AVISON YOUNG

Gloucester, Cheltenham and Tewkesbury:

Retail and City / Town Centre Review

Volume 1: Main Text

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Contents

1. Introduction

1.1 This Retail and City / Town Centre Review report (hereafter referred to as 'the Study') has been prepared by Avison Young ('AY') for Tewkesbury Borough Council ('TBC'), Gloucester City Council ('GCC') and Cheltenham Borough Council ('CBC') (hereafter referred to as 'the Councils') in order to provide up to date evidence for a review of the Joint Core Strategy ('JCS').

1.2 Policy SD2 of the existing adopted JCS notes that:

> *"Following adoption of the JCS, this policy will be subject to an immediate review. The single issue review will take approximately two years to complete. It will cover strategic planning matters relating to the three JCS authorities including issues such as a revised assessment of retail needs, market share between different designated centres, city / town centre boundaries, site allocations, primary and secondary shopping frontages and locally defined impact thresholds".*

1.3 The requirement for an immediate review of the retail and town centre policy in the JCS stems from the conclusions of the JCS Inspector in October 2017 which noted:

> *"139. However, in view of the dearth of site evidence before me, the lack of any SA on retail sites, and the fact that no call for strategic retail sites has been made during the preparation of the JCS, I am not in a position to make strategic retail allocation recommendations. Waiting for this evidence would cause a significant delay to the JCS and would not be in the public interest. Therefore, considering the Dacorum judgement1, in order to resolve this soundness issue, a policy commitment should be made within the JCS to undertake an immediate review of retail policy.*
>
> *140. Furthermore, contrary to paragraph 23 (third bullet) of the NPPF, town/city centre boundaries for Gloucester, Cheltenham, and Tewkesbury, which are centres with more than local impact, have not been defined. This is of particular concern in relation to Gloucester, which has no extant local plan and, therefore, no existing defined town centre boundary.*
>
> *141. The emerging Gloucester City Plan has a draft City Centre boundary for Gloucester, a Primary Shopping Area and Primary and Secondary Shopping Frontages and it is proposed that these all be incorporated into the JCS. The Policies map will require corresponding changes to ensure the soundness of this policy. These boundary designations will be included in the immediate review of retail policy, which will consider their justification in the light of forthcoming retail evidence.*
>
> *142. With respect to Cheltenham and Tewkesbury, insufficient work has been carried out to identify updated town centre and shopping frontages although, there are relevant saved policies in both the existing Cheltenham and Tewkesbury local plans. Consequently, pending an immediate review of designations and their inclusion in the JCS, new retail development will be encouraged in accordance with the saved local plan policies. This should be explicitly set out in Policy SD3".*

1.4 The JCS Review will consider the delivery of strategic allocation sites identified in the JCS and ensure that each authority is able to meet its housing and employment requirements, including maintaining a five year supply of housing land. The JCS Review will again look at the future growth needs, what the best strategy is for delivering that growth, and the allocation of strategic sites to help meet these needs. However, it is also an opportunity to review all of the policies contained with the current adopted plan to see if they continue to be effective and consistent with the National Planning Policy Framework ('NPPF').

1.5 The brief for this Study requires the following information and assessments to be provided:

- Comprehensive health checks of Gloucester city centre, Tewkesbury town centre, Cheltenham town centre, Winchcombe and Bishops Cleeve, including their role and function and place in the existing hierarchy.
- Review and make recommendations on the role, function and existing hierarchy of these centres.
- Undertake an assessment of the strengths, weaknesses, opportunities and threats for these centres, and make strategy and policy recommendations in relation to opportunities to improve their long-term vitality and viability that reflect their character, role and function.
- Provide intelligence on existing retail and leisure parks located outside of town centres in terms of how they operate and impact upon designated centres.
- Undertake an assessment of the need for retail floorspace in each of the designated centres, including a review of market share trends.
- Undertake a review of sites to accommodate identified retail needs, alongside a review of retail and town centre planning policies and the identified town centre and primary shopping area ('PSA') boundaries.
- Undertake a proportionate review of the health of district, local and neighbourhood centres across the three local authority area, including identification of opportunities to improve their vitality and viability, and to make recommendations on the need for any new or expanded centres.
- Make recommendations on proportionate locally set impact thresholds for retail proposals outside of designated centres.

1.6 In order to address the requirements of the Councils' brief, this Study provides a comprehensive review of the role and function of the main 'town centres' across the three local authority areas, along with a comprehensive review of current shopping patterns and trading performance of stores and centres over time. In order to inform this assessment, two main pieces of empirical research have been undertaken:

- Land use surveys of the main city, town, district, local and neighbourhood centres in each of the three local authority areas have been undertaken. This has utilised either data from Experian GOAD and updated by AY to a 2019 base, or where such information is not available then bespoke surveys undertaken by AY.
- A new telephone survey of household shopping patterns, undertaken by NEMS Market Research in February 2019. The survey has obtained information on convenience and comparison goods shopping patterns along with leisure activities.

1.7 In addition to the gathering of new evidence base data, the preparation of this study has been informed by consultation with stakeholders. At the inception of the study a stakeholders group was established and two subsequent meetings held: one at the start of the study to review the project brief and a second at the draft report stage. In addition, individual presentations of the draft study were made to each of the three local authorities.

1.8 Also, based upon the requirement for a duty to co-operate, the JCS authorities, at the start of this study, informed the immediately surrounding local authorities of the preparation of this study, including: (A) the content of the agreed project brief, and (B) offering each authority the opportunity to submit comments on the scope of the study and any other information that they felt would be relevant to its preparation.

1.9 Throughout this Study references will be made to previous retail and town centres studies commissioned by the Council to inform the adopted JCS. The most recent of these studies was prepared by DPDS and was entitled the 'Joint Core Strategy Retail Study 2011-2031 2015 Update' ('the 2015 Study'). It concentrated upon updating the quantitative need assessment for retail floorspace across the three local authority areas (rather than providing any new town centre health check information) and followed previous studies prepared by DPDS which also provided need assessments and town centre health checks. The 2015 Study was also informed by a survey of household shopping patterns and this Study provides an assessment of the changes in market share and shopping patterns between the 2015 and 2019 household surveys.

1.10 From the outset of this Study, it should be noted that its preparation commenced in 2019 before the severe impact of the COVID-19 pandemic on the UK economy (and how the population went about their working and day-to-day lives) was fully realised. We can confirm that all of the evidence base data for the Study was collected before the government introduced lockdown measures (in March 2020) and that the economic forecasts adopted for our quantitative assessment are dated October 2020 (which take into account the latest available 'thinking' about the impact of COVID-19 on retail spending). As a consequence, the factual content of this Study should be read and understood in this context. Moreover, as will be discussed further later in this report, the impact of the COVID-19 pandemic is, based upon current predictions, likely to have long-lasting effects on the UK economy and how people interact with retail, leisure and wider town centre uses. Therefore, the content of this Study should be seen as a baseline for the evidence base library for the JCS Review and there will be a need to consider updates to the health checks, economic forecasts and shopping patterns in due course, as the preparation of the JCS Review progresses.

1.11 The remainder of this report is structured in the following manner:

- Section 2 provides a review of adopted and draft planning policy across the three local authority areas along with a summary of current national planning policy relation to retail and main town centre uses.
- In Section 3 we provide a review of salient retail and town centre trends.
- Sections 4-6 provide our review of town centre health across city, town, district, local and neighbourhood centres in Tewkesbury, Cheltenham and Gloucester.
- Section 7 provides our assessment of the quantitative and qualitative need for retail floorspace in Cheltenham, Gloucester, Tewkesbury, Bishops Cleeve and Winchcombe.
- We provide an assessment of the various sites across Gloucester, Cheltenham and Tewkesbury which have the potential to accommodate identified needs and/or contribute to the health of defined 'town centres' in Section 8.
- Our recommendations regarding planning policies and town centre/PSA boundaries in contained in Section 9.
- Finally, a summary of the findings of this Study can be found in Section 10 of this report.

1.12 All plans, statistical information and other documentation referred to in the main text of this report can be found in a separate volume of appendices.

2. Policy Review

The Development Plans for Gloucester, Cheltenham and Tewkesbury

The JCS

2.1 Policy SD2 is the retail and town centre policy in the adopted JCS. The policy outlines, amongst other things, the following:

- The retail hierarchy in the JCS area with Gloucester and Cheltenham identified as 'key urban areas', Tewkesbury identified as a 'market town' and Bishops Cleeve and Winchcombe described as rural service centres.
- It is noted that the retail policies in Cheltenham's and Tewkesbury's plans will be reviewed as part of the JCS Review.
- Gloucester city centre's various boundaries are shown on the policies map pending an immediate review via the JCS Review.
- Proposals for retail land uses outside of defined town centres will be assessed against the sequential and impact policy tests.
- There are also development management policies in relation to proposals affecting defined primary and secondary shopping frontages.
- Finally, the policy outlines the quantitative need forecasts for the five main towns in terms of convenience and comparison goods floorspace between 2021 and 2031.

Gloucester

2.2 In addition to the JCS, the other part of the development plan for Gloucester is the 1983 Local Plan. There aren't, however, only policies in the 1983 plan which remain relevant and neither are relevant to the issues pertinent to this Study.

2.3 The Second Stage Deposit City of Gloucester Local Plan is a draft plan that reached an advanced stage and was published and approved by GCC for development management decision making in 2002. It has a number of relevant and partially relevant policies relating to retail and town centre issues including the following:

- S13 – changes of use in district and local centres. Control of the amount of non-Class A1 retail floorspace in defined local and district centres.
- S4a – new retail development outside of designated centres (partially relevant). A criteria based policy for assessing retail land use proposals on unallocated sites.
- S9 – new district and local centres (partially relevant). Conditional support for new centres so long as the proposed new centre does not affect existing centres, plus identification of new centres at Kingsway and Barnwood.

- S10 – district centres. Conditional support for new development in district centres so long as it does not have an unacceptable impact on Blackfriars and the primary shopping area in the city centre.

2.4 GCC is now preparing the Gloucester City Plan. The Pre-Submission Plan was approved by GCC in September 2019 and consulted upon between November 2019 and February 2020. The version of the Pre-Submission Plan recently approved by GCC does not include any specific retail or main town centre use development management policies although it does propose to allocate the Kings Quarter area for a mixed use development including retail uses. The full retail and city/town centre review is to be progressed through the JCS.

Cheltenham

2.5 In July 2020, CBC adopted the Cheltenham Plan, which supersedes a number of policies in the 2006 Cheltenham Local Plan, and should be read alongside the adopted JCS. Section 4 of the newly adopted plan notes that:

> *"4.1. Policy SD2 of the Joint Core Strategy (JCS) states that retail policies within the Borough of Cheltenham are set out in the saved policies of the existing Local Plan i.e. the Cheltenham Borough Local Plan (adopted 2006). Furthermore, it states that these policies will be reviewed and taken forward as part of the immediate review of JCS retail policy.*
>
> *4.2. This being the case, the new Cheltenham Plan does not include any policies on retail. Retail policies will be introduced at the earliest opportunity upon completion of the JCS retail review and will be formulated to work in tandem with revised JCS retail policy in future.*
>
> *4.3. The above approach reflects the requirements of the Planning Inspector who conducted the JCS Examination".*

2.6 The new adopted plan also goes on to note that:

> *"The Joint Core Strategy (JCS) supersedes policies from the saved Cheltenham Borough Local Plan (2006) as set out below. Where 2006 Local Plan policies are not superseded by the JCS, they will remain saved, but will be superseded by the new Cheltenham Plan once adopted. The exception is Retail, which will be subject to the JCS Retail Review".*

2.7 Therefore, the following policies remain saved beyond the adoption of the JCS and the Cheltenham Plan:

- Policy RT1 – the sequence of preferred locations in relation to the sequential test.
- Policy RT2 – development management policy dealing with retail development proposals in the defined core commercial area.
- Policy RT3 – control of non-Class A1 land uses in the primary shopping frontages.
- Policy RT4 – retail development in defined local shopping centres
- Policy RT5 – a criteria-based approach to the management of proposals for non-Class A1 land uses in local shopping centres
- Policy RT8 – control over proposals for small scale convenience stores and the proposed change of existing convenience stores to an alternative use.

Tewkesbury

2.8 The other part of the development plan in Tewkesbury is the Local Plan, adopted in 2006. The salient retail and town centre policies in the adopted plan are as follows:

- Policy RET1 – control of non-Class A1 land uses in the defined primary shopping frontages in Tewkesbury town centre.
- Policy RET2 – support for A1, A2, A3[1], residential and office uses in the defined mixed use frontage areas.
- Policy RET3 – support for Class A1, A2 and A3 land uses in the defined 'retail areas' of Bishops Cleeve, Brockworth, Innsworth, Churchdown and Northway.
- Policy RET4 – support for small scale shops / groups of shops subject to controls over their scale and function.
- Policy RET6 – development management policy in relation to proposals for large scale stores[2] including reference to the tests of need[3], impact and the sequential test.

2.9 TBC submitted its draft Borough Plan (2011-2031) in May 2020 to the Secretary of State for examination. Section 6 of the document deals with retail and main town centre issues and acknowledges that the JCS Review may lead to some policies in the Local Plan being superseded. Policy RET1 outlines the proposed 'town centre' hierarchy in the Borough with Tewkesbury described as a 'market town', Bishops Cleeve and Winchcombe described as 'service centres' and Brockworth, Churchdown, Coopers Edge, Innsworth and Northway described as 'local centres'.

2.10 Policy RET2 outlines the approach to development management for A1 and non-A1 uses in the proposed primary shopping area, whilst Policy RET3 deals with proposals in the designated retail areas of Bishops Cleeve, Winchcombe, Innsworth, Northway, Coopers Edge, Brockworth, Churchdown and the new local centres to be provided within the strategic allocations.

2.11 Policy RET4 deals with proposals which lie outside of defined 'town centres' and indicates that proposals for main town centre uses will only be permitted where the sequential approach has been followed and it has been demonstrated that there will be no significant adverse impact on the overall vitality and viability of an existing centre. RET4 indicates that the national threshold will be applied to impact assessments.

2.12 Proposed Policy RET6 deals with hot food take-aways and aims to avoid the over-concentration of such uses. As a consequence, permission for Class A5 uses will not be granted where (A) it would result in two such uses being adjacent to each other, and (B) lead to more than two A5 uses in any continuous frontage of 10 retail units or less.

2.13 In relation to site-specific issues, Policy RET9 outlines the following redevelopment opportunities in and around Tewkesbury town centre:

[1] Now A3, A4 and A5 uses
[2] 'large scale' is not defined by this policy or its supporting text.
[3] As noted earlier in this section, the test of 'need' is no longer part of national planning policy for retail land use issues in terms of development management.

- Healings Mill: re-purposing the site for a mixed use redevelopment to include residential, employment, retail, leisure, food and beverage, and tourist-related development.
- Spring Gardens: allocated for mixed use development including residential, retail, leisure and employment uses.
- MAFF site – allocated for high density residential accommodation and a care home.

The NPPF

2.14 Section 7 of the February 2019 NPPF deals with retail, leisure and main town centre land use issues and closely follows the 2012 version of the NPPF. The main changes insofar as retail, leisure and main town centre land use issues are concerned are:

- Whilst the two main policy tests for proposals outside of town centres (and not in accordance with an up to date development plan) remain the sequential and impact tests, the new NPPF has clarified the issue of availability of alternative sites (in the sequential test) as being available within 'a reasonable period of time'. However, there is no definition (or guidance) as to what is 'a reasonable period of time' in the context of proposals for main town centre uses.
- The new NPPF has deleted the requirement for local authorities to define primary and secondary retail frontages in development plan. The new NPPF still requires local authorities to define town centre boundaries and primary shopping areas.
- Whilst the requirement to allocate sites to meet identified needs remains, the new NPPF indicates that this should be at least ten years ahead, rather than the full plan period as previously advised.
- The new NPPF does not provide any guidance on how 'needs' should be assessed for main town centre uses (previously quantitative and qualitative indicators were cited) and we await to see if further guidance will be provided in an updated version of the Planning Practice Guidance ('PPG').

Permitted Development and the Use Classes Order

2.15 In recent years, in response to the on-going challenges faced by town centres and high street retailers (and other commercial uses) national government has introduced more flexibility into the permitted development rights system. Permitted development has long been an element of the planning system in England although, over time, further flexibility has been introduced in order to allow for changes, in certain circumstances, between some main town centre land use classes. A summary of the current permitted development rights[4] is contained in Table 2.1 below.

[4] **Please note in regard to changes to Use Classes from 1 September 2020:** For any reference to permitted development rights, and for restrictions to them or applications for prior approval, the Use Classes in effect prior to 1 September 2020 will be the ones used until the end of July 2021 (this is defined as the 'material period' in legislation so may be referred to as such).

Table 2.1: summary of permitted change of use rights

From	To
A1 (shops)	• **A2** • **A3** up to 150m² and subject to Prior Approval • **B1(a)** up to 500m² and subject to Prior Approval • **C3** up to 150m² and subject to Prior Approval • **D2** up to 200m² and subject to Prior Approval and only if the premises was in A1 use on 5th December 2013 • A **mixed use** comprising an A1 or A2 use and up to two flats may also be permitted subject to meeting certain conditions
A2 (professional and financial services)	• **A1** • **A3** up to 150m² and subject to Prior Approval • **B1(a)** up to 500m² and subject to Prior Approval • **C3** up to 150m² and subject to Prior Approval • **D2** subject to Prior Approval and only if the premises was in A2 use on 5th December 2013 • A **mixed use** comprising an A1 or A2 use and up to two flats may also be permitted subject to meeting certain conditions
A3 (restaurants and cafes)	**A1** or **A2**
A4 (drinking establishments)	**A4** (drinking establishment) with **A3** (restaurants and cafes)
A4 (drinking establishment) with **A3** (restaurants and cafes)	**A4** (drinking establishments)
A5 (hot food takeaways)	• **A1** or **A2** or **A3** • **B1(a)** up to 500m² and subject to Prior Approval • **C3** up to 150m² and subject to Prior Approval
B1(a) (business - offices)	• **B8** up to 500m² • **C3** subject to Prior Approval • **State-funded school or registered nursery** subject to Prior Approval
B1(b) (business - research and development)	• **B8** up to 500m² • **State-funded school or registered nursery** subject to Prior Approval
B1(c) (business - light industrial)	• **B8** up to 500m² • **C3** up to 500m² and subject to Prior Approval • **State-funded school or registered nursery** subject to Prior Approval
B2 (general industrial)	• **B1** • **B8** up to 500m²
B8 (storage and distribution)	• **B1** up to 500m²
C1 (hotels)	**State-funded school or registered nursery** subject to Prior Approval
C2 (residential institutions) / **C2A** (secure residential institutions)	**State-funded school or registered nursery** subject to Prior Approval
C3 (dwelling houses)	**C4** (small houses in multiple occupation)
C4 (small houses in multiple occupation)	**C3** (dwelling houses)
D2 (assembly and leisure)	**State-funded school or registered nursery** subject to Prior Approval
Sui generis (agricultural buildings)	**A1**, **A2**, **A3**, **B1**, **B8**, **C1**, **C3**, **D2**, **State-funded school or registered nursery**, all subject to meeting relevant criteria and Prior Approval. See notes below.
Sui generis (amusement arcade/centre)	**C3** up to 150m² and subject to Prior Approval
Sui generis (betting offices and pay day loan shops)	• **A1** • **A2** • **A3** up to 150m² and subject to Prior Approval • **B1(a)** up to 500m² and subject to Prior Approval • **C3** up to 150m² and subject to Prior Approval • A **mixed use** comprising a betting office or a pay day loan shop, or an A1 or A2 use and up to two flats may also be permitted subject to meeting certain conditions.

	• **D2** up to 200m² and subject to Prior Approval
Sui generis (casinos)	• **A3** only if existing building is under 150m² and subject to Prior Approval • **C3** up to 150m² and subject to Prior Approval. • **D2**
Sui Generis (launderette)	• **B1(a)** up to 500m² and subject to Prior Approval • **C3** up to 150m² and subject to Prior Approval

2.16 However, in July 2020, the government introduced a significant change to the land use classes order. The changes came into effect on the 1st September 2020 and revoked Parts A and D of the existing use classes order.

2.17 In relation to retail and main town centre uses the changes will be as follows:

- A new Class E is to be introduced which will encompass the former A1, A2, A3, B1a, B1b, B1c and part of the D2 use class (for gyms and indoor recreational facilities)[5].
- The former A4 and A5 uses will now become sui generis uses, as will part of the former Class D2 uses comprising cinemas, concert halls, bingo halls and dance halls. The remaining former Class D2 uses (community halls, swimming pools, skating rinks and outdoor sport and recreation uses) are now placed into Use Class F2.
- The uses within the former Class D1 are split between the new Use Class E (health care uses, creches, day centres) and the new Use Class F1 (schools, museums, libraries, halls courts and places of worship).

3. Retail and Town Centre Trends

Economic Context

Overview

3.1 A common and necessary introductory part of any retail and town centres evidence base study is to set the context in terms of recent, current and potential future trends in the economy. This section of the Study provides this analysis although the on-going and uncertain effects of the world-wide COVID-19 pandemic mean that forecasts maybe subject to change due to the fast-moving circumstances of the pandemic. Therefore, this section provides the following information and analysis:

- The potential scenarios for the UK economy as a consequence of the COVID-19 pandemic;
- A review of the prospects for the UK economy and retailing in pre-COVID-19 'normal' circumstances; and
- Information on how the COVID-19 pandemic is affecting retailing and town centres.

3.2 Prior to the outbreak of COVID-19 in the UK, the UK economy slowed over 2019, with growth sliding to a 7 year low by the end of the year. The period was dominated by heightened Brexit uncertainty and a weaker global economy. Against this backdrop, business investment declined for the second year in a row and exports remained sluggish. Consumer spending also lost momentum, reflecting low confidence and lacklustre incomes growth. The outcome of the December 2019 general election has removed near-term political uncertainty and the risk of a no-deal Brexit, empowering the government to push forward with spending pledges and EU withdrawal plans. At the start of 2020, the latest indicators pointed to a pick-up in business confidence and investment intentions. Housing market surveys suggested activity had been rebounding and consumer sentiment had also improved.

3.3 On the global front, a partial easing in trade disputes and loosening in monetary policy was encouraging. That said, lingering uncertainty over the outcome of the next phase of Brexit negotiations had expected to curb the pace of any investment recovery. Forecasts from Experian assumed an orderly transition to a new deep free trade agreement, but significant risks remain around the process, not least because of the extremely tight timetable (and now heightened by COVID-19). Alongside this, forecasts on the recovery in consumer spending were predicted to remain muted, reflecting modest incomes growth. Against this backdrop, GDP growth was predicted to remain on a slower growth trajectory of 1-1.5% over 2020 and 2021, well below the performance of earlier years.

COVID-19

3.4 The advent of COVID-19 has, and continues to have, a huge effect on all aspects of life around the world. Given that the full implications of COVID-19 are not yet able to be fully understood and predicted, Experian have outlined, earlier in 2020, four potential scenarios and their potential characteristics. Experian's analysis and the various scenarios are outlined below.

3.5 The outbreak of COVID-19 will have a considerable impact on the UK and global economies. Due to the unprecedented nature of the event and absence of hard data, it is impossible at this point to be confident of the scale and duration of the outbreak and the economic consequences of the measures to limit contagion. Hence, all forecasts will be subject to greater than usual uncertainty and volatility.

3.6 At the time of writing, Experian's view is that the V-shape cases outlined below are, on-balance, the more likely trajectories based on the scale of response from the UK and other governments. However, it should be noted from the outset of this analysis that the UK and global economy has never experienced a pandemic such as this and situation remains fast-moving. Indeed, whilst the UK started to ease certain 'lockdown' measures in June and July 2020, including the re-opening of non-essential shops (in controlled conditions), the prospect of a second wave of infections in Autumn/Winter 2020 is now apparent and a second 'lockdown' has been imposed. As a consequence, the content of this analysis should be seen as 'a point in time' and it will be important for the Council to keep matters under review during the life of preparing JCS Review.

3.7 The scenarios provided by Experian assume that the government follows the Imperial College ('ICL') recommendations for an Adaptive Suppression approach to managing the epidemic. This would involve an intensive period where a number of interventions (case isolation, household quarantine, social distancing of the whole population and closure of schools and universities) would be implemented until the number of cases falls below an acceptable threshold.

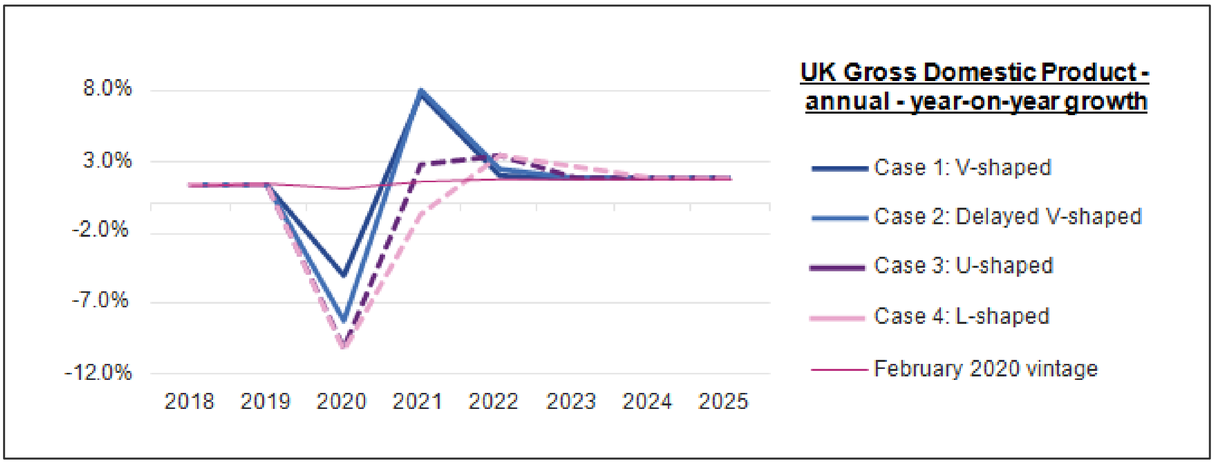
3.8 ICL recommended maintaining these interventions for 5 months, which is assumed to be followed in all scenarios except the V-shape case (3 months). To support the effectiveness of the suppression measures, the government has enforced periods of 'lockdown' involving the temporary closure of non-essential businesses and activities. Thereafter, it would be possible to relax these measures as long as hospital cases remained below a target threshold.

Scenario Overview

3.9 Table 3.1 below shows the various forecast scenarios for year-on-year growth in UK Gross Domestic Product ('GDP') up until 2025. In cases 1 and 2, the COVID-19 outbreak is contained relatively swiftly allowing GDP to rebound strongly in a V-shape following a sharp decline in Q2, with minimal long-term scarring. Case 3 has the virus contained in the same timeframe as case 2, however the economic impacts are more severe due to additional shocks arising from a tightening in credit conditions and further declines in Sterling. This results in a U-shaped, rather than V-shaped recovery. In case 4, the scale of the credit crunch and the Sterling declines are significantly deeper. As the economy emerges from the severe containment phase, it enters an extended period of stagnation/very subdued growth.

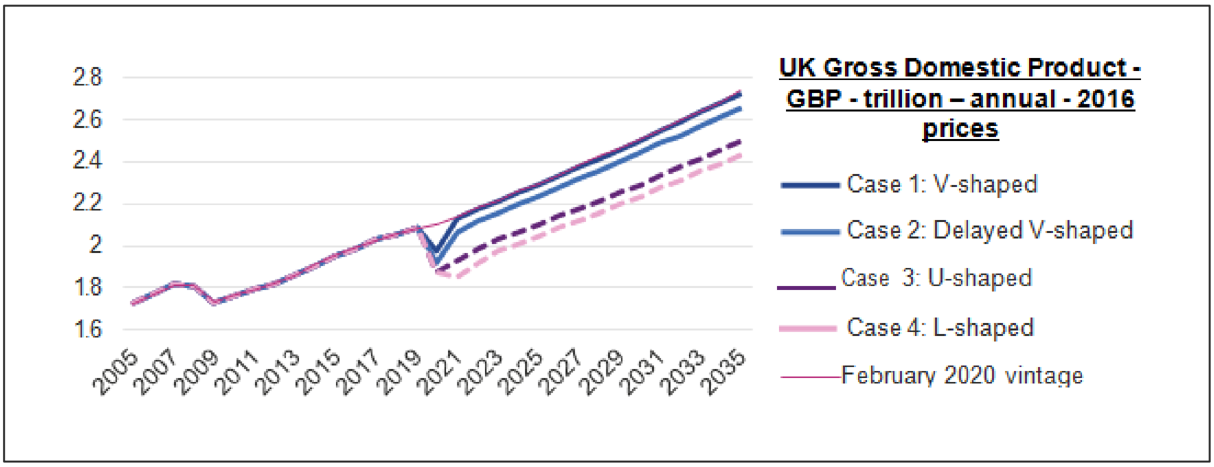
3.10 However, it should be noted that these forecasts were released by Experian earlier in 2020 and the imposition of a second period of lockdown is likely to have put back the period for recovery. As a consequence, the timeframes outlined below may need to be put back several months the advent of a number of potential new vaccines may well assist with the recovery process.

Table 3.1: forecast UK GDP per annum



3.11 In levels terms, the lost output in the first half of 2020 is quickly recovered in the first two cases. However, it persistently lags behind where Experian were projecting in their February 2020 forecast. The U and L shaped cases show a more gradual recovery. In the former, it takes roughly five years for all lost output to be recovered, broadly in line with the experience following the global financial crisis. In the latter, it takes longer still.

