

# Cotswold District Local Plan 2018 – 2031 Update

## Town and Country Planning (Local Planning) Regulations 2012

### Regulation 18 “Issues and Options” consultation/participation

#### Evidence Paper: Tourism

#### 1. Introduction

- 1.1 This paper summarises the evidence and looks at the policy context for tourism in Cotswold District. It considers what changes, if any, should be incorporated into the Local Plan Partial Update, making recommendations for how existing planning policy might best be amended. It also takes a longer view on the relationship between tourism and the climate change emergency, making recommendations as to how potential conflicts with certain key policy areas may best be approached in a subsequent full review of the Local Plan.
- 1.2 Unavoidably, the paper overlaps with other related Topic Papers, some of which are referenced.

#### Context

- 1.3 Tourism in England is overseen by the British Tourism Association (BTA), consisting of VisitBritain, the national tourism agency, responsible for marketing the nations and regions of Britain overseas to drive growth in international leisure and business tourism, and VisitEngland, the national tourist board for England, responsible for marketing England to domestic and established overseas markets and for improving England’s tourism product.
- 1.4 In a regional context, Cotswold District is at the heart of the geographical area covered by Cotswolds Tourism. Cotswolds Tourism is the official Destination Management Organisation promoting and marketing tourism across the Cotswolds. A public-private sector organisation, Cotswolds Tourism is a partnership of tourism businesses, supported by local authorities. Hosted at Cotswold District Council, Cotswolds Tourism is supported with resources by West Oxfordshire District Council, Cotswold District Council and includes strategic partners of Cotswolds National Landscape, Cheltenham Borough Council & Marketing Cheltenham, Tewkesbury Borough Council, and Stroud District Council.
- 1.5 Cotswolds Tourism working in partnership with VisitBritain and VisitEngland seeks to “ensure that the Cotswolds is a vibrant year-round destination where visitors enjoy high quality, authentic experiences and tourism makes an increasing contribution to the economic, social and environmental sustainability of the local economy.” (Cotswolds Tourism Destination Management Plan)
- 1.6 In September 2021, the de Bois review of Destination Management Organisations in England, commissioned by the governmental Department for Digital, Culture, Media & Sport (DCMS), was published. The review examined and assessed how Destination Management Organisations across England are funded and structured, and how they perform their roles,

in order to establish whether there may be a more efficient and effective model for supporting English tourism at the regional level, and if so what that model may be.

- I.7 The report made a number of recommendations and called for a substantial reduction in the overall number of DMOs and a tiered structure for DMOs with central government providing core funding for the top tier organisations, Destination Development Partnerships. If the report's recommendations are adopted by the government, there is likely to be a significant restructuring of tourism nationally in the coming years.
- I.8 Cotswold District also benefits from the work of Visit Gloucestershire, which is a new strategic management organisation of tourism in Gloucestershire backed by GFirst Local Enterprise Partnership and Gloucestershire County Council. This organisation seeks to develop a proactive approach to tourism via strategy, planning and working with the key Destination Management Organisations in the county, such as Cotswolds Tourism, and local authorities.

### Facts and figures

- I.9 As a popular and well-known visitor destination, tourism is a significant part of Cotswold District's economy and a key local employment sector.
- I.10 In 2019 17% of all jobs in the District were in tourism related sectors (figure 1). Most tourism employment relates to food and drink, and accommodation for visitors. (Gloucestershire LIS, draft 2019). The Local Plan ensures that the location of new tourism development is effectively and appropriately managed to protect the high quality natural and built environment of the District (Local Plan, para. 9.10.1, 9.10.4). The built and natural environment is also a source of investment and many people view the area as an attractive place to live, work and visit.

#### The Economic Impact of Gloucestershire's Visitor Economy (Cotswold District) 2019

£366 million	Total Visitor Related Spend
7,348	Estimated actual employment
17%	Proportion of all employment

£82 million	Retail
£52 million	Accommodation
£123 million	Food and drink
£50 million	Attractions and entertainment
£38 million	Transport and other
Making a direct expenditure of over £345 million in 2019	

