that 49.6% of newly forming households in the District are unable to afford to buy or rent on the open market.
26. The policy and text seeks to maximise the amount of affordable housing built in the District, despite viability constraints on individual developments and where there is a shortage of suitable sites.
27. Overall, the policy is supported by CTC approaches to date. It will require all developments over 5 dwellings or an area of over 0.3 ha. to provide up to 50% affordable housing. Where it will not be possible to provide the units on the same site, the LPA will consider commuted sums of money to put towards affordable schemes elsewhere. The policy seeks to create mixed communities where the developments are "tenure blind" so that all houses appear to be the same.
28. Outside the principle settlements, all residential development will be restricted (see comments to DS2 above) except on Rural Exception Sites. These are sites outside the principle settlements where new housing can be built where it is 100% affordable and to meet local need.

Implications for Cirencester

29. The requirement for Rural Exception Sites to be 100% affordable should raise concerns for Cirencester for the same reasons as the restrictions on village extensions discussed regarding DS2. Affordable housing is less profitable for developers. Schemes that only provide affordable housing are unlikely to be, in general, sufficiently profitable since market housing needs to cross-subsidise affordable housing. This balance is at the heart of considerations of a scheme's viability. The 100% affordable housing requirement will ensure that very few Rural Exception Sites will add little to the overall demand for new homes.
30. The NPPF (para. 54) states in relation to Rural Exception Sites "Local Planning Authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs". This would imply that the 100% threshold is too high.
31. In its response to the February Reg. 18 Development Strategy consultation, CTC raised concerns that the amount of affordable housing proposed for Cirencester (over 100 units per year) would be unsustainable and would not meet local need but would attract people from other areas. It is important for affordable housing to be available in other parts of the District so local need can be met with local schemes, and not result in people moving to affordable homes in Cirencester and commuting for work to other areas.
32. The 100% threshold for Rural Exclusion sites should be lowered to be in line with other housing land so that more units can be delivered in other parts of the District outside Cirencester.

Specific comments

Reference	Comment
H1, 2b	The 100% expectation for affordable housing on Rural Exception Sites must be lowered to allow delivery of affordable housing by cross-subsiding with market housing. This change is required to retain conformity with the NPPF. It is recommended that this clause be deleted and that the expectation be 50% affordable housing for Rural Exception Sites in line with other residential development so that more units can be delivered in other parts of the District outside Cirencester.

Housing Mix and Tenure (H2)

Background

33. This policy seeks to ensure that new housing development meets the needs of most sectors of the population. It makes special reference to meeting the needs of an ageing population and the need to make provision to reflect local earnings. Market housing will need to be provided to address local demand with regard to household size and income. Affordable housing should generally be in houses and bungalows, not flats. Land should be made available for self-builders on sites with 20 or more dwellings. The policy allows for Starter Homes to be considered on commercial or industrial land. Smaller one and two bedroom properties will be encouraged and these will generally be houses and not flats though there is no justification given for this approach.

Implications for Cirencester

34. Overall, this policy should be welcomed because it will seek to ensure that new residential development is mixed so that exclusive communities based on house-prices are not created. The policy clearly seeks to make provision for "local" demand but this term is not defined. Considering CDC's proposals in the strategic allocation (February 2015), this could be inferred to mean that the "local demand" is defined by demand in the District, rather than in the Cirencester area. This principle was objected to by CTC in the previous consultation and the criticism from that time remains valid.
35. One area of concern for Cirencester is the policy that considers the use of commercial and industrial land for Starter Homes. Comments below on the need to protect economic development land will be relevant here. There should be a strong presumption that employment land is retained in that use wherever possible.

Specific comments

Reference	Comment
H2 1	The policy and text is generally supported but there is concern that meeting "local demand" will result in people moving long distances to occupy homes in places like Cirencester.
H2 5	The use of employment land is questioned and it is suggested that there should be a strong presumption that employment land is retained in that use wherever possible. Delete this policy.

Residential Care Accommodation (H5)

Background

36. This policy discusses the projected rise in the elderly as a proportion of the overall population and seeks to find a balance between the need for residential care accommodation and the County Council's policy to reduce residential care in favour of community care and support services. The policy seeks to limit new residential care to development related to a local need or connection.

Implications for Cirencester

37. CTC's draft Planning Statement seeks to promote a flexible approach to new development that allows properties to be modified to accommodate changing needs.
38. Overall, this policy will ensure that only enough residential care development will occur to meet local need. This should be supported. Unlike other housing policy in the Reg. 18 documents, this probably does not encourage in-commuting to Cirencester as accommodation is restricted elsewhere.

Specific comments

Reference	Comment
H5	This policy is supported.

Economy

Local Plan Economic Strategy

Background

39. In paragraph 4.1.2, a statement is made that about 2000 people commute to the District. However, as was pointed out in CTC's previous Reg. 18 response, evidence does not support this assertion for Cirencester, and Chesterton in particular. Therefore, it is misleading for this generalised statement to exist without a caveat that Cirencester shows a different pattern, and importantly, it is likely for the South Chesterton urban extension to be a net exporter of labour to other areas. This potential impact should be mitigated with stringent policies in Cirencester and nearby to protect employment land designations.
40. **Economic Objective A** sets out the principle of meeting employment and economic need by allocating and safeguarding employment land. The focus for growth is in Cirencester and the principle settlements. The supporting text clarifies a focus on Cirencester including the new development at Chesterton which will include the expansion of high quality business parks and general/industrial business areas. Expansion of training, research and technology organisations, including SME facilities at Royal Agricultural University (RAU) will be supported. The text highlights the loss of B Class employment floorspace and lack of space for new and expanding business across the District.
41. **Economic Objective B** sets the principle of supporting high quality jobs in professional, technical and knowledge-based sectors to capitalise on existing academic and training institutions. This seeks to build on existing strengths to maintain and support the District's place in the market. The RAU is given special mention. The text notes that the District does not have a strong presence in GFirst's projected growth areas and will

rather build upon and support SMEs, a highly skilled resident workforce, entrepreneurial culture and larger employers and institutions.

42. **Economic Objective C** seeks to maintain Cirencester's dominant employment and service role whilst ensuring flexibility and adaptability to changing economic circumstances. The text points out that only half of economic growth is projected to occur on allocated sites. In this section, it is acknowledged that "larger cities and towns outside of the District, especially Cheltenham, Gloucester and Swindon, draw expenditure out of the District and function as service and employment hubs for many Cotswold Residents." This does not align entirely with CTC's evidence for Cirencester (see comment on 4.1.2 below).
43. **Economic Objective D** supports sustainable tourism.

Implications for Cirencester

44. This section sets out economic principles which are by their nature very general. However, the emphasis throughout the document is that the majority of the residential and economic development will take place in Cirencester. It is therefore extremely disappointing that so little consideration is given to Cirencester and its special requirements which were set out in considerable detail in CTC's previous response to the Reg. 18 Development Strategy consultation.
45. CTC specifically requested the LPA to increase the amount of employment land in Cirencester and this has not been done. The District Council was also asked to actively work with stakeholders to create high skill high value jobs. Though this may possibly be demonstrated with the sections of the current document regarding the RAU, it cannot be demonstrated elsewhere. More is needed to ensure that employment land in major developments is "primed" with roads and utility infrastructure so that it can be easily developed.
46. The previous CTC response highlighted that certain employment areas are now crowded and unable to expand. This is a serious issue and can be argued to be at odds with the aspirations in Objective A which seeks to support the growth of existing businesses. Again, more detail is required regarding how the LPA and District Council will take action in support of these fine intentions.

Specific comments

Reference	Comment
4.1.2	This paragraph should clarify that Cirencester has a different journey to work pattern and at present, only 50% of Chesterton residents work in town and 18% commute to Wiltshire and Swindon.
4.1.13	The acknowledgement that there is out-commuting should be refined. It is not acceptable to place all the expectation for economic and residential growth to be in Cirencester and then provide evidence for the District as a whole. There should be a separate discussion setting out the key characteristics of Cirencester with consideration of economic and retail relationships with other areas inside and outside the District.
Economic Objective A	Overall, this policy is supported, in particular the aim to allocate new employment land and safeguard existing business locations. More is needed to ensure that employment land in major developments is "primed" with roads and utility infrastructure so that it can be easily developed.

Economic Objective B	This objective is supported.
Economic Objective C	This objective is supported.
Economic Objective D	This objective is supported.
Section as a whole	If Cirencester is meant to be the main focus of future economic development in the District, its specific characteristics should be discussed. The current crude data provided in support of these policies should be disaggregated to reveal the real circumstances and profile for Cirencester.