Table 3.2: GDP growth



3.12 The government has announced a range of measures to mitigate the impact on households and businesses and, at the time of writing, it appears that further policies may follow.

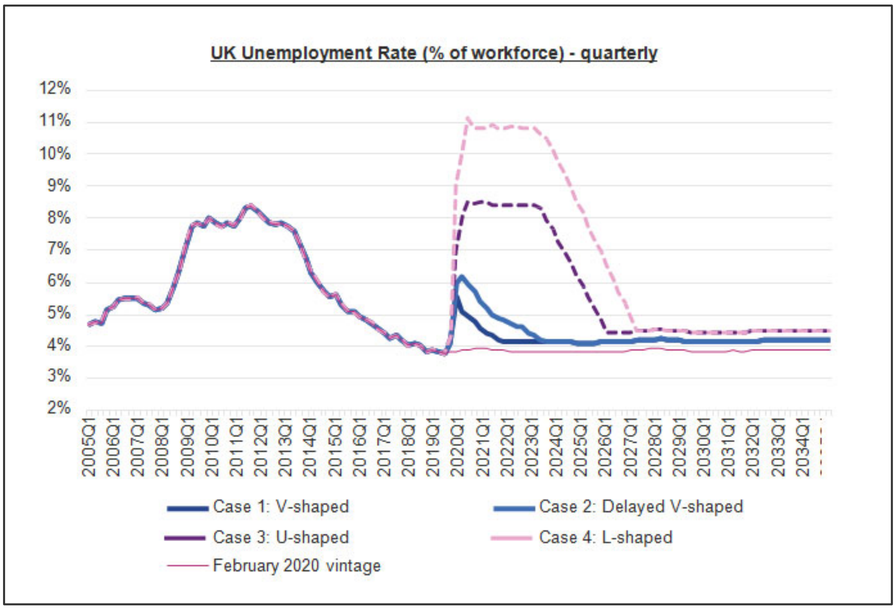
3.13 In cases 1 & 2, the fiscal response is expected to successfully rein in the rate of job shedding.

3.14 The unemployment rate is anticipated to rise sharply and substantially in the second quarter of the year, as a range of sectors of the economy such as retail, leisure and hospitality, reduce staff.

3.15 Experian's working assumption is that the scale of impact will be less than that of the last recession. However, because the effects are mostly concentrated in Q2, the hit is considerably higher than any single quarter of the 2008 recession.

3.16 In cases 3 and 4, the government measures to protect jobs are assumed to be far less successful, and the unemployment rate holds stubbornly high.

Table 3.3: forecast UK employment rate



Scenario 1: V Shaped Recovery

3.17 In this case, the suppression policy goals are achieved faster than the ICL's estimates and the timescales around securing a vaccine are also at the optimistic end of the estimates. The virus is successfully contained in 2020 Q2. Numbers infected reduce rapidly and fall below target thresholds by the end of June. Suppression measures begin to unwind in early 2020 Q3 and any resurgence of cases proves milder than expected.

3.18 Technology and infrastructure are sufficiently enhanced to enable speedy tracking and response times, so infection rates stay low and incidents remain localised. Wholesale suppression strategies are avoided and intensive global efforts secure a vaccine with sufficient stockpiles built to begin rollout to the 'at-risk' population group before the end of 2020.

3.19 In this scenario, the economic impacts are limited by the optimistic timeframes involved in bringing the epidemic under control. The reduction in infection rates triggers a swift rebound in investor, business and consumer confidence. Financial markets rebound and Sterling recovers. The tightening in credit conditions proves mild and short lived. Alongside this, mitigation efforts by the government prevent large scale job shedding and business insolvencies, which enables activity to recover relatively swiftly as workers return to normal working hours, businesses re-open and delayed investments are restarted.

Scenario 2: Delayed V Shaped Recovery

3.20 In this case, the suppression policy adopted is in line with the ICL's recommendations for 5 months of intensive action. Also, the timescales around securing a vaccine are at the midpoint of the range of the ICL's estimates of 12 to 18 months. Given this, the assumption is that the virus is successfully contained in Q3. Numbers infected reduce rapidly and fall below target thresholds by the end of August. Suppression measures begin to unwind in September and the resurgence of cases is well controlled. Technology and infrastructure are sufficiently enhanced to enable speedy tracking and response times, so infection rates stay low and incidents remain localised.

3.21 Wholesale suppression strategies are avoided and intensive global efforts secure a vaccine and sufficient stockpiles are built to begin rollout to the 'at-risk' population group during 2020. The economic impacts vary from the V-shape case in the following ways:

- The longer containment period leaves confidence subdued for longer in 2020, resulting in weaker outcomes for consumer spending and business investment.
- The impact of government mitigation polices has a fair amount of success. A tightening in credit conditions proves mild and short lived, while Sterling stabilises. However, due to the longer containment period there are more job losses and business insolvencies than the V-shape case.
- The economic recovery is V-shaped but postponed until late 2020 Q3 and 2020 Q4.
- The relatively longer period of weakness results in greater scarring than the V Shape case.

Scenario 3: U Shaped Recovery

3.22 In this case, the timescales for addressing the pandemic threat are the same as the Delayed V-shape recovery case, but the economic impacts are more severe due to additional shocks arising from a tightening in credit conditions and further declines in Sterling.

3.23 The suppression policy adopted is in line with the ICL's recommendations for 5 months of intensive action. Also, the timescales around securing a vaccine are at the midpoint of the range of the ICL's estimates of 12 to 18 months. Given this, the assumption is that the virus is successfully contained in Q3.

Scenario 4: L Shaped Recovery

3.24 The main difference between this and the U-shape case is that the scale of the credit crunch and Sterling decline is significantly deeper. The assumptions around the timescales for bringing the pandemic under control remain similar. In this case, as the economy emerges from the severe containment phase, it enters an extended period of stagnation/very subdued growth.

Consumer spending

3.25 Household spending growth slowed to an 8 year low of 1.2% in 2019. Consumer appetite for durables, property and, in particular, cars was notably muted. Low confidence was a major drag, but tepid growth in household incomes was also a factor behind the lacklustre spending trend. Despite another year of robust labour market conditions, with over 300,000 jobs created, incomes growth averaged a disappointing 1% in 2019. A pick-up in wage growth and receding inflation also provided a boost to earnings growth. However, this was offset by a continued squeeze in welfare benefits and other incomes sources. Looking ahead, prospects for incomes remain mixed. A positive is the very benign inflation backdrop. Combined with the boost to wages from more generous public sector pay and uprating to the National Living Wage, the recovery in real wages should remain intact over the coming year. However, this will be offset by a projected slowdown in the place of job creation to more sustainable levels. Another positive factor is the end of the freeze on working-age benefits, but the on-going roll out of other welfare reforms will continue to bite. Given this, real incomes is projected to average 1.3% this year and consumer spending growth will remain in sub-1.5% territory.

Retail

3.26 Retail sales volumes grew by 3% in 2019, the weakest reading since 2014. There was a marked slowdown in growth over the course of the year, reflecting low confidence and sluggish incomes. The weakening trend was concentrated in non-food stores, which started the year with growth above 4% and ended with declines not seen since early 2012. Department stores and household goods retailers bore the brunt, suffering from a fall in sales of durable goods. Demand for household goods has suffered as the housing market remained in the doldrums for a second year. In contrast, sales from predominantly on-line retailers picked up momentum with growth rising to 15%, compared with 10% in 2018. As a consequence, even before the advent of COVID-19, prospects for retail sales remained subdued. Household incomes gains were set to remain modest in 2020 although whilst the government's furlough scheme has been hugely ambitious, incomes since March 2020 have been impacted significantly with job losses becoming significant (as certain sectors experience extreme impact on how COVID-19 affects businesses).

Medium term outlook

3.27 The UK left the EU on January 31st 2020 and entered a transition period which allows continued access to the European single market while the next phase of negotiations take place. The transition period ends in December 2020, leaving a tight timetable for negotiating, amongst other things, a new trading relationship with the EU. Given this, there remains a real risk of another 'no deal' cliff edge as the transition deadline approaches (no doubt heightened by the impact of COVID-19). Experian's forecasts adopted in the quantitative assessment in this Study assume that this is avoided and a limited trade deal is struck. During 2021, the assumption is that negotiations are concluded for sectors not covered by the initial deals.

3.28 At the time of preparing this Study, there remains much uncertainty over what balance the government will strike on the trade-off between an agreement which minimises trade friction and the right to diverge from EU rules, which could lead to higher costs and reduced market access. The economic forecasts provided by Experian for use in this Study assume that the final outcome is a deep trade deal that allows continued access to EU markets. We continue to monitor progress and as the nature of the agreements become clearer we will adjust the baseline accordingly.

3.29 Experian's forecasts assume an orderly adjustment to the new trading environment. As Brexit related uncertainty ends, business investment should recover. However, the resultant increase in trade barriers will result in lower productivity and export performance than would have otherwise been the case.

3.30 Alongside this, Experian predict that fiscal policy will be more supportive than over the past decade. The baseline forecasts only incorporate announced policy so there is scope for upside from the March 2020 Budget. The government's increased majority should clear the path for it to push forward with policy priorities on regional development, infrastructure and health.

3.31 At the present time, Experian have not revised their projections for productivity and potential GDP growth, which drive the outlook over the medium/longer term. For the 2022-26 period overall, GDP growth is expected to average 1.8% per annum, compared with 2.0% during 2010 to 2018 and 2.6% from 1981 to 2007. Alongside this, the consumer spending outlook is little changed, forecast to average 1.8%, with retail sales averaging 2.7%.

Long term outlook

3.32 The final terms of the new economic relationship between the EU and the UK remains a major consideration for the long term outlook and Experian's assumptions on this front are little changed from previous years. The baseline forecasts assume that the UK will continue to have access to the single market under the new arrangement. However, it is unlikely that the new terms will be as favourable as full EU membership, which in turn impacts the long term outlook for trade, investment and GDP.

3.33 Population is forecast to expand on average 0.3% per annum over 2030-2040, which is below the average of 0.8% observed during 2005-2016. Productivity growth is expected to recover from recent lows to 1.4%, but will be well below the 2.4% averaged in the decade preceding the last recession. Given this, our long term GDP growth forecast remains at around 1.7%, below the historic long-term trend growth of 2.3%.

3.34 Revisions to the consumer spending outlook are minimal, with long term growth forecast at 2.2%, underpinned by gains in population and household incomes. However, downside risks clearly exist from a more marked slowdown in EU migration than projected.

3.35 The expansion in comparison goods volumes, averaging 3% per head to 2040 will be similar to the preceding decade but less buoyant than historic trends as key factors that boosted growth, notably the globalisation that subdued audio visual prices significantly, will not be repeated to the same degree.

3.36 Per head spending on convenience goods has slowed sharply in the last couple of years. Experian project that growth will remain a modest 0.1% over the long term, which is weaker than experienced in recent years but an improvement on the historic trend of annual 1% declines during 2000-2019.

Retail and Town Centre Trends

Internet Shopping

3.37 One of the key trends that has impacted on the retail sector and shopping patterns over the last decade has been the growth in internet shopping, which forms part of the definition known as 'special forms of trading' ('SFT'). Based on ONS data, Experian estimate that:

- The value of internet sales in 2019 was estimated to be £84.1bn (at current prices). This represents a +45% increase from £58bn recorded in 2016. Total non-store retail sales are estimated to amount to some £90.7bn in 2019 and is set to £203bn in 2036.
- To explain the differential in terms of growth between all retailing and internet retailing, in 2019 overall retail growth was 3% whereas internet sales grew by 9.6%. In 2020, overall retail sales are expected to grow by 2.5% whereas internet sales are likely to increase by 7.9%.
- The overall market share of internet sales, as a proportion of total retail sales, has increased nationally from 5.5% in 2006 to 20.2% in 2019. It is forecast by Experian to grow to 22% by 2021 and to 31% by 2036.

3.38 In relation to on-line grocery sales, most of the main national grocery businesses (apart from ALDI and Lidl) provide a delivery service. The entrance of Ocado to the online market in 2002 made a big impact upon the strategies of the traditional 'big four' grocers and led them accelerate plans for the online channel. Ocado has a different type of operation to the traditional grocers whereby its orders are picked from warehouses (via robotics) whereas most orders from Tesco, ASDA, Waitrose etc are picked by staff in-store. The Ocado business model is very efficient but expensive to invest in initially. The in-store grocery picking system is less costly initially but is generally regarded as a loss-maker.

3.39 In 2020 two particular factors have had a key influence on on-line grocery sales. The impact of COVID-19 meant that many people were reluctant to visit shops and the experience of using foodstore, particularly in the first part of 'lockdown' become inefficient and time-intensive. This led to a significantly higher demand for on-line deliveries which the main grocers found it difficult to keep pace with. However, now that the initial shock has passed, grocers are trying to build in additional capacity and online sales have risen from 7% of the total grocery market at the start of 2020 to 13% by May 2020. Research by UBS in the UK found that 71% of those surveyed will shop online as often or more after the COVID-19 situation improves.

3.40 The other development in 2020 has been the decision by Amazon to start offering free grocery deliveries to its Prime members. Amazon's grocery offering is sourced from a range of sources including Morrisons, Booths and Whole Foods and is, in due course, likely to add capacity to the delivery network particularly in urban areas. Whilst Amazon customers are paying indirectly for the delivery service, this move does mirror Ocado's entrance into the market although the latter did subsequently introduce charges in line with the other traditional grocery retailers.

3.41 The impact of COVID-19 has been even more significant for non-food shopping. Whilst a small amount of stores (classified as essential) remained open (under very strict controls) there has been a very significant shift to on-line sales, albeit subdued due to the furlough scheme and the risk of job losses. Initial data suggests that the initial spike will reduce as physical stores re-open although many commentators consider that the upwards trend in online sales is likely to be reinforced by the impact of COVID-19.

Changing Retailer Requirements

3.42 The economic downturn, the growth in internet shopping and the continued demand for out-of-centre shopping has resulted in national retailers reviewing and rapidly adapting their business strategies over the past several years, including new store requirements and existing store formats to keep pace with the dynamic changes in the sector and consumer demand.

3.43 This is probably best illustrated by the changes in the grocery sector over the last 6-7 years. Following a sustained period of growth over almost 20 years up to 2009/10, principally driven by new store openings, the focus for the main grocery operators (i.e. Tesco, Sainsbury's, Asda, Waitrose and Morrisons) shifted earlier this decade to growing market share through opening new smaller convenience store formats (such as Tesco Express, Sainsbury's Local and Little Waitrose), a better customer experience and online sales. In relation to online sales, following the original entrants into the market (Tesco, Ocado, Sainsburys and ASDA), Morrisons joined a few years ago and Marks & Spencer will start their own sales (in partnership with Ocado) in September 2020.

3.44 Over the past several years applications for large store formats have slowed to a virtual standstill and in some cases permissions are not being built out. At the other end of the grocery spectrum, the European-led 'deep discount' food operators (namely Aldi and Lidl) are increasing their market shares through new store openings across the UK. Iceland are also expanding their Food Warehouse format.

3.45 In the non-food sector, those retailers that experienced significant growth up to 2007/08 have had to adapt to the very different market conditions over the past dozen or so years. The retailers that have not been flexible enough to respond to changing consumer needs, or are being squeezed in the increasingly competitive 'middle ground' between high-end and value retailing, have largely struggled to maintain market share. In some cases, this has resulted in a series of high profile 'casualties' and a number of key retailers have either disappeared from our high streets altogether, or have significantly reduced their store portfolio in centres across the UK (e.g. Debenhams, House of Fraser and Marks & Spencer).

3.46 Research also shows that there is an increasing polarisation and concentration of retailer demand and investment interest in the larger regional and sub-regional centres (i.e. the 'top 25-50' UK centres as defined by Javelin VenueScore rankings). This is because these centres usually have large and established catchment areas, and therefore represent less 'risky' investments in the current uncertain economic climate. These larger centres have also generally benefitted from recent new shopping centre development and investment over the last decade, and are therefore better placed than smaller and medium sized centres to accommodate retailers' requirements for modern larger format units. At the same time, retailer and investment demand is also mainly focussed on the prime retail pitches, with the secondary and tertiary pitches contracting and deteriorating in some centres due to limited demand, smaller shop units and increasing vacancies. The continuation of these trends will impact on future operator requirements, with retailers looking to satisfy their demand for larger modern premises in prime shopping locations, with strong catchment areas and a good supply of appropriate retail space.

3.47 Furthermore, many of the major multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, TK Maxx, John Lewis and Marks & Spencer have been seeking larger out of centre format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.

3.48 As a result, it is the larger centres and out-of-centre retail parks that are often best placed to meet this demand; as larger units are difficult to accommodate within existing traditional high streets and town centres, particularly historic areas characterised by conservation areas and listed buildings. As a result, some traditional high street retailers are moving out of town centres to retail parks. For example, over recent years Marks & Spencer has closed a number of traditional variety stores on high streets and opened new M&S Simply Food stores in out-of-centre locations. M&S has also recently announced a further wave of store closures. This further underlines the growing demand from multiple retailers for larger format shop units, and the need for town centres to provide a good mix of large modern units to help attract and retain high street retailers, or potentially risk their relocation to new competing shopping destinations as and when leases expire.

3.49 The on-going challenging environment facing the comparison goods sector has been exacerbated by the impact of the COVID-19 pandemic and the lockdown period imposed in March 2020. Many comparison goods stores were classified as non-essential shops and have only recently re-opened. Whilst a significant element of sales transferred on-line (to those retailers who had a good online sales platform) overall sales have been affected considerably. Data for July 2020 indicates that some retailers have experienced a good initial 'bounce' back, other retailers have indicated that they may not open all of their former stores. In addition, experience of comparison goods shopping trips, which were until recently taken as a quasi-leisure activity, has fundamentally changed which, in the short term, is likely to impact upon the attractiveness of town centres.

3.50 These changes in retailer requirements and market demand will continue to have a significant impact on the UK's town centres and high streets, particularly in those cases where retailers make the decision to relocate from town centres to out-of-centre locations, or even move out of the area altogether, or focus future activities online.

4. Town Centre Health Checks – Gloucester City

4.1 This volume of the JCS Retail and City / Town Centre Review contains health checks of the various 'town centres' in Gloucester. For the avoidance of doubt, the definition of 'town centres' under national planning policy in the National Planning Policy Framework ('NPPF') includes city, town, district and local centres.

4.2 Within Gloucester there are the following three tiers of centres:

- Gloucester city centre
- The district centres of Quedgeley and Abbeydale
- Local centres at Windsor Drive/Holmleigh Road, Seventh Avenue, Matson Avenue, Glevum Way, Old Cheltenham Road, Finlay Road, Coney Hill, Barton Street, Seymour Road, High Street Tredworth, Hucclecote Road and Kingsway.
- The brief also asks AY to look at whether existing clusters of shops, commercial and community uses at Bristol Road in Linden, and Mead Road in Abbeymead, should be designated as local centres.

4.3 In line with the content of the Planning Practice Guidance ('PPG') our assessment of each centre has been based upon available data on the following categories:

- diversity of uses
- proportion of vacant street level property
- commercial yields on non-domestic property
- customers' views and behaviour
- retailer representation and intentions to change representation
- commercial rents
- pedestrian flows
- accessibility
- perception of safety and occurrence of crime
- state of town centre environmental quality

4.4 In relation to the district and local centres data on a selection of the above health check categories will not be available and therefore our assessment has, in those instances, concentrated upon their land use profile. In addition to the above categories recommended by the PPG, we also provide information on the shopping profile of each relevant centre using the results of the household survey commissioned for this Study.

Gloucester city centre

Structure

4.5 The City of Gloucester lies 8 miles from to the west of Cheltenham, 10 miles south of Tewkesbury and it is close to the Forest of Dean and the Welsh border. Gloucester city centre is located on the north-western corner of the city along the River Severn covering much of the historic core of the city.

4.6 The adopted Joint Core Strategy ('JCS') considers Gloucester City Centre to be "performing well for a city of its size"[6] with a small catchment, providing a good services and facilities.

4.7 Strategic interventions to transform the city centre and enhance its attractiveness for investment were established in the adopted Regeneration and Economic Development Strategy 2016, on key sites such as Kings Quarter, Bakers Quay and the Blackfriars. Planning permission has now been granted for the redevelopment of Kings Quarter for a mixed use scheme (which is discussed later in this report) and for the redevelopment and partial refurbishment of the former prison. These initiatives build upon the success of the docks area which has been transformed over the past 20 years into an attractive area which has provided residential apartments, food and beverage uses and an attractive public realm. Investment has also been made in the route between the docks and Southgate Street which is a key reason why the docks and the Quays areas have been able to provide good linkage with the traditional primary shopping area.

4.8 The opening of the new Gloucester Bus Station in 2018 has helped to support these strategic interventions and enhance the vitality of the city centre through improved and more attractive transport interchanges and improved connectivity. The bus station and adjacent railway station provide an important transport hub for the city, with additional funding from the LEP now secured to provide additional investment in the railway station.

4.9 The JCS provides a number of policy designations for the city centre including: (A) the city centre boundary, (B) a primary shopping area, (C) primary retail frontages, and (D) secondary retail frontages:

- The city centre boundary covers a wide area, stretching from Westgate Island, to the Docks and Gloucester Quays in the south and Trier Way in the east. The northern boundary of the city centre runs along the inner relief road (Bruton Way).
- The PSA covers a smaller area focused upon within the city centre is bounded by Black Dog Way to the north, Bruton Way to the east, Commercial Road to the South and Three Cocks Lane to the west.

4.10 In relation to current on-going investment projects in the city centre, Kings Walk shopping centre is shortly to undergo a £12 million refurbishment, presenting the most significant change in the city centre before the Kings Quarter and Blackfriars regeneration projects are delivered. This project will enhance the shopping centre's identity with an improved external façade and shop fronts, new entrances, an upgrade to section of Eastgate Street, a fresh public realm and ultimately draw in new tenants. In addition, plans were announced in 2019 for redevelopment of the Fleece Hotel site to provide a new hotel alongside food/beverage floorspace.

[6] Paragraph 4.2.5

Diversity of Uses

4.11 Information on the diversity of uses in the city centre is shown in Table 4.1 below and is based upon data provided by the previous JCS retail studies, Experian GOAD and an update of the GOAD data performed by AY in Spring 2019[7].

Table 4.1: diversity of retail land uses in Gloucester city centre

	August 2010			2018			2019		
Retail Trade Group	**Outlets number**	**%**	**%UK**	**Outlets number**	**%**	**% UK**	**Outlets number**	**%**	**%UK**
Convenience	33	6.86	9.23	38	8.46	9.99	38	8.46	10.00
Comparison	189	38.29	41.89	165	36.75	37.52	157	34.97	37.47
Service	148	30.77	34.78	171	38.08	38.80	169	37.64	38.82
Miscellaneous	10	2.08	1.18	9	2.00	1.18	7	1.56	1.18
Vacant	101	21.00	12.92	66	14.70	12.52	78	17.37	12.54
Total	481	100	100	449	100	100	449	100	100

4.12 Table 4.1 shows that Gloucester city centre has increased the number and proportion of convenience (food) goods retailers over the past several years. Whilst the proportion of convenience goods retailers in the city centre has increased, the overall proportion remains below the national average. Convenience goods retailers occupy circa 18,900sq m of space in the city centre which is equivalent to 17.6% of all retail floorspace and slightly below the national average of 18.5%.

4.13 There has been a noticeable sustained fall in the number of comparison (non-food) goods retailers in the city centre over the past several years. In 2010 comparison goods retailers were the largest category in the city centre with 38% of all retail units, although this has now changed with service uses forming the largest grouping. The number of comparison goods retailers has fallen from 189 in 2010 to 157 in 2019, meaning that they now occupy around 35% of all retail units in the city centre. It will be noted from the above table that the fall in the number of comparison goods units in the city centre has mirrored the national trends for this retail sector.

4.14 Whilst the number of comparison goods retail units remains below the national average, the amount of floorspace occupied by comparison goods retailers is above the national average. 49,650sq m of floorspace is occupied by comparison goods retail space which is equivalent to 46.2% of all retail space in the city centre and can be compared with the national average of 43.0%. Within the comparison goods sector, information from Experian GOAD reveals that the many of the various sub-categories are in line with their respective national averages. The noticeable differences are an under-representation of mixed and general clothing

[7] It should be noted that the area surveyed by Experian in the city centre is different to the defined city centre boundary in the adopted JCS.

stores, furniture and floorcovering retailers, DIY and hardware retailers. In contrast, the proportions of sports goods stores and electrical/mobile phone stores are above their national averages.

4.15 As noted above, the service sector[8] is now the largest retail sector in Gloucester city centre. There are now a total of 169 service retailers which accounts for 37.6% of all units. This is now close to the UK average of 38.8% and is an increase from 30.8% in 2010. In relation to the various service sub-categories data from Experian indicates that there is an over-representation of health and beauty services and an under-representation restaurant, café & fast foods businesses. Service uses occupy circa 25,200sq m of floorspace which is equivalent to 23.5% of all floorspace and slightly below the national average of 26.1%.

Vacancies

4.16 Table 4.1 above indicted that at the time the survey was undertaken, there were 78 vacant units in the city centre, which is equivalent to 17.4% of all units in the city centre. Table 2.1 indicates that the number of vacant units in the city centre has varied quite significantly over the past decade. In 2010 there were 101 vacancies in the centre which was equivalent to one fifth of all retail units and was significantly higher than the national average of 13%. By 2018 the number of vacancies had fallen to 66 which brought the proportion much closer to the national average albeit still higher. However, between 2018 and 2019 vacancies have increased again which is a significant cause for concern for the health of the city centre.

4.17 A number of the increased level of vacancies have been caused by the closure of national multiple stores, including Burton and Dorothy Perkins, Prezzo, Poundland, New Look, HMV and Pep&Co. This is in additional to the closure of the BHS store on Eastgate Street which was part of the national failure of that business.

Retailer representation

4.18 Despite a number of high profile store closures, Gloucester city centre retains a reasonably wide range of retail and service businesses. Within the convenience goods sector, the main national multiple businesses are an Iceland store at Kings Square, a foodhall within the Marks & Spencer store, a Sainsburys store on Northgate Street and a Tesco Express on Southgate Street. These stores tend to focus upon top-up food shopping trips although the Sainsburys store does attract a modest amount of main food shopping trips also. A short walking distance on the eastern edge of the centre is a large ASDA supermarket which is one of the most popular main food shopping destinations in the city. It has recently been announced that the city centre Sainsbury's store will close.

4.19 The main national multiple comparison goods retailers include Debenhams, Marks & Spencer, TK Maxx, Primark, Waterstones, B&M, H&M, Wilko and Boots. These retailers are mainly located in the central and eastern parts of the city centre's primary shopping area around Eastgate Street, Kings Walk and Eastgate Shopping Centre. The presence of these retailers places Gloucester city centre very much in the mid-market part of the retail sector which faces competition from a number of sources including Cheltenham town centre (which also has a wider offer, thus making it more attractive), on-line shopping and the significant amount of comparison goods floorspace which lies outside of the city centre. Out of centre provision in the city is covered later in this volume of the study.

[8] The service sector includes the following types of business: cafes, restaurant, hair salons, banks, building societies, estate agents, travel agents

4.20 As noted above, service uses in the city centre have been growing in number in recent years, which is in line with the national trend. A number of the national high street banks are represented including RBS, Santander, Halifax, Barclays and Lloyds and these are generally clustered around the cross. There is a noticeable differentiation between the food and beverage offer in the more historic part of the city centre (i.e. Southgate, Westgate, Eastgate and Northgate) and the Gloucester Quays area. The Quays has been successful in attracting a number of national multiple businesses such as Pizza Express, Bills, TGI Fridays, Coal and Bella Italia. This element of the Quays has proved very popular and has reinforced the retail offer of the Quays area. Within the traditional part of the city centre, the offer is more focussed around local independent traders and whilst there has been a general perception in recent years that the food/beverage offer has been modest, new outlets are opening with Westgate Street experiencing noticeable change. The offer will be further improved by the food/beverage provision which will be provided as part of the Kings Quarter redevelopment scheme.

Accessibility

4.21 Given its size and position in the settlement hierarchy, Gloucester city centre has good transport links via various modes. The recently completed new bus station element of the transport hub has made travelling to the centre by bus much more attractive. Services visiting the station include links to Dursley, Tewkesbury, Cheltenham, the Forest of Dean, Ross-on-Wye, Stroud and Ledbury. National services also regularly visit the new station also. There are also frequent circular city-wide services.

4.22 The transport hub also contains the railway station is also a short walk from the northern edge of the city centre. The station is tired in appearance and is planned to receive significant investment in the near future to its main entrance and car parking provision. The station is visited by both local and national services, including regular services to London Paddington and local services to Bristol, Lydney, Cheltenham and Chepstow.

4.23 There are a number of car parks across the city centre including multi-storey facilities at Kings Walk, , Longsmith Street and Eastgate Shopping Centre. The Bruton Way multi-storey car park has recently been demolished as part of the King's Quarter regeneration scheme, to be replaced with a 400 space new facility. There are also surface level car parks at Westgate Street, Longsmith Street, Welliington Street, St Kilda Parade and Park Street. This replacement facility is much needed as the quality of existing multi-storey provision in the city centre is poor/dated.

4.24 In relation to walking and cycling, a substantial part of the primary shopping area in the city centre is pedestrianised which makes movement around the centre easy. Two Sustrans cycle routes also run through the centre (Routes 41 qnd 45), running though the docks/quays area and past the cathedral. As mentioned earlier, the route between the primary shopping area and Gloucester docks/quays has been substantially improved. However, there are other key routes that are currently of poor quality and under-utilised that would benefit from improvement. These run through the docks, adjacent to the former City Council offices, and through Blackfriars along Ladybellgate Street and The Barbican.