## **Sustainable tourism**

- 1.11 The terms 'green tourism' and 'sustainable tourism' are often used interchangeably, however they have different meanings.
- 1.12 Originally, green tourism was used to describe small-scale tourism that encouraged people to visit natural areas and minimise the impact of tourism on the environment. More recently, the term has been used by businesses and destinations who make some effort to make their activities more sustainable, but do not have sustainability at the core of what they do.
- 1.13 Sustainable tourism goes beyond green tourism and encompasses the environmental, economic and socio-cultural aspects of tourism development. Sustainable tourism practice includes ensuring that the well-being and cultural heritage of communities is protected. Activities may include supporting conservation projects, hiring local staff, sourcing locally-produced products, conserving energy and recycling. Sustainable tourism requires participation of stakeholders and is a long term process that needs to be monitored and adapted as required.
- 1.14 On a national and international scale, sustainable tourism is becoming increasingly significant because of the global climate crisis. The BTA have begun work on a Sustainable Tourism Policy Paper, which will define the role that businesses, organisations, and the BTA will play in creating a more sustainable tourism offer for Britain. The paper is due to be published in late 2021/early 2022.

## **Key Strategic Challenge**

- 1.15 Ensuring a balance between the economic and social benefits from visitor spend and the impacts that visitor numbers can have on the natural environment and resident communities, as well as the need to conserve and enhance the natural assets that play a critical role in attracting visitors in the first place. The inexorable impact of climate change and the need for action to mitigate and adapt to its effects is greatly increasing the pressure to find ways of sustainably managing or resolving these challenges. It is not an overstatement to say that the climate change emergency represents a paradigm shift in how the different considerations that a Local Plan must take into account are weighed and balanced. In blunt terms, in delivering the council's aspiration to produce a Local Plan that is "green to the core" the climate change emergency puts a thumb on the scales.

## **2. Objectives**

- 2.1 The most relevant of the current Local Plan strategic objectives is Objective 3: Local Economy.
- 2.2 Possible amendments to the original objective, in part due to the climate change and ecological emergencies that have been declared by Cotswold District Council, are suggested in red text

### 3. Local Economy

Through implementation of the OAN, Economic Strategy and allocation of land:

- a. Support the local economy to transition to a pandemic resilient and low carbon future and enable the creation of more high quality jobs in the District, which meet local employment needs.
- b. Encourage the vitality and viability of town and village centres as places that supports a diversity of activities and uses, that includes:
  - for shopping, leisure, cultural and community activities;
  - opportunities to access affordable homes;
  - opportunities to attain rewarding careers; and
  - becoming active transport hubs to aid health outcomes and reduce emissions and pollution.
- b.c. ~~including m~~ Maintaining Cirencester's key employment and service role.
- e.d. Support sustainable tourism in ways that enable the District to act as a tourist destination which attracts higher numbers of longer-stay visitors.

*\*Amend 3.d to LP comment below:*

*Support sustainable tourism to enable the District to act as a tourist destination, which maximises the benefits and minimises the impacts of visitors.*

### 3. NPPF, NPPG and other material considerations

#### The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)

- 3.1 The economy is one of the threads of sustainable development running through the NPPF. Para 81 says that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 3.2 Tourism, and its economic benefits, is mentioned only specifically in the context of supporting the rural economy. Planning policy and decisions should enable, 'sustainable rural tourism and leisure developments which respect the character of the countryside' (NPPF para. 84 (c)).
- 3.3 Within the glossary of the NPPF "tourism development" is referenced in respect of main town centre uses, alongside retail and leisure. These are uses most suitable within town centres in the first instance. (NPPF para 86 -91).
- 3.4 There is no specific planning guidance on tourism contained within the supporting PPG.
- 3.5 **Climate change and ecological emergencies** have been declared by the Council embedding climate emergency considerations in all work areas. In July 2019 the Council declared a climate change emergency followed by an Ecological Emergency a year later.
- 3.6 The Council's **Corporate Strategy 2020-2024** establishes a series of actions to respond to these emergencies and other priorities. Of relevance to this paper is an objective to 'Enable a Vibrant Economy' which commits the Council to deliver actions contained in the Cotswolds Tourism Destination Management Plan (DMP), promoting Cotswold District as a high quality year-round destination and 'Increase tourism's contribution to the economic, social and environmental sustainability of our communities'.