Existing Employment Sites (EC1)

Background

47. This policy seeks to safeguard existing employment sites to retain existing businesses and have the opportunity to grow.
48. Policy EC1 permits employment development on existing employment and allocated sites in Cirencester. It does not permit employment development outside the development boundary of Cirencester (see comment DS1 and DS2).
49. Part 3 of the policy sets out tests to enable conversion from employment to other land uses. All the criteria must be met. Most of the policy is closely aligned with CTC's preferred approach with the exception of policy subsection 3a. The implications for Cirencester are set out below.
50. Throughout the Reg. 18 document, there appears to be an inconsistent approach to the time period tests for change of use. Examples are:
 - H2 – 12 month period of marketing before exempted for requirement for self-build land
 - H3 – 3 year period agricultural workers' dwelling can be permitted after the concern has been established for 3 years and profitable for 1 year
 - H6 – no period specified for the removal of occupancy conditions
 - EC7 – 12 month marketing period for loss of town centre uses on the ground floor

Implications for Cirencester

51. CTC's earlier response to the Reg. 18 consultation strongly emphasised the need to protect employment land from redevelopment. This approach has been amplified and elaborated in the Draft CTC Planning Statement (see PS6 and the section on Local Economy). The Planning Statement approach suggests a test should be applied to safeguard employment land from change of use which requires a demonstration that the property has lain vacant for 4 years or more and that reasonable steps were taken to market the property for its permitted use. If the property is not fit for the permitted use, the Planning Statement suggests

it may be considered for change of use. It is acknowledged that the 4 year test is onerous. However, local experience has shown that many vacant properties may take a number of years to be brought back into use. Local stakeholders indicated strongly that there is a need to only release employment land as a last resort. Therefore, viability tests such as this should be challenging.

52. Overall, the tests in section 3 are sympathetic to CTC's Policy Statement PS 6 and are therefore to be welcomed. However, 3a requires evidence of active marketing for a period of 12 months which is far shorter than CTC's 4 year test period.
53. A 12 month marketing period is not challenging for developers in the face of significant profits to be made on the change of use from B class to residential, particularly in circumstances where there will be a shortage of smaller sites of under 0.3 ha that will fall outside the requirement for affordable housing provision. In Cirencester, it is likely that employment land will provide the best opportunity for new, profitable, market housing.
54. Local concern should be acknowledged by the LPA and this marketing period should be significantly extended. If the LPA's stated priority to "safeguard existing business locations" it must put challenging hurdles in the way.

Specific comments

Reference	Comment
EC1 3 a	The marketing period should be extended to 4 years to reflect the importance of Economic Objective A and its intention to safeguard existing business locations. amend: "...and effectively marketed for a period of at least 4 years on terms...."
H2, H3, H6, EC7	Consideration should be given to extending these test periods in line with necessary changes to EC1.

Special policy areas (EC2)

Background

55. The RAU is required to prepare a Master Plan to set out its planned development and expansion which is based on consultation with the local community.

Implications for Cirencester

56. Major development at the RAU will be beneficial to Cirencester but will have wider impacts and therefore, public consultation and the involvement of local community views in the form, layout and impact of the development will be necessary.

Specific comments

Reference	Comment
EC2	This policy is supported.

Royal Agricultural University, Cirencester (EC2a)

Background

57. This policy sets out the LPA's expectations for what a Master Plan (EC2) would cover. The text highlights the importance of RAU to Cirencester and how it has the potential to drive growth and related economic development. The emphasis in the text is the potential impact on landscape, heritage and AONB. It highlights the proximity of the South Chesterton development and the need to consider opportunities for shared infrastructure and opportunities in the Strategic Economic Plan from GFirst.

Implications for Cirencester

58. As the considerable consultation and response to the proposals to South Chesterton have demonstrated, local people are more concerned about traffic impacts and pressure on the town centre than they are with matters of landscape, heritage and AONB which is what the existing wording of the policy and text address.
59. The review of Our Future Cirencester, Community Plan, revealed that there was significant local support for partnership working for sport provision across the Town. RAU was consistently recognised as having potential to make a significant contribution in term of land and facilities.

Specific comments

Reference	Comment
4.2.3.2	<p>In addition to landscape, heritage and impacts on AONB, the master plan must seriously and thoroughly consider impacts upon traffic, residential areas, movement, intensification of use in the town centre, its relationship to other academic institutions in Cirencester and other matters.</p> <p>amend:</p> <p>...The masterplan will need to ...including the AONB, neighbouring residential areas, the town centre and other academic institutions.</p>
EC2a	<p>amend:</p> <p>vii. Integration with the local community and adjacent academic institutions to provide opportunities for local young people to benefit from the masterplan proposals.</p> <p>Viii. Consideration of partially meeting the wider needs for sport and recreation in Cirencester.</p>

Proposals for Employment-Generating Uses (EC3)

Background

60. This policy permits B class employment uses, noting that about half of employment growth will not occur on allocated sites.
61. Policy EC3 seeks to direct economic development within Cirencester's development boundaries. Outside the development boundaries, small scale employment uses will be permitted where they are appropriate for

a rural area and where they contribute to the economic objectives, do not entail residential use as a principle element of the business, retain and grow local employment, are justified by a business case and are appropriate to their rural location.

Implications for Cirencester

62. Cirencester relies upon many outlying employment uses either in neighbouring villages, immediately outside the defined development boundary (see comments above) or in rural areas. There is a danger that this policy will be used to refuse employment generating uses that are linked to Cirencester but outside it. It would be beneficial for Cirencester if this policy acknowledged that in addition to rural areas, there may be a need for economic development that supports Principle Settlements that are outside the development boundaries. The development boundary for Cirencester should include all economic development and allocations and existing employment uses.

Specific comments

Reference	Comment
EC3	amend "2. Subject to Policy EC1, outside the development boundaries of Cirencester and the Principle Settlements, proposals for small scale employment development appropriate to the rural area or functionally linked to Cirencester or the Principle Settlements will be permitted where....."

Town Centres and Retail Hierarchy (EC6)

Background

63. This policy defines Cirencester as the preferred location in the District for the main town centre uses. These uses are defined in the NPPF as including: retail development, leisure, entertainment, sports and recreation, offices, arts, culture and tourism.

Implications for Cirencester

64. This policy is in line with the Planning Statement though the entire approach towards Cirencester fails to recognise the refined approach in the Planning Statement which considers development inside and outside the Ring Road. In some instances, it may be necessary for town centre development to occur out of centre. This section needs further consideration in the Cirencester policies.

Specific comments

Reference	Comment
EC6	This policy is in line with the Planning Statement though the entire approach towards Cirencester fails to recognise the refined approach in the Planning Statement which considers development inside and outside the Ring Road. In some instances, it may be necessary for town centre development to occur out of centre. This section needs further consideration in the Cirencester policies.

Town Centre Uses

Background

65. This policy and the supporting text adds detail to the definition of town centre uses and how they will be protected by planning policy. The earlier Reg. 18 consultation on strategic sites provided indicative retail floorspace requirements. This consultation calls for additional retail sites to come forward and promises a re-run of the retail modelling.

Implications for Cirencester

66. Overall, the policies and text are very "off the NPPF peg" and do not reflect the character of Cirencester which is unfortunate given the detailed proposals put forward by CTC in the Reg. 18 consultation in February and the emerging Planning Statement which was prepared in consultation with the LPA.
67. **EC7 1** expresses a preference for town centre locations then edge of centre and finally out of centre locations. Though in line with the NPPF, there is significant scope for this policy to better reflect Cirencester's unique character. The Planning Statement goes into considerable detail about the nature of in and out of centre retail and acknowledges that retail development outside the ring road (i.e. out of centre) has a role. Different styles of retail use meet different demands and it is too coarse a distinction to merely look at distance from the centre without also considering function. The main purpose of this policy is to protect the viability of the town centre whilst enabling other development to occur as needed. This part of the policy, or a separate policy, or the text, should specifically say this or there should be an explicit objective that decisions will first seek to protect and enhance the vitality and viability of Cirencester's town centre.
68. **EC7 2** states that proposals out of centre for town centre uses (i.e. town centre uses outside the ring road) will only be acceptable if they are "accessible and well connected to the Centre by public transport, walking and cycling". This pattern of development does not reflect recent planning permissions near Siddington where there is no public transport between the sites and the town centre nor any functional reason for such a connection. The Siddington retail area is car based and is popular because of the parking it provides. Again, the typology of town centre vs. out of centre lacks sophistication. Matters such as retail demand, character, and the impact on the town centre, as set out in the Planning Statement, provide a more refined approach to these land uses and their location.
69. **EC7 2a/b** are largely design and amenity policies that might better be included in the Cirencester Town Centre policy (Section 8) because this clause should apply to any land use, not just town centre uses.
70. **EC7 a-e** are policies that appear to be more appropriate for primary settlements other than Cirencester which has its own Town Centre policy. If this is the case, the policy should be reworded.
71. **EC7 4** seeks to protect ground floor uses from change of use based on a marketing period of 12 months (see comments above to EC1. In a similar vein, this marketing period should be extended to 4 years in Cirencester.
72. **EC7 5** clarifies that proposals for residential developments will be permitted on upper floors.
73. **EC7 6** states that concentrations of "single uses" will not be permitted where this would be likely to cause issues of amenity or affect the vitality and viability of the Centres". However, in Cirencester such concentrations exist and add to local character such as the retail single uses on Black Jack Street, the

restaurant single uses on Castle Street, and the retail single uses on Cricklade Street. There is no justification for this approach in the supporting text and it is suggested that without justification, this policy should be deleted or its intentions clarified.