Customer views and behaviour

4.25 The results of the household survey commissioned for this Study provide detailed information on the usage of Gloucester city centre and its catchment for various types of shops and services. Based upon the market share analysis informing our quantitative need assessment, the following information is salient to Gloucester city centre:

- Gloucester city centre has a limited main food shopping role. In relation to first choice main food trips, the centre attracts circa 6.5% of trips from residents of Zone 5a (the central Gloucester zone) and 4% of trips from Zone 6 (Newent). The centre is slightly more popular in terms of second choice main food shopping destinations, with a 9% market share in Zone 5a, a 6% market share in Zone 5b (south-west Gloucester) and 4% market in Zone 5c (east Gloucester). The most popular store is, unsurprisingly, the Sainsburys on Northgate Street given its size and retail offer.
- The city centre is more popular in terms of top-up food shopping but not significantly so. This is perhaps a product of the large amount of convenience goods floorspace elsewhere across the city which creates a significant amount of competition. The centre's popularity as a first choice top-up food shopping destination is limited to residents of Zone 5a (central Gloucester) where is a 10% share of all trips. In terms of second choice top-up food shopping trips, the city centre's catchment is wider, across the whole city, with a 7% in Zone 5a, 9% in Zone 5b, 3% in Zone 5c and 6% in Zone 5d (north Gloucester).
- The core catchment of the city centre in relation to comparison goods shopping comprises the four zones which cover the Gloucester urban area (5a, 5b, 5c and 5d), plus Zones 6 (Forest of Dean North), 11 (Cinderford), 12 (Lydney) and 13 (Dursley/Berkeley). Based upon the market share data from 2019 household survey[9], the city centre's market share for first choice clothing/fashion trips from Zones 5a-5d is between 30%-40%. Its market shares for first choice trips in the other comparison goods categories across Zones 5a-5b are as follows:
    - Furniture and carpets – 18% to 28%
    - DIY goods – 13% to 31%
    - Electrical goods – 15% to 23%
    - Soft furnishings – 34% to 53%
    - Books, CDs, DVDs – 22% to 40%
    - Health and beauty goods – 20% to 46%
    - Recreational goods – 18% to 38%
    - Gardening goods - 9% to 23%

4.26 In many instances, the city centre's market share in the central and northern Forest of Dean zones is able to match those market shares achieved in the city itself.

4.27 In order to assess the health of the city centre over time, we have compared the city centre's market share in the various comparison goods categories between the results of the 2015 and 2019 household surveys. The datasets from each survey which have been used are the weighted and unfiltered sets. This analysis is contained at Appendix II to this volume and shows the following:

[9] The weighted data which has been filtered to removed 'null' responses

- There is not a consistent trend across zones within the city centre's core catchment and all goods categories, however there has been a reduction in market share in two of the four Gloucester zones and an increase in another.
- There has been a reduction in two of the Gloucester zones and an increase in the other two for shopping on book, CDs and DVDs.
- For recreation goods shopping, there have been small reductions in Zones 5a and 5b, a larger increase in Zone 5c and no change in Zone 5d.
- In relation to health and beauty goods there have been falls in market share in each of the four zones covering the Gloucester urban area.
- There is also a mixed picture in relation to the city centre's market share amongst shopping trips from Forest of Dean residents. Reductions in market share can be found in relation to shopping for books, health and beauty goods.

4.28 In addition to the above market share analysis, it is also possible to compare the convenience and comparison goods turnover forecasts for the city centre between the 2015 Study and this latest analysis. In the 2015 Study, the city centre was forecast to have an annual study area derived turnover for convenience goods of £18.5m[10] in 2015. Within our latest analysis at Table 5a in Volume X, use of the new household survey data indicates a significant fall in the convenience goods turnover of the city centre to £12m in 2019. This represents a fall of one third and is a sign of the falling popularity of the city centre for food shopping trips.

4.29 We have also compared the comparison goods turnover forecasts between both studies and a similar pattern emerges with a fall from £319.3m in 2015 to £269.8m in 2019. This represents a fall of 15% and is a further worrying sign of the health and performance of Gloucester city centre.

Pedestrian flows

4.30 Detailed pedestrian footfall counts have not been commissioned for this Study and instead observations regarding vitality levels across the city centre have been during our visits over the course of this Study. In line with the original JCS retail study in 2011 it remains the case that the busiest parts of the city centre remain around the cross, Eastgate Street, the Eastgate Shopping Centre and Kings Walk Shopping Centre. Pedestrian activity tails off significantly along Westgate Street although activity along Northgate Street remains reasonably high.

4.31 Around the edges of the centre, pedestrian activity and linkages with the railway station is hindered by the dual carriageway of Bruton Way and there are significant opportunities to make improvements in this area. To the south of the city centre, considerable investment has been made over the past decade in relation to linkages between the Docks, Gloucester College and Gloucester Quays and Southgate Street. This has made a significant difference to the attractiveness of the walk between the Quays/Docks and the primary retail area of the city centre and it is clear from observation that there is reasonable flow of linked trips throughout the

[10] See Table 10 in the 2015 Study

day. Such linkages will, of course, work in both directions and the benefit of the Gloucester Quays area to the city centre can also have the effect of sucking pedestrian activity away from the core city centre area.

Environmental quality

4.32 Much of Gloucester city centre is covered by Conservation Area designations which recognise the history and heritage of the centre. Some of the centre's most recognisable assets are the cathedral, the historic 'cross' of the four 'gate' streets in the shopping core and the varied collection of buildings particularly along Westgate Street and Southgate Street. On the southern edge of the centre the Docks area has been invested in by the public and private sectors over many years and this investment has introduce new city centre living, a quality waterfront environment and a space where open air events can take place.

4.33 However, more modern post-war additions to the centre have not aged well and key regeneration projects around Blackfriars and Kings Quarter have a key objective of improving the physical appearance of these parts of the city centre. The new bus station has provided an attractive modern addition to the northern edge of the centre and we consider that the next key project in this area is to improve the appearance of the railway station area and associated pedestrian linkages. At the time of writing, King's Square is subject to substantial public realm improvements and the wider regeneration of King's Quarter and King's Walk is progressing.

4.34 The City Council has prepared a Heritage Strategy for the central part of Gloucester[11] and includes the following objectives:

- Development and regeneration at key sites in the historic city centre area
- Marketing and promotion of the city centre as an opportunity for business and creative enterprise, an affordable place to live and as a place with a different retail offer
- Reconciling ground floor retail/commercial and upper floor residential uses
- Improving connections between the docks area and the historic core
- Reviewing Conservation Areas and Article 4 Directions
- Reviewing local green space designations

Summary and conclusions

4.35 Within the 2011 Study for the current JCS document, Gloucester city centre was found to be a relatively robust and healthy centre which benefitted from its historic built environment and had shown resilience to difficult economic conditions. The 2011 Study also observed that vacancy levels were falling but considered there was a need for an improved retail offer (particularly around the fashion sector) and the need for new development to improve the overall attractiveness of the centre. Since the 2011 Study, some of the indicators assessed for this latest Study show some improvement, particularly around falling vacancies and an improved comparison goods turnover. However, since the 2015 Study these trends have been reversed with a fall in the 2019 comparison goods turnover back to 2011 levels and a rise in vacancies over the past year. The

[11] Published in February 2019

comparison goods retail offer in the city centre is reducing (albeit this is a common trend in a number of town and city centres) and there has been a shift to a growing level of services. In addition, the financial performance of the convenience goods sector in the centre has fallen by one third.

4.36 All of these factors point to a centre which is vulnerable and susceptible to even small levels of trade loss. There are likely to be a varied range of reasons for this vulnerability, including the structural changes affecting high streets nation-wide, the continuing growth of spending via the internet, the greater level of success achieved by Cheltenham in recent years and also the large scale competition available in out of centre stores in the city. It is likely that the implementation of further retail floorspace commitments outside of the city centre will continue the trends set out above and it is now likely that the city centre needs to be re-focused away from its traditional retail offer and accommodate a wider mix of land uses in order to sustain its health. The Kings Quarter and Greater Blackfriars projects will be important first steps in this process, bringing in an increased level of residential accommodation in to the city.

DISTRICT CENTRES

Quedgeley

4.37 Quedgeley is one of two district centres in Gloucester and lies in the southern part of the city where there has been significant residential growth over the past two decades. The centre is split into two distinct parts on either side of Bristol Road and characterised by reasonably low density detached buildings of various sizes.

4.38 To the west of Bristol Road is a large Tesco Extra supermarket served by a large surface level car park. There is also a petrol filling station, library, pub/restaurant and a small parade of shops. To the east of Bristol Road is a parade of large retail units, an ALDI foodstore, a pub/restaurant and a further parade of shops.

4.39 Table 4.2 below provides a summary of a review of retail uses in the district centre undertaken by AY in Spring 2019. The data has been collated and organised using the standard Experian GOAD 'centre report' classification in order to provide consistency with those centre covered by this Study which do benefit from Experian GOAD data.

Table 4.2: retail land use profile of Quedgeley district centre

	2019		
	No.	**%**	**% UK**
Convenience	2	8.0	10.0
Comparison	7	28.0	37.5
Service	13	52.0	38.8
Misc.	2	8.0	1.2
Vacant	1	4.0	12.5
Total	25	100%	100%

Source: AY survey 2019

4.40 Convenience goods retail provision in the district centre is dominated by the Tesco Extra and ALDI stores. The Tesco store extends to 3,750sq m net (convenience goods) sales and sells a wide range of fresh, refrigerated, frozen and pre-packaged food products, along with reasonably large comparison goods offer. The ALDI is smaller in size, at 950sq m net sales, and has a more limited number of food product lines. The household survey commissioned for this Study indicates that the Tesco store is the first choice main food shopping destination for 50% of all residents in Zone 5b (south Gloucester) in the study area. The Tesco also draws 5% of first choice main food trips from Zone 5a (central Gloucester) and 5% from Zone 5c (east Gloucester). The ALDI store has a 15% market share in first choice main food shopping trips in Zone 5b. ALDI also has a similar market share (15%) in second choice main food trips in Zone 5b although Tesco has a 19% share of these trips.

4.41 The Tesco store is also the most popular top-up food shopping destination for Zone 5b residents, with a 32% share of first choice top-up trips and 32% share of second choice top-up trips. The ALDI store attracts 13% of first choice top-up trips and 15% of second choice top-up trips.

4.42 In relation to the comparison goods sector in the district centre, this has been traditionally dominated by the retail park on the eastern side of Bristol Road. Up until recently the retail park had four national multiple retailers (Boots, Next, Brantano and Matalan) although Brantano and Next have now closed (the latter closure due to the opening of a new large Next store at Gloucester Quays).

4.43 Table 6 in Appendix II outside the market shares associated with comparison goods shopping trips to Quedgeley district centre. It provides the following information:

- The district centre is the first choice destination for 7% of resident population for clothing and fashion shopping trips. In the perspective of the size of the city centre and Gloucester Quays we consider this to be a good performance for Quedgeley although the closure of Brantano and Next is likely to affect this position. The district centre is also a reasonably popular second choice clothing/fashion shopping destination with a 1%-3% market share across the whole of the city.
- The district centre has the following market shares as a first choice shopping destination in the following categories:
  - Furniture and floorcoverings – 11% market share in Zone 5b
  - DIY – 2% market share in Zone 5b
  - Electrical goods – 13% market share in Zone 5b
  - Soft furnishings – 7% market share in Zone 5b
  - Books, CDs and DVDs – 14% market share in Zone 5b
  - Health and beauty goods – 62% market share in Zone 5b, 4% market share in Zone 5a, 3% market share in Zone 5c and 5% market share in Zone 13.
  - Recreational goods – 8% market share in Zone 5b, and 1% market share in Zones 5a and 5d apiece.
  - Gardening goods – 6% market share in Zone 5b

4.44 Overall, whilst Quedgeley district centre may, on face value, have the appearance of an out of centre foodstore and small retail park, it does contain a reasonably wide range of retail, service and other main town centre uses which provide valuable day to day and higher order facilities for the local popular across the southern part of Gloucester. The convenience goods sector in the centre – i.e. the Tesco and ALDI stores – continue to perform well, albeit the Tesco would appear to have lost some turnover since the 2015 Study. In addition, the latest survey provides a more realistic turnover estimate for the ALDI store on Bristol Road and this store remains trading well.

4.45 We consider that Quedgeley district centre is a vital and viable centre which provides a good range of shops and services for the local community. The loss of Next and Brantano will have an effect on the health of the centre and it will be important for the City Council to ensure that an appropriate main town centre use is able to re-occupy this space in order to reinforce and protect the health of the centre. The centre is likely to play a particularly important role in serving the growing community in the southern part of the city, serving a wide range of day to day retail and service trips and, based upon its content, role and function, should be retained as a district centre in the retail hierarchy.

Abbeydale

4.46 The other district centre in Gloucester lies in the suburb of Abbeydale in the eastern part of the city. The centre lies within a large post-war housing estate and contains a small amount retail units. The largest unit is a Morrisons supermarket which is the clear anchor for the centre. The store is served by a large surface level car park and sells a wide range of convenience goods along with a small amount of comparison goods.

Table 4.3: retail land uses in Abbeydale district centre

	2019		
	No.	%	% UK
Convenience	1	16.7	10.0
Comparison	1	16.7	37.5
Service	2	33.3	38.8
Misc.	0	0.0	1.2
Vacant	1	16.7	12.5
Total	6	100%	100%

Source: AY survey 2019

4.47 Other retail units in the centre accommodate a charity shop, an estate agent, a bookmaker and a take-away. There is one small vacant retail unit. All of these units are attached to the Morrisons store and benefit from the adjacent parking area.

4.48 Other non-retail units on the edge of the centre include a pub/restaurant, a community centre and a veterinary practice.

4.49 The market share analysis for our quantitative assessment indicates that the Morrisons supermarket is the most first choice main food shopping destination in Zone 5c (the zone in which the district centre lies). 22.7% of all first choice main food shopping trips from Zone 5c residents are associated with the Morrisons store, whilst it also attracts 5% of first choice main food trips from Zone 5d residents. It is also a reasonably popular second choice main food destination with 10% of trips from Zone 5c residents and a 3% market in Zone 5a. It is also the single most popular first choice top-up food shopping destination amongst Zone 5c residents with a 24.2% market share.

4.50 Based upon the content of the 2015 and 2019 quantitative assessments and accompanying household surveys, it would appear that the Morrisons store has increased its market share and turnover by a modest extent. The previous study forecast a turnover of circa £26.5m whilst the latest assessment suggest a slight increase to circa £31m.

4.51 Unsurprisingly, given the retail land use content of the district centre, the household survey commissioned to support this Study does not register Abbeydale as a comparison goods shopping destination under most comparison goods categories. The exception to this is the health and beauty goods category and this will be driven by the retail offer of the Morrisons supermarket which stocks a reasonably wide range of goods.

4.52 Overall, we conclude that there is no particular concern over the health of Abbeydale. This is unsurprising given the anchor role of the Morrisons supermarket which, according to the available household survey data, has increased its market share. The main issue for Abbeydale is whether it should continue as a district centre in the Gloucester 'town centre' hierarchy in light of the low number of retailers present in the centre. The latest (February 2019) version makes reference to district centres but does not define their content and role. The most recent definition lies in the Practice Guidance supporting the (now superseded) PPS4 which notes that *"District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library"*.

4.53 Based upon this definition, which is of course non-binding, Abbeydale is at the lower end of what can be described as a district centre in the Gloucester 'town centre' hierarchy. There is no reason to drop Abbeydale from the 'town centre' hierarchy although the lack of variety and scale in main town centre uses in the centre suggests that it may be more appropriate for the centre to be re-classified as a local centre in the hierarchy.

Local Centres

4.54 The local centres across the Gloucester urban area have been assessed. These centres are:

- Windsor Drive & Holmleigh Road
- Seventh Avenue
- Matson Avenue
- Old Cheltenham Road
- Kingsway
- Finlay Road
- Coney Hill
- Barton Street
- Seymour Road
- High Street, Tredworth
- Hucclecote Road

Windsor Drive & Holmleigh Road

4.55 This local centre can be found within the Lower Tuffley area of Gloucester and lies approximately 3 miles to the south of the city centre. The centre is split into two parts: on Holmleigh Road and a smaller separate area to the south-east on Windsor Drive.

4.56 Holmleigh Road otherwise known as 'Holmleigh Parade' is reminiscent of the 1960/70's in terms of its appearance serving the local community with a range of shops. The centre is mixed use in nature with residential flats above the shop units and is surrounded by terraced and semi-detached residential properties off Holmleigh Road. The parade provides a modest amount of off street parking immediately in front of the shops. The proximity to the Tuffley Library, Harewood Infants School, and Beaufort Co-operative Academy assists with the vitality and footfall of the centre.

4.57 The separate area of Windsor Drive is similar in appearance, and neighbours a public house offering a range of goods and services to serve the local community in addition to the above. Car parking is limited to on street parking only.

4.58 Surveys of both parts of the centre by AY in Spring 2019 provide the following land use data:

Table 4.4 – land use composition of Windsor Drive & Holmleigh Road

	2019		
	No.	**%**	**% UK**
Convenience	3	23.1	10.0
Comparison	4	30.8	37.5
Service	6	46.2	38.8
Misc.	0	0.0	12.5
Vacant	0	0.0	1.2
Total	13	100%	100%

Source: AY survey 2019

4.59 The above table shows that both parts of the local centre have a strong focus upon comparison goods and service uses which, when combined, occupy over 77% of all of the units in the centre. Nearly half (46%) of all the units are occupied by service goods retailers, which is in excess of the national average of 38%. The level of service provision is evenly balanced between both Windsor Drive & Holmleigh Drive with uses including an estate agent, hairdressers, and a number of takeaways.

4.60 The opposite is true for comparison uses (31%), which falls below the national average of 38%. Comparison uses include a florist, pet shop, pharmacy, and charity shop.

4.61 There are three convenience good stores in the centre which consist of Premier and McColl's convenience stores plus a local bakery business known as 'Jane's Pantry'.

4.62 There are no vacant units in the centre which demonstrates the ability of the centre to successfully serve the local community of Tuffley.

4.63 Whilst this local centre is likely to be primarily attractive to walk-in visits from the local community, there are also bus stops close to the centre which are visited by Stagecoach service 10 which visits Brockworth, Gloucester city centre, and Cheltenham.

4.64 We consider that this location has the characteristics that make it a 'local centre' in the city's retail hierarchy.

Seventh Avenue

4.65 This local centre also lies within the Tuffley area of south Gloucester, approximately 3 miles to the southern edge of the city centre. The centre is accessed off Tuffley Lane via Robert Raikes Avenue which is situated in the centre of a residential estate and consists of a purpose built single storey parade of five units.

4.66 The has a modest amount of parking in front of the shop units and the proximity to St Peters High School & Sixth Form Centre assists with the vitality and footfall of the centre.

4.67 Table 4.5 below provides information from AY's survey of the local centre in Spring 2019:

Table 4.5 – land use composition of Seventh Avenue

	2019		
	No.	**%**	**% UK**
Convenience	3	60.0	10.0
Comparison	1	20.0	37.5
Service	1	20.0	38.8
Misc.	0	0.0	1.2
Vacant	0	0.0	12.5
Total	5	100%	100%

Source: AY survey 2019

4.68 Seventh Avenue is dominated by convenience goods retailers including Co-op and Premier convenience stores and also a local chain bakery known as 'Jane's Pantry'. The household survey commissioned for this Study indicates that this centre is not associated with any main food shopping trips although it is able to attract a 3.4% market share from Zone 5c (south east Gloucester).

4.69 Overall, Seventh Avenue is a healthy small scale centre with a limited catchment, primarily based upon a food shopping function. Any future strategy for the centre should focus upon improving its appearance and taking opportunities to expand the amount of floorspace that it provides. It clearly provides an important local function although we consider the scale and function of the 'centre' is close to the tipping point between it being a local centre and neighbourhood centre. We consider that the former is the most appropriate classification.

Matson Avenue

4.70 Matson Avenue lies in the south-eastern part of the city, approximately 2.5 miles from the city centre. The centre is accessed off the Painswick Road (B4073) via Matson Lane which is situated in the middle of a residential council estate and consists of a mixed use four storey parade of eight units which comprises of multiple uses including flats above the ground floor retail uses. The parade is surrounded by a mixture of three storey flat blocks and semi-detached residential housing which enclose a modest area of greenspace. There is a reasonable amount of parking immediately adjacent to the centre.

4.71 Information on the diversity of uses within Matson Avenue local centre has been obtained through surveys conducted by Avison Young in 2019 and which provide the following data:

Table 4.6 – land use composition of Matson Avenue

	2019		
	No.	**%**	**% UK**
Convenience	4	50.0	10.0
Comparison	2	25.0	37.5
Service	2	25.0	38.8
Misc.	0	0.0	1.2
Vacant	0	0.0	12.5
Total	8	100%	100%

Source: AY survey 2019

4.72 The above table shows that the local centre has a strong focus upon convenience uses, which occupies half of all of the units in the centre, which is in excess of the national average of 10%. There are four convenience good stores in the centre which consist of a Martin's, Premier, Matson Store and a local chain bakery known as 'Jane's Pantry'.

4.73 The opposite is true for comparison uses (25%), and service uses (25%) which fall below the national average of 38%, and 39% respectively. Comparison units comprise of a pharmacy and florist with service units comprising of a hairdressers, and launderette.

4.74 There are no vacant units in the centre which demonstrates the vitality of the centre through the range of uses provided and its ability to serve the local community of Matson. In relation to other land uses, some of the space in the centre is being utilised as a GL4 office by the local authority and 'The Gateway' as community related use. Bus stops are immediately outside the centre which provides a direct service to Gloucester City Centre. We consider that this location should remain as a local centre in the retail hierarchy.

Old Cheltenham Road

4.75 This small local centre can be found within the Longlevens area of Gloucester. The local centre lies approximately 2.4 miles to the north eastern edge of the city centre. The centre is accessed off both the Cheltenham Road (B4063) and Old Cheltenham Road which is situated within a predominantly residential area comprising semi-detached and detached properties.

4.76 Parking is predominantly on street for many of the uses on Old Cheltenham Road, although the Co-op and Tesco Express stores within the centre have their own designated car parks with other off street provision in front of some of the other uses. Vehicular access to the Co-op store is via Cheltenham Road, whilst vehicular access to the remainder of the centre is via Old Cheltenham Road.

4.77 Information on the diversity of uses within the Old Cheltenham Road local centre has been obtained through surveys conducted by Avison Young in Spring 2019 and which provide the following data:

Table 4.8 – land use composition of Old Cheltenham Road

	2019		
	No.	**%**	**% UK**
Convenience	2	18.2	10.0
Comparison	1	9.1	37.5
Service	8	72.7	38.8
Misc.	0	0.0	1.2
Vacant	0	0.0	12.5
Total	11	100%	100%

Source: AY survey 2019

4.78 The above table shows that the local centre has a strong focus upon service uses which occupies around three quarters (73%) of all of the units in the centre. This is around twice the proportion of the national average of 39%. Service uses in the centre include estate agents, takeaways, hairdressers, and financial planning services.

4.79 The only comparison goods retailer is a Lloyds Pharmacy to be found on the corner of Old Cheltenham Road and Windermere Road.

4.80 The two convenience stores in the centre - Co-op and Tesco Express – provide an important anchor to the centre. They provide an important local shopping function for the surrounding local community plus pass-by trade along Cheltenham Road. The household survey commissioned for this Study indicates that:

- The Tesco Express store attracts a 1.4% market share in first choice main food shopping trips from residents of Zone 6 and a 0.7% market share of first choice trips for residents in Zone 5d. It also has a 1.5% share of second choice main food trips amongst Zone 6 residents.
- Given the size of the Tesco Express store, it is unsurprising that it is more popular for top-up food shopping trips, with a 9.4% market share of first choice top-up trips amongst Zone 5d residents. It also has a 12.9% market share for second choice top-up trips in Zone 5d.
- The household survey does not indicate any main food shopping trips associated with the Co-op store on Cheltenham Road although it is more popular than the Tesco Express store for first choice top-up food shopping trips amongst Zone 5d residents, at 15%, with 6% market share for secondary top-up trips in Zone 5d.

4.81 In addition to the retail uses surveyed above, there is a petrol filling station on Cheltenham Road which adds to the popularity of the centre, attracting pass-by visits plus a small shop.

4.82 Our survey reveals that there are no vacant units in the centre which demonstrates the popularity of the centre as a trading location in the local community, and it is clear from our visits to the centre over the course of this Study that it is well used by both local residents and pass-by visits.

4.83 In addition to accessibility to the centre via private car, bus services stop on Cheltenham Road providing direct services to Gloucester city centre and Cheltenham town centre.

4.84 Overall, Old Cheltenham Road is a small but healthy centre which provides an important role to the local community in north-east Gloucester. It is the only centre in this part of the city and, as such, it role and function needs to be protected by the City Council, including its status as a local centre, when considering proposals for new retail provision in the city.

Finlay Road

4.85 This local centre can be found directly on the A38 a key arterial route leading onto Eastern Avenue. The local centre lies approximately 2.0 miles to the south of the city centre. The centre is accessed off the A38 Finlay Road which leads immediately onto Selwyn Road which is situated within a predominantly residential area comprising semi-detached and detached properties. The centre is one of the smallest local centres with only five units and is split by Selwyn Road with units on either side with parking constrained to on street only.

4.86 Information on the diversity of uses within the Finlay Road local centre has been obtained through surveys conducted by Avison Young in 2019 and which provide the following data:

Table 4.9 – land use composition of Finlay Road

	2019		
	No.	%	% UK
Convenience	1	20.0	10.0
Comparison	1	20.0	37.5
Service	2	40.0	38.8
Misc.	1	20.0	12.5
Vacant	0	0.0	1.2
Total	5	100%	100%

Source: AY survey 2019.

4.87 The above table shows that the local centre has a focus upon service uses which occupies over a third (40%) of all of the units in the centre which is just above the national average of 39%. The level of service uses provided is constrained to solely takeaways.

4.88 The opposite is true for comparison a goods retailer (20%), which falls well below the national average of 38% with only one comparison use in the centre being DaJon (Kitchen & Bathroom) retailer.

4.89 There is also only one convenience store in the centre which consists of a Co-op which comprises 20% of the total unit stock which is above the national average of 10%. Despite their only being one convenience use within this local centre, it offers a range of offer in terms of goods to centre users, and the wider community using this key route into the city.

4.90 In addition to the above there is a post office within the centre which offers a range of services and is open Mon to Sat (9am until 5pm). There are no vacant units. Bus stops are within close proximity on Finlay Road providing frequent direct services to White City and Brockworth (Services 7 / 805).

4.91 Like other 'centres' of this size in Gloucester, it is borderline as to whether this should be classified as a local centre or a neighbourhood parade. We consider that the former should be preferred.

Coney Hill

4.92 This local centre can be found in Coney Hill which borders Saintbridge. The local centre lies approximately 2.1 miles to the south east of the city centre. The centre is accessed off the Coney Hill Road which leads immediately onto Coney Hill Parade which is situated within a predominantly residential area comprising terraced and semi-detached properties. The centre is the smallest local centres with only four units and is split by Naunton Road with units on either side with ample parking located in front of the retail units on Coney Hill Parade.

4.93 Information on the diversity of uses within the Coney Hill local centre has been obtained through surveys conducted by Avison Young in 2019 and which provide the following data:

Table 4.10 – land use composition of Coney Hill

	2019		
	No.	%	% UK
Convenience	2	50.0	10.0
Comparison	0	0.0	37.5
Service	1	25.0	38.8
Misc.	0	0.0	12.5
Vacant	1	25.0	1.2
Total	4	100%	100%

Source: AY survey 2019.

4.94 The above table shows that the local centre has a focus upon convenience uses which occupies half of all of the units in the centre which is five times the national average of 10%. The level of convenience uses although over prescribed are provided by a Premier and Coney Hill superstore.

4.95 The opposite is true for comparison uses with no provision at all with facilities such as a pharmacy not provided by the local centre. Service use provision is also lacking upon which occupies only a quarter (25%) of all of the units in the centre which is well below the national average of 39%. There is only one takeaway to cater for the basic needs of the local community.

4.96 There is one vacant unit in the centre which was previously occupied by the Post Office. This represents 25% of all units in the centre and is conversely well above the UK average (1%).

4.97 Although small the centre lacks basic needs for the local community and is constrained to convenience uses. Bus stops are within close proximity on Coney Hill Road providing infrequent services to Gloucester City Centre and Churchdown (Service 49).

4.98 As a consequence of the above, we do not consider that Coney Hill should be classified as a local centre in the formal retail hierarchy as it is more suited to a small parade of neighbourhood significance.

Barton Street

4.99 Barton Street lies close to the eastern edge of the city centre and is the largest local centre in the city with circa 70 retail units. The centre is linear in nature and Barton Street is a key vehicular route in the eastern part of the city, linking the city centre to Eastern Avenue.

4.100 Barton Street is characterised by terraced properties with commercial uses at ground floor level and, in some cases, residential accommodation above. Properties are generally 2-3 storeys situated close to the highway, providing a compact environment. The centre is surrounded by high density terraced residential housing on streets which have on-street parking although Barton Street itself has restrictive parking measures with no on-street parking.