## **Sustainability Appraisal (SA Scoping report) 2021**

- 3.7 The data in this section of the SA is from before the Covid-19 pandemic. How long-lasting the impact will be and how long it will take for visitor numbers to recover remains to be seen. The information set out here must be considered within that changed context.
- 3.8 Key sustainability issues raised:
- Limited range of public transport options, which affects the ability to both reach the destination and travel around sustainably.
  - Uneven distribution of visitors throughout the year and across the district. Balancing the needs of visitors and locals to avoid conflict and retain a sense of place.
  - Potential environmental damage e.g. erosion caused by increased visitor numbers.
- 3.9 The high quality landscape and historic settlements play an important role in attracting visitors across the District: *‘Business surveys show that 33% of tourism and tourism related businesses and 12% of other businesses felt that a deterioration in the quality of the landscape would seriously affect their business performance’*. (Gloucestershire Local Industrial Strategy (LIS) draft 2019).
- 3.10 *Sustainable rural tourism is an important part of a prosperous rural economy and is recognised by the NPPF, but rural development has some specific considerations to take into account. Tourism developments might not be possible in the tightly drawn boundaries of market towns and villages and a need might arise for facilities in countryside attractions, or areas of outstanding natural beauty, which are a long way from the main services of an area. (VisitBritain)<sup>1</sup>.*

### **Background evidence**

- 3.11 The **Cotswold District Council Green Economic Growth Strategy** was published in December 2020. The strategy seeks to improve the quality of tourism and increase visitor spend, building on the ‘experience’ of our towns and linking it with other local businesses. Again it emphasises the Council’s *aspiration* to move towards a sustainable visitor economy that encourages a wider geographical spread beyond the most famous villages and to promote the area as an “all-year-round” destination rather than having a heavy concentration of visitors in the summer.
- 3.12 Cotswolds Tourism’s **Destination Management Plan for Tourism** - The DMP was updated in October 2021 in order to place sustainability at the core of the DMO’s priorities. Their key sustainable tourism objectives are:
- To increase usage of sustainable transport by visitors when travelling to and around the Cotswolds.

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<sup>1</sup> Visit Britain is the national tourism agency, responsible for marketing Britain worldwide and developing Britain’s visitor economy. It regularly publishes statistics on tourism including visitor numbers and stays (see [www.visitbritain.org](http://www.visitbritain.org)).

- To encourage businesses to adopt sustainable practices and to develop sustainable tourism messaging to all stakeholders and visitors.
- To encourage the use of local produce and suppliers to support the development of better local supply chains.
- To improve information provision to encourage visitors to travel more responsibly when in destination.
- To encourage visitors to respect the unique Cotswolds landscape and local communities, and encourage participation in the Caring for the Cotswolds payback scheme.
- To encourage a better geographical and seasonal spread of visitors to lessen the impact on the landscape and its residents.
- To promote the co-benefits of active travel (walking and cycling) on health and wellbeing - as well as reducing carbon emissions.

### **Gloucestershire Economic Needs Assessment 2020**

- Cotswold has a particularly strong employment rate in this sector [Accommodation and Food Service activities] at 13.6%, reflective of its strengths in attracting tourism into the area (para 5.22).
- Within Cotswold, the accommodation industry has a notably larger proportion of jobs (at approximately 2,500) as well as sports and recreation (1,500) which relates to the reliance on tourism for employment generation (BRES 2018 data) (para.5.26)
- Across Gloucestershire, tourism continues to perform well, one of the key strengths and drivers for growth in the rural economy, also including Agri-Tech and Natural Capital – an attractive place for investment and people to live, visit and work (para 6.77)
- However, businesses are finding it very difficult to attract and then retain UK employees to work, for example, there remains an ongoing problem with the sourcing of labour in tourism, hospitality and agricultural sectors (para 6.82).
- It is likely that the impact of Covid-19 means that hospitality and tourism services will take a large hit as people suspend their travel plans and social activities (para 9.15). Cotswold has the highest rate of exposure to this sector in Gloucestershire, and ranks 11th out of 317 Local Authorities in England. The national average is 7.5%.
- Forecasting future economic performance remains highly uncertain, due to the unprecedented nature of the lockdown, as well as the impact on post-Brexit negotiations.