Specific comments

Reference	Comment
EC7 1	This should more closely reflect the Planning Statement and in particular PS7.
EC7 1 (new objective)	Set out an explicit objective that planning decisions will first seek to protect and enhance the vitality and viability of Cirencester's town centre. The sequential test should contain more detail about the nature of the decisions about location and the impact upon developments inside and outside the ring road in line with the Planning Statement.
EC7 2	The overall approach should be refined to consider the functional differences between town centre uses inside and outside the ring road and their impact upon one another as set out in the Planning Statement.
EC 2a, b	Consider moving this to the Cirencester Town Centre Strategy.
EC7 a-e	If these policies apply to other primary settlements and not Cirencester, this should be more explicitly stated.
EC7 4	amend: "...has been appropriately marketed for 4 years and..."
EC7 6	If this policy cannot be justified, or elaborated, to take account of successful concentrations of single uses, it should be deleted or its intentions clarified.

Retail impact assessments (EC8)

Background

74. This policy seeks to ensure that large retail proposals for areas outside the town centre should be accompanied by a Retail Impact Assessment and that development that has a significant impact on the vitality and viability of town centres will not be permitted.

Implications for Cirencester

75. This policy provides strong support for the objectives of the Planning Statement, particularly PS7, and should therefore be strongly supported.

Specific comments

Reference	Comment
EC8	This policy is strongly supported.

Development of Tourist Facilities and Visitor Attractions (EC9)

Background

76. This policy describes the types of tourism development that will be permitted to enable this important local employment sector to grow.
77. The policy seeks to limit new tourism development (excluding accommodation) to those with a link to the Cotswolds, served by major roads, serves a new need or market, uses existing buildings effectively and does not require on-site accommodation.
78. Effectively, this policy will allow for smaller new tourism activities within the "Cotswold brand" and will exclude theme parks that could be located anywhere and have large hotel/residential elements (such as Centre Parcs).
79. Nowhere in the document is reference made to the Amphitheatre Master Plan. It would be beneficial if the supporting text made reference to this very important Town Council initiative.

Implications for Cirencester

80. This policy is not foreseen to have negative impacts for Cirencester and will enable its local tourism activities to expand as necessary. Small scale new operations, such as local museums, the enhancement of the Amphitheatre, improvements to Abbey Grounds will be supported by this policy.

Specific comments

Reference	Comment
EC9	<p>This policy is supported.</p> <p>Nowhere in the document is reference made to the Amphitheatre Master Plan. It would be beneficial if the supporting text made reference to this very important Town Council initiative.</p>

Tourist Accommodation (EC10)

Background

81. This policy specifically addresses hotels, self-catering accommodation, holiday lets and caravan/camping sites. There is generally enough hotel accommodation in the District but there is scope to upgrade and improve facilities. The policy seeks to restrict new-build hotel development outside the development boundaries but can be successfully accommodated in existing buildings outside the development boundaries.
82. **Hotels** will be permitted where they use or extend existing buildings or as new-build in Cirencester.
83. **Self-catering** will be permitted where it uses an existing building or is within Cirencester.

84. **Holiday lets** cannot have their occupancy conditions removed if they were built for that purpose. This policy is probably targeted at the Water Park where some owners tried to live in their holiday lets as their main residence. This has been an ongoing enforcement issue.
85. **Policy 5** is unclear and is difficult to comment upon. It states that applications will be permitted to convert buildings in Cirencester but it is not clear to what – holiday lets, serviced accommodation or self-catering? This policy needs to be clarified.
86. **Caravan/camping sites** will be permitted on main roads and in existing buildings but must be of high quality design and landscaping.

Implications for Cirencester

87. Overall, the policy will enable new hotels to be built, and new forms of accommodation to be created in existing buildings in Cirencester. The Development Statement does not deal with these issues and this policy is therefore positive and should be welcomed.

Specific comments

Reference	Comment
EC10	This policy is supported.
EC10 5	Policy 5 is unclear and is difficult to comment upon. It states that applications will be permitted to convert buildings in Cirencester but it is not clear to what – holiday lets, serviced accommodation or self-catering? This policy needs to be clarified.

Design & Cotswold Design Code

Design (D1) and the Design Code (Appendix C)

Background

88. This policy creates the principle of using the Cotswold Design Code to ensure high quality design. The Cotswold Design code sets out the detailed framework for individual design decisions within a development to reflect the local vernacular. It has been in existence in many forms for decades and is largely responsible for maintaining high quality vernacular design throughout the District.

Implications for Cirencester

89. Overall, the use of the Cotswold Design Code should be applauded and supported because it has ensured, and will continue to do so, high quality design features across Cirencester and the District. It is actively used in development management and is a very effective tool.
90. However, the CTC Planning Statement makes special reference to the Cirencester Design Code which is currently being prepared by Portus and Whitton. This design code will be based on the recent planning permission for the Market Place Improvement Scheme. The LPA was aware that this was in preparation and it is very disappointing that no mention is made of the Cirencester Design Code in the policy, supporting text or Appendix C.

91. Later in the Reg. 18 document (Section 8), town centre improvements are discussed but this does not refer to the Cirencester Design Code either.
92. These omissions can be considered to be significant flaws in the Reg. 18 document and there should be explicit recognition that local design consideration also need to be taken into account. This is necessary so that development proposals and decisions in Cirencester's historic core will reflect the detail streetscape and design guidance in the Cirencester Design Code.
93. NPPF para. 58 sets out the Government's expectations for design in planning. Within that, specific reference is made to streetscape, sense of place, and the need to respond to local character. These are all issues that the Cirencester Design Code will specifically address in a very fine-grained and local manner. As such, that local policy document should be linked to the more strategic Cotswold Design Code which does not go into this level of detail for Cirencester.
94. The Planning Statement also contained a policy on the need to protect important local views (PS32) and this has not been recognised anywhere in the consultation document.

Specific comments

Reference	Comment
D1	<p>This policy is supported with one caveat.</p> <p>It does not refer to local design considerations such as the Cirencester Design Code which should be given explicit recognition in the main policy, the supporting text to the policy and the Cotswold Design Code itself. This approach is supported by NPPF para. 58 which sets out the Government's expectations for design in planning. Within that, specific reference is made to streetscape, sense of place, and the need to respond to local character. These are all issues that the Cirencester Design Code will specifically address in a very fine-grained and local manner. As such, that local policy document should be linked to the more strategic Cotswold Design Code which does not go into this level of detail for Cirencester.</p>
D1	<p>The Planning Statement contained a policy on the need to protect important local views (PS32) and this has not been recognised anywhere in the consultation document. Specific reference to protect locally identified key views should be added to the policy and the text.</p>

Natural and Historic Environment

Landscape (EN1)

Background

95. This policy protects the landscape character of the AONB, Special Landscape Areas and the wider countryside.

Implications for Cirencester

96. This policy does not directly affect Cirencester but is a positive protection of the landscape surrounding the town.

Specific comments

Reference	Comment
EN1	This policy is supported.

Trees, Hedgerows and Woodlands (EN2)

Background

97. This policy protects veteran trees and trees of significant value and requires their replacement if they must be removed. It also addresses the value and need for protection of woodlands and high-quality hedgerows.