4.101 Land use surveys conducted by Avison Young in Spring 2019 provide the following retail land use profile for Barton Street local centre:

Table 4.11 – land use composition of Barton Street

	2019		
	No.	**%**	**% UK**
Convenience	10	13.0	10.0
Comparison	17	22.1	37.5
Service	33	42.9	38.8
Misc.	0	0.0	1.2
Vacant	17	22.1	12.5
Total	77	100%	100%

Source: AY survey 2019

4.102 The above table shows that the local centre has a strong focus upon service uses which occupies nearly half (43%) of all of the units in the centre, above the national average of 39%. The level of service provision is dominated by hairdressers, launderettes, takeaways, beauty salons, and tattoo shops.

4.103 The opposite is true for comparison goods retailers (22%), which fall well below the national average of 38%. Comparison uses include pharmacies, discount furniture stores, audio / electrical / telecom stores, a charity shop, and a florist. On the western edge of the centre there is a large Go Outdoors unit, accessed from Trier Way.

4.104 There are ten convenience good stores in the centre which comprise 13% of all retail units, above the national average of 10%. Although the convenience stores are of relatively small scale with no national multiples present they offer a range of offer in terms of goods to centre users with some specialist food shops selling a variety of products not found in mainstream / chain supermarket stores.

4.105 There are seventeen vacant units in the centre. This represents 22% of all units in the centre and is well above the UK average (12.5%). This suggests a local centre with a weak demand for retail premises and/or a centre which is capable of contraction. One of the reasons for this high vacancy is likely to be due to the inability to easily find available vehicular parking spaces which will limit the ability of the centre to capitalise on pass-by trade.

4.106 The household survey commissioned for this Study provides some market share data for the Sainsburys Local store which lies on the eastern edge of the proposed local centre boundary in the Gloucester City Plan. The survey indicates that the Sainsburys store has a 0.7% market share in first choice main food trips in Zone 5c and a 3% market share of secondary main food trips in Zone 5b. Given the modest size of the Sainsburys store, it unsurprisingly has a higher market share in top-up food shopping trips, with a 7% market share amongst Zone 5a residents. Barton Street does not feature amongst the market share data in the 2019 household survey for comparison goods shopping trips.

4.107 Overall, Barton Street is a local centre of modest health, but should retain its local centre classification. It mainly serves a food and service role for a walk-in catchment on the eastern edge of the city centre, catering for a wide variety of food and beverage needs. Whilst the centre benefits from a high density walk-in catchment, it suffers from a poor appearance influenced by lack of investment in property and also the influence of the heavily trafficked nature of Barton Street. The shopping function of the centre will also no doubt be influenced by the wide retail offer of the nearby ASDA supermarket.

4.108 In relation to the boundary of the centre, we recommend that draft boundary in the Gloucester City Plan should be extended to include the Sainsburys Local unit in the east. It will also be noted that parts of the draft boundary designation include non-main town centre uses. Whilst this is not uncommon for some ‘traditional’ local and district centres, there are a number of uses along Barton Street and therefore the exact boundary of the centre may have to be kept under review.

Seymour Road

4.109 This local centre can be found in the Linden area of Gloucester. The local centre has thirteen retail units and lies approximately 1.3 miles to the south east of the city centre. The centre retail units are situated on both sides of Seymour Road and fragmented in nature dispersed at various intervals along the street. The centre is largely surrounded by streets characterised by terraced residential housing. There is on street parking Seymour Road with some restrictions in place. Uses are spread out but do offer the local community with a relatively good range of shops.

4.110 Information on the diversity of uses within the Seymour Road local centre has been obtained through surveys conducted by Avison Young in 2019 and which provide the following data:

Table 4.12 – land use composition of Seymour Road

	2019		
	No.	%	% UK
Convenience	2	15.4	10.0
Comparison	2	15.4	37.5
Service	5	38.5	38.8
Misc.	0	0.0	12.5
Vacant	4	30.8	1.2
Total	13	100%	100%

Source: AY survey 2019.

4.111 The above table shows that the local centre has a strong focus upon service uses which occupies over a third (39%) of all of the units in the centre which is on par with the national average of 39%. The level of service provision is comprised of hairdressers, takeaways, and a travel agent.

4.112 The opposite is true for comparison goods retailers (15%), which fall well below the national average of 38%. Comparison uses include a florist and a pharmacy.

4.113 Although there only two convenience good stores in the centre which comprises 15% of the total unit stock it is however above the national average of 10%. These two units consist of a Co-op and Best One convenience store which offer a significant level of floor space, and range of offer in terms of goods to centre users, and the wider community.

4.114 There are four vacant units in the centre. This represents 31% of all units in the centre and is well above the UK average (1%). Due to the nature of the centre being disperse pedestrian footfall is sparse this could have been a direct effect of challenging economic conditions with some of these units previously operating as a café, and as a Co-op pharmacy. Bus stops are within close proximity on Seymour Road providing infrequent services to Gloucester City Centre and Cheltenham (Service 10).

4.115 We recommend that Seymour Road should be classified as a local centre in the formal retail hierarchy.

High Street, Tredworth

4.116 This local centre can be found in the Tredworth area of Gloucester. The local centre has thirteen retail units and lies approximately 0.9 miles to the south of the city centre. The centre retail units are situated on both sides of the High Street and concentrated mainly around the Co-op supermarket. The centre is largely surrounded by streets characterised by terraced residential housing. There is on street parking along Seymour Road by designated linear parking bays with some restrictions in place either side of the road. The centre is relatively well used and provides a convenient 'quick shop' stop for certain goods, and services.

4.117 Information on the diversity of uses within the High Street, Tredworth local centre has been obtained through surveys conducted by Avison Young in 2019 and which provide the following data:

Table 4.13 – land use composition of High Street, Tredworth

	2019		
	No.	%	% UK
Convenience	5	16.1	10.0
Comparison	3	9.7	37.5
Service	12	38.7	38.8
Misc.	1	3.2	12.5
Vacant	10	32.3	1.2
Total	31	100%	100%

Source: AY survey 2019.

4.118 The above table shows that the local centre has a strong focus upon service uses which occupies over a third (39%) of all of the units in the centre which is on par with the national average of 39%. The level of service provision is comprised of hairdressers, takeaways, café's, and a launderette.

4.119 The opposite is true for comparison goods retailers (10%), which fall well below the national average of 38%. Comparison uses include a motorcycle shop, auto parts, and pet shop.

4.120 There are five convenience good stores in the centre which comprises 16% of the total unit stock it is however above the national average of 10%. These two units consist of a mixture of well-known convenience stores Co-op and Premier, with smaller niche mini markets each offering a range of offer in terms of goods to centre users, and the wider community.

4.121 There are ten vacant units in the centre. This represents 32% of all units in the centre and is well above the UK average (1%). Based on the previous survey undertaken some of these units now vacant previously operated as a butcher, hairdresser, clothing retailer and children supplies shop.

4.122 Based upon the above, High Street in Tredworth should be classified as a local centre in the formal retail hierarchy.

Hucclecote Road

4.123 This local centre can be found in between the Barnwood / Hucclecote area of Gloucester. The local centre has thirteen retail units and lies approximately 3.2 miles to the east of the city centre. The centre retail units are situated on both sides of Hucclecote Road and dispersed at various intervals along the street. The centre is largely surrounded by streets characterised by residential housing. There is off street parking in front of many of the shops along Hucclecote Road. Uses are spread out but do offer the local community with a good range of shops and services.

4.124 Information on the diversity of uses within the Hucclecote Road local centre has been obtained through surveys conducted by Avison Young in 2019 and which provide the following data:

Table 4.14 – land use composition of Hucclecote Road

	2019		
	No.	%	% UK
Convenience	3	10.0	10.0
Comparison	8	26.7	37.5
Service	16	53.3	38.8
Misc.	0	0.0	12.5
Vacant	3	10.0	1.2
Total	30	100%	100%

Source: AY survey 2019.

4.125 The above table shows that the local centre has a strong focus upon service uses which occupies over half (53%) of all of the units in the centre which well above the national average of 39%. The level of service provision is comprised of hairdressers, takeaways, estate agents, a dry cleaners and optometrist.

4.126 The opposite is true for comparison goods retailers (27%), which fall well below the national average of 38%. Comparison uses include a multiple pharmacies, newsagents, pet shop, mobility centre, and a florist.

4.127 There are three convenience good stores in the centre which comprises 10% of the total unit stock which is on par with the national average of 10%. Two are the Co-op spread apart along the Hucclecote Road, with Jane's Pantry a local chain bakery being the only other convenience use.

4.128 There are three vacant units in the centre. This represents 10% of all units in the centre and is well above the UK average (1%). Based on the previous survey undertaken some of these units now vacant previously operated as a butcher and a florist.

4.129 Based upon the above, Hucclecote provides an important local centre in the eastern part of the city and should be classified as such in the formal retail hierarchy.

Kingsway

4.130 Kingsway local centre is one of the most recently developed centres in Gloucester. It lies in the heart of the large Kingsway mixed-use development in the southern part of the city which has grown in size over the past decade. The centre comprises several modest-sized retail and service uses in single-storey accommodation lying adjacent to a surface level car parking area.

4.131 The latest survey of the centre shows that the centre is occupied by the following uses:

- a Tesco Express convenience store
- a Premier convenience store
- four take-away units
- a launderette
- a charity shop
- a craft goods shop
- a café / take-away unit
- estate agent
- vets

4.132 In addition to existing units, the northern part of the centre comprises plots of vacant land which are currently being marketed for additional commercial uses, beyond which is a primary school, public house and a busy community centre. There is also an unimplemented planning permission for a place of worship adjacent to the community centre.

4.133 We consider that Kingsway now forms an important part of the 'town centre' hierarchy in Gloucester and should be classified as a local centre in the development plan.

Out of Centre Retail and Leisure Provision

4.134 Gloucester has a substantial amount of retail floorspace located outside of defined 'town centres' across the city. In total, the available data on retail parks and supermarkets suggests that there is circa 117,0000sq m of out of centre floorspace compared with 107,000sq m in the city centre. Whilst it is common for large cities to have experienced a continued rise in out of centre floorspace over the past three decades, the amount of out of centre floorspace in Gloucester is likely to have had a significant effect upon the performance of the city centre in recent times. This influence is likely to continue, particularly as the retail sector continues to evolve, and the City Council is faced with applications to vary the ranges of goods which can be sold from existing units.

4.135 Out of centre floorspace includes the following:

- The Peel Centre – circa 15,400sq m - Next, Hobbycraft, Iceland Food Warehouse, Gala Bingo, Home Bargains, Bensons, Burger King, Dream and three existing vacant units. The Peel Centre has seen a reasonable amount of planning application activity in recent years including variation of condition (Section 73) applications in order to accommodate the Iceland Food Warehouse store, along with a planning permission to accommodate the new Next Fashion, Home and Garden store and the conversion and extension of the former Cineworld unit.
- Gloucester Quays Retail Outlet Centre – a retail outlet centre which has been developed in two phases and now containing over 50 retail and food & beverage units along with a cinema
- Go Outdoor, Barton Street – 3,878sq m
- Triangle Park – circa 7,000sq m - Morrisons, Costa, a two food and beverage units and permission for a further three small retail/F&B units
- Westgate Island – circa 4,300sq m – Dunelm, Carphone Warehouse, Jolleys, Stationer and Majestic Wine
- Pets at Home (circa 900sq m) and Wickes, Woodrow Way (off Bristol Road) (circa 800sq m)
- St Oswald's Park (former Cattle Market) – circa 20,800sq m – B&Q, Homesense, DW Sports, Argos, Wren Kitchens, Tapi, McDonalds, Harvester, Frankie & Benny's, Cost, Natwest, Dominos and Subway
- A large collection of retail stores along Eastern Avenue – Lidl, Farmfoods, Currys / PC World, Harveys, Pizza Hut, Carpetright, Homebase, Jumptastic, The Range, AHF, B&M, Pure Gym, Starbucks, Halfords, Smyths and Magnet (providing a total floorspace of around 30,000sq m). Planning permission exists for the redevelopment of the former Interbrew site for a mix of employment floorspace and a DIY store.
- Stand-along supermarkets located at:
  - Tesco at St Oswalds Road (10,000sq m), located adjacent to St Oswalds Retail Park and a short walk from the city centre
  - Sainsburys, Gloucester Quays (6,000sq m), located to the south-west of the Gloucester Quays outlet centre and to the west of the newly opened Next store.
  - ASDA. Kingsway (4,000sq m), located adjacent to the A38 and the newly opened B&M store.
  - Sainsburys, Barnwood (7,500sq m)
  - Lidl, Bristol Road (2,000sq m), which has been redeveloped and expanded in recent years
  - A new ALDI store at Hucclecote (1,500sq m) which opened in 2018

- A large edge of centre ASDA supermarket located adjacent to Bruton Way (7,000sq m) and a short walk from the city centre
- Farmfoods, Bristol Road (600sq m)
- A new Lidl store at St Oswalds (2,000sq m) which opened in February 2020.

5. Town Centre Health Checks – Cheltenham Borough

5.1 This chapter of the JCS Retail and City / Town Centre Review contains health checks of the various 'town centres' in Cheltenham. For the avoidance of doubt, the definition of 'town centres' under national planning policy in the National Planning Policy Framework ('NPPF') includes city, town, district and local centres.

5.2 Within Cheltenham there are the following three tiers of centres[12]:

- Cheltenham town centre
- District centres at Coronation Square, Bath Road and Caernarvon Road.
- Neighbourhood centres at: Tennyson Road, Lynworth Exchange, Hatherley Road, Hesters Way Road, Andover Road, Gloucester Road, Church Street (Charlton Kings), Windyridge Road, Gloucester Road/Queens Road, Windermere Road, Whaddon Road, Cornwall Avenue, London Road (Charlton Kings), Lyefield Road West, Leckhampton Road, Salisbury Avenue, Cirencester Road, Priors Road, Hewlett Road, Tewkesbury Road, Keynsham Street, Suffolk Road, Benhall Avenue, Hewlett Road, Prestbury Road and Prestbury Village.

Cheltenham town centre

Structure

5.3 In relation to Cheltenham town centre, paragraph 4.2.4 of the adopted JCS notes that:

> *"Cheltenham town centre is a particularly strong retail centre which supports traditional high street stores alongside independent retailers and high-end boutiques and galleries; this forms an important element along with its heritage assets for tourism. As such, it performs within the sub-regional context and is second only to Bristol in the South West in terms of shopping choice on offer. It is important therefore that this is recognised, protected and, where possible, enhanced. Investment is ongoing, focused on bringing forward improvements to create better linkages between the High Street, Promenade and Lower High Street shopping areas".*

5.4 The policies map associated with the adopted 2006 Local Plan has four main defined areas: primary shopping frontages, the core commercial area, the central shopping area and the Montpellier shopping area. These cover the following areas:

- Primary shopping frontages: these lie along the High Street and the Promenade, along with Montpellier Street in Monpellier.
- The central shopping area: including the above plus the western part of High Street, part of Albion Street, a further area to the eastern end of High Street, Regent Arcade and part of Clarence Street.
- The core commercial area: this covers the above areas along with land between High Street, Fairview Road and Berkeley Street, land between High Street, Bath Road and Oriel Road, plus land around St
- Montpellier primary shopping frontages: along Montpellier Street between Imperial Square in the north and the south-western part of Montpellier Gardens in the south.

[12] As outlined in the 2006 adopted Cheltenham Local Plan

5.5 The emerging review of the Local Plan, currently at Examination, is not proposing to materially change any of these areas.

5.6 Cheltenham Town Centre was also recognised as the fifth healthiest UK High Street according to the Royal Society for Public Health (RSPH) 2018.

Diversity of Uses

5.7 Information on the diversity of uses in Cheltenham town centre is shown in Table 5.1 below has been obtained from Experian GOAD. The latest Experian survey for the town centre was undertaken in 2018 and this has been updated to a 2019 base following a survey undertaken by Avison Young in March 2019. This set of data enables an assessment of the retail land use profile of the centre over the past decade.

Table 5.1: diversity of retail land uses in Cheltenham town centre between 2010 and 2019.

	August 2010			**June 2018**			**March 2019**		
	Outlets number	**%**	**%UK**	**Outlets number**	**%**	**% UK**	**Outlets number**	**%**	**%UK**
Convenience	37	5.53	9.23	41	7.01	9.99	42	7.13	10.00
Comparison	317	47.38	41.89	243	41.54	37.52	247	41.94	37.47
Service	228	34.08		236	40.34	38.80	242	41.09	38.82
Miscellaneous	7	1.04		8	1.37	1.18	9	1.53	1.18
Vacant	80	11.95		57	9.74	12.52	49	8.32	12.54
Total	**669**	**100**	**100**	**585**	**100**	**100**	**589**	**100**	**100**

Source: Experian GOAD and Avison Young.

5.8 The GOAD survey of the centre in 2018 identifies a total of 585 retail-related units accounting for 1,261,800 square feet of floor space. The number of retail units has increased by 4 outlets since 2018 following the opening of the new John Lewis and the letting of 3 service units on the Brewery Quarter namely; Five Guys, Creams and the Botanist. However, this still remains a marked difference from the total number of outlets in the year 2010 at 669 units, partly due to the closure of the Beechwood Shopping Centre.

5.9 Table 5.1 demonstrates that Cheltenham town centre is a comparison retailer dominated centre, with a strong service offer of restaurants, cafes & fast food outlets and hairdressing, beauty and health stores. The number of vacant units and floor space within the centre has fallen from the levels observed in 2010.

5.10 The proportion of convenience goods retailers in the centre has grown in recent years (to 7.1%) although it remains this still lies below the national average of 10%. The major convenience retailers that are represented in the town centre include Sainsbury, Marks and Spencer and Tesco. The latest survey evidence indicates that the proportions of bakeries, butchers, off-licences and newsagents are all below their respective national averages. The proportion of grocery stores is broadly in line with the national average. The sale of food products is, however, boosted by the regular farmers market which is held on the Promenade on the second and last Fridays of each calendar month.

5.11 42% of all surveyed retail units in the town centre are occupied by comparison goods retailers. This is above the national average of 37.5%. The 2019 survey reveals that there are 247 comparison goods retailers in the town centre which is a similar position to that observed in 2018 and a reduction in the number since 2010 (primary due to the closure of the Beechwood Shopping Centre).

5.12 Within the individual comparison goods sub-categories, all of the major categories are represented. Those categories which have a proportion of retailers higher than the national average are clothing, particularly women's, along with mixed and general clothing, electrical goods, sports shops and jewellers. Those sectors with a lower than average proportion of retailers include: DIY and hardware stores, china and glass retailers, plus florists.

5.13 Since 2010, there has been a gradual increase in the number and proportion of service retail uses in the town centre, from 34% in 2010 to 41% in 2019. The proportion of service uses (41.1%) is now slightly above the national average of 38.8%.

Vacancies

5.14 There were 49 vacant units in Cheltenham town centre at the time of our survey earlier in 2019, which is a fall from the 57 vacancies recorded in June 2018. The current level of vacancies in the centre is equivalent to 8.3% of all surveyed units in the centre and is below the national average of 12.5%. This is a noticeable reduction in the proportion of vacancies in the centre which stood at 12% in 2010. Vacancies are generally spread out throughout the centre although the recently completed extension to the Brewery Quarter does possess a reasonably high number of vacancies at the time of survey.

Retailer representation

5.15 Within the convenience goods sector, it is noted above that the main national multiple retailers in the town centre include a Tesco Express convenience store in the Brewery Quarter, a Sainsburys Local store on the corner of High Street and Bath Road and a food hall within the Marks & Spencer store on High Street. The size of these stores, along with the other smaller niche convenience retailers, suggest that they concentrate upon top-up and day-to-day shopping trips. This issue is covered in more detail later in this chapter.

5.16 The most significant changes in the town centre over recent years have been the redevelopment of the Beechwood Shopping Centre to remove a two-floor arcade of separate shop units (including a Debenhams store) and replace them with a new John Lewis store which opened in 2018. This store has made a significant addition to the town centre, providing a wide range of comparison goods. The other key change in the town centre in recent years has been an extension to the Brewery Quarter. The first phase of the Brewery Quarter was completed a decade ago and provided a multi-screen cinema and several new restaurants. This original phase has now been extended southwards to connect to High Street and currently provides a Wilko variety store and a Tesco Express. Across the remainder of the town centre a wide variety of national multiple retailers are represented including House of Fraser, Marks & Spencer, Superdry, Waterstones, H&M, Monsoon, Karen Millen, Jack Wills, Hobbs, Reiss, White Stuff and Joules.

5.17 Within the service sector, the town centre has a strong food and beverage role with 18% of all surveyed units in the centre in this sector. The focus within this sector is within the casual dining sector including a large number of units in the Brewery Quarter, areas to the north of High Street and towards the southern end of the Promenade (moving into Montpellier).

Accessibility

5.18 The size and position of Cheltenham means that its town centre is very accessible by public transport and private car. In terms of bus services, bus stops are placed across the centre with particular concentrations at the Promenade, Royal Well, Clarence Street and Pittville Street. In addition to regular circular town services, regular longer distance services include connections to Stroud, Cirencester, Moreton-in-Marsh and Gloucester. Off-street car parks in the town centre include facilities the Brewery Quarter, Regents Arcade, Royal Well, Bath Road, St James Street and Town Centre East.

5.19 In contrast to Gloucester city centre, the railway station in Cheltenham is some considerable distance from the town centre. The average walking distance from the station to the town centre is around 15 minutes and therefore whilst travel to the town centre remains an option, this may not be a particularly attractive option for an element of potential visitors. For those that do wish to travel by train and link their trip with the town centre, the railway station is visited by local rail services travelling to Lydney and Cardiff, plus national services to the south-west and north-west of England.

Customer views and behaviour

5.20 The survey of household shopping patterns commissioned to inform this study has collected data on convenience and comparison goods shopping trips from residents of the defined study area. The study area for the household survey can be found in Appendix I to this study.

5.21 The results of the survey in relation to convenience goods shopping in Cheltenham town centre indicate the following:

- The zones covering the Cheltenham urban area within the household survey commissioned for this study are Zones 1, 1b, 1c and 1d.
- Within these zones, Cheltenham town centre has a first choice main food shopping market share of 1% in Zone 1a, 7% in Zone 1b, 1% in Zone 1c and 2% in Zone 1d. Similar levels of market share amongst these four zones can be found in relation to other main food shopping trips. Interestingly, the Tesco Express store achieves the highest share of first choice main food trips in the town centre with the Iceland, M&S and Sainsburys stores achieving similar market shares collectively across the four Cheltenham zones.
- For top-up food shopping, the town centre achieves higher market shares with first choice shares of 8% in Zone 1a, 14% in Zone 1b, 2% in Zone 1c and 2% and Zone 1d. The centre also gains a small amount of top-up trips from Zone 4 (south-east of Cheltenham), Zone 5b (south-west Gloucester), Zone 5d (north Gloucester) and Zone 9 (Stroud).
- For other top-up food shopping trips, the town centre has a 10% market share in Zone 1a, a 23% share in Zone 1b and 13% in Zone 1d. The centre also draws 10% of other top-up trips from Zone 3b (Winchcombe).

5.22 For comparison goods shopping, the results of the survey indicate the following:

- Cheltenham has a strong market share across more than half of the study area zones, making it the most popular of the three main 'town centres' in the JCS retail hierarchy. In addition to residents of the Cheltenham urban area, the town centre has a strong comparison goods market share amongst residents of Bishops Cleeve (Zone 2), Northleach/Bourton-on-the-Water (Zone 3a), Winchcombe (Zone 3), areas to the south-east of Cheltenham (Zone 4), along with Tewkesbury (Zone 7) and Evesham (Zone 8).
- The average market share of the town centre across residents of the town (Zones 1a-1d) by different types of comparison goods shopping is as follows:
    - Clothing/fashion – 62%
    - Books, CDs etc – 39%
    - Home furnishings – 36%
    - Recreational goods – 29%
    - Health and beauty goods – 48%
    - Electrical goods – 27%
    - DIY goods – 26%
    - Furniture and floorcoverings – 23%
    - Gardening goods – 17%
- Across the wider area, the town centre is able to attract over half of clothing/fashion trips from Bishops Cleeve and Winchcombe, plus around one third of clothing/fashion trips from residents of Tewkesbury. The centre also has a strong market share amongst shopping for home furnishings in these areas. In addition, the town centre has a strong market share amongst residents of the Stroud area, including 47% of clothing/fashion goods, one fifth of books/CDs/DVDs, home furnishings and electrical goods and 40% of trips for health and beauty goods.

5.23 It is also possible to compare the market share levels for the town centre between the 2015 and 2019 household surveys and a summary of this data is contained at Appendix II. It shows that, across the Cheltenham urban area (Zones 1a-d) there has been a loss in market share for clothing/fashion in two of the four zones (1a and 1d) whilst the share in the other two has remained static. There is a mixed picture in terms of home furnishings with falls in 1a and 1d and a rise in 1b, which is similar to recreational goods shopping (with rises in 1a and 1b and falls in 1c and 1d). In three out of the four zones (1a, 1b and 1d) there has been a noticeable fall in market share amongst shopping for health and beauty goods.

5.24 In addition to the above market share analysis, it is also possible to compare the convenience and comparison goods turnover forecasts for Cheltenham town centre between the 2015 Study and this latest analysis. In the 2015 Study, the town centre was forecast to have an annual convenience goods turnover of £20.6m[13]. Within our latest analysis at Table 5a in Appendix II, use of the new household survey indicates an increase to £29.9m

[13] 2013 prices

(£29.5m in 2013 prices). Noticeable increases turnover have been experienced by Sainsburys Local, Tesco, Marks & Spencer and Iceland.

5.25 For comparison goods turnover, the 2015 Study indicated a turnover of £483m (2013 prices) whilst the latest analysis indicates an annual turnover of £439m (£436.8m in 2013 prices). This represents a 10% fall which is primarily due to the combined loss of market share for the town centre across a selection of comparison goods categories. This is not as large a fall as Gloucester city centre over the same period although indicate the pressures that Cheltenham town centre is also facing from various sources, particularly falling levels of expenditure growth and spending via the internet.

Pedestrian flows

5.26 Detailed pedestrian footfall counts have not been commissioned for this Study and instead observations regarding vitality levels across the town centre have been made during our visits over the course of preparing this Study. High Street and the Promenade both have strong levels of footfall with the central part of High Street (between Boots, Marks & Spencer and Topshop) having the strongest levels in the centre. The eastern part of High Street is likely to have experienced poorer than average levels of footfall due to the closure of the Beechwood Shopping Centre although the opening of the John Lewis store in October 2018 has provided a boost which has allowed a longer stretch of High Street to maintain good levels of vitality.

5.27 The proximity of Montpellier to the Promenade allows a reasonable amount of linkages between these two locations, with vitality levels significantly increased during the regular events which take place on Montepellier Gardens.

5.28 Following the completion of the first phase of the Brewery development, linkages between this area and the High Street were considered to be poor, a situation which has been significantly improved following the completion of the second phase of the Brewery development. This has given a boost to the western end of High Street which is likely to continue as tenants are found for the remaining vacant units.

Environmental quality

5.29 The Central Conservation Area covers all of the town centre and a large part of the surrounding area. This designation is split into 19 character areas with Old Town and Montpellier covering a large part of the shopping core of the centre.

5.30 The Old Town area is centred along the linear High Street and has a distinctly different feel and appearance to the surrounding Regency parts of the town. It has a variety of architectural styles, with the wide nature of High Street contrasting with much narrower side lanes which contain a wider variety of land uses. Many of these streets create character and provide key routes to other parts of the town centre. Much of the central part of High Street is pedestrianised and the use of materials in these areas presents an environment of reasonable quality. In other areas, where vehicle routes remain, the quality of the environment falls with these routes providing, in some instances, barriers to movement and creating narrow pedestrian friendly areas.

5.31 Located to the south of the Old Town area is Montpellier. It has a strong Regency heritage with a considerable proportion of the area built in the 1820s and 1830s. The quality of the building in this area is generally very high, whilst Montpellier Gardens provides an important green space which regularly holds events throughout the year. The Promenade is an iconic shopping street, whose appearance is dominated, particularly in the summer, by the tree-lined street which creates an attractive environment. Across much of The Promenade, the spaces are pedestrianised, providing an attractive pedestrian environment. Other areas accommodate buses and taxis which, whilst greatly benefitting accessibility to the centre, to detract from the street scene and pedestrian movement. The quality of the environment remains high travelling southwards towards Montpellier with many buildings accommodating retail, hotel, service and other commercial businesses. The environment does however suffer from the use of the main parts of the Regency street grid for part of the ring road around the town centre, with the junction of the Promenade and St George's Road a particular barrier to movement.

Summary and conclusions

5.32 Overall, Cheltenham remains a healthy town centre which is the strongest of the three main 'town centres' at the top of the JCS centre hierarchy. It has the highest amount of surveyed retail units and has proportions of comparison retail and services uses which are above their respective national averages. Vacancy levels have again fallen over the past year and remain below the national average. Overall, the centre has seen considerable development over past few years, with the completion of the second phase of the Brewery development and the redevelopment of the Beechwood shopping centre to provide a new John Lewis store. These projects have cemented Cheltenham's position as the largest and most successful centre across Gloucestershire.

5.33 However, the town centre is not without its challenges. A comparison between the 2015 and 2019 household surveys reveals that, despite its continuing strong market share across a number of comparison goods categories, market share has been lost which has led to a 10% dip in its overall annual turnover level. The most significant influence on this loss of market share is, like most towns, due to the influence of the internet which has been strong growth amongst Cheltenham residents particularly in sectors such as clothing/fashion.