### **3.13 Gloucestershire Economic Recovery analysis paper - A summary of the plans and strategies across Gloucestershire, during the 2020 COVID19 pandemic:**

- heritage and the visitor economy are hugely important in Gloucestershire;

- pre-Covid - projects to convert heritage and the tourism sector to a low carbon offer was considered key to unlocking potential for tourism activities, including ecotourism;
- of the approximately 31 per cent of workers furloughed in Gloucestershire, around 20 per cent are likely to be in the accommodation and food services sector, with about half of this focussed in Cheltenham and Cotswold;
- opportunities future recovery include - Bringing back tourism and the visitor economy to support volume employment to Gloucestershire
- strong low carbon/environmental theme running through the recovery strategy, including building green jobs and infrastructure and providing opportunities to move to low carbon transport options – and to develop more sustainable environmentally friendly tourism.

3.14 **Visit Gloucestershire** The 2021- 2024 strategy is a collaborative plan of action for recovery after the pandemic, and includes a climate emergency declaration, projecting what tourism in Gloucestershire may look like over the next 10 years, and for a sustainable future. It pledges to support the visitor economy, amongst others, by:

- developing a climate action plan in the next 12 months, including to cut carbon emissions (55% on 2017 levels by 2030) by reductions in the total carbon emissions per trip arising from tourism operations and their travel services. Signed up to the [tourism declares initiative](#)
- development of Gloucestershire as a Green Destination and to be globally recognised as a responsible tourism destination.
- All the Local Plan evidence for economy including tourism can be found here; <https://www.cotswold.gov.uk/planning-and-building/planning-policy/evidence-base-and-monitoring/>

### Observations

3.15 The importance of the tourism sector for the district's economy is indisputable. However, more recent studies noted above (Gloucestershire Economic Recovery and Visit Gloucestershire for example) recognise the need to address the less desirable climate change impacts of tourism. These include air pollution and congestion from traffic. The critical need to address these issues (and not just regarding tourism) is altering the components of the balance that needs to be struck in reaching planning decisions. The planning challenge is to maintain and grow the tourism economy while developing and implementing measurable initiatives to increase its sustainability performance.

## 4. Current Local Plan policy

4.1 **Policy EC10** sets out the criteria for new or extended tourist facilities and visitor attractions. The policy supports the provision of enhanced and new facilities in appropriate locations.

- 4.2 **Policy EC11** requires tourist accommodation to be appropriately located and both policies recognise the environmental sensitivity of the District.
- 4.3 The policies support sustainable tourism by enabling new and extended tourism development, visitor attractions, cultural and leisure facilities that are appropriate to their location and enhance and protect the existing attractions within the District.
- 4.4 The policies also support appropriate regeneration schemes and tourism development proposals that seek to enhance the economic, social and cultural value of the distinctive industrial heritage and crafts associated with the district (para.64).
- 4.5 The **Sustainability Appraisal (SA) Scoping Report** 2021 considers the policies to generally be working well. It 'scoped out' tourism as a topic requiring further investigation. A tension was noted however in EC10 between clause b requiring tourist facilities to be well related to the main tourist routes and that of the concentration of tourism in 'honeypot' destinations. Similarly EC11 is essentially restrictive rather than enabling. Whilst having regard to the recognised environmental sensitivity of much of the district, it tends to conflict with statements, again in the supporting text, that emphasise the importance of tourism as "a key employment sector in the district". Local Plan policy revisions could seek to improve the policies to better consider these tensions/ conflicts.
- 4.6 Whilst both policies are noted as fit for purpose, the **Local Plan review 2019** recommends minor revisions are required in the short term for clarity:
- 4.7 "Policy EC10 - to clarify that new/extended tourist attractions should be viable without the provision of tourist accommodation. And that new tourist attractions should not include accommodation (in a more explicit way than at present), to prevent the argument that the new accommodation will form part of the tourist attraction (EC11 (4)) and is therefore acceptable.
- 4.8 Following on and in context of possible changes to EC10, Policy EC11 should be more explicit when policy applies to improve clarity on when accommodation, in connection with an attraction, will be supported e.g. when extensions to existing hotels/serviced accommodation facilities apply."