Implications for Cirencester

98. Cirencester has a number of veteran trees (trees of a great age or size) which are protected individually through Tree Protection Orders or more generally when they exist in conservation areas. The SAM designation has meant that few trees are allowed to grow within the town centre, but where they exist in the local parks, City Bank, along the Churn and at the Amphitheatre. They add significantly to Cirencester's local character.
99. Not all of the veteran trees in Cirencester are in public ownership (i.e. CTC, the NHS or CDC) and this policy is therefore important as a means of protecting those trees that are outside of planning control or public ownership.
100. There are no valuable hedgerows in Cirencester as these are generally a rural feature, though there are some smaller hedgerows that are worth preserving. There are some stretches of woodland along the Churn and at the Amphitheatre that are also very much worth protecting.
101. The Planning Statement has a policy on Green Infrastructure and Urban Greening which seeks local improvements. This policy strongly supports those aspirations and is welcomed.

Specific comments

Reference	Comment
EN2	This policy is supported.

Designated Heritage Assets – Conservation Areas (EN5)

Background

102. This policy sets out the approach to conservation areas, controlling changes, demolition and new buildings. The policy ensures that special character of individual conservation areas is preserved in terms of building design, landscaping, protection of open space from loss or encroachment, and signage.

Implications for Cirencester

103. This policy has been extant in various forms for decades and is responsible for continued high quality design and amenity in Cirencester's conservation areas. It supports the aspirations of the Planning Statement and should be welcomed.

Specific comments

Reference	Comment
EN5	This policy is supported.

The Conversion of Designated and Non-Designated Heritage Assets (EN6)

Background

104. This policy controls change of use of heritage assets (something in a Conservation Area, a listed structure, a designated archaeological feature, or something of local value) to ensure that this is done in such a way as to preserve the feature's inherent heritage value.

Implications for Cirencester

105. The policy is probably aimed at barn conversions in the countryside but has relevance in Cirencester. It is conceivable for instance that development may be proposed that affects features such as the long barrow near the Amphitheatre, the Bomb Shelter, the Lock Up, the Norman Arch, Tar Barrows, etc. In addition, residential buildings may be converted to offices or shops. This policy will ensure that these features, and their contribution to Cirencester's amenity and historic representation, will be considered in planning decisions. This is an important policy and should be welcomed.

Specific comments

Reference	Comment
EN6	This policy is supported.

Pollution, Contaminated Land and Hazardous Substances (EN7)

Background

106. This policy links to pollution regulations outside the planning system regarding new development and the removal of development that caused land contamination in the past (including requiring remediation). In practice, developments that may cause pollution will be expected to supply evidence in the form of special reports that address such issues as noise, light pollution, water and air pollution (including from traffic), vibration, etc. It makes specific reference to the use of planning conditions to control long-term management of pollution issues.

Implications for Cirencester

107. This is an important policy for Cirencester and will be the means whereby pollution and land remediation will be managed. For instance, air quality impacts arising from additional traffic from new developments will be controlled under this policy as will site clean-up from the closure of petrol stations or changes of use in the industrial estates that may have residual pollution issues. This is an important policy and should be welcomed.

Specific comments

Reference	Comment
EN6	This policy is supported.

Infrastructure

Infrastructure (INF1)

Background

108. This policy and supporting text sets out the LPA's approach to securing developer contributions towards necessary supporting infrastructure. This is a complex policy based on significant levels of government guidance, legal precedent and new approaches set out in the NPPF and planning regulations. Because of this complexity, much of how this policy will play out in practice is not set out in the document but is assumed.

Viability

109. Viability is a key concept that is only briefly mentioned but may have a significant impact upon how the policy is interpreted.

110. The Government is seeking to encourage developers to put more housing and new commercial developments in place. These developments need to meet local and national policy expectations and must be acceptable in planning terms, and this means that the developer will be required to add additional costs to the project to create necessary infrastructure such as roads, schools, green spaces, or affordable housing contributions.

111. The NPPF makes it clear that the scale of additional developer contributions should not be so great that the scheme is no longer attractive to the developer. Some of the costs that affect a scheme's viability are:

- Build costs
- Remediation of contaminated land
- Managing special characteristics of the site around heritage, archaeology, biodiversity, etc.
- Infrastructure provision such as roads, drainage, utility connections, schools and community buildings, etc.
- Community infrastructure levy
- Unilateral legal undertakings
- The cost of preparing the planning application
- Legal costs arising from negotiations on the planning application

112. When applying this policy, the LPA will need to find a balance between necessary infrastructure and additional, but less pressing, mitigation. The text makes it clear that the LPA will prioritise mitigation requirements to ensure that the proposal remains viable. Prioritization will be first core, then place making, then Strategic.

Infrastructure types

113. The text differentiates between "core infrastructure" (that which is considered to be of fundamental importance for supporting the delivery of the development) and "place-making infrastructure" (which is

required to deliver the plan's Vision such as libraries, cultural and community facilities, sports centres, etc.). Finally, there may be "strategic" infrastructure requirements relating to the County or wider sub-region.

114. County wide infrastructure requirements (core and place-making) will be included in the Cotswold Infrastructure Delivery Plan (IDP) which is currently being updated and will become available in time for the Reg. 19 consultation on the final draft of the local plan. In addition, a Planning Obligations Advice Note will be prepared by the LPA to explain how infrastructure requirements are to be secured.

Implications for Cirencester

115. This policy has significant implications for Cirencester and the Town Council's intended approach as set out in the Planning Statement.
116. Overall, the policy should be supported because it will ensure that new development meets the strategic needs identified in the IDP. The Town Council will be consulted in the preparation of the IDP but it will, because of its strategic nature, be generated in a much wider stakeholder community and should therefore provide the best basis for wider infrastructure planning.
117. However, there is a significant omission in the policy that may have equally significant repercussions for the delivery of the aspirations of the Planning Statement and these need to be highlighted in the strongest possible terms to the LPA in this consultation.
118. The Planning Statement contains within it mechanisms to identify locally necessary infrastructure requirements that arise from individual developments and from the impact of developments on existing infrastructure through the "intensification of use". None of this infrastructure will appear in the IDP or the Local Plan Vision because they are too fine grained for those documents.
119. In para. 16 of the NPPF, the role of local communities is clarified how they should engage in neighbourhood planning. The Planning Statement is not a neighbourhood plan, but there is a clear intention that it might become one.
120. The preparation of a neighbourhood plan is a lengthy and resource-intensive process, and none have been made in the District to date. As communities such as Cirencester move through this process, by whichever way they see fit for their local circumstances, the LPA should take local views into account and work alongside them to deliver locally identified infrastructure needs.
121. Para. 16 of the NPPF states that Neighbourhood Plans should support strategic development needs set out in the local plan and should shape and direct development in their area outside the strategic elements of the local plan. This is what the Planning Statement does. In effect, the Planning Statement is an emerging neighbourhood plan based on sound planning principles set out in the NPPF and its place in infrastructure decision-making and prioritisation should be acknowledged. This is true of other neighbourhoods in the District who are also preparing detailed planning approaches either as community plans or neighbourhood plans.

Specific comments

Reference	Comment
INF1	In general, the policy is supported, with the following caveat: Policy INF1 should explicitly acknowledge the role of local infrastructure requirements

	<p>in its prioritisation and a new bullet should be added to INF1 2 to this effect:</p> <p>"d. Local Infrastructure Requirements, which are those identified in in Neighbourhood Plans, emerging Neighbourhood Plans or other community based plans."</p>
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Community Infrastructure Levy and Developer Contributions (INF2)

Background

122. The Community Infrastructure Levy (CIL) regulations were changed 2014, having a dramatic impact upon how developer contributions can be levied by the LPA. The changes were twofold: to move the emphasis away from individual S106 contributions towards strategically identified infrastructure needs in CIL (such as those identified in the IDP) and the introduction of the "pooling restrictions" which means that it is now only possible to collect S106 contributions for a maximum of 5 developments (where before the number was unlimited).
123. This policy seeks to reconcile the fact that Cotswold's CIL has not yet been adopted with the pooling restrictions. It does this by including an interim policy that will be deleted once the CIL has been adopted and introduces an Infrastructure Project Tracker to manage the delivery of individual infrastructure projects.
124. On 19 November 2015, CDC Cabinet considered a paper that set out proposals how the District would approach CIL. In para. 3.2 of that paper, it was suggested that the relevant proportion of CIL would be passed to Town Councils to support one of the District Council's corporate priorities to Champion issues which are important to local people by working with communities to meet infrastructure requirements and maximise developer contributions.
125. Planning Practice Guidance on CIL emphasises that CIL can be used to fund a broad range of facilities and can also be used to remedy deficiencies in existing infrastructure "made more severe by new development. The levy can be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development".