District Centres

Coronation Square

5.34 Coronation Square is located to the west of Cheltenham, circa two and half miles from Cheltenham city centre. The majority of shops and services are located along the southern side of Edinburgh Place, with a number of units along the north of Princess Elizabeth Road, Evington Road and others along the north of Goldsmith Road. The area is formed of a large hardstanding set back from the road along Edinburgh Place. This space also hosts a Saturday Market.

5.35 The district centre is surrounded by residential uses, with Princess Elizabeth Road serving as a main route through the western part of the urban area running along the western side of Coronation Square. The district centre benefits from some free on road parking along Edinburgh Place, easily accessible by car with a large pay and display car park located off Goldsmith Road.

5.36 Edinburgh place sites a number of well-known high-street names, a large number of these units are occupied by the British Heart Foundation, with other know businesses such as Age UK, Pizza Hut, Bet Fred, Iceland and Lloyd's Pharmacy occupying other units along this stretch of road.

5.37 Information on the diversity of uses within the Coronation Square district centre has been obtained through surveys conducted by Avison Young in 2019 and which provide the following data:

Table 5.2: retail land uses in Coronation Square, Cheltenham

	2019		
	No.	**%**	**% UK**
Convenience	3	10.3	10.0
Comparison	7	24.1	37.5
Service	15	51.7	38.8
Misc.	0	0.0	1.2
Vacant	4	13.8	12.5
Total	29	100%	100%

5.38 The above table shows that Coronation Square has a strong focus upon service uses which occupy over half (51.7 %) of all units within this centre, higher than the 38.8% national average. Examples of services uses located in Coronation Square include a number of food take aways (Chinese food, Indian food, fish and chip or pizza). The proportion of convenience goods stores in the district centre is in line with the national average with the main retailers comprising Iceland and Farmfoods.

5.39 The proportion of comparison goods retailers in the centre falls below the national average, whilst at the time of survey there were four vacant units in the centre equivalent to 13.8% of all surveyed units. This proportion is slightly higher than the national average of 12.5%.

5.40 The quantitative assessment prepared for this study, informed by a household survey conducted in 2019, indicates that Coronation Square a 3% share of main food first choice shopping trips in Zone 1b of the study area (the zone in which the centre lies), a 7% share of first choice top-up food shopping trips and a 5% share of other top-up trips. In relation to comparison goods shopping trips, the centre has a market share of 2% of shopping trips for health and beauty products.

Bath Road

5.41 The district centre on Bath Road is located to the southeast of Cheltenham town centre. Retail and other commercial uses are accommodated in 2/3 terraced properties on either side of Bath Road stretching from the junction with Leckhampton Road and Langdon Road to the junction with Kew Place and Bath Road to the north.

5.42 The centre is surrounded by dense residential uses, along with Cheltenham College to the north east and Cheltenham town centre to the north-west.

5.43 A number of national multiple businesses are located in the centre including Natwest, Co-op, Sainsburys Local, Domino's Pizza, Andrews Estate Agents and the British Red Cross Charity Shop.

5.44 Information on the diversity of uses within the Bath Road district centre has been obtained through surveys conducted by Avison Young in 2019 and which provide the following data:

Table 5.3: land uses in Bath Road district centre

	2019		
	No.	**%**	**% UK**
Convenience	11	14.7	10.0
Comparison	26	34.7	37.5
Service	36	48.0	38.8
Misc.	1	1.3	1.2
Vacant	1	1.3	12.5
Total	75	100%	100%

5.45 Data in the table above indicates a strong focus on service uses, with 48% of all units occupied within this sector. This is around ten percentage points above the national average of 38.8%.

5.46 The proportion of convenience goods retailers in the centre (14.7%) is also above the national average of 10%. As noted above, the main convenience goods retailers within the centre are Co-op and Sainsburys Local. These retailers attract a 1% market share of first choice main food shopping trips from Zone 1b residents and a 10% share of trips from Zone 1c and a 2% share of trips from Zone 1a residents. The centre also attracts 3% of other main food trips from Zone 1b and 6% from Zone 1c.

5.47 In relation to top-up food shopping trips, the district centre is one of the most popular destination across Cheltenham. The Co-op store attracts 28% of first choice top-up trips from Zone 1c, with a further 5% share for the Sainsburys Local store. These roles are reversed for other top-up food shopping trips with the Sainsburys store attracting a 7% share amongst Zone 1a residents, 18% in Zone 1b and 15% in Zone 1c.

5.48 These market shares lead to a total study area convenience goods turnover for the centre of £17.8m, with £11.1m of this coming from top-up food shopping.

5.49 In regard to comparison goods, Bath Road lies just below the national average, with 34.7% of all units falling into the comparison good category. The district centre falls significantly below the national average for miscellaneous uses, at only 1.3% of all units compared to the national average of 12.5%. In terms of vacant units, Bath Road sits only slightly above the national average of 1.2%, at 1.3 %. Our quantitative analysis in Appendix II to this report indicates that Bath Road has an annual comparison goods study area derived turnover of £6.7m with a large part of this turnover being derived from health and beauty goods.

5.50 At the time of survey there was just one vacancy in the centre, representing just 1.3% of all surveyed property in the centre.

Caernarvon Road

5.51 The defined boundary of Caernarvon Road district centre encompasses a large supermarket and a number of smaller retail units. The district centre is located on the southern edge of the Cheltenham urban area, circa 2.3 miles from the town centre. The centre surrounded to the north, east and west by housing, and to the south by open fields. On the northern edge of the centre are a public house, a petrol filling station and a library.

5.52 There are only 5 retail units within the defined boundary of the centre, comprising a large Morrisons supermarket, a pharmacy, a car accessories shop, a dry cleaners, along with a vacant unit. The Morrisons supermarket sells a wide range of fresh, frozen, refrigerated and pre-packaged groceries along with beers, wines and spirits and a modest non-food section. The store is served by a large (free of charge) surface level car park.

5.53 Given the size of the Morrisons store it unsurprisingly a popular main food shopping destination, attracting 19% of first choice main food trips from Zone 1c residents and 26% of first choice main food trips from Zone 1d. The centre itself lies within Zone 1d. The store also attracts 16% of other main food trips from Zone 1c and 26% from Zone 1d. In relation to top-up food shopping, the store's catchment is more localised with an 18% share of first choice trips and a 7% share of other trips from Zone 1d residents. These market shares translate into an annual convenience goods turnover for Morrisons which includes £32.8m spent on main food shopping trips. Our quantitative analysis also reveals that the store is predicted to have a study area derived comparison goods turnover of £6.2m.

Neighbourhood Centres

Tennyson Road

5.54 Tennyson Road neighbourhood centre comprises a small number of units located to the south of the Shakespeare Road and Tennyson Road junction. The area around the neighbourhood centre comprises majority of family sized homes, with the centre itself is located circa 2 miles to the east of Cheltenham town centre. The small neighbourhood centre comprises only 5 units, housed within two-storey properties. These comprise a car accessories store, a convenience store, hair salon and are butcher and are classified into the land use categories in Table 5.4 below.

Table 5.4: land use mix in Tennyson Road local centre

	2019		
	No.	%	% UK
Convenience	2	40.0	10.0
Comparison	2	40.0	37.5
Service	1	20.0	38.8
Misc.	0	0.0	12.5
Vacant	0	0.0	1.2
Total	5	100%	100%

5.55 Parking provision within the centre is on-street and there is a bus stop immediately adjacent to the centre (visited by regular services linking the centre to Leckhampton, the town centre and Coronation Square).

5.56 This local centre does not feature in the data on convenience and comparison goods shopping patterns in the 2019 household survey.

Lynworth Exchange

5.57 Lynworth Exchange neighbourhood centre is located within a large housing estate to the north west of Cheltenham, circa 1.5 miles from the city centre. The retail units sit at ground floor level within a three storey building comprising of flats. The rest of the surrounding area comprises family sized houses or flats. The neighbourhood centre comprises 4 units in total, with the units sitting either side of Cotswold Road.

5.58 The retail uses in the centre comprise a Premier convenience store, a hair salon and a take-away. There is also one vacant unit. These uses have been classified in their land use categories in Table 5.5 below.

Table 5.5: land use mix in Lynworth Exchange neighbourhood centre

	2019		
	No.	**%**	**% UK**
Convenience	1	25.0	10.0
Comparison	0	0.0	37.5
Service	2	50.0	38.8
Misc.	0	0.0	12.5
Vacant	1	25.0	1.2
Total	4	100%	100%

5.59 There is a small amount of on and off-street parking serving the neighbourhood centre. There is a bus stop on the southern edge of the centre which is served by Stagecoach West Route A which visits Gloucestershire College, the town centre and GCHQ.

Cirencester Road/Croft Road

5.60 Cirencester Road/Croft Road neighbourhood centre comprises only 3 retail units. The units are located either side of Croft Road, on the junction of Croft Road and Cirencester Road, surrounded by residential uses. Retail units are housed in two storey properties. The neighbourhood centre is located to the south west of Cheltenham, circa 2 miles from the town centre.

5.61 Two units are occupied by a hair salon and a butcher, with the third unit vacant. These are classified in Table 5.6 below:

Table 5.6: land use mix in Cirencester Road/Croft Road neighbourhood centre

	2019		
	No.	%	% UK
Convenience	1	33.3	10.0
Comparison	0	0.0	37.5
Service	1	33.3	38.8
Misc.	0	0.0	12.5
Vacant	1	33.3	1.2
Total	3	100%	100%

5.62 There is a small amount of informal off-street parking associated with the centre, whilst the nearest bus stops are located close to a Sainsburys Local store a short walking distance to the north. These stops are visited by services which link Cheltenham town centre to Cirencester.

Leckhampton Road

5.63 The policies map for the development indicates that the neighbourhood centre at Leckhampton Road comprises two parts either side of Church Road. However, the southern unit is now no longer in retail use and therefore neighbourhood centre current comprises only 1 retail unit. This unit is occupied by a Co-op convenience store which is housed in a single-storey building with a small amount of off-street parking adjacent to the main customer entrance. The household survey commissioned to support this Study indicates that the Co-op store attracts 1.4% of first choice main food trips from Zone 4 residents, along with 6% of first choice top-up food trips from Zone 1c and 2% of trips from Zone 1d. Finally, the store also attracts other top-up food shopping trips from residents of Zones 1c (2%) and 4 (3%). The quantitative assessment prepared for this Study translates these market share levels into a study area derived convenience goods turnover for this store which is calculated to be £2.0m.

Prestbury Village

5.64 Prestbury Village neighbourhood centre comprises 4 units located on the south side of High Street in Prestbury. The units are occupied by a men's hair salon, a Budgens convenience store, a hair and beauty unit and a Post Office. The centre has an attractive historic village character with limited car parking provision (provided in a pay and display car park adjacent to the Kings Arms public house). Adjacent to the defined boundary of the centre are the Kings Arms and a pharmacy.

5.65 The household survey commissioned for this Study indicates that Prestbury Village has a market share of 1% amongst Zone 1a residents for other main food shopping trips along with a 2% market share as a first choice top-up food shopping destination and a 8% share of other top-up trips.

5.66 There are two bus stops located adjacent to the centre which are visited by services travelling to Cheltenham town centre, Lynworth Exchange, GCHQ and Coronation Square.

Prestbury Road

5.67 Prestbury Road neighbourhood centre can be found a short distance to the north-east of Cheltenham town centre. The defined boundary of the centre lies across both sides of Prestbury Road between Clarence Road and Albert Place. Retail uses and other businesses are housed in 2/3 storey terraced properties which front the back of pavements. There are parking restrictions along the length of the centre although the surrounding area does provide some limited on-street parking provision.

5.68 Retail land uses along Prestbury Road were surveyed by AY in Spring 2019. The results of this survey are contained in Table 5.7 below.

Table 5.7: retail uses in Prestbury Road neighbourhood centre

	2019		
	No.	**%**	**% UK**
Convenience	2	9.1	10.0
Comparison	6	27.3	37.5
Service	13	59.1	38.8
Misc.	0	0.0	1.2
Vacant	1	4.5	12.5
Total	22	100%	100%

Source: Avison Young survey, Spring 2019

5.69 The table above shows that there are 2 convenience goods stores in the centre, comprising an off-licence and a small convenience store. These occupy around 9% of the total number of surveyed retail units in the centre, slightly below the national average of 10%. Service uses dominate the centre, occupying 59% of all surveyed units, which is well above the national average of 39%. Service uses include a number of take-aways along with estate agents and health and beauty uses. There are six comparison goods retailers in the centre, occupying around one quarter of all surveyed units. There is only one vacancy within the centre, meaning that only 5% of the available space in the centre is without an occupier.

5.70 The household survey commissioned for this Study indicates that convenience stores in this centre attract around 1.5% of first choice main food shopping trips from Zone 1a residents.

5.71 In relation to public transport accessibility surrounding this centre, there are bus stops to the north of the centre which are visited by the W1 and W2 services[14] which provide links to Cheltenham town centre and Bishops Cleeve.

London Road (Charlton Kings)

5.72 London Road neighbourhood centre in Charlton Kings comprises a number of retail units located along both the north and south side of the A40 which is a key vehicular route on the eastern side of the Cheltenham urban area. The neighbourhood centre stretches from units located between Oakland Street and Hamilton Street (along the south) from the west, towards Copt Elm Road to the east. The neighbourhood centre is located to the south east of Cheltenham town centre with retail businesses housed in two storey terraced or semi-detached properties. There is limited on-street parking within the centre which limits the opportunities for custom via pass-by trade. The centre is also highly accessible via public transport with four services an hour linking the centre to Cheltenham town centre and Charlton Kings.

5.73 AY undertook a survey of the retail land uses in the centre in Spring 2019 and the results of that survey are shown in Table 5.8 below.

[14] Operated by Marchants Coaches

Table 5.8: land use mix in London Road neighbourhood centre

	2019		
	No.	%	% UK
Convenience	2	4.8	10.0
Comparison	12	57.1	37.5
Service	8	38.1	38.8
Misc.	0	0.0	1.2
Vacant	0	0.0	12.5
Total	22	100%	100%

5.74 There are 21 retail units in the centre and unusually for a lower level local/neighbourhood centre in the JCS area the number/proportion of comparison goods retailers comprises the largest sector. There are 12 retailers in this sector and these include a kitchen products shop, home furnishing stores, a pharmacy, an optician and a clothes store.

5.75 In terms of service uses, the neighbourhood centre closely reflects the national average, with occupiers including of solicitors, cafes, estate agents and beauty salons all located along London Road.

5.76 There are two convenience goods stores in this centre, comprising a delicatessen and a Co-op convenience store. Usage of the Co-op store is recorded in the household survey commissioned for this Study, showing that the store has a 1% of other main food shopping trips in Zone 1a and a 1% share in Zone 4. It also attracts 9% of first choice top-up food shopping trips from Zone 1a residents and 2% of trips from Zone 4 residents, along with 4% of other top-up trips from Zone 1a.

Lyefield Road West

5.77 The neighbourhood centre of Lyefield Road West comprises 4 units at the corner of Lyefield Road West and Copt Elm Road. The retail uses in this centre are housed in semi-detached two storey properties and comprise a Nisa convenience store, a café, a florist and gift shop and a pharmacy. There is a reasonable amount of on-street parking adjacent to the centre. The centre attracts 1% of first choice main food shopping trips from residents of Zone 1c, along with 6% and 2% of other top-up food shopping trips from Zone 1a and 1c residents respectively. There are bus stops on the western edge of the centre which are visited by Stagecoach West Service B which provides linkages to Cheltenham town centre and other destinations in Charlton Kings.

Keynsham Street/London Road

5.78 Keynsham Street/London Road neighbourhood centre comprises 7 units located on the edge of London Road. The centre is surrounded by residential uses and is 0.7 miles to the north west of Cheltenham town centre. The retail uses in the centre include a convenience store, a tattoo parlour, two take-aways and a betting shop. Given the centre lies on the A40, which is a key route into Cheltenham from the east, there is very little parking around the centre, concentrated upon a small amount of on-street parking. The household survey commissioned for this Study does not record any data in relation to convenience and comparison shopping associated with this centre.

Andover Road

5.79 Andover Road neighbourhood centre lies to the south of Cheltenham town centre and Montepellier and comprises 15 retail units. The defined boundary of the centre lies on the southern edge of Andover Road close to its junction with Suffolk Road, with the retail and commercial uses housed within an attractive and uniform set of terraced properties. There is a reasonable amount of on-street parking spaces adjacent to the centre on Andover Road.

5.80 AY conducted a survey of the retail land uses in Andover Road in Spring 2019 and this found 15 units. One unit was vacant and the remainder of occupied units include a butcher, café, off-licence, estate agents, hair salon and a home furnishings store.

5.81 With regards to the results of the household survey commissioned for this Study, Andover Road attracts 2% of first choice top-up shopping trips from Zone 1d residents and 3% of trips from Zone 9 residents.

Suffolk Road

5.82 Suffolk Road neighbourhood centre comprises a large number of units along part of Suffolk Road, Suffolk Parade, and the northern part of Great Norwood Street. The neighbourhood centre is located close to the southern edge of Cheltenham town centre. This is an attractive centre with commercial uses contained within two storey properties mainly on Suffolk Parade but also on Suffolk Road to the south.

5.83 A survey of the retail land use mix of the centre was conducted by AY in Spring 2019 and the results are summarised in Table 5.9 below:

Table 5.9: land use mix within Suffolk Road neighbourhood centre

	2019		
	No.	**%**	**% UK**
Convenience	1	2.1	10.0
Comparison	20	41.7	37.5
Service	27	56.3	38.8
Misc.	0	0.0	12.5
Vacant	0	0.0	1.2
Total	48	100%	100%

5.84 Suffolk Road is one the larger neighbour centres in Cheltenham. It has a very strong service and comparison goods focus, with 42% of units occupied by comparison goods retailers and 56% of units occupied by service uses. There were no vacant units in the centre at the time of our survey. Units in this centre have a markedly different focus from other local and neighbourhood centres across Cheltenham including a number of furniture and homeware shops and restaurants/wine bars. Suffolk Parade clearly makes an important contribution to the retail offer in Cheltenham, providing a complementary niche shopping role.

5.85 The household survey commissioned for this Study does not record any convenience or comparison market shares in relation to Suffolk Road.

Salisbury Avenue

5.86 Salisbury Avenue neighbourhood centre comprises 11 units located along the southern side of Salisbury Avenue, up to Lincoln Drive to the west, and up to and including Katherine Court to the east. The surrounding area comprises residential uses. Data on the retail land use profile of the centre is contained in Table 5.10 below.

Table 5.10: land use profile of Salisbury Avenue neighbourhood centre

	2019		
	No.	**%**	**% UK**
Convenience	1	9.1	10.0
Comparison	3	27.3	37.5
Service	6	54.5	38.8
Misc.	0	0.0	1.2
Vacant	1	9.1	12.5
Total	11	100%	100%

5.87 The above data confirms the strong service orientated function of Salisbury Avenue. Over half of the surveyed units in the centre are occupied by service uses including hair salon, take-away and estate agent uses. In line with most other local/neighbourhood centres in the local area, the focus for the centre is on service uses which occupy over half of all surveyed units in the centre. Service uses occupy 55% of all units which is well in excess of the national average.

Hatherley Road

5.88 Hatherley Road neighbourhood centre comprises 5 units and is located to the south of the junction at Hatherley Road and Caernarvon Road. The 5 units sit at ground floor level below flats on the first floor, the neighbourhood centre benefits from a small number of car parking spaces. The uses within the centre include a convenience store, a take-away and an estate agent. There is also one vacant unit. The household survey commissioned to inform this Study indicates that this neighbourhood centre has a 2% share of first choice main food shopping trips and a 2% of first choice of top-up food shopping trips.

Windermere Road

5.89 Windermere Road neighbourhood centre is located circa 3 miles to the south west of Cheltenham town centre with the defined centre boundary. The centre comprises 4 retail units, including 2 on Windermere Road and 2 Grasmere Road. The surveyed uses in the centre include a convenience store, a pharmacy, a dentist, and a take-away. These retail uses are housed within two-storey properties which can be accessed via adjacent on-street parking.

Gloucester Road/Queens Road

5.90 The Gloucester Road/ Queens Road neighbourhood centre is located to the west of Cheltenham town centre. It is located in close proximity to Cheltenham Spa railway station and is centred around the junction of Queens

Road and Gloucester Road. This defined centre is split into three parts around the junction of these roads and includes a varied amount of uses

5.91 Table 5.11 below outlines the retail land use mix in this centre:

Table 5.11: land use profile of Gloucester Road / Queens Road neighbourhood centre

	2019		
	No.	**%**	**% UK**
Convenience	0	0.0	10.0
Comparison	2	18.2	37.5
Service	8	72.7	38.8
Misc.	0	0.0	1.2
Vacant	1	9.1	12.5
Total	11	100%	100%

5.92 The above table demonstrates the strong service use focus of the Queens Road neighbourhood centre. Three quarters of all surveyed retail units are occupied by service business and these include three take-aways, a café and a hair salon. There are no convenience goods retailers in the centre and only two comparison goods retailers. However, there is a Tesco Express convenience store on the eastern edge of the centre which clearly provides a positive contribution to the health and attractiveness of the centre.

5.93 The household survey commissioned for this Study does not record any specific convenience or comparison goods trips associated with units in the centre although the edge of centre Tesco Express store attracts 2% of first choice top-up food shopping trips from Zone 1b residents and 1% of trips from residents of Zones 1c and 1d. It also attracts 3% of first choice top-up trips from residents of Zone 5d (Gloucester North). The Tesco store also attracts other top-up food shopping trips from Zones 1b (2%), 1c (5%) and 1d (16%).

5.94 In addition to being very accessible to Cheltenham Spa railway station, this neighbourhood centre is visited regularly by a number of local bus services which provide links to the town centre, Hatherley and Bishops Cleeve.

Hesters Way/Barbridge Road

5.95 Hesters Way/Barbridge Road neighbourhood centre lies on the western edge of the Cheltenham urban area. The centre comprises only 2 units including a Co-op convenience store and a mixed goods retailer. These retailers are accommodated in two storey properties adjacent to a modest amount of on-street parking provision. The household survey commissioned for this Study indicates that the Co-op store has a 3% share of first choice top-up food shopping trips. This equates to a study area derived turnover of £0.6m. the centre is visited by a number of different bus services which connect the centre with a number of different parts of Cheltenham.

Benhall Avenue

5.96 The neighbourhood centre at Benhall Avenue lies in the south-western part of the Cheltenham urban area, with the centre surrounded by residential uses. Benhall Avenue itself is an attractive street with both carriageways separated by a tree-lined central reservation. The defined centre boundary encompasses 8 units on the western side of Benhall Avenue which are housed in a terrace of three storey properties. There

5.97 Uses within the centre include three hair salons, two take-aways and a convenience store. There are also two vacancies within the centre.

5.98 The household survey commissioned for this Study does not record any shopping patterns data for convenience or comparison goods associated with this centre.

5.99 There is bus stop immediately adjacent to the centre which is visited regularly by services travelling to Cheltenham town centre and Up Hatherley.

Gloucester Road/ Alstone Lane

5.100 Gloucester Road / Alstone Lane neighbourhood centre comprises 4 units, all of which sit at ground floor level below residential apartments located at first floor level. The defined centre boundary sits at the junction of Alstone Lane, Gloucester Road and St George's Road which is a signal controlled junction on one of the main vehicular routes (B4633) in the western side of the Cheltenham urban area. The units are occupied by a furniture store, a convenience store and a take-away. The other unit was vacant at the time of survey. Due to busy nature of Gloucester Road there is not any on-street parking adjacent to the centre although we have observed cars parked on the wide pavement areas adjacent to the retail units. There are bus stops immediately adjacent to the centre which are visited by a variety of services travelling to the town centre, Bishops Cleeve, Up Hatherley, Leckhampton, Coronation Square and Prestbury.

5.101 The household survey commissioned for this Study does not record any convenience or comparison shopping patterns data for this neighbourhood centre.

Tewksbury Road/Elm Street

5.102 Tewksbury Road/Elm Street neighbourhood centre comprises just 4 units which sit below residential flats at first and second floor level. The centre lies a short distance to the west of Cheltenham town centre and is served by a modest amount of on-street parking provision which lies adjacent to Tewkesbury Road which is the main vehicular route into Cheltenham from the west.

5.103 The retail units in the centre are occupied by a betting shop, an off-licence, a take-away and a Post Office.

5.104 The household survey commissioned for this Study does not record any shopping patterns associated with this centre.

Hewlett Road

5.105 Hewlett Road neighbourhood centre comprises 10 units, located on both the east and western sides of Hewlett Road, spread around the mini roundabout at the junction of Hewlett Road, All Saints Road, Fairview Road and Leighton Road. Hewlett Road is a busy vehicular route into the northern edge of Cheltenham town centre with parking restrictions on all highways surrounding the centre. There are bus stops located to the north and south of the centre which are visited by services

5.106 Retail and other commercial uses in the centre are housed in two storey terraced properties and include a Londis convenience store, an off-licence, a pharmacy, a florist, a café and a home accessories store. There are also two residential properties within the defined centre boundary. The Londis convenience store is recorded in the 2019 household survey commissioned for this Study as attracting 1% of first choice top-up food shopping trips.

Mersey Road/Hewlett Road

5.107 The defined boundary of this centre lies at the junction of Mersey Road and Hewlett Road located to the east of Cheltenham town centre. Retail units are housed in two storey terraced properties fronting on to Hewlett Road.

5.108 The centre consists of 5 units occupied by a Tesco Express convenience store, an off-licence, a hair salon and two take-aways. The Tesco Express store features in the results of the 2019 household survey with this store identified as attracting 1% of first choice main food trips from Zone 1b residents, along with 1% of main food trips from residents of Zone 4. The survey also records the Tesco store as attracting 6% of other main food trips from residents of Zones 1b and 1d, plus 7% of other main food trips from residents od Zone 9. It also attracts 2% of other top-up food trips from Zone 1a residents and 1% of trips from Zone 1b residents.

5.109 There are bus stops located a short walking distance to the south of the centre and which are visited by services travelling to Cheltenham town centre, Charlton Kings and Whaddon. There are parking restrictions on the highways immediately adjacent to the centre although cars are observed to park on the wide pavement areas adjacent to the retail units.

Whaddon Road

5.110 The defined neighbourhood centre boundary on Whaddon Road covers 6 units which are housed in two storey semi-detached properties. The defined centre boundary lies on the northern edge of Whaddon Road adjacent to the junctions with Thames Road and Severn Road. The centre lies a reasonably short distance to the north-east of Cheltenham town centre and is occupied by a betting shop, a mobility scooter shop, a convenience store (including a Post Office) and two take-aways. The other properties covered by the defined centre boundary accommodate residential uses. There are parking restriction along Whaddon Road although on-street parking is available on the surrounding streets whilst some vehicles are observed to park on the pavement areas adjacent to the retail units.

5.111 The convenience store within the centre is recorded in the 2019 household survey as attracting circa 1% of first choice top-up food shopping trips from Zone 1a residents.

Priors Road/ Imjin Road

5.112 Priors Road/Imjin Road neighbourhood centre is formed of 3 units, all of which are located to the west of Prior Road and the south of Imjin Road. Uses in the centre include two take-aways and a hair salon, which are housed in single storey properties. There is a small amount of parking provision adjacent to the centre on Imjin Road.

Windyridge Road

5.113 Windyridge Road neighbourhood centre is located on the northern edge of the Cheltenham urban area. The defined boundary of the centre includes properties fronting on to Windyridge Road and Windyridge Gardens, along with residential properties along Wymans Court. Retail uses in the centre include a Co-op convenience store, a Premier convenience store, a pharmacy, a hair salon along with two take-aways. The household survey commissioned for this Study indicates that the Co-op foodstore has a 6% share of first choice top-up food shopping trips amongst Zone 1b residents along with 7% of other top-up trips in the same zone. The centre is served by a modest area of off-street parking provision behind the retail units on Wymans Court. There is a bus stop adjacent to the centre which is visited by a service which travels to Swindon Village and Arle Farm.

Church Street (Charlton Kings)

5.114 Church Street neighbourhood centre in Charlton Kings comprises 10 units, housed within 1/2 storey properties fronting Church Street plus modern post-war properties set back from the road (with pedestrian access from Church Road and vehicular access via Church Piece). The largest unit in the centre is a Co-op foodstore which sells a reasonably wide range of fresh, frozen and pre-packaged grocery products. The household survey commissioned for this Study indicates that the Co-op attracts 2% of first choice main food trips amongst Zone 1c residents along with 1% of similar trips from Zone 9 residents. The store also has a 1% and 2% market share for other main food trips in Zones 1a and 1c. It is also a popular first choice top-up food shopping destination with a 13% share of first choice top-up trips in Zone 1c and 4% share in Zone 11. It also has a large share of other top-up food shopping trips including 14% in Zone 1a, 15% in Zone 1c and 25% in Zone 4.

5.115 Other land uses in centre include a library, a newsagent, Brand Mellon solicitors, two cafes, two take-aways and a vacant unit.

5.116 In addition to a modest amount of off-street parking provision, there are bus stops immediately adjacent to the centre which are visited by services travelling to Cheltenham town centre, Whaddon and Cheltenham hospital.

Cornwall Avenue / Devon Avenue

5.117 The defined neighbourhood centre at Cornwall Avenue and Devon Avenue comprises a total of 6 units, on the southern side of Cornwall Avenue and the western side of Devon Avenue. The retail units are housed in three storey properties with residential accommodation above. The centre has a small amount of off-street parking directly in front of the retail units.

5.118 The units in the centre are occupied by a Premier convenience store, a betting shop, a launderette, a take-away and a charity shop. There is one vacant unit in the centre.