## **5. Potential policy responses - short and long-term**

- 5.1 Tourism's interface with planning can be looked at in two contexts: as a self-contained policy area and as part of a strategic "bigger picture".
- the self-contained policy viewpoint tends to see it largely in terms of visitor economy or spend and the drive to increase the visitor 'offer' in respect of accommodation, retail, attractions etc. as a result of greater spread both across the District, especially in the towns, and year-round availability.
  - the strategic perspective is that tourism does not exist in isolation. It has an impact on the environment and economy, and as such may be in conflict with other planning policies. This potential or actual conflict is being exacerbated by the need to address climate change issues and changes in the economy. The changing nature of the high street and reduction in retail is a dynamically evolving situation. There is a need to



ensure that the local economy is better balanced between tourism and other sectors, more resilient to change and has a wider employment “offer”. A central aim in making the Local Plan “green to the core” is to promote more sustainable modes of transport as an alternative to the inevitability of the private car. The broader impact of tourism on the natural environment is a recognised risk.. In summary, a key objective is to increase the sustainability of tourism while recognising its central importance to the district’s economy.

- 5.2 Given time constraints of a partial update and because they have different requirements, it is not possible to deliver both of these dimensions simultaneously. Therefore the policy response is that there are two objectives: one to deal with in the short term (in the Local Plan partial update), and a longer term option (Local Plan review) once a strategic tourism strategy is in place. This could also be linked into Local Plan Economic Objective 3d.
- 5.3 **Short-term solution** – clarity is needed for development management as identified in the Local Plan Review 2019 (see above). The solution is to amend and update the policies accordingly. This may also include a version where the supporting text is also amended to include reference to the Corporate Plan’s objective of a ‘green to the core’ Local Plan.
- 5.4 **Longer-term solution** – the overarching issue is that of unintentional conflict i.e. those topic areas which at a strategic level are in conflict with the current role of tourism in the District. This is partly due to the emerging paradigm shift triggered by the need to mitigate and adapt to climate change. As noted above, the recommended way towards a solution is that a sustainable tourism strategy is needed to discuss and strive to reconcile the conflicts and challenges. This will take time and will not be available for the Local Plan Update. A full Local Plan review would in due course be able to deliver the planning elements of the strategy.

Policy Approach	Discussion of impacts, effectiveness etc - justification
<p><b>Preferred Option</b> Amend extant policies for clarity in line with Local Plan Review recommendations, and continue to ensure tourism development protects, and is appropriate in, the natural and built environment. Propose in the partial update that a sustainable tourism strategy is prepared, with planning actions/outputs taken forward in the future full Local Plan review. Amend supporting text to reflect the “green to the core” aspiration. Green Tourism Strategy to be prepared by a corporate stakeholder working group.</p>	<p>Justified by NPPF focus on ‘<i>sustainable rural tourism and leisure developments which respect the character of the countryside</i>’ (Para. 84) Extant policies are considered to be consistent with the relevant sections of the NPPF No further changes immediately required in update other than for clarity of implementation. Strategic conflicts between tourism, economy and environmental impact/climate change adaptation and mitigation need to be comprehensively addressed in an integrated way to ensure a balanced and sustainable approach can be implemented in future. A strategy is the most efficient and effective way of doing this.</p>

	<p>Amendment to supporting text in the Local Plan to reflect current context - climate emergency, especially related to sustainable transport and health (pandemic), 'green/ ecotourism', changing nature of the "traditional" high street.</p> <p>Ensure supporting text notes the desirability of an evidence-based Green Tourism Strategy to manage and balance conflicting objectives.</p> <p>Together with conflict management and ensuring sustainability is at its core, the strategy could look at serviced accommodation e.g new hotels, in a sustainable location to support jobs and access (e.g. near a railway station). It could consider support for public EV charging points at tourist locations. It could set out proposals regarding how to provide year round tourism and the role of tourism in revitalising town centres.</p>
<p><b>Rejected Option</b></p> <p>Amend extant policies for clarity in line with Local Plan Review recommendations, and continue to ensure tourism development protects, and is appropriate in, the natural and built environment.</p> <p>Propose and undertake a District wide green tourism strategy to assess and resolve strategic conflict with other core planning issues.</p>	<p>Justified by NPPF focus on '<i>sustainable rural tourism and leisure developments which respect the character of the countryside</i>' (Para. 843)</p> <p>Extant policies are considered to be consistent with the relevant sections of the NPPF</p> <p>No further changes immediately required in update other than for clarity of implementation</p> <p>The team has insufficient resources and time to undertake this work for the Local Plan Update. It is preferable also for the Strategy to be prepared by internal stakeholders, including planning input but not led by Forward Planning. It is more realistic to commit to undertaking this work to tie in a future full review of the Local Plan.</p>