Implications for Cirencester

126. CIL will probably address strategic policies. If the change suggested for INF1 (above) is adopted, it might also take account of local infrastructure requirements. The CDC Cabinet paper set out a process whereby the 123 Infrastructure list will be prepared, though the mechanisms were not described. It is imperative that CTC works with CDC to ensure that the 123 List and the Champion issues reflect the CTC Planning Statement and its Appendix 1.
127. The Planning Statement uses the term "intensification of use" which is synonymous with the Planning Policy Guidance referred to above. Intensification of use should feature in the delivery of developer contributions, CIL negotiations and the 123 Infrastructure List.
128. This is a necessary policy and should be welcomed but the execution of the policy should be sensitively managed in partnership with local communities.

Specific comments

Reference	Comment
INF2	<p>This policy is supported with the following caveat.</p> <p>CTC and the Planning Statement and Appendix 1 should be a key consideration for the formulation of the 123 Infrastructure List. CDC should work closely with Cirencester Town Council and other communities to ensure that the 123 Infrastructure list reflects local requirements, including the intensification of use.</p>

Social and community infrastructure (INF3)

Background

129. This policy addresses the need to provide supporting infrastructure for services. The supporting text, and therefore the policy, treats them as a single group. However, in practice, the LPA will consider them in different ways and afford them different levels of protection. For the purposes of this response, and for illustration, they can be disaggregated as follows:

130. Infrastructure that will probably be included in CIL (and in the IDF):

- doctors'/dental surgeries, hospitals, etc.
- blue light (police, fire, ambulance)
- education and training (education authority controlled)
- waste management
- major sports facilities
- cultural facilities (County run such as libraries)

131. Infrastructure that will probably defined locally:

- day care centres, children's nurseries
- local private health practitioners
- community building including for faith groups and special interest groups
- youth provision (non-local education authority)
- cultural facilities (private such as New Brewery Arts)
- privately owned sports and recreation facilities
- open space and local parks and gardens that are not owned by the District or County
- other open spaces (excluding those with special protection such as AONB etc.)
- pub or shop

132. These distinctions are important when considering this policy which seeks to permit the development of new community infrastructure which should be provided in line with new development, looking at existing provision, business viability, accessibility by means other than the car, offering other services (multi-purpose) and it will be maintained in the long term and not allowed to fall into disrepair.

133. The policy goes further to seek to prevent the loss of existing community facilities which will only be allowed where it can be demonstrated that the need for that service no longer exists, or there is no alternative community use for that building, or it is being replaced with a new facility.

134. The policy treats all community services equally, but in practice, those in the CIL and IDF will probably be afforded greater protection than the locally defined services. This distinction will be due mainly to the level of

evidence available to define the need for the service. The CIL and IDF will be fully researched and will provide guidance on levels of need that can be used as justification for these policies. Privately run (including charitable) operations will have a more difficult time working with this policy because they will need to provide an assessment of the prevailing local demand. This can be at least partially circumvented by the preparation of a neighbourhood or community plan or in Cirencester's case, the Community Plan, Concept Statement, and Planning Statement which all provide evidence about the intrinsic value of local community infrastructure.

135. The supporting text states that new development that adds to the need for new or expanded community facilities should provide them. Importantly, the text clarifies that they need to be provided by the time that the new development is occupied and should ideally be integrated in the new development.
136. The supporting text also seeks to ensure that new community facilities are well-located and accessible to the majority of the community though the text in para. 7.2.5 is rather vague ("should be accessible to all members of the community" (emphasis added) could refer to physical, financial or social accessibility).
137. Para. 7.2.9 explains the LPA's thinking about how existing services should be protected from redevelopment where there remains a need for the service or structure. Overall, the tests relate to funding and viability which is a reasonable approach, though the marketing period is stated as 12 months which has been discussed elsewhere in this response as being too short a period to incentivise land owners from retaining the existing use. Sports and recreational facilities should be tested according to the NPPF.

Implications for Cirencester

138. Overall, this policy should be welcomed and is a significant positive change from the existing local plan policy approach. The Concept Statement and the Planning Statement both go into considerable detail regarding community facilities, particularly under Key Theme 2.
139. The focus in the Planning Statement's Key Theme 2 is upon providing for need generated by "intensification of use". This wording is intended to act as a trigger to S106 and NPPF and the need to ensure that any infrastructure is provided because it is necessary to make the development acceptable in planning terms, it is directly related to the development, and it fairly and reasonably relates to the development in scale and kind. Saying this another way, the use of the term "intensification of use" is meant to denote that a new development will create more users of the community infrastructure so that this can be taken into account when on and off-site community infrastructure provision is considered.
140. The policies in the Planning Statement and INF 3 generally seek to achieve the same ends, though the terminology is different. It would be helpful if the terminology in INF3 specifically addressed the concept of "intensification of use" in the supporting text so that future planning applicants were aware of the need to address existing community infrastructure as well as the need for new community infrastructure.
141. Key Theme 2 also addresses the issue of long-term maintenance which is reflected in the wording of INF3. This should be welcomed.

Specific comments

Reference	Comment
INF3	This policy is supported.

7.2.5	The reference to "should be accessible to all members of the community" should be clarified in terms of what "accessible" refers to: physical accessibility in terms of sustainable modes of travel; financially accessible in terms of fees that enable most of the community to use the facility; socially accessible so that there is no exclusive membership that restricts some parts of the community from using the service; etc. Transport accessibility is addressed in para. 7.2.6. It may be useful to reconsider these paragraphs together.
INF3 and supporting text	It would be helpful if the terminology in INF3 specifically addressed the concept of "intensification of use" in the supporting text so that future planning applicants were aware of the need to address existing community infrastructure as well as the need for new community infrastructure.
7.2.9	The marketing period of 12 months is too short to incentivise land-owners to make genuine efforts to preserve the use. This period should be extended to 4 years.

Sustainable Transport (INF4)

Background

142. There is very little supporting text to this and subsequent transport policy (INF5 & 6) which is perhaps unhelpful given the great importance that local communities place upon traffic impacts.

143. Para. 7.3.3.1 states: *"Development should be refused on transport grounds only where the residual cumulative impacts are severe. "Residual" here means after mitigation measures have been applied.*

144. This statement should be of considerable concern to all stakeholders because it implies that it will be acceptable for future development to be permitted if it results in "almost severe" traffic impacts. This approach should be questioned in terms of the NPPF's aspiration to ensure sustainable development. The NPPF specifically states: "Transport policies have an important role to play in facilitating sustainable development". It can be argued that "almost severe" traffic impacts can affect an area's economic, social and environmental role.

145. Much more work is required of the LPA on these matters. As a starting point, "severe" is a term that is used lightly but the impacts will be felt into the long-term future. Acceptable levels of traffic impact should be very clearly and specifically defined and stringent tests on local impacts applied. As worded, this policy provides local areas with no comfort that they will be sustainably developed in the future.

146. The NPPF states that *"Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, LPAs should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport."* Policy INF4 meets this need well and should be welcomed. However, not all travel decisions will involve the use of sustainable transport modes such as walking, cycling and using public transport. This means that it may not be "reasonable" to assume that sustainable transport will be the main mode for new development in the Cotswolds. Most travel choices in the District involve single occupancy journeys in cars and this is what leads to congestion on our local streets. This section of the Planning Policies is therefore not fit for purpose since it does not specifically address this issue except to disregard any congestion that is less than "severe".

147. The text in 7.3.3.2 starts by saying that *"the volume and type of traffic generated by a development is a key planning consideration"*. It suggests that road layouts should discourage through traffic, reduce vehicle flows and restrain vehicle speed. This may be desirable but the text does not address local issues of congestion and the need to avoid further congestion.
148. Para 7.3.3.3 suggests that where proposals will exacerbate or create new traffic problems, mitigation will be sought in the form of junction improvements or the introduction of new pedestrian infrastructure. It also states *"Proposals should avoid locations where there are known to be existing problems on the highway network and where adequate mitigation measures may prove difficult to implement"*. However, if this is taken against the background that it is acceptable in planning terms to have "almost severe" traffic impacts, this text offers little comfort to local communities already facing congestion.
149. The text is more helpful when discussing the actual impacts of traffic (air pollution, vibration, noise) and the need to promote sustainable modes of transport such as walking, cycling and public transport. However, these modes though very important, only marginally address the issue of congestion.
150. Reference is made to Travel Plans but only in passing. Reference is made to National planning practice guidance which sets out clearly the expectation that Travel Plans will be monitored and that sanctions may be applied when promised outcomes are breached. Given the overall emphasis on sustainable transport modes in the supporting policy text and the implied assumption that traffic will be managed in future by encouraging modal shift to sustainable options, the Travel Plan, and its outcomes, will be a crucially important tool in the LPA's arsenal. More detail is required in the supporting text regarding how developers will be required to use Travel Plans in the Cotswolds where the use of the private car may be necessary in most circumstances, and how sanctions will be applied when promised outcomes do not materialise.
151. Overall, taking these major criticisms and omissions into account, the policy itself is generally to be welcomed as one that promotes sustainable transport. Particular matters of interest are:
- a. sustainable transport connections are required in new development
 - b. priority is given to pedestrians, cycling, and public transport should be accessible to the needs of all people
 - c. impact on residential amenity – this should also address other amenity, for instance in public spaces and for commercial areas.
 - d. links should be made to green infrastructure
 - e. development will be permitted that incorporates "where feasible" facilities for charging plug-in and other ultra-low emission vehicles. This wording is not clear enough. It will be "feasible" to put charging plug-in points in every new home and business built but this should not be a requirement of planning permission since not all vehicles use this fuel source. It would be better to set out specific circumstances where this was required, such as Planning Statement policy PS40.
 - f. development will be permitted where it accommodates efficient delivery of goods and supplies
 - g. development will be permitted where it considers the needs of people "with disabilities" by all modes of travel. This wording is not entirely helpful because it does not take into account other people who may also have difficulty accessing all modes of travel. Para 7.3.3.5 uses the term "people with reduced mobility" which covers a wider range of the population such as older people, people using mobility aids and parents with small children, etc. The Planning Statement uses the term "mobility impaired" which may also be helpful.