5.119 There are bus stops to the north of the centre on Devon Avenue which are visited by services travelling across Cheltenham to the town centre, Leckhampton and Coronation Square.

Out of Centre Retail and Leisure Provision

5.120 The largest concentration of out of centre retail floorspace in Cheltenham lies along Tewkesbury Road and includes the following stores:

- Centrum Park: Homebase, Dunelm, Costs and KFC
- Gallagher Retail Park: Next, Pets at Home, Hobbycraft, Outfit, Boots, DFS, Homesense, Sports Direct, Oak Furnnitureland, Greggs, Costa, EE, Subway, Tapi, Dreams, Majestic Wine, Iceland Food Warehouse and a large Sainsburys supermarket.
- Gateway Retail Park: Smyths Toys, Hillarys and Currys/PC World
- Kingsditch Retail Park: B&M, Marks and Spencer, Argos, Halfords, Furniture Village, Harveys, ScS, McDonalds,
- In addition to the above, there are also Wickes, Lidl, Starbucks and The Range stores on Tewkesbury Road

5.121 There is also a DW Sports store on Gloucester Road, B&Q, Home Bargains and Pets at Home stores on Grovefield Way, Matalan on Swindon Road

5.122 In addition, there are the following out of centre foodstores and supermarkets:

- ASDA, Hatherley Lane
- Waitrose, St James's Square
- Tesco, Collets Drive
- Sainsburys, Priors Road, Oakley

6. Town Centre Health Checks – Tewkesbury Borough

Tewkesbury town centre

Structure of Town Centre

6.1 Tewkesbury is the northernmost of the three main 'town centres' in the JCS area. It is a market town, located approximately 11 miles to the north of Cheltenham close to Junction 9 of the M5 motorway with the town centre lying adjacent to the River Severn.

6.2 The adopted 2006 Tewkesbury Local Plan does not define a town centre boundary for the town centre. It does, however, define primary retail frontage and mixed use frontage areas. Policy RET1 of the Local Plan deals with the primary shopping frontages and aims to retain a minimum of 75% of Class A1 retail uses within any 100 metre stretch of this defined area and any alternative uses should be either classes A2 or A3. This defined area stretches along High Street from its junction with Sun Street in the north to the junction with Church Street and Barton Street in the south.

6.3 The defined mixed use frontage covers a wider area including Barton Street up to its junction with Chance Street, the northern part of High Street and also Church Street up to its junction with Mill Street. Within this defined area the 2006 Local Plan notes that retail (A1) financial services (A2), food and drink (A3), residential and office uses will be supported.

6.4 The October 2019 Pre-Submission Tewkesbury Borough Plan proposes two defined areas for the centre: a town centre boundary and primary frontages. The primary frontage area covers the same area as the primary retail frontage whilst the proposed town centre boundary includes all of the mixed use frontage area plus the area between East Street, Oldbury Road and Chance Street (including Spring Gardens).

Diversity of Uses

6.5 Table 6.1 below compares the retail land use data from the 2011 JCS Retail Study with the latest data available for the town centre.

Table 6.1: diversity of retail uses in Tewkesbury town centre, 2011 and 2019

Sector	2011			2019		
	No	%	% UK Ave	No	%	% UK Ave
Convenience	17	8.9	9.2	14	7.8	10.0
Comparison	86	45.0	41.9	66	36.7	37.5
Service	59	30.9	34.8	64	35.6	38.8
Other	5	2.6	1.2	4	2.2	1.2
Vacant	24	12.6	12.9	32	17.8	12.5
Total	188	100	100	180	100%	100%

Source: AY survey 2019, Experian GOAD and 2011 JCS Retail Study.

6.6 The data in the above table indicates that there has been a small reduction the amount of convenience goods retailers in the town centre over the past 8 years, from 17 to 14 units. This reduction means that the proportion of convenience goods retailers in the town centre remains below the national average.

6.7 There has been a noticeable reduction in the number/proportion of comparison goods retailers in the centre since 2011, from 86 to 66. In 2011 the proportion of comparison goods retailers in the centre (45%) was above the national average but the drop in retailers in this sector means that the current proportion is now one percentage point below the national average. There has been a rise of six service units in the centre between 2011 and 2019. The proportion of retail service businesses in the town centre is now closer to the national average although, like 2011, it remains below the national average.

Vacancies

6.8 Of the 180 units within the defined town centre boundary, thirty two were vacant at the time of the survey. This represents 18% of all units in the centre which is well above the UK average. This suggests that a combination of influencing factors including (A) the potential for the town centre to currently accommodate an over-supply of retail floorspace, and/or (B) a lack of demand for retail space in the town centre. In our experience, a reasonably high vacancy rate is not uncommon amongst medium sized market towns across the UK, as demand for space reduces, but nevertheless, in terms of Tewkesbury, there is a need to raise concerns over the health of the town centre and also a need to re-consider the extent of the town centre. There are no particular high concentrations of vacancies in the centre although the highest number can be found on the periphery of the centre, including Barton Street and Church Street.

Retailer Representation

6.9 The convenience goods retail offer in Tewkesbury town centre is generally medium to small scale in nature. The largest store is Tesco Metro located on Bishops Walk / Oldbury Road and extends to 974sq m net sales area. The available evidence indicates that the store attracts both main and top-up food shopping trips although the size of the store would suggest that the balance of trips is in favour of top-up trips. In addition to the Tesco store, convenience goods stores include a One Stop convenience store, Holland & Barrett and a Greggs bakery.

6.10 The comparison sector is the largest sector in the town centre with just over a third of all the available units being occupied by this type of use. National multiple retailers in the centre include Boots Halfords, M&Co, Poundland and Edinburgh Woollen Mill with the majority of traders comprising local independent businesses. With the comparison goods sector, there is an under-representation of clothing and fashion retailers (against the national average) alongside an over-representation of charity and health/beauty retailers when compared to the national average.

6.11 Within the service sector, the majority of the units are occupied by local independent operators and include a number of hair salons, restaurants & takeaways, estate agents, and café's. The available land use date indicates that the proportions of these retail service uses are generally in line (or slightly below) their respective national averages.

Accessibility

6.12 There are several car parks across Tewkesbury town centre, eight of which are operated by Tewkesbury Borough Council and a further one operated by the Abbey Lawn Trust.

6.13 The largest car park in the centre is located at Spring Gardens (286 spaces), followed by Vineyards (129 spaces), Rails Meadow (127 spaces) and Oldbury Road (96 spaces) located immediately opposite Spring Gardens. In total, the TBC's available information on (Council owned/controlled) car parking sites indicates that there are 848 spaces in the town centre.

6.14 Provision of public transport accessibility for the town centre is focused on bus services[15]. Bus stops are located along High Street and Barton Street providing relatively frequent services to Cheltenham, Mitton, Ashchurch, Evesham, Northway, Gloucester, Bishops Cleeve, Upton on Severn, and Worcester.

6.15 Due to the historic linear nature of the town centre, pedestrian movement around the centre has a need to interact with the heavily trafficked High Street, Barton Street and Church Street. Pavement areas are modest in width (reflecting the building line which abuts the rear of most pavement areas. Pedestrian movement between both sides of High Street, Barton Street and Church Street is aided by signal-controlled crossings and central reservations in the middle of the highway.

Customer views & behaviour

6.16 The household survey commissioned for this Study has been able to gather information on the shopping patterns associated with Tewkesbury town centre. This data is summarised in Tables 4 and 6 in our quantitative assessment and indicates the following:

- In relation to convenience goods shopping, the town centre has a low market share of main food shopping trips. The centre attracts 4% of first choice main food trips from Zone 7 (the zone in which the town lies). In relation to other main food shopping trips, the town centre is no more successful in attracting trips from Zone 7 residents, with a 3% market share, along it also attracts 3% of trips from Zone 1b residents[16] and 2% of trips from Zone 1a[17] residents.
- Given the size of convenience goods stores in the town centre it is unsurprising that they have a higher market share amongst top-up food shopping trips. The centre attracts 10% of first choice top-up food trips from Zone 7 residents along with 1% from Zone 6[18] residents. In terms of other top-up food shopping trips, the town centre attracts 10% from Zone 7 residents, 5% from Zone 5b residents and 3% from Zone 5a residents.
- For comparison goods shopping, Tewkesbury town centre has the following market shares amongst its local (Zone 7) residents:
    - Clothing/fashion goods: a 7% share of first choice trips and 6% share of secondary trips.
    - Furniture: 7% of first choice trips and 4% share of other trips.
    - DIY goods: 6% of first choice trips and 18% of other trips.
    - Electrical goods: no market share for these types of goods apart from a small 2% share of secondary trips amongst Zone 7 residents.
    - Books, CDs, DVDs: 14% of first choice trips and 32% of other trips.

[15] The nearest railway station is located at Ashchurch some 4 miles to the east of the town centre.
[16] north-west Cheltenham and surrounding rural hinterland
[17] north-east Cheltenham and surrounding rural hinterland
[18] Newent area

  - Health and beauty products: a 46% share of first choice trips and a 16% share of other trips.
  - Recreational goods: 3% share of first choice trips and 5% share of other trips.

6.17 In order to better understand the performance of Tewkesbury town centre over time, we have compared the 2019 household survey data with the 2011 Study survey results and the summary of this data is contained at Appendix II to this report. This data indicates the following:

- In relation to market share levels in Zone 7 (the zone in which Tewkesbury lies) the 2011 and 2019 survey data indicates that the town centre has maintained its small market share of clothing/fashion trips of 6%-7%.
- The centre's share of books, CDs, DVDs trips has reduced by around half and now stands as 13% (from 25% previously).
- There have also been material falls in the town centre's share of shopping trips amongst Zone 7 residents for soft furnishings, health and beauty goods, DIY goods and gardening goods.
- In relation to the wider area, it remains the case that Tewkesbury town centre does not attract a significant market share, although it continues to attract a small share of trips amongst Zone 5d, Zone 6 and Zone 8 residents:
  - 1.7% of second choice clothing/fashion trips from Zone 6 residents.
  - 17.5% of second choice DIY trips from Zone 8 residents.
  - 5.3% of first choice shopping trips for electrical goods from Zone 5d residents.
  - 2.2% of first choice trips on soft furnishing products from Zone 6 residents.
  - 1.3% of first choice shopping trips from Zone 6 residents for books, CDs and DVDs.
  - 2.4% of first choice trips for health and beauty products from Zone 6 residents.

6.18 In addition to the comparison between market share levels, it is also possible to compare the turnover levels of the town centre for convenience and comparison goods shopping between the 2015 Study and the assessment prepared for this Study. In the 2015 Study the Tesco Metro store was recorded to have a turnover of £14.9m with a small additional amount of expenditure attributed to the Co-op store on the High Street. The Co-op store has now closed and the analysis prepared for this Study indicates a fall in turnover for the Tesco store to £6.8m. These changes are set against a small rise in the turnover of the out of centre Morrisons store and also a fall in turnover for the ALDI store (although the latter store still continues to trade well). In relation to comparison goods turnover, there has also been a fall between the 2015 Study and this assessment. In 2015, the turnover of the town centre was assessed to be circa £25.4m and this has now fallen in 2019 to circa £19.5m.

Pedestrian Flows

6.19 Detailed pedestrian flow counts have not been conducted for this Study although observations have been made on our visits to the town centre during the course of completing this health check assessment. High

Street remains the busiest part of the centre with good flows throughout its length. The area around Bishops Walk is particularly busy and the pavement areas on the eastern side of the highway the busier of the two sides. There is a noticeable drop in footfall on Church Street and particularly Barton Street.

Environmental Quality

6.20 Tewkesbury is an attractive historic market town and is considered a well-kept, safe and maintained centre. The defined town centre is focused around the High Street moving southwards to The Cross with Church Street and Barton Street centred off this. There are a mixture of building styles of high aesthetic quality namely of the Tudor and Georgian period which is interspersed with more modern development which in certain places does not seem sympathetic to the historic character of the centre. A typical example of this is apparent at the northern end of the High Street around Bishops Walk and the car parks which although functional and well used is not considered the most attractive area of the wider town centre. In comparison the central area of the High Street to The Cross is alluring and provides the concentration of character buildings, including the main retail frontages which contribute to creating a distinctive and high quality townscape, although the traffic can impact the overall quality of the environment.

Summary and conclusions

6.21 Tewkesbury town centre plays an important role for its residents and surrounding rural settlements. It is an attractive historic centre which benefits from the presence of the Abbey, many other historic buildings and the riverside location. The retail composition and offer is broadly comparable to the national average bar save for a slight under-provision of convenience retailers and a growing number of vacancies. One sixth of all surveyed retail units in the town centre are vacant and this trend may be linked to the falling market share of the centre in terms of comparison goods shopping. The number of vacancies should be of some concern regarding the health of the centre and may be a sign that there is an over-provision of retail space. The key future challenge for Tewkesbury town centre will be create and maintain its own distinctive role as it will be difficult for the town to compete directly with Gloucester and Cheltenham, particularly in terms of certain types of comparison goods shopping. Whilst some actions to encourage this distinctive role may be outside of the influence of the planning system, the on-going changes to national policy and legislation regarding use classes may offer TBC the opportunity to encourage flexibility in the land use profile in the town centre. This is discussed further later in this report. Finally, with the construction of the new retail outlet centre at Ashchurch, the town centre has the potential to experience future change and pressures in the coming years and there is concern that its comparison goods and food/beverage functions could face renewed pressure.

Winchcombe

6.22 Winchcombe is an historic market town, located in the east of Tewkesbury Borough, lying mid-way between Broadway and Cheltenham on the B4632. The town lies in the Cotswolds Area of Outstanding Natural Beauty. The Local Plan policies map defines a 'Retail Area' for the town centre along both sides of the southern end of North Street plus a short stretch of Hailes Street to the west of its junction with North Street. This boundary is linked to Policy RET3 of the adopted Local Plan which notes that proposals for A1, A2, A3 uses at ground floor level (and proposals for A1, A2, A3, office and residential use at upper floor level) will be permitted.

6.23 Information on the diversity of uses in Winchcombe town centre has been obtained from a survey completed by Avison Young in Spring 2019. This survey updates the most recent Experian GOAD survey of the centre in

May 2017. Table 6.2 below also provides land use data provided in the health check assessment for Winchcombe in the 2011 Study.

Table 6.2: retail land use composition of Winchcombe town centre, 2011 and 2019

Sector	2011			2019		
	No	%	% UK Ave	No	%	% UK Ave
Convenience	8	13.3	9.2	5	8.8	10.0
Comparison	24	40.0	41.9	28	49.1	37.5
Service	24	40.0	34.8	19	33.3	38.8
Other	0	0	1.2	1	1.8	1.2
Vacant	4	6.7	12.9	4	7.0	12.5
Total	**60**	**100%**	**100%**	**57**	**100%**	**100%**

Source: 2011 DPDS JCS Retail Study and AY survey 2019.

6.24 The above data shows that there has been a small reduction in the number of retail units in the centre between 2011 and 2019, from 60 to 57. Within this reduction there have been a number of changes to the number of convenience, comparison and service uses. Convenience retailers have fallen from 8 to 5 and the proportion of retailers (8.8%) is now slightly below the national average (10.0%).

6.25 Uncommon with the trends found in a number of other centres reviewed for this Study there has been a rise in the number of comparison retailers in the centre from 24 to 28. In 2011 the proportion of comparison goods retailers was broadly in line with the national average at that time although the rise over the past several years has left the proportion of comparison retailers (49%) around twelve percentage points above the national average (37.5%). This rise is against the national trend which is seeing a fall in the proportion of comparison goods uses in town centres. There could be a number of reasons for this trend, although the apparent confidence of businesses to invest in the centre may well be a sign of the willingness of the local population to shop locally for certain types of comparison goods and also opportunities seen by local businesses to sell/offer products which can compete with stores further afield. This is also likely to be reinforced by the attractiveness of Winchcombe amongst visitors, which will add a further dimension to the attractiveness of the centre.

6.26 Also against the national trend, the number and proportion of service uses in the centre has declined over the past eight years from a position where they were above the national average in 2011 to a current proportion which is below average. This is an unusual situation for a smaller centre, as they tend to be popular with day-to-day local service needs, although isn't necessarily a particular concern for the wider health of the centre. Moreover, it will be interesting for TBC to monitor how the balance between retail and service uses changes in the short to medium term following the changes to the use class regime.

6.27 Of the 57 surveyed retail units within the defined centre boundary, only four were vacant at the time of the survey. This represents only 7% of all units in the centre and which is well below the UK average (12.5%).

6.28 Within the convenience good sector the five current occupiers are Co-op, North's Bakery, Food Fanatics Deli, Winchcombe Fruit & Veg Greengrocers, and the Vale & Hill Butcher. The main convenience store is focused on the Co-op store on North Street which provides a modest range of pre-packaged and fresh convenience goods, along with a range of beers, wines, and spirits. Outside of the town centre there is Budgens foodstore which opened in 2016. This store extends to circa 380sq m and sells a modest amount of convenience goods.

6.29 The comparison sector is the largest sector in the centre with just under half of all the available units being occupied by this type of use. Uses are predominantly made up of antique shops, interior decoration outfits, and clothing retailers with other comparison uses including a number of jewellers, charity shops, gift shops, and a florist, opticians, pharmacy, and a DIY hardware store.

6.30 Within the service sector, the majority of the units are occupied by local independent operators and include a number of hairdressing salons, restaurants & takeaways, estate agents, a beauty & cosmetic store, and multiple café's. In addition, there is a Coventry Building Society.

6.31 Although, not on a key arterial route the historic configuration of the centre is reflected in the narrow street network which has implications for traffic passing through the centre. There are a number of pinch points which pose particular problems for HGV traffic, and have implications on the pedestrian flows within the central area. In addition, to this the majority of the retail units are front serviced in terms of accepting deliveries which in turn exacerbates the traffic congestion in the centre.

6.32 There is restricted parking in the centre with a number of restrictive parking controls with many local residents not benefiting from off street parking. Car parking in the centre is limited based on the historic configuration of the centre despite the reliance on the car for accessing Winchcombe. There are two Council operated car parks; the largest at Back Lane (98 spaces, 2 coaches, and 1 disabled bay – with access to the centre via Cowl Lane) and Bull Lane the closest facility to the centre (41 spaces, and 1 disabled bay – with access via Bull Lane) which provides a mix of short and long stay parking. In addition, on street parking is also provided on the edge of the defined rural service centre at Abbey Terrace (35 spaces, restricted to two hours).

6.33 Bus stops are located on the northern and western edges of the town centre and are visited by the W1 and W2 services. These are hourly services which travel to Cheltenham, Prestbury, Southam, Bishops Cleeve, Woodmancote and Gotherington.

6.34 The household survey commissioned to inform this Study provides information regarding convenience goods shopping patterns in Winchcombe. Table 4 at Appendix II to this Study indicates that the Co-op and Budgens stores in the town primarily draw main food shopping trips from Zone 3b. The Budgens store has a 8.5% share of first choice main food trips in 3b, whilst the Co-op store has a 6.4% share. Given the size of the stores it is unsurprising that the Budgens store is a more popular second choice main food destination with a 11.9% share of these trips in Zone 3b. In terms of top-up food shopping, the Budgens and Co-op stores retain the majority all top-up food shopping trips in Zone 3b. The Budgens store is by far the more popular of the two for first choice top-up trips with a 53% share. The Co-op has a 18.9% share of first choice top-up trips. The situation is reversed in relation to other top-up food trips with the Co-op possessing a 41.5% share and the Budgens achieving a 25.3% share.

6.35 For comparison goods shopping the centre attracts the following market shares:

- A 10% share of secondary clothing/fashion trips in Zone 3b.
- A 2% share of first choice furniture trips in Zone 3b and a 3% share of other trips in Zone 1a.

- A 10% share of first choice DIY trips and a 17% share of other DIY trips amongst Zone 3b residents.
- A 1% share of first choice soft furnishings trips in Zone 3b.
- A 9% share of first choice trips and 4% of other trips for books, CDs, DVDs.
- 56% of first choice health and beauty goods trips from Zone 3b residents are retained by Winchcombe, along with 31% of other trips for these goods.

6.36 Winchcombe town centre, along with a large part of the rest of the town is covered by a Conservation Area designation. It is a typical Cotswold town with continuous frontages of historic buildings with good examples of Cotswold vernacular architecture lining the main streets without significant interruption from inappropriate development. Buildings in the centre are generally 2-3 storey in nature and sit at the rear narrow pavement areas. These buildings have a high proportion of nineteenth and early twentieth century traditional shop fronts, which make an important contribution to the town's character. The public realm areas and retail units across the centre are well maintained and the overall attractiveness of the centre is clearly a key contributor to the health of the town centre.

6.37 Overall, Winchcombe is considered to be a healthy small town centre which provides an array of niche and specialist retailers, set within a compact and aesthetically pleasing environment. Although Winchcombe is relatively isolated and not located on the strategic road network it can be characterised as a relatively affluent centre serving a mixed local population mainly represented by the retired and commuters which, when combined with its attractiveness to visitors, ensures that the centre has a modest but strong retail and service offer. Indeed, the location of Winchcombe may well be of benefit to its overall health, due to it becoming more of a focus for the local community, combined with the added spending power of visitors. This is evident by the consistently low number of vacancies, suggesting a good level of demand for retail / commercial property in the centre.

Bishops Cleeve

6.38 Bishops Cleeve can be characterised as a relatively small centre, located to the north of Cheltenham and to the west of Winchcombe and can be accessed via the A435. The village has grown rapidly in the post-war period with provision of shops, services and other facilities generally acknowledged to have not kept pace with the growth of residential accommodation.

6.39 The adopted Tewkesbury Local Plan policies map identifies the centre boundary as lying on both sides of Church Road between its junction with Tobyfield Road and Cheltenham Road. The centre boundary also includes a large Tesco supermarket and its surface level car parking area. The centre is surrounded by a mix of residential accommodation, a primary school and Lidl foodstore on north-western edge.

6.40 Table 4.1 below summarises the retail land use information for the village centre collected by Avison Young in Spring 2019. For the avoidance of doubt, the data relates to uses inside the proposed centre boundary as set out in the draft new Local Plan.

Table 6.3: retail land uses in Bishops Cleeve, 2019

	2011			2019		
	No.	**%**	**% UK**	**No.**	**%**	**% UK**
Convenience	6	11.8	9.2	4	10.3	10.0
Comparison	12	23.5	41.9	9	23.1	37.5
Service	26	51.0	34.8	23	59.0	38.8
Vacant	4	7.8	1.2	2	5.1	12.5
Misc.	3	5.9	12.9	1	2.6	1.2
Total	**51**	**100**	**100**	**39**	**100%**	**100%**

Source: AY survey 2019. 2011 data taken from 2011 JCS Retail Study. Figures may not be directly comparable as the methodology and area for the 2011 survey is unknown.

6.41 The above table shows that Bishops Cleeve has a strong focus upon service uses which occupy over half of all surveyed units. Within the service sector, the majority of the units are occupied by local independent operators and include a number of hairdressing salons, restaurants & takeaways, estate agents, a beauty & cosmetic store, plus a number of cafés. The proportion of service uses in the centre is over twenty percentage points above the national average.

6.42 The next largest grouping of businesses are comparison goods retailers. There were 9 retailers in the centre at the time of survey and comprise clothing and shoe shops, charity shops, opticians, pharmacy and DIY/hardware store. Bishops Cleeve lies within Zone 2 of the household survey area commissioned for this Study and our summary of the survey results at Table 6 in Appendix II indicates that the village centre has some reasonable market share levels for a centre of this size. The centre has a 9% market share for first choice recreation goods shopping trips in Zone 2, whilst it retains 44% of first choice shopping trips on health and beauty goods. In relation to other goods, the centre has lower market shares for the more bulkier goods categories including 7% for DIY goods and 5% for electrical goods and 2% for clothing/fashion.

6.43 There were four convenience good stores in the centre at the time of survey, comprising 10% of the total unit stock and therefore in line with the national average. The household survey indicates that the Tesco store attracts 58% of all first choice main food trips from Zone 2 residents, with only 4% of these trips flowing to Lidl. Surprisingly, the survey suggests that the Co-op at The Green has a similar share of first choice trips (4%). In relation to second choice main food trips, the Lidl and Tesco stores have similar market shares (circa 12%) and the beneficiaries of main food shopping trips, particularly second choice trips, being lost from Bishops Cleeve are the Sainsburys and Tesco stores in Cheltenham. 81% of first choice top-up food trips generated by Zone 2 residents are retained by Bishops Cleeve, with the Tesco store gaining a 56% market share and the Co-op at The Green gaining 17%. Like main food shopping, a majority of residents in Zone 2 prefer to use stores Cheltenham for second-choice top-up food trips with the Sainsburys on Tewkesbury Road attracting almost one fifth of all trips.

6.44 Of the 39 units within the defined rural service centre boundary, only two were vacant at the time of the survey. This represents only 5% of all units in the centre and which is well below the UK average of 13%. This suggests that Bishops Cleeve rural service centre is a popular and successful centre with retail businesses.

6.45 Car parking is focused on the existing Tesco Extra store car park located off Church Road. This provides parking for up to 3 hours (free for 2 hours). There is a limited provision of on street parking within the centre, providing a short term provision for 45 minutes with no return within the hour (Monday to Saturday 8am – 6pm). This is found along the majority of Church Road up until it meets the junction with School Road and Pecked Lane.

6.46 The provision of public transport is solely focused on bus services with no rail services available in Bishops Cleeve itself with the nearest train station located in Cheltenham (approximately 4.8 miles) and Ashchurch (approximately 5.9 miles). Bus stops are located in the centre at Mill Parade, Church Road providing relatively frequent services to Cheltenham, Gloucester, Winchcombe and Tewkesbury.

6.47 Pedestrian movement around the centre is aided by reasonably wide pavement areas and good linkages between Church Road and the Tesco Extra car park. There is also a zebra crossing at the eastern end of Church Road which also assists movement.

6.48 Many of the buildings in the defined centre at Bishops Cleeve are post-war, having been provided at the time when village grew rapidly after the war. None of these buildings have any particular architectural merit although their Cotswold stone/brick construction provides an 'edge of Cotswold' feel to the centre. There is evidence of on-going maintenance to a number of buildings in the centre and there are no particular areas of poor environmental quality.

6.49 Overall, Bishops Cleeve provides an important retail centre for the local residents in the village, along with those living in the rural hinterland. The centre is dominated by a large Tesco Extra store and supporting car park which acts as the main food shopping destination and car parking facility for the centre. This is supported by the smaller Lidl store which arguably functions as part of the centre and we therefore agree with the content of the draft new Local Plan which is proposing an expansion to the defined centre boundary. The centre performs an important role and function in servicing a growing local population although growth would be beneficial as the centre is now arguably too small for the size of Bishops Cleeve. The proximity of Cheltenham is likely to influence the rate and extent of any future growth.

Local Centres

Brockworth

6.50 The defined local centre at Brockworth lies along Court Road. The majority of the centre lies on the eastern side of the highway although there are also five units within the boundary on the western side. A survey of the centre by AY in Spring 2019 found the following uses two charity shops, a Co-op convenience store, a McColls convenience store, two take-aways, a bookmakers, a carpets/flooring store, a Lloyds bank, a bakery, a barbers and a launderette. The retail units are housed in two-storey properties on the eastern side of the centre and unattractive single-storey units on the west. The Co-op store is recorded by the 2019 household survey as having a 1% share of second choice main food trips in Zone 5c, along with 3% of first choice top-up trips and 2% of second choice top-up trips in the same zone. There are bus stops located on the northern edge of the centre which are visited by the No.48 service which links the centre to Gloucester city centre, Barnwood, Longlevens and Abbeymead.

Churchdown

6.51 There are two defined local centres in Churchdown on Church Road and St Johns Avenue. The Church Road centre contains a take-away/restaurant, a public house, two hair salons, a Premier convenience store, a kitchens and bathrooms store, an estate agent and a café. The defined centre boundary is split across two parts: Church Road and Blacksmith Lane. Church Road local centre is in the more historic part of Churchdown and has a village-type feel. The 2019 household survey records the centre as having a 1% market share of first choice top-up food shopping trips amongst Zone 5d residents.

6.52 The centre at St Johns Avenue is located on the western side of the highway with a single terrace of two-storey properties. The centre is served by a limited amount of on-street parking. The centre contains a McColls convenience store, an undertakers, a bookmakers, charity shop, hair salon and two vacant units. The 2019 household survey indicates that the McColls store has a 1.5% share of first choice top-up food trips amongst Zone 5d residents.

Innsworth

6.53 This centre is located on Blackbird Avenue. It comprises a terrace of four units comprising a Premier convenience store, hair salon, electronic goods repairs and take-away. There is a modest amount of on-street parking provided in front of the units.

Northway

6.54 Northway is located in Ashchurch and comprises five units houses within a purpose built parade of terraced units. One unit is vacant and the occupied units comprise a Co-op foodstore, a pet shop, a pharmacy and a bookmaker. The centre is served by a reasonably large free surface level car park. The household survey commissioned to inform this Study indicates that the Co-op store has a market share of 8.5% for first choice top-up food shopping trips amongst Zone 7 residents. It also attracts 8% of other top-up food shopping trips from Zone 7 residents.

Cooper's Edge (Proposed New Local Centre)

6.55 Cooper's Edge is a new and growing residential area adjacent to Brockworth. It gained outline planning permission around 15 years ago and a large part of the area covered by the outline permission as subsequent reserved matters is allocated in Policy BR1 of the adopted Local Plan for 1,400 new homes and inter alia a new local centre, community and educational facilities. The draft new Local Plan is proposing to allocate a new local centre whose boundary would include the large Tesco Extra supermarket, public house, gym, hotel, Greggs bakery, hair salon, bookmakers and Costa café.