Implications for Cirencester

152. The implications of this policy as presented are both positive and negative.

153. On the positive side, the policy directly supports Planning Statement policies in Key Theme 3 and will provide the “hook” that CTC can use to secure local infrastructure improvements.

154. On the negative side, the policy will probably not afford Cirencester with the protection it needs with regard to congestion and sanctions when developers' promises set out in their planning applications and their Travel Plans are not delivered. In addition, there are a number of small issues raised above which need clarification or further attention.

155. The February Reg. 18 response commented specifically and forcefully on matters around traffic congestion in Cirencester.

156. With regard to the South Chesterton proposal, the policy will not protect Cirencester from “severe” traffic impacts though since this term is not defined, what level of protection that will be secured is unknown. Overall the policy relies too heavily upon sustainable transport as the remedy for traffic growth which is probably unreasonable. The policy lacks specificity about how traffic impacts will be judged and relies upon the Highways Authority to make these determinations. As such, it can be argued that the policy approach overall is not fit for purpose.

Specific comments

Reference	Comment
INF4 and supporting text	<p>This policy though generally welcomed raises very strong concerns and objections regarding :</p> <p>its use of the term “severe” in relation to refusal of planning permission</p> <p>its inadequate consideration of issues of congestion which is specifically referred to in NPPF para. 30.</p> <p>its inadequate approach to transport's role in promoting sustainable development overall.</p>
7.3.3.10 and 7.3.3.11	<p>Reference is made to Travel Plans but only in passing. Reference is made to planning practice guidance which sets out clearly the expectation that Travel Plans will be monitored and that sanctions may be applied when promised outcomes are breached. Given the overall emphasis on sustainable transport modes in the supporting policy text and the implied assumption that traffic will be managed in future by encouraging modal shift to sustainable options, the Travel Plan, and its outcomes, will be a crucially important tool in the LPA's arsenal. More detail is required in the supporting text regarding how developers will be required to use Travel Plans in the Cotwolds where the use of the private car may be necessary in most circumstances, and how sanctions will be applied when promised outcomes do not materialise.</p>
INF4 c	<p>“amenity” here should also refer to public spaces and commercial areas. All amenity is important, not just residential.</p>

	<p>amend:</p> <p>delete "residential"</p>
INF4 e	<p>Development will be permitted where it incorporates "where feasible" facilities for charging plug-in and other ultra-low emission vehicles.</p> <p>This wording is not clear enough. It will be "feasible" to put charging plug-in points in every new home and business built but this should not be a requirement of planning permission since not all vehicles use this fuel source. It would be better to set out specific circumstances where this was required, such as Planning Statement policy PS40.</p>
INF4 g	<p>Development will be permitted where it considers the needs of people "with disabilities" by all modes of travel.</p> <p>This wording is not entirely helpful because it does not take into account other people who may also have difficulty accessing all modes of travel but who are not technically "disabled".</p> <p>Para 7.3.3.5 uses the term "people with reduced mobility" which covers a wider range of the population such as older people, people using mobility aids and parents with small children, etc. The Planning Statement uses the term "mobility impaired" which may also be helpful.</p>

Highway Safety (INF5)

Background

157. This policy sets out how development should be well integrated with the existing transport network incorporating measures to accommodate increased traffic levels. It also specifically addresses the need to avoid creating severance in communities due to traffic generation.
158. The policy specifically seeks to create new safe and secure layouts that incorporate sustainable transport with safe and suitable access with lowered traffic speeds.
159. Finally, it suggests that development should avoid locations where the cumulative impact of congestion or other undesirable impact on the transport network "is likely to remain severe following mitigation".
160. The text for this policy is shared with ENF4 so the comments made above apply here.

Implications for Cirencester

161. Overall, this policy should be welcomed, particularly the reference to avoidance of severance and the requirement for traffic layouts that accommodate sustainable transport modes. Had these policies been in place in the last Local Plan, many of the issues faced by Cirencester would not now need to be addressed in the Planning Statement.
162. As with INF4, INF5 provides a "hook" for policies in the Planning Statement, and these two policies together will go a long way to securing some of Cirencester's long term infrastructure aims.

163. However, the policy will not adequately address congestion and it makes no comment on how congestion should be managed overall or what standards are applied to congestion management. In Cirencester, this will have repercussions in the town centre and other roads.

Specific comments

Reference	Comment
INF5	Overall the policy is supported. However, there are severe concerns regarding the management of congestion (see response to INF4).
INF5 c	There appears to be a typo. Should "low <i>design</i> speeds" read "low <i>traffic</i> speeds"?

Parking Provision (INF6)

Background

164. Parking is dealt with only briefly in the text, first setting out recent changes in national guidance setting out how LPAs should set local parking standards, and then stating that it will be a matter for the Highways Authority to determine on a case-by-case basis what local standards may be appropriate. The LPA's role is to work in partnership with the Highways Authority because existing parking standards are out of date. The LPA intends to revise its approach in consultation with the Highways Authority and will be in the preferred approach forward in the Reg. 19 consultation.

165. There are a number of flaws in this text. The Statement of Community involvement states that the community will be given:

166. Opportunities to contribute ideas. Community groups and the wider public will have the opportunities to put forward their own ideas and feel confident that they will be listened to and that there is a process for responding to their concerns (2.3)

167. In addition, Town and Parish Councils are statutory consultees to all aspects of the planning process.

168. The approach in para 7.3.3.9 should therefore be questioned since it makes no reference to consultation with statutory consultees such as Town Councils or with the public at large. Local parking standards need to be based on local circumstances and if these are not examined in detail, they will be at risk of being inappropriate. The shortened process of preparing parking standards is not fit for purpose and should involve wider stakeholders with statutory consultees and the community.

169. The policy itself seeks to make provision for parking where there is evidence, in the opinion of the Highway Authority, that it is necessary. The LPA and the Highway Authority will work together. The policy makes no reference to local consultation of any sort.

170. An additional policy addresses the issue of car parks which will be permitted where they form part of a strategy for town centre traffic management, and are essential for maintaining the Town/District centre vitality and viability (but does not mention out of centre), or where edge/out of centre development is of a scale that is in keeping with the size of the town centre, could reduce congestion and not make existing problems worse, and would not adversely impact upon sustainable transport options.

171. The way that the policy would be used to determine proposals for out of centre car parks, for instance to service retail or commercial uses, is unclear.

172. The policy is silent on the impact of parking on residential areas, either in the form of off-street parking provision and regulation, policies that affect off-street parking such as dropped curbs and loss of off-street parking in residential developments, etc. More concerning, the policy is silent on the need to protect the amenity of residential areas in terms of congestion and highway safety. It is also silent on how developments that seek to reduce vehicle movements by providing fewer parking spaces should not adversely impact adjoining residential areas.

Implications for Cirencester

173. Parking is probably the most contentious issue in Cirencester – it effects the entire town centre inside the ring road and there are many outlying residential areas where overspill from commercial and other institutions causes significant disruption in residential areas affecting the flow of traffic and highway safety.

174. Overall, the policy is inadequate and though the existing clauses can be supported, the omissions are significant and the policy is not fully fit for purpose.