6.56 The 2019 household survey records that the core main food shopping catchment of the Tesco Extra store stretches across Zones 5c, 5d and 6 of the study area, along with a limited additional amount of trips from Zones 1a and 1b. The core top-up food shopping catchment of the store comprises Zones 5b, 5c and 5d, with the majority of trade coming from Zone 5c.

7. Assessment of Retail Needs

Basis for the Quantitative Need Assessment

Introduction

7.1 This section of the Study outlines the various data sources and assumptions which have been adopted In order to prepare our quantitative need forecasts. Quantitative capacity forecasts are reliant on a series of data sources which are regularly updated in response to various factors including UK economic forecasts and the performance of retailers. The section covers the following areas:

- Study area
- Population data
- Per capita retail expenditure forecasts
- Data on shopping patterns for convenience and comparison goods shopping
- Commitments for retail floorspace
- Benchmark turnover levels of existing and committed retail floorspace

Study Area and Shopping Patterns Data

7.2 Given the scale of the combined administrative area of the three JCS authorities, the study area for this assessment is required to be necessarily large. The study area will need to capture shopping patterns associated with each of the main town centres and the average spending levels of those people who use these centres.

7.3 A plan showing the extent of the study area is contained at Appendix I to this document.

7.4 The study area has been split into 20 separate zones in order to capture specific shopping patterns associated with individual settlements and the surrounding area and, for the larger settlements such as Gloucester and Cheltenham, specific shopping patterns across different parts of their urban areas. The study area and the constituent zones are the same as the zones used in the household survey informing the 2015 Study, thus allowing a time series analysis to be performed to examine the market share of particular centres over time.

7.5 As set out in earlier sections of this Study, a survey of household shopping patterns has been undertaken in order to inform both this quantitative assessment and the town centre health checks. The survey has been structured to collect data on the following convenience and comparison shopping activities:

- First choice and other main food shopping destinations
- First choice and other top-up food shopping destinations
- First and second choice destinations for the following types of comparison goods:
  - Clothing and fashion goods
  - Furniture

- DIY
- Electrical goods
- Soft furnishings
- Books, CDs and DVDs
- Health and beauty goods
- Recreation and luxury goods
- Gardening goods

7.6 The results of the household survey have been weighted against the age profile of each individual zone and have been summarised in Table 4 at Appendix II (for convenience goods shopping) and Table 6 at Appendix II (for comparison goods shopping).

7.7 For the purposes of our assessment 'don't know' and 'don't do' responses have been removed from the results and the market share data re-based. In line with the 2015 study, shopping patterns associated with the internet and mail order shopping have been retained in the assessment in order to provide consistency.

7.8 However, in order to take into account how shopping via the internet in the future may have an influence on retail expenditure available to 'bricks and mortar' stores in the main settlements, our analysis is based upon an amended market share over the assessment period. This is particularly important given the on-going effects of the COVID-19 pandemic which has seen a significant uplift in the amount of retail spending in 2020 via the internet. Whilst the latest forecasts from Experian suggest a modest 'bounce back' from 2021 onwards once economic conditions become more settled, the forecasts nevertheless show a sustained increase in spending via the internet particularly for comparison goods. As a consequence, the market share levels from the household survey have been refined in order to take into account this trend and thus provide a realistic estimate of the level of convenience and comparison goods retail expenditure which is available to 'bricks and mortar' stores in the main settlements in the JCS area.

Timeframe for the Quantitative Assessment

7.9 The timeframe for the adopted JCS runs to 2031 and the recent Issues and Options consultation on the JCS Review has indicated that the new plan should go beyond the existing end date. Therefore, our assessment has been framed to cover the period from the current year (2020) up to 2034. The February 2019 version of the NPPF indicates that local authorities should "*allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, <u>looking at least ten years ahead</u>*". Therefore, there is no compulsory requirement for this quantitative assessment to run all the way to 2034 although we have done so in order to provide some broad informal guidance for the JCS authorities. Capacity forecasts are therefore provided for 2020, 2024, 2029 and 2034.

7.10 However, it should be noted when absorbing the content of our quantitative assessment that the forecasts will become less reliable over time due to the nature of the economic forecasts which will be influenced by external factors some of which will be unforeseen. As a consequence, we would recommend that the first ten years of the assessment is the focus for the retail strategy (i.e. up to 2030) and that the forecasts are reviewed at least every five years. The 2034 forecasts are therefore, indicative.

Population

7.11 In line with the approach taken in the 2015 study, our quantitative need assessment adopts population forecasts provided by Experian. Population levels for each of the study area zones are shown in Table 1 at Appendix II.

Per Capita Retail Expenditure Data and Future Forecasts

7.12 New per capita retail expenditure data has been obtained from Experian. The data provided is set at a 2017 base level and has been projected forward based upon the forecast change in per capita retail expenditure for convenience and comparison goods as set out within Experian's Retail Planner Briefing Note 18, published in October 2020. These are the latest available economic forecasts which aim to predict the future effects on the retail and leisure sector of the COVID-19 pandemic.

7.13 Per capita retail expenditure for convenience and comparison goods is shown in Tables 2a-2d at Appendix II.

Commitments

7.14 Data on relevant Class A1 retail commitments has been obtained from the Councils and is set out in Table 8b at Appendix II. Because the household survey commissioned for this Study was undertaken in March 2019 recent (significant) store openings since that date have also been included. The decision to undertake the survey in Spring 2019 was taken in order to allow the new John Lewis store in Cheltenham town centre to open. In addition, we have also taken into account potential (significant) losses in Class A1 retail floorspace.

Benchmark Turnover Levels

7.15 Within previous retail studies across the JCS area two different approaches were taken for benchmark turnover levels for the convenience and comparison goods assessments. For convenience goods floorspace, it is common for the benchmark turnover of a selection of existing floorspace to be calculated using the existing net floorspace and company average sales densities for individual national multiple retailers and an assumed average for other convenience goods floorspace in defined 'town centres' and elsewhere.

7.16 We remain with this approach in this Study and have:

- updated the sales density information for named national multiple retailers using the latest research undertaken by Verdict and Mintel[19]; and
- including data on new store openings since the previous studies.

[19] Retail Rankings, 2017 edition

7.17 For the comparison goods assessment, previous studies have adopted the standard approach of assuming that benchmark turnover of existing stores in a particular settlement was the same as existing total turnover at the base year of the assessment – i.e. in equilibrium.

7.18 This updated assessment, along with the use of the new 2019 household survey, offers the opportunity to link back to the benchmark turnover for the various settlement used previously in order to provide some consistency across the 2015 and 2019 studies.

Floorspace Efficiency

7.19 Finally, our convenience and comparison goods capacity assessments both make an allowance for changes in floorspace efficiency over the assessment period. The assumptions that have been made are taken from recommendations made by Experian in its latest Retail Planner Briefing Note (October 2020)[20].

7.20 We now turn to the assessment of need for each of the main settlements.

Assessment of Need

Gloucester

7.21 The quantitative assessment of convenience goods floorspace capacity in Gloucester is contained in Table 9a at Appendix II. It indicates that, on a combined basis, all existing convenience goods stores in the city attract £329.9m of expenditure from residents of the study area. This is lower than the £373.7m estimate for 2015 in the 2015 study. Table 9a makes a small allowance of additional expenditure inflow into the city[21] equivalent to 3% of study area derived turnover, leading to a total turnover potential of £331.7m at 2020 (once the amended market share for increased internet spending is taken into account). This is circa £60m below the combined benchmark turnover of all existing stores as estimated by Table 8a at Appendix II. This suggests a noticeable over supply of existing floorspace.

7.22 Table 9a also includes an allowance for convenience goods commitments in Gloucester including the two new planned Lidl stores, the potential for a new modest-sized foodstore at the Peel Centre, a foodhall within the Kings Quarter redevelopment project and an element of convenience goods sales in a new B&M store in Kingsway. These commitments add further £45m of turnover to the quantitative assessment.

7.23 As a consequence, Table 9a indicates that there will not be any surplus convenience goods floorspace capacity in the city over the assessment period. The scale of over-provision is substantial, at -£108m in 2020 and only falling to -£88.8m in 2030, based upon a constant market share over the assessment period[22].

7.24 In relation to the qualitative aspects of provision, Gloucester has a very wide range of convenience goods stores and there is no suggestion that, on a town-wide basis, there is any qualitative deficiency. A number of the larger grocery retailers have two stores in the city (including Sainsburys, ASDA and Morrisons) whilst there is a growing number of discount operators (ALDI and Lidl). All areas of the existing urban area have easy access to foodstores although perhaps the one area where there is room for improvement is the city centre. The

[20] Including the need to take into account influences on efficiency in 2020 as a result of the COVID-19 pandemic
[21] In order to allow for tourist/ visitor expenditure on retail goods
[22] These capacity figures do not include an allowance for any convenience floorspace which could be provided as part of the Hunts Grove residential-led mixed use scheme which lies in Stroud District but would essentially function as part of the Gloucester urban area

centre has a Marks & Spencer foodhall, an aging Sainsburys store and a number of smaller convenience stores and niche operators, plus an Iceland. The planned foodhall in the Kings Quarter development would help to widen the offer of the city centre and also add a new type of retail use.

7.25 Table 10a at Appendix II outlines the quantitative floorspace capacity for comparison goods floorspace in Gloucester. As noted earlier in this section we have taken the decision to link the benchmark turnover used in our comparison goods assessment back to the benchmark turnover used by DPDS in the 2015 study. This provides consistency between the JCS evidence base studies and we are not aware of any criticism of the benchmark or actual turnover levels from the JCS Inspector in her report in October 2017.

7.26 On this basis, Table 10a shows a significant over-provision of comparison goods floorspace in the city. This is because of a noticeable fall in overall comparison goods turnover and the loss of market share. Section 4 of this Study has already outlined the concerns over the loss in the city centre's market share. The over-provision situation is made more severe by the inclusion of a small number comparison goods floorspace commitments which are likely to soak up circa £22.6m of expenditure. In addition, we have also made an allowance for the negative impact that the new retail outlet centre at Ashchurch will have on the market share of Gloucester as a whole. Based upon the assessments made at the time of TBC determining that application, Gloucester is likely to lose around £23m of comparison goods expenditure which will have a -0.3% impact on the city's market share between 2020 and 2025.

7.27 Finally, it is important to note that unlike the 2015 study we have made an allowance for a modest amount of expenditure inflow into Gloucester from outside of the study area. This has been set at 7% of study area expenditure[23] which is considered to be appropriate and primarily led by the attractiveness of the retail outlet centre at Gloucester Quays.

7.28 Overall, Table 10a indicates there is a significant over-provision of comparison goods floorspace and based upon a constant market share this over-provision will remain until 2034. We note that a key issue at the previous JCS Examination in Public was a discussion over the appropriate market share for Gloucester. A key issue is whether the retail strategy for Gloucester should plan for increase in its market share as the city has traditionally lost out to Cheltenham and, further afield, Bristol along with the more contemporary issue of internet shopping (which is affecting most large towns and cities). We consider that there is a certainly a case for a qualitative improvement in provision in Gloucester and this is centred upon the traditional part of the city centre. In addition to facing competition from surrounding large towns and cities, the traditional part of the city centre (i.e. existing primary shopping area) has, in our opinion, also been affected by the retail outlet centre at Gloucester Quays. This effect is likely to continue as the Peel Centre continues to evolve, including the opening of the new full-line Next home and fashion store adjacent to the former cinema.

7.29 Therefore the focus upon improving the quality of comparison goods floorspace in Gloucester should be on the traditional city centre area (i.e. the primary shopping area). This will focus upon the redevelopment, refurbishment and recycling of existing floorspace and we consider that there are unlikely to be any net gains. Whilst any sensible opportunity to improve the market share of Gloucester should be explored, the scale of

[23] It will be noted that previous retail floorspace / expenditure capacity exercises did not make an allowance for expenditure flowing to JCS centres / settlements from outside of the study area. We consider that such an allowance is appropriate in certain circumstances where retail stores have the potential to draw from a wide catchment. Definitive information on longer-distance shopping trips can be difficult to obtain, although we consider that a modest allowance of 7% for Gloucester is reflective of the draw of the retail outlet centre and the wider Quays / Docks area.

forecast over-provision is such that there is unlikely to be, in our opinion, any quantitative case for net additional provision in the city. Indeed, simply attempting to plan for an increase in Gloucester's overall market share without any focus upon a particular area (i.e. the primary shopping area in the city centre) risks the potential to be counter-productive as providing out of centre floorspace will simply reinforce recent trends and further worsen the health of the centre.

Cheltenham

7.30 Table 9b outlines our assessment of the quantitative capacity for convenience goods floorspace in Cheltenham. It indicates that, overall, existing stores attract £417m of convenience goods expenditure from the study area and we have made a small allowance for expenditure inflow (£12m). Taking into account a small adjustment to the town's market share for an increase in spending via the internet over the assessment period, Table 9b indicates a total turnover potential of £419.4m at 2020. Table 9b also makes an allowance for the turnover of convenience goods commitments including the Lidl on Tewkesbury Road and the new ALDI store on Grovefield Way[24]. Based upon these figures, and a benchmark turnover of £334.1m of existing stores, Table 9b indicates that there is large level of surplus expenditure for convenience goods floorspace in Cheltenham, of circa £60m. This is equivalent to an indicative floorspace capacity of circa 5,000sq m net at 2020.

7.31 Based upon a constant market share of the assessment period, Table 9b indicates that the capacity for net additional convenience goods floorspace rises to circa 5,500sq m net at 2025 and circa 6,300sq m net at 2030.

7.32 In terms of the quality of existing convenience goods floorspace provision, Cheltenham has similar characteristics to Gloucester in that it has a good range of stores throughout the town. All of the main large-scale grocery operators are represented with ALDI and Lidl now also securing new stores. In terms of any particular geographic gaps in provision, we consider that:

- the choice and competition on the eastern side of the town has the potential to be improved. Bath Road district centre plays an important role is this part of the town and the available evidence suggests that stores such as Co-op and Sainsburys Local are trading well in excess of their respective company averages.
- The abandonment of the Morrisons supermarket proposal in the northern part of the town centre was disappointing in terms of removing the ability to add to choice and competition in the centre. Any opportunity to include a reasonably sized new foodstore in the town centre would provide an important qualitative improvement for the centre.
- Finally, Cheltenham, in the existing adopted JCS, is subject to a number of large scale planned urban extensions, including West Cheltenham and the larger North-West Cheltenham. The latter's allocation already includes the provision of a new centre. Given the scale of these urban extensions it is appropriate for new local or district centres to be provided and therefore we consider that a large part of the identified quantitative capacity should be placed in these areas in order to provide easily accessible food retail floorspace provision.

[24] Which has recently been granted permission at appeal, as part of a mixed use scheme

7.33 Table 10b at Appendix II outlines the quantitative capacity for comparison goods floorspace in Cheltenham. The data contained within the table takes into account a number of comparison goods floorspace commitments in Cheltenham including new and repurposed retail floorspace at Gallagher Retail Park and the gains in comparison goods floorspace which have and are expected to occur in the second phase of the Brewery Quarter development. Like the Gloucester quantitative assessment, the Cheltenham assessment also takes into account the loss in market share as a consequence of the trading impact of the new retail outlet centre at Ashchurch. This reduces the market share of Cheltenham comparison goods stores across the study area from 15.9% in 2019 to 15.5% in 2024. The collective market share of comparison goods stores across the town has been amended to take into account the increasing influence of shopping via the internet.

7.34 Taking into account a number of comparison goods floorspace commitments, including floorspace at the second phase of the Brewery Quarter phase 2 and new/amended retail floorspace at Gallagher Retail Park on the western side of the town, Table 10b indicates that there will be a small deficit of £15.2m of comparison goods expenditure in Cheltenham at 2024 which is equivalent to an indicative over-supply of circa 2,800sq m net. Based upon the altered future market share for Cheltenham, Table 10b indicates that a small over-supply in capacity would remain across the assessment period.

7.35 Whilst these figures indicate a potential increase in the ability to provide net additional retail space in Cheltenham, the qualitative picture does not necessary fully support such a future trend. Cheltenham currently has a very good range of comparison goods retail provision. It traditionally has been the pre-eminent retail centre in Gloucestershire and the provision of the new John Lewis department store and the second phase of the Brewery Quarter have made material improvements to the retail offer of the town. Given the size of the town, the competition that it faces in the wider catchment from destinations such as Bristol, the on-going issues facing high street retailing, along with the good quality of the existing offer and available space in the second phase of the Brewery Quarter, we do not consider that there is a requirement for the JCS Review to include a strategy for a significant expansion of comparison goods retail floorspace over the plan period. As noted above, the main focus for additional retail floorspace provision across Cheltenham over the JCS Review period will be in local and district centres in the planned urban extension (albeit located in both Cheltenham Borough and Tewkesbury Borough Council's administrative areas). We do not consider that such new planned centres need to include a large amount of comparison goods floorspace but a modest amount of provision should be allowed for, alongside anchor foodstores and service uses.

Tewkesbury

7.36 Table 9c at Appendix II to this report outlines the quantitative expenditure/floorspace capacity for convenience goods floorspace in Tewkesbury. It indicates that existing floorspace attracts £50.1m from residents of the study area[25] and we have also made a modest (£1.5m) allowance for expenditure inflow from outside of the study area. This provides a total turnover potential of £51.6m. Table 8a indicates that the overall benchmark turnover of all existing convenience goods in the town is £58.6m and therefore Table 9c indicates that there is an over-supply of convenience goods floorspace in Tewkesbury to the tune of circa -£7.0m or

[25] Taking into account a small reduction in market share to allow for a forecast increase in internet shopping over the assessment period.

circa -580sq m net. Based upon a constant market share over the assessment period[26], Table 9c indicates that there will not be any surplus quantitative capacity in Tewkesbury over the assessment period.

7.37 From a qualitative perspective, Tewkesbury has a reasonable variety of convenience goods floorspace provision. It has a large Morrisons supermarket which is able to meet a range of main and top-up food shopping needs. The recently developed ALDI store also meets a range of needs and has added to choice and competition in recent years. The area where a qualitative improvement should be made is in relation to the town centre. The centre has a modest sized Tesco store, along with small niche retailers, although a further additional medium to large sized store would, in our opinion, provide an important material addition to the attractiveness and health of the town centre.

7.38 Table 10c outlines quantitative capacity levels for comparison goods floorspace in Tewkesbury and Ashchurch. The assessment includes Ashchurch due to (A) the contribution that residents of this area make to retail and service facilities in Tewkesbury, and (B) the permission for a large new retail outlet centre and garden centre which will have significant effect on the quantum of retail floorspace in the local area. It also takes into account the increasing influence of internet shopping on market share levels.

7.39 Table 10c indicates that, based upon the work undertaken for TBC as part of the assessment of the outlet and garden centre planning application, Tewkesbury's market share will increase significantly (both in terms of the town itself and the wider Borough). Table 10c indicates that there could be potential capacity for an additional 1,000sq m net by 2024, rising to 1,340sq m net by 2029 although we consider that the JCS authorities should not plan for any significant net additional comparison goods floorspace in the Tewkesbury and Ashchurch area until the retail outlet centre has opened, shopping patterns have settled and the impact upon the role, function and health of Tewkesbury town centre has been fully understood. In particular, we would recommend that a new survey of household shopping patterns is undertaken 2/3 years after the opening of the retail outlet centre development in order to allow shopping patterns to have settled and the full effects of the development on the local area to be understood.

Bishops Cleeve

7.40 Tables 9d and 10d outline the levels of quantitative capacity for convenience and comparison goods floorspace in Bishops Cleeve. Table 9d indicates that existing stores attract £53.4m of convenience goods expenditure from study area residents, with £45m of this expenditure being attracted by the large Tesco supermarket in the town centre. The Lidl store was, at the time of the household survey commissioned to inform this Study, forecast to attract £5.1m of expenditure although the analysis includes an allowance for the increase in floorspace at this store following a recent redevelopment.

7.41 Table 9d indicates that the current convenience goods turnover potential of stores in Bishops Cleeve is £53.7m which can be compared against a benchmark turnover of existing floorspace plus commitments and recent developments (Lidl) of £35.2m and £8.0 respectively. This gives a current 'surplus' level of convenience goods expenditure of £10.4m which is equivalent to a quantitative need for an additional 866sq m net of floorspace. Based upon a constant market share over the assessment period, quantitative capacity rises to circa 960sq m net in 2025 and circa 1,078sq m net in 2030.

[26] Taking into account the influence of internet shopping

7.42 It should be noted that this net additional quantitative capacity is primarily driven by the very good existing trading performance of the Tesco supermarket whilst the pre-extension Lidl store was forecast to be trading well below its company average. Whilst it may well be the case that the extended Lidl store has experienced a significant increase in its trading performance, due to the quality of the new store, it is important to note that the majority of convenience goods floorspace in Bishops Cleeve lies in and around the town centre and therefore any strategy to plan for additional convenience goods floorspace will need to ensure that new provision is (A) placed close to the town centre, and (B) it does not materially harm the trading performance of existing stores as they clearly play an important role in the overall health and attractiveness of the town centre.

7.43 Table 10d outlines the forecast quantitative capacity for comparison goods floorspace in Bishops Cleeve. It forecasts that the town has a total turnover potential of £13.2m at 2019 which is slightly higher than the benchmark turnover of £14.5m (which is a figure brought forward from the 2015 study). In line with the approach to considering retail floorspace / expenditure capacity in the other main JCS settlements, we have considered whether any adjustments need to be made to the market share of Bishops Cleeve in order to take into account the trading impact of the retail outlet centre at Ashchurch. In this instance, we do not consider that any amendments need to be made and, therefore, based upon a constant market share this creates a negative capacity of -44sq m net at 2024 and -17sq m net at 2030. Bishops Cleeve has a modest amount of comparison goods floorspace and whilst qualitative improvements should clearly be aspired to, we consider that a significant increase in provision is unlikely from both a quantitative and qualitative perspective due to the size of the settlement and its attractiveness to the retail sector.

Winchcombe

7.44 The final settlement covered by our need assessment is Winchcombe. Table 9e outlines the forecasts convenience goods expenditure/floorspace in the town and indicates that it currently attracts £13.8m of convenience goods expenditure. We have made an allowance for a small amount of expenditure inflow from outside the study area (£0.4m), and also a small reduction in market share due to the influence of internet shopping, giving a total turnover potential of £13.9m. This is noticeably higher than the benchmark turnover of existing stores of £5.7m and this 'surplus' in available convenience goods expenditure is driven by the forecast trading performance of the Co-op and Budgens stores which are forecast to be trading well above their respective company average performance levels. This is a significant increase over the levels recorded for Winchcombe in the 2015 study but we do not consider that there is a strong case for significant additional provision in the town due to the historic nature of the settlement and the inability to create development opportunities in and around the town centre.

7.45 For comparison goods floorspace a similar situation is apparent from Table 10e at Appendix II. The level of comparison goods turnover in Winchcombe is forecast to be £5.5m from the study area, with a total turnover potential estimated to be £5.3m (following an amended market share). Table 10e makes the link back to the benchmark turnover of the town from the 2015 study, updated to a 2020 base, and this is estimated to be £2.0m. This creates an element of 'surplus' capacity which is equivalent to circa 824sq m net at 2025 and circa 840sq m net at 2030. This level of capacity is noticeably higher than predicted by the 2015 study but we consider it unlikely that it will be realised from a commercial market perspective due to the size and location of the town. The issue of a lack of central development opportunities, as outlined above, is a further reason why a strategy to increase floorspace in the town is unlikely to be appropriate.

8. Review of Potential Opportunities to Accommodate Identified Needs

8.1 Paragraph 85(d) of the NPPF advises local authorities to *"allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead"*. The previous section of this Study has outlined the various aspects of 'need' associated with the five main settlements in the JCS area and this section provides an assessment of the opportunities which are available in each settlement to need/accommodate those needs.

Gloucester

8.2 The previous section has outlined the following aspects of retail floorspace need for Gloucester:

- There is no forecast quantitative need for any net additional convenience or comparison goods floorspace across the city as a whole. When benchmarked against the baseline turnover used in the 2015 study, there is now a forecast over-supply of comparison goods floorspace, whilst convenience goods floorspace is collectively trading below benchmark levels.
- In relation to the qualitative aspects of existing and committed retail floorspace provision, across the city as a whole there is good choice and competition. However, floorspace located outside of defined 'town centres' continues to grow and the city centre is losing comparison goods market share/turnover.

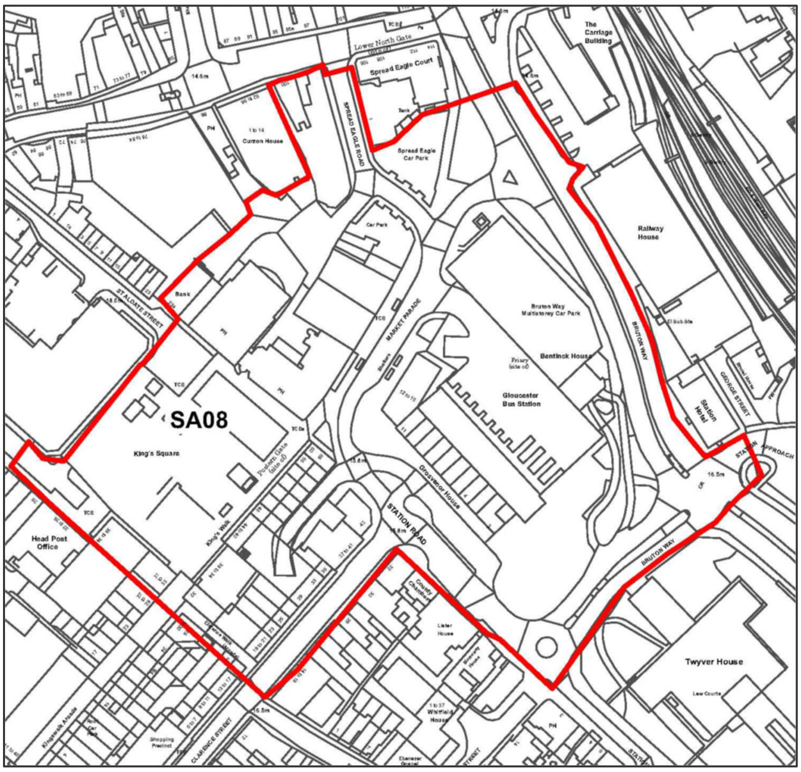
8.3 As consequence of the above, there is no requirement under NPPF policy to plan for a net increase in either convenience and/or comparison goods floorspace across the city. That does not mean to say that GCC cannot continue to approve planning applications for new retail floorspace although the under-performance of parts of the city means that there will be a sharper focus on the 'impact' test and support for the Council to set a low impact assessment threshold in order that it can properly scrutinise proposals located outside of defined 'town centres'.

8.4 The focus is therefore likely to be on existing floorspace and understand whether the quality of provision can be improved and/or whether it is sensible to consider other land uses. The sites and locations which we are available / have been promoted are as follows:

- Kings Quarter
- Former Fleece Hotel / Longsmith Street car park
- Part of West Quay in the Docks
- Madleaze Industrial Estate
- St Oswald's Retail Park
- Land adjacent to Eastgate Shopping Centre

8.5 **Kings Quarter** has long been identified as one of the most important regeneration sites in the city over the past decade. The extent of the site is identified in Figure 8.1 below and encompasses a large area of land including a multi-storey car park, the recently redeveloped bus station, rows of shop along Kings Square and Station Road. It is proposed to be allocated under Policy SA08 in the new City Plan for mixed use development including residential, office, retail, leisure, employment, hotel and car parking uses.

Figure 8.1: Kings Square

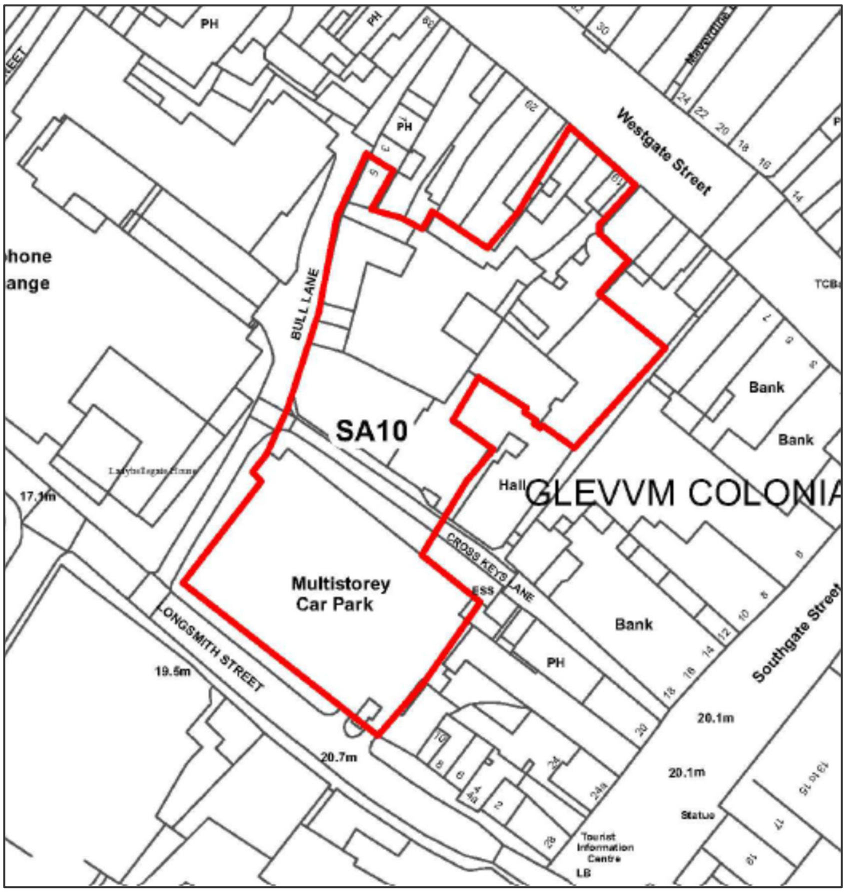


8.6 Over the past decade attempts have been made to progress a large retail-led mixed use redevelopment project but these have not come to fruition. GCC is now promoting an alternative mixed use scheme which includes a new hotel, substantial office space, a replacement multi-storey car park, residential accommodation and a small scale of retail and food & beverage floorspace. This is being promoted alongside GCC taking (in partnership with Reef) a more pro-active interest in the Kings Walk Shopping Centre, where refurbishment of existing retail floorspace will take place.