175. In particular, the policy should address the issue raised above about consultation. The Highway Authority tried in the past to consult with the Cirencester community and unfortunately, that consultation failed to reach a satisfactory conclusion. This may be the motivation behind the current approach which leaves community and Town Council out of the process. However, despite the short timescales resulting from the promise to have a parking strategy in place in time for the Reg. 19 draft, and the unhappy history of previous consultation on parking, the Statement of Community Involvement makes it clear that local people should be consulted in the preparation of the strategy which will have a major impact on their overall amenity. It is not enough to consult them after the policy has been written – consultation should occur when considering options and possible solutions as well.

176. The approach to parking in the Planning Statement has not yet been finalised in anticipation of this work on the parking standards. Until this work is complete, the Planning Statement can only adopt an interim approach.

Specific comments

Reference	Comment
7.3.3.9	The approach in para 7.3.3.9 is questioned since it makes no reference to consultation with statutory consultees such as Town Councils or with the public at large. Local parking standards need to be based on local circumstances and if these are not examined in detail, they will be at risk of being inappropriate. The shortened process of preparing parking standards is not fit for purpose and should involve wider stakeholders with statutory consultees and the community.
INF 6	Whilst much of the policy can be supported, overall, the omissions regarding public consultation in the preparation of parking standards and the need to manage the impact of parking decisions on nearby areas must be addressed. The policy as currently drafted is unacceptable.

Green Infrastructure (INF8)

Background

177. This policy seeks to ensure that all development respects and contributes to green infrastructure across the District. It also seeks to create a wider green infrastructure network using the principles of good design as set out in the Cotswold Design Code.

178. The Design Code considered the interrelationship between the built and green environment on a landscape scale but also on granular local scale of spaces between buildings. It also deals with other detailed issues including street trees, road junctions, pedestrian and cycle routes, healthy lifestyles, provision for all sectors of the community etc. Perhaps most importantly, the Cotswold Design Code makes provision for long term management and community involvement.

Implications for Cirencester

179. Overall, this policy should be welcomed as a “hook” for the more detailed aspirations set out in the Policy Statement, the Green Spaces Strategy and the Amphitheatre Master Plan.

Specific comments

Reference	Comment
INF8	This policy is supported.

Managing Flood Risk (INF9)

Background

180. This policy controls where development occurs in relation to flooding in line with national policy. It is a comprehensive policy which addresses matters such as:

- assessing flood risk
- cumulative impact of multiple developments
- Sustainable Draining Systems (SuDS)
- avoid increase in discharge into the public sewer system
- impact on water quality
- natural drainage
- long term management and maintenance
- protect the natural environment

Implications for Cirencester

181. Overall, the policy should be welcomed but it does not go as far as the Planning Statement and therefore does not address all the concerns raised by Cirencester residents, many of whom have been the victims of flooding incidents in recent years.

182. The Planning Statement raises concerns about:

- surges in surface water
- insufficient sewage capacity
- water extraction leading to low water in the Churn in summer with implications for biodiversity and amenity
- drinking water

183. The policy would be more balanced if it also included these matters.

Specific comments

Reference	Comment
INF9	<p>Overall support for the policy but it should also address the following issues:</p> <ul style="list-style-type: none">• surges in surface water• insufficient sewage capacity• water extraction leading to low water in the Churn in summer with implications for biodiversity and amenity• drinking water

Telecommunications Infrastructure (INF10)

Background

184. This policy seeks to ensure that proposals for communications infrastructure is necessary and must be located on the proposal site. It also requires redundant infrastructure to be removed.

Implications for Cirencester

185. There are no specific implications for Cirencester and few consultees have mentioned issues around communications infrastructure other than slow down-load speeds in Cirencester. Broadband improvements are planned.

Specific comments

Reference	Comment
INF10	This policy is supported.

Renewable and Low Carbon Energy Development (INF11)

Background

186. This policy regulates new renewable and low carbon energy proposals excluding wind. It permits most developments provided that they do not have a harmful impact, individually or cumulatively, on surrounding land uses. It requires the removal of redundant infrastructure.

187. Wind energy is specifically excluded from the policy. It is not clear what would happen if wind energy proposals were to come forward. The general approach in the NPPF is that if a plan is silent on a subject, permission should be granted. There may be a risk that if this policy wording is left unchanged, any wind scheme can be permitted in the District which is perhaps not the intention of the policy.

Implications for Cirencester

188. Cirencester has seen a number of renewable schemes come forward, mainly on an ad-hoc basis on local roofs and in gardens. Outside the town, a number of solar panel farms have been developed. This supports local energy efficiency and should be supported in principle and where there is no unacceptable harm. This was not an issue raised by respondents in consultation on the Planning Statement though it featured heavily in the original OFC.

Specific comments

Reference	Comment
INF11	This policy is supported.
INF11 (exclusion of wind energy)	Wind energy is specifically excluded from the policy. It is not clear what would happen if wind energy proposals were to come forward. The general approach in the NPPF is that if a plan is silent on a subject, permission should be granted. There may be a risk that if this policy wording is left unchanged, any wind scheme can be permitted in the District which is perhaps not the intention of the policy.

On-site Energy Generation Measures for New Developments (INF12)

Background

189. This policy seeks to encourage "significant" development proposals to examine opportunities to draw energy from off-grid, renewable or low energy supply systems and incorporate them where feasible. This wording is rather imprecise and the term "significant" does not make it clear which developments this policy may apply to. In addition, there is no feasibility test offered. These shortcomings are partially recognised and interim standards from 2009 will be used until further evidence is required. It is not clear why they cannot be adopted now.

Implications for Cirencester

190. The South Chesterton development, if it proceeds, will have high energy requirements that may be dealt with locally, thus improving Cirencester's overall energy self-sufficiency. The introduction of 2,300 new homes, as proposed, provides a significant opportunity to explore new opportunities such as community heating, solar panels on all appropriate roof surfaces, reuse of waste water, and even the use of locally generated waste and biofuels to generate energy and heat. However, the current proposals do not appear to consider any of these options but rely upon grid electricity and gas supply.

191. Overall, this policy, though well intentioned, is written in very passive language and will not drive improvement in local energy generation. The Planning Statement seeks to maximise opportunities for energy generation and also seeks a site-wide approach to energy management in major urban extensions such as South Chesterton. More positive wording in this policy is required.

Specific comments

Reference	Comment
INF 12	The policy is supported but it would benefit from more positive indications of how energy generation should be achieved.

Spatial Issues

Cirencester Town Centre Strategy

Implications for Cirencester

192. This is probably the most important policy under consultation regarding Cirencester. In the previous Reg. 18 consultation, the LPA presented its vision for South Chesterton. The Vision has not been modified following that consultation and the manner in which the Town Council's and other stakeholders' views were taken on board cannot be commented on as a result. This presents obvious difficulties because that policy is intrinsically linked to this policy. The LPA has built its entire development strategic and policy base on Cirencester as the main settlement and the only part of the District that will take new housing. It would have been helpful in this consultation if all current thinking had been revealed.
193. This policy is complimentary to the Vision for South Chesterton Policy in that it raises the off-site issues that that proposal will need to address. In addition, this policy sets out the LPA's vision for the town centre (defined as the area inside the ring road which is different from the Planning Statement's smaller Town Centre Improvement Area).
194. The existing Supplementary Planning Document (SPD 2008) addressed similar issues but this Reg. 18 policy goes significantly farther. It is clear that the drafting of this policy took account of the Planning Statement which was discussed in detail with the LPA during its preparation and through consultation.
195. The overall approach in the policy is to consider the area within the ring road in isolation. No reference is made to its interrelationship with other parts of the town or their potential impact on the town centre. This is not the approach taken in the Planning Statement which seeks to consider the inter-relationship between existing and potential developments in the town. As such, it can be argued that the approach in The Strategy is seriously flawed. This shortcoming can be rectified by creating a policy or direct relationship between this policy and other development in Cirencester that may lead to an intensification of use leading from development outside the Strategy Boundary. It is hoped that this will be done in the Reg. 19 document.
196. Beyond this, the overall policy has much of positive value for Cirencester and is generally aligned with the Concept Statement and the Planning Statement. It provides the strategic basis for the more detailed proposals in the Planning Statement and the two should be able to be applied together in harmony to achieve better outcomes for Cirencester and the surrounding areas that rely upon it.

Vitality and viability

197. **Policies 1 and 2** seek to ensure that Cirencester town centre thrives and develops. It seeks to make the town centre competitive with other nearby towns and makes provision for 5,600 sq. m. of comparison and 1,300 sq. m. of convenience floorspace. This is to be welcomed.
198. **Policy 4** reiterates some of the retail policies set out elsewhere. It refers to the proposals map (but this is not included in the documents) and seeks their retention. Concentrations of uses will not be allowed (see previous comments on EC 7 6) but in places like Cricklade Street and Black Jack Street this is very effective so this restriction should be reconsidered or reworded.

Transport and Parking

199. The text provides some helpful detail about Cirencester's local context, but in the light of INF6 and the stated approach to developing parking standards, the outcome of these aspirations is unclear and the

effectiveness of the policies may be difficult to determine at this stage. The policy refers to a Transport and Parking Strategy but this is not explained in the text. It is unclear how this strategy will relate to the parking standards nor is it clear what methodology will be employed nor how stakeholders will be involved in considering options and solutions.

200. **Policy 5** seeks to reduce congestion in the town centre (but not for Cirencester generally) by rationalising off-street parking, possibly by introducing decked parking. This approach is supported in the Planning Statement. The policy also states that existing car parks may be used as economic development land should the parking not be required. This approach is supported in the Planning Statement. Much of the congestion in Cirencester (inside and outside the ring road) is the result of on-street parking. Though this functions as "natural traffic calming" it also results in unsafe driving conditions and hazards for pedestrians and cyclists. There may be merit in reducing on-street parking provided that safe and convenient alternatives are offered. The policy support for cycling and walking in the town centre is very supportive of the aspirations in the Planning Statement and should be supported.

201. **Policy 3** falls under Vitality and Viability but should probably be moved to Transport and Parking. This safeguards existing car parks from loss of spaces until alternatives (presumably decked parking) has been secured.

202. **Policy 6** seeks to improve and enhance the quality of pedestrian access and permeability on key pedestrian routes which largely correspond to the Planning Statement's Town Centre Improvement Area (TCIA). The wording refers to enhancing the quality in this area which is very helpful because it provides a hook for the Planning Statement's more detailed policies, particularly the Cirencester Design Code.

Tourism and Cultural Facilities

203. **Policy 7** supports sustainable tourism development including hotel provision. This should be welcomed.

Enhancing Environmental Quality

204. **Policy 8** addresses many of the public realm issues discussed in the Planning Statement. It will serve as a "hook" for many of the approaches therein. There is a specific reference to "enhanced streetscape" which should make specific reference to the Planning Statement and the Cirencester Design Code.

Green Infrastructure and Play Space

205. **Policy 9 and 10** address Cirencester's open spaces, play spaces, and the Green Strategy priorities inside the ring road. As such, it is very complementary to the Planning Statement but it does not address matters outside the Ring Road which also need careful handling in planning policy and decisions. Most important of these is the Amphitheatre which is afforded no comment anywhere in the document.

Redevelopment of town centre sites

206. **Policies 11 and 12** address the possibility of redevelopment of CDC car parks should alternative parking be provided (presumably decked parking) which will create valuable opportunities for new retail and other town centre uses which will be needed should Cirencester grow. The policy also includes residential and care home development on these sites – it is important that individual planning decisions on these sites do not squander the relatively constrained amount of development land available on land uses that might be located farther from the town centre. An appropriate balance needs to be made between the desirability of reducing traffic by locating residential development near to shops, and preventing economic development for the wider area.

Master plan

207. A master plan is proposed for the area inside the ring road that would include key sites

- Sheep Street
- Memorial Hospital
- Brewery Car Park
- Forum car park and Dyer Street
- Waterloo Car Park

208. Given the current uncertainty around these sites including the awaited Parking Standards and the Transport and Parking Strategy, the preparation of a Master Plan for these key sites should be welcomed. In addition, the Master Plan will be prepared in association with the Town Council and the local community and this should also be welcomed.

209. **Policy 13** seeks to actively redevelop the town centre sites to contribute towards the town centre's employment base (B1 office and possibly studio and start-ups). This is supported by the Planning Statement and CTC's previous response to the Reg. 18 consultation.

Omissions

210. There were two significant omissions regarding the strategic policy context for Cirencester: Key Views and the Amphitheatre Master Plan. These issues were covered in detail in the Planning Statement and should be adequately addressed in the Reg. 19 document.

Specific comments

Reference	Comment
Cirencester Town Centre Strategy	Broadly this policy is supported with the caveat that more thought is required how this policy relates to the Vision for South Chesterton and other developments outside the ring road.
Vitality and viability	<p>Policies 1 and 2 seek to ensure that Cirencester town centre thrives and develops. It seeks to make the town centre as competitive with other nearby towns and makes provision for 5,600 sq. m. of comparison and 1,300 sq. m. of convenience floorspace. This is to be welcomed.</p> <p>Policy 4 reiterates some of the retail policies set out elsewhere. It refers to the proposals map but this is not included and seeks their retention. Concentrations of uses will not be allowed (see previous comments on EC 7 6) but in places like Cricklade Street and Black Jack Street this is very effective so this restriction should be reconsidered or reworded.</p>
Transport and Parking	<p>The text provides some helpful detail about Cirencester's local context, but in the light of INF6 and the stated approach to developing parking standards, the outcome of these aspirations is unclear and the effectiveness of the policies may be difficult to determine at this stage. The policy refers to a Transport and Parking Strategy but this is not explained in the text. It is unclear how this strategy will relate to the parking standards nor is it clear what methodology will be employed nor how stakeholders will be involved in considering options and solutions.</p> <p>Policy 5 seeks to reduce congestion in the town centre (but not for Cirencester generally) by rationalising off-street parking, possibly by introducing decked parking. This approach is supported in the Planning Statement. The policy also states that existing car parks may be used as economic development land should the parking not</p>

	<p>be required. This approach is supported in the Planning Statement. Much of the congestion in Cirencester (inside and outside the ring road) is the result of on-street parking. Though this functions as "natural traffic calming" it also results in unsafe driving conditions and hazards for pedestrians and cyclists. There may be merit in reducing on-street parking provided that safe and convenient alternatives are offered. The policy support for cycling and walking in the town centre is very supportive of the aspirations in the Planning Statement and should be supported.</p> <p>Policy 3 falls under Vitality and Viability but should probably be moved to Transport and Parking. This safeguards existing car parks from loss of spaces until alternatives (presumably decked parking) has been secured.</p> <p>Policy 6 seeks to improve and enhance the quality of pedestrian access and permeability on key pedestrian routes which largely correspond to the Planning Statement's Town Centre Improvement Area (TCIA). The wording refers to enhancing the quality in this area which is very helpful because it provides a hook for the Planning Statement's more detailed policies, particularly the Cirencester Design Code.</p>
Tourism and Cultural Facilities	Policy 7 supports sustainable tourism development including hotel provision. This should be welcomed.
Enhancing Environmental Quality Green Infrastructure and Play Space	<p>Policy 8 addresses many of the public realm issues discussed in the Planning Statement. It will serve as a "hook" for many of the approaches therein.</p> <p>There is a specific reference to "enhanced streetscape" which should make specific reference to the Planning Statement and the Cirencester Design Code.</p> <p>Policy 9 and 10 address Cirencester's open spaces, play spaces, and the Green Strategy priorities inside the ring road. As such, it is very complementary to the Planning Statement but it does not address matters outside the Ring Road which also need careful handling in planning policy and decisions. Most important of these is the Amphitheatre which is afforded no comment anywhere in the document.</p>
Redevelopment of town centre sites	Policies 11 and 12 address the possibility of redevelopment of CDC car parks should alternative parking be provided (presumably decked parking) which will provide valuable opportunities for new retail and other town centre uses which will be needed should Cirencester grow. The policy also includes residential and care home development on these sites – it is important that individual planning decisions on these sites do not squander the relatively constrained amount of development land available on land uses that might be located farther from the town centre. An appropriate balance needs to be made between the desirably, reducing traffic by locating residential development near to shops, and preventing economic development for the wider area.
Master plan	<p>A master plan is proposed for the area inside the ring road that would include key sites</p> <ul style="list-style-type: none"> • Sheep Street • Memorial Hospital • Brewery Car Park • Forum car park and Dyer Street • Waterloo Car Park <p>Given the current uncertainty around these sites including the awaited Parking Standards and the Transport and Parking Strategy, the preparation of a Master Plan for these key sites should be welcomed. In addition, the Master Plan will be prepared in association with the Town Council and the local community and this should also be</p>

	welcomed.
Policy 13	This seeks to actively redevelop the town centre sites to contribute towards the town centre's employment base (B1 office and possibly studio and start-ups). This is supported by the Planning Statement and CTC's previous response to the Reg. 18 consultation.
Omissions	There were two significant omissions regarding the strategic policy context for Cirencester: Key Views and the Amphitheatre Master Plan. These issues were covered in detail in the Planning Statement and should be adequately addressed in the Reg. 19 document.