8.7 Given the increase in vacancy across the city centre, and a falling market share for some types of comparison goods shopping, we consider that the focus on bringing in new land uses in to the city centre to be appropriate and positive for the future health of the centre. Focus on the existing shopping centres and vacancies in the core shopping area is a priority and the ability for the Kings Quarter project to bring increased levels of vitality into the centre via a growing resident population, and allowing visitors to the city to be able to stay in a central location, should be supported. The Kings Quarter regeneration project also presents the opportunity to create a better link between the core shopping area and the railway station (which itself is due to undergo transformation in the near future).

8.8 The former **Fleece Hotel and Longsmith Street car park** sites lie between Westgate Street, Southgate Street and Longsmith Street. The site contains a collection of under-used historic buildings and a multi-storey car park separated by Cross Keys Lane (which is a narrow highway linking Bull Lane to Southgate Street). The sites are shown below and are proposed to be allocated under Policy SA10 for mixed use development including residential and main town centre uses.

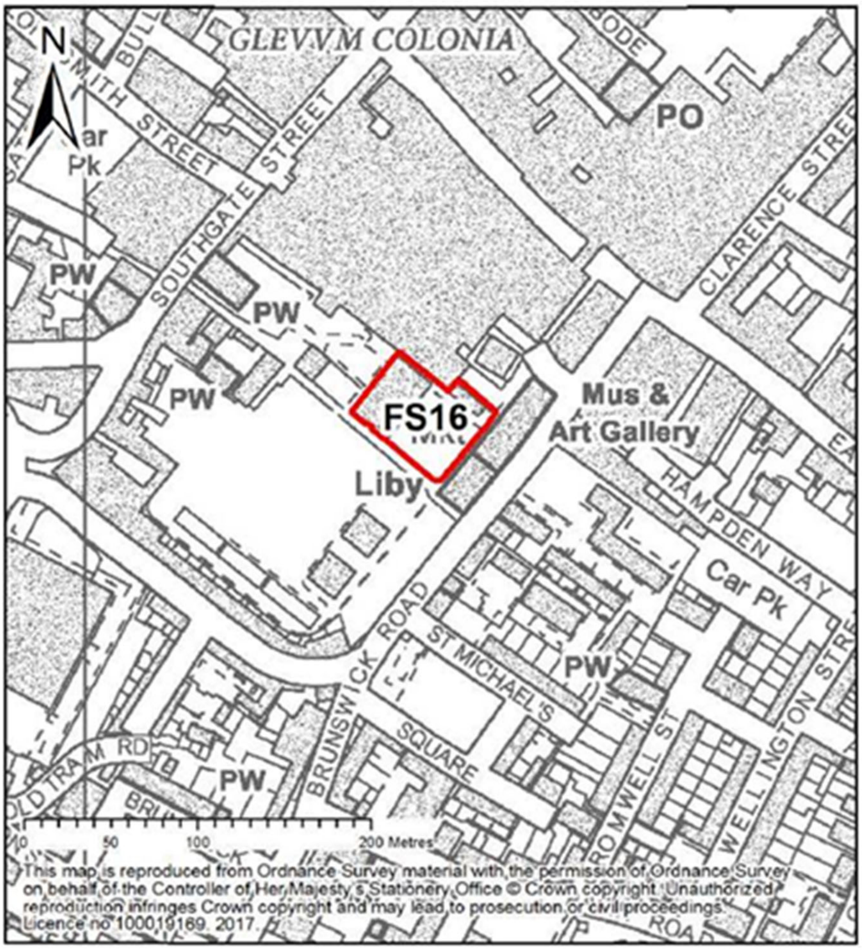
Figure 8.2: former Fleece Hotel and Longsmith Street car park



8.9 Given the location of the site, the likelihood that existing historic properties along Westgate Street (which is the only recognised shopping street) will not change to any significant extent, plus the presence of listed buildings, we do not consider that it will be able to provide any new retail floorspace. The existing multi-storey car park provides an important facility in this part of the city centre in a very central location although it's appearance is poor with narrow circulation / parking spaces. We also understand that the car park has poor structural integrity and has been identified for demolition. The freeing up of this site may present the opportunity for a limited amount of ground floor commercial uses fronting on to Longsmith Street.

8.10 Another site within the central part of the city centre is an area of **land between Eastgate shopping centre and Gloucester Library**. This is shown in Figure 8.3 below.

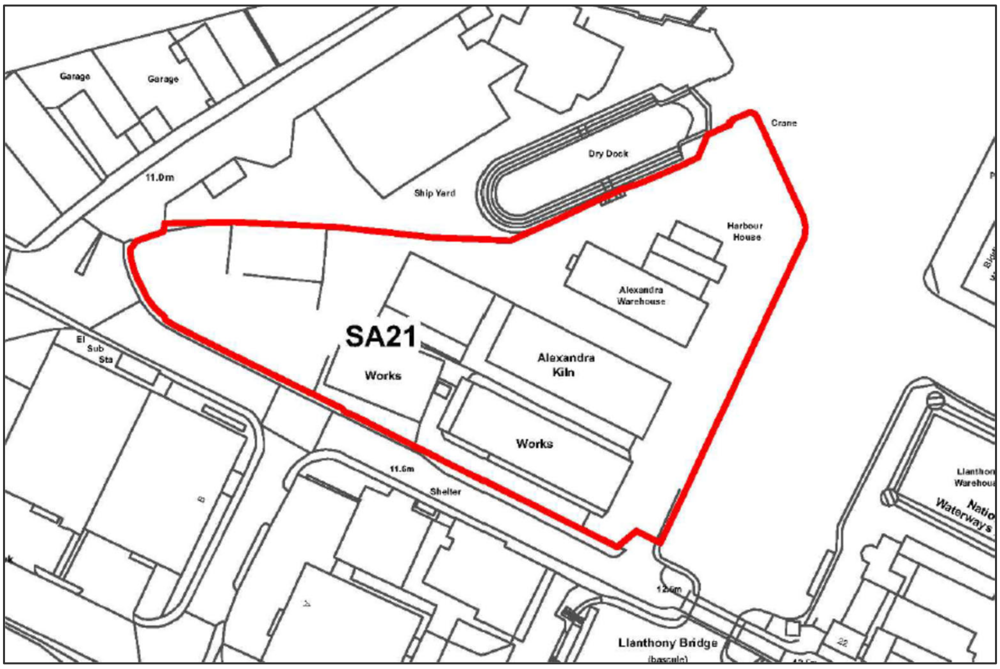
Figure 8.3: Land Between Eastgate Shopping Centre and Gloucester Library



8.11 It comprises a former bowling green and club building, whose principal access point is via a relatively narrow lane between Brunswick Street and Southgate Street. This route is now pedestrianised and has been improved as part of the adjacent development site. Whilst there may be important issues around the existing open space on the site and heritage issues to resolved, we consider that if a redevelopment project is to progress it is likely to focus around residential uses although ground floor active frontages would animate this street (subject to impacts on adjacent residential amenity).

8.12 Policy SA21 of the draft Gloucester City Plan proposes to allocate part of **West Quay** (minus Alexandra Warehouse) for a mixed use development including main town centre uses. There are a varied collection of buildings and structures across this area (shown in Figure 8.4 below) including listed buildings. There is a limited planning history associated with this area with the most recent permission being granted in 2017 to allow the building occupied by Gloucester Brewery to continue as a visitor centre/brewery and also to hold live music events and other entertainment.

Figure 8.4: West Quay, Gloucester Docks



8.13 This area lies close to the core docks area and Gloucester Quays retail outlet centre which has seen considerable change over the past 20 years. The refurbishment and partial redevelopment of this area offers the opportunity to continue this trend, including small-scale commercial uses which are likely to be attractive around the waterfront area, along with an appropriate mix of main town centre uses. It is likely that this site will be better suited to food and beverage uses which have become increasingly popular around the docks and the Quays, although there is a need to ensure that the continuing operation of the working docks facilities is not compromised.

8.14 **Madleaze Industrial Estate** lies to the south of the Peel Centre retail park and comprises a collection of Class B employment uses, car sales and a go-karting centre. The commercial units lie on either side of Madleaze Road which is accessed via Bristol Road. This area is not proposed to be allocated for any particular land use in the draft City Plan. The Peel Centre to the north turns its back on the industrial estate although the most logical area for connecting the two sites would appear to be at the western end, close to the canal, where the existing car parking area wraps around the western end of the retail unit terrace.

8.15 Retail proposals at The Peel Centre, including the new Next store and proposals to vary the range of goods which can be sold from the existing units have proved, to one extent or another, controversial in recent years. Whilst it is reasonable to note that there are clear linkages between the Quays outlet centre and the traditional part of the city centre, the Madleaze industrial Estate is, in our opinion, materially further away from the city centre making linkages between the two much less likely. Given the influence which the Peel Centre area has over the health and function of the city centre, along with the lack of a need for additional retail provision and the unlikelihood of linkages with the centre, we do not consider that Madleaze Industrial Estate should be identified as a retail development location.

8.16 We have also examined is the potential which can be offered by **St Oswalds Retail Park**. This retail park was developed around 15 years ago and currently comprises 15 retail units of varying sizes including a very large B&Q Warehouse unit of circa 11,000sq m to small service and food/beverage units occupied by Natwest, Subway and Costa. It is a very traditional retail park with a large surface level car park, located a reasonably short walking distance from the northern edge of the city centre. We understand that the units on the retail park have a mixture of planning permissions including bulky goods and some open A1 units. The retail park is currently fully occupied apart from the former Mothercare which was vacated in 2020 (following the national failure of that particular retail business). This level of occupation makes opportunities for redevelopment / re-organisation in the short term may be difficult to achieve. However, as and when units become vacant or come up for a break or lease renewal we consider that there is a substantial opportunity to make more efficient use of this site which does not necessarily create a large increase in the amount of retail floorspace but introduces new uses. Moreover, given the location of the retail park, lying a short distance to the north of the city centre, it could well lie in a sequentially preferable location to a number of other out of centre locations across the city and therefore vacancies should be included, in appropriate circumstances, in sequential site assessment exercises.

8.17 The final location in Gloucester to be included in our assessment is **the Peel Centre**. This is another traditional retail park which has undergone a number of changes in recent years. The original part of the Peel Centre comprises a parade of large retail units of varying sizes, sitting adjacent to a large surface level car parking area. The site lies immediately to the south of the Gloucester Quays area, which contains a mixture of retail and leisure uses and surveys undertaken in recent years have indicated that there are linkages in trips between the Peel Centre and Gloucester city centre to the north. Our own experience of visiting the Peel Centre over many years has also observed this situation. In recent years planning permissions have been granted to alter the range of convenience and comparison goods which can be sold from the original element of the retail park. In addition, two food and beverage units have been demolished to make way for a large Next store (selling fashion and home furnishings). The multi-screen cinema use has relocated into Gloucester Quays and there is a planning permission to convert and extend that building to provide three additional retail units. As a consequence of this situation, the potential for the Peel Centre to provide new retail floorspace has already been set and therefore the purpose of this analysis is to highlight its potential to accommodate such uses when the City Council is considering the sequential test. As will be noted elsewhere in this report, whilst the Peel Centre does not lie within the defined city centre boundary, it is on the edge of it and offers the opportunities for linked trips. It should therefore be considered as one of the three 'inner ring' of locations (the others being Westgate Island and St Oswalds Retail Park) which could be considered second-choice locations after opportunities in the primary shopping area and other more accessible edge of centre opportunities have been analysed.

Cheltenham

8.18 In relation to sites/locations for assessment in and around Cheltenham town centre, the following have been identified:

- North Place / Portland Street
- Royal Well and the Municipal Offices
- Coronation Square

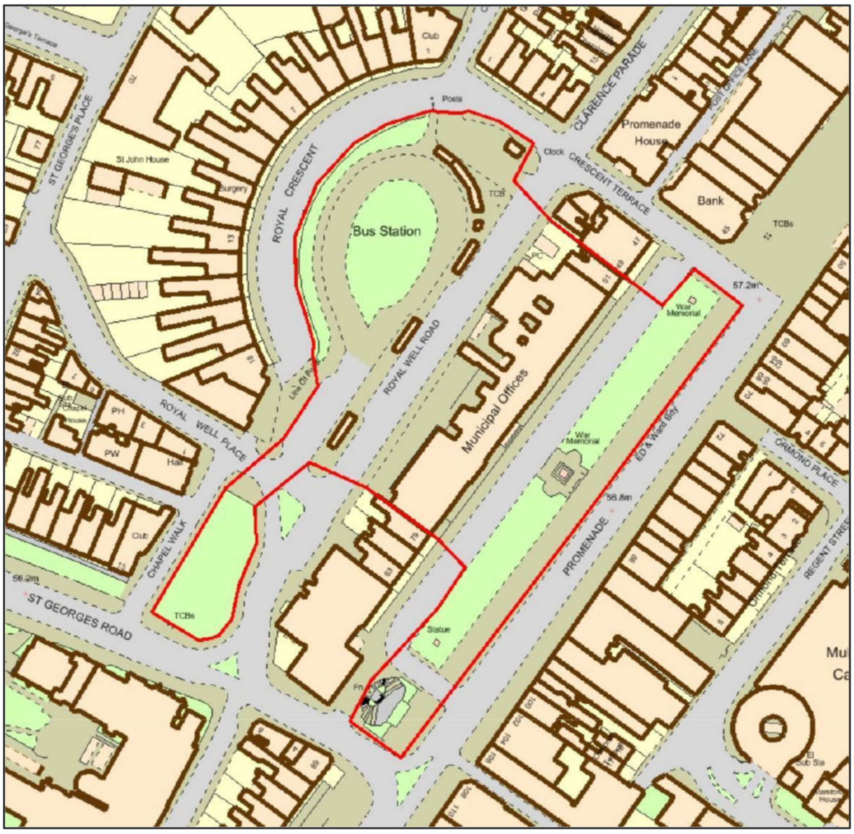
8.19 The **North Place and Portland Street** sites lie in the northern part of Cheltenham town centre. They comprise two large surface level pay and display car parks surrounded by residential uses, a church to the east, and retail and commercial uses to the south and east. A planning application was submitted in 2012 for the comprehensive redevelopment of these sites for a large supermarket, a multi-storey car park, further small retail/commercial units and residential apartments. The application was granted permission but the development did not proceed due to Morrisons pulling out of occupying the supermarket element. The extent of these two sites is shown in Figure 8.4 below.

Figure 8.5: North Place & Portland Street

8.20 These two sites are now proposed to be allocated in the new Cheltenham Local Plan for approximately 143 dwellings along with an appropriate scale of retail, healthcare and community facilities to meet the needs of the community. The abandonment of the previous permission came at a time when many national grocers were dramatically scaling back their new store development programme. Another foodstore proposal on this site would add to the grocery retail offer in the town centre although any such store is likely to be smaller in scale. We do not consider that this is an appropriate location for large scale comparison goods retail floorspace for two reasons: (A) the site is separated from the core town centre area which raises concerns over linkages and drawing trade away from the primary shopping area, and (B) the completion of the John Lewis store and vacant space in the second phase of the Brewery Quarter raise issues of whether there would be sufficient demand for comparison goods space in this location. It is therefore more appropriate in our opinion for CBC to plan for a wider range of land uses including main town centre uses which can sometimes find it difficult to find suitable and viable space in core shopping areas (including leisure, healthcare and community uses).

8.21 The **Royal Well and Municipal Officers site** extends to 0.9 hectares and is proposed to be allocated in the new Cheltenham Local Plan for a mixed use development. The proposed allocation indicates that the site has been subject to a development brief and additional work is being undertaken on transport modelling and master planning. The proposed allocation does not provide a list of suitable alternative land uses for the site and simply notes that such uses should be appropriate to the town centre. The extent of the proposed allocation is shown in Figure 8.6 below.

Figure 8.6: Royal Well & Municipal Offices site



8.22 The frontage of the municipal offices on to the Promenade presents one of the most imposing buildings in town[27], although the western frontage is of lower quality. The Royal Well area is an important space for various bus stops. The municipal offices building lends itself to a range of uses including residential, hotel, food/beverage uses as well as the existing office use. Whilst the format of the building may not make it the most efficient in terms of a modern office, retaining the Borough Council's office function in the town centre will be important to the overall vitality and viability of the centre as it creates trips to the centre and encourages spending in the centre by office workers. However, opportunities to introduce new uses should also be encouraged and, for example, the provision of a hotel would continue the trend of new hotels to the south of the Promenade.

8.23 **Coronation Square** is a purpose-built shopping centre in the western part of Cheltenham comprising two shopping parades of 2/3 storeys and defined as a district centre in the local retail hierarchy. It is proposed to be allocated for mixed use development (Policy MD3) and is included as part of the West Cheltenham Regeneration project. The centre contains a large pedestrianized area in front of the larger of the two parades and a large surface level car parking area to the rear.

[27] Attracting II* Listed status

Figure 8.7: Coronation Square

8.24 The centre is poor in appearance and has previously been subject to draft redevelopment proposals which never made it to the submission of a formal planning application. Coronation Square has been included in the most recent SALA which indicates the potential for the site to provide 68 residential units and 0.4ha for community, community and local retail uses. The SALA also indicates that the redevelopment potential for the centre is longer term (16-20 years) which is likely to be due to the large amount of leases on commercial property across the centre. We consider that Coronation Square should remain a priority for regeneration in Cheltenham and support the vision for the future of the centre as set out in the West Cheltenham Regeneration project. It is likely that much more efficient use of the centre can be made, with the centre attempting to differentiate itself from the town centre and retail parks along Tewkesbury Road, providing smaller retail units which appeal to local independent businesses. Given the likely longer-term timescales for redeveloping the centre it is unclear how much of the identified capacity should be assigned to this location although it certainly should be classified as a top-up priority for meeting identified needs in Cheltenham.

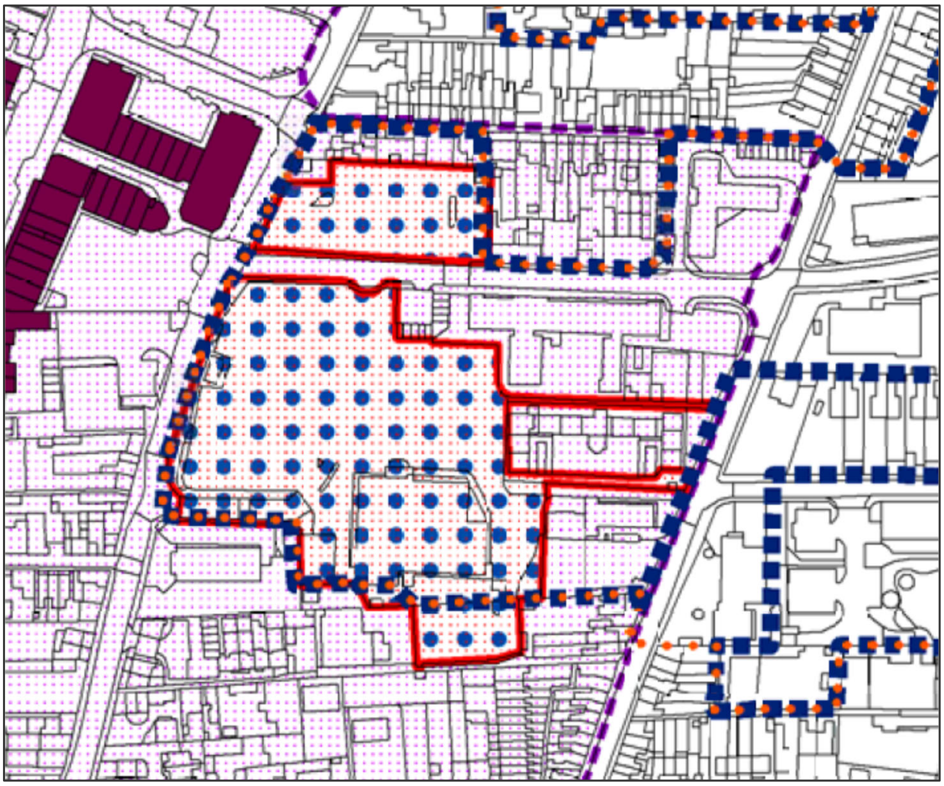
8.25 In addition to the above sites, CBC have asked that this Study considers the scale, role and function of retail facilities in the JCS North West Cheltenham allocation and also whether any other planned urban extensions should also include provision for retail/local centre facilities. This is contained in the next section of this report.

Tewkesbury

8.26 The main redevelopment sites in Tewkesbury town centre which have been identified by TBC in recent years are the **Spring Gardens** and **Healings Mill** sites. Policy TEW3 and Policy RET9 of the Pre-Submission Tewkesbury Local Plan propose to allocate the Spring Gardens site for 30-100 dwellings as part of a mixed use redevelopment including the potential for retail, leisure, food/beverage and employment uses. The proposed mix of uses for this site was being informed by a master-planning and viability work being undertaken by consultants for TBC although, following the identification of a series of redevelopment options, we understand that the project has been placed on-hold until the full implications of the COVID-19 pandemic have been understood.

8.27 The extent of the land proposed to be allocated is shown in Figure 8.8 below.

Figure 8.8: Spring Gardens, Tewkesbury town centre

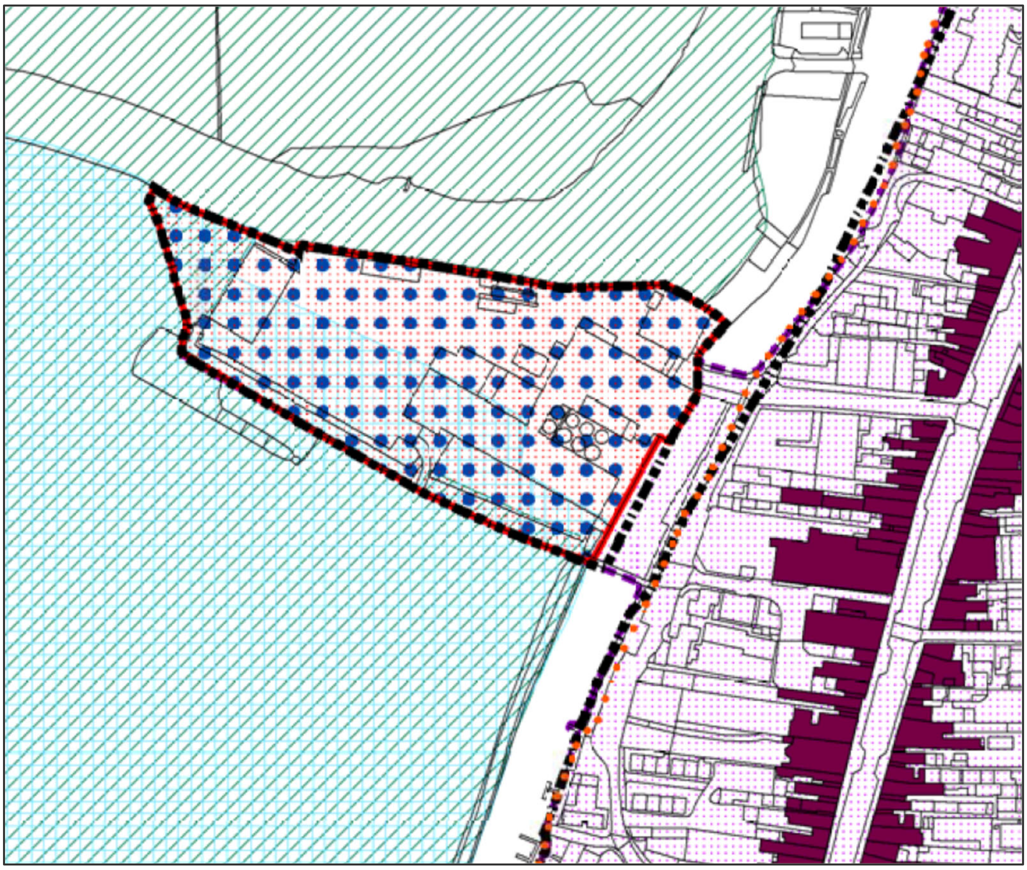


8.28 Clearly, the substantial amount of work which has been undertaken for TBC will ultimately guide the proposed allocation of this site and any future development brief/SPD although we consider that moving away from a retail floorspace dominated scheme on the Spring Gardens site, with a move towards a greater amount of residential accommodation, is likely to provide a more deliverable proposition. There are also opportunities for the redevelopment of this area to contribute to enhanced public realm including open space and green infrastructure, in an area which is currently dominated by a mass of surface parking. The provision of new residential accommodation will offer the opportunity for more people to live in the town centre and thus increasing vitality and local spending. Any retail and main town centre land use accommodation which can be provided within a redevelopment scheme should lie towards the western part of the site in order to provide good and seamless linkages with the existing retail/commercial area. In light of the recent and on-going changes to the use classes order (and permitted development rights) the space should be designed to be flexible to respond to changing market conditions and this is likely to require reasonably small units at ground floor level which can easily be adapted.

8.29 **Healings Mill** is proposed to be allocated under the same policies in the draft Tewkesbury Local Plan for a mixture of residential (approximately 100 dwellings), employment, retail, leisure, tourism and food/beverage uses. The mill building and adjacent iron bridge are Grade II listed and are a rare example of a large-scale flour mill from the 19th century. The mill building lies on land between the two sections of the River Avon which run down the western side of Tewkesbury town centre and lie in an area which is at high risk of flooding. In addition to being proposed for allocation in the new Local Plan, the Healings Mill site is included in the Tewkesbury Town Centre SPD.

8.30 The extent of the site is shown in Figure 8.9 below.

Figure 8.9: Healings Mill, Tewkesbury



8.31 The Town Centre SPD outlines the preference for residential uses on the upper floors of converted and new buildings across the site, with more active ground floor uses. We support such an approach, which could offer a similar sort of development to Gloucester Dock albeit on a smaller scale and more appropriate to Tewkesbury town centre. We consider that the allocation / SPD should remain a key part of the town centre strategy for the following reasons: (A) it offers only one of two main town centre redevelopment sites, and is significantly under-used at the present time; (B) whilst it is to be acknowledged that the site faces a number of challenging issues, not least flood risk, it is located in an environment which presents a number of attractive attributes, including the historic building complex and the waterside location. In relation to the latter issue, the experience of the evolution of Gloucester Docks / Quays should provide significant encouragement regarding the potential positive contribution, including and the potential to make the Healings Mill area a new destination for visitors who perhaps would not frequently visit the town centre.

9. Planning Policy Recommendations

9.1 As part of the brief for this Study, the JCS authorities require advice in relation to the following areas:

- Town centre and primary shopping area boundaries in the five main town centres;
- Advice on the wording of retail, leisure and town centre policies in the JCS Review;
- The approach to identifying new centres in the retail hierarchy (including centres in planned urban extensions).

9.2 We deal with each issue in turn below.

Town Centre Boundaries

9.3 In order to set the context for our advice and recommendations for town centre boundaries in each of the five main town centres in the JCS area, the February 2019 version of the NPPF departs from the 2012 version by removing the need to define primary and secondary retail frontage areas. As set out earlier in this report, this change is likely to be an acknowledgement from Central Government that a wider mix of land uses are now becoming more important to town centres. Therefore, at the present time, there is a need to define town centre and primary shopping area boundaries. The definitions for these areas in the Glossary of the NPPF (Annex 2) are as follows:

> *"Primary shopping area: Defined area where retail development is concentrated.*
>
> *Town centre: Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres".*

Cheltenham

9.4 The 2006 adopted Local Plan defines three main town centre related boundaries and frontages: Core Commercial Area, Central Shopping Area and Primary Shopping Frontage. As noted above, there is now no need for the development plan to define a primary frontage although there is a need to ensure that the central shopping area relates to the primary shopping area and the core commercial area relates to the town centre boundary.

9.5 With regards to the draft central shopping area boundary we consider it continues to relate to what the primary shopping area should be in Cheltenham town centre. The base map submitted to the current Examination does not include the recent second phase of the Brewery Quarter redevelopment project and therefore some small refinement may be required to the boundary in this location (although only the southern part of the scheme should be included).

Gloucester

9.6 Given that there is no extant Local Plan in Gloucester, the main source for examination of the city centre and primary shopping area boundaries is the JCS policies map. Within the JCS, the city centre boundary extends along The Quay and Severn Road in the west, up to Black Dog Way in the north, along Bruton Way and Eastgate Street in the east and then running along Southgate Street southwards to St Ann Way.

9.7 Based upon the definition of 'town centres' in the NPPF we consider that the boundary is a reasonable reflection of the current situation. This area is predominantly (but not exclusively) occupied by main town centre uses, including a number of character areas. This includes the historic core of the city centre, including Southgate, Westgate, Northgate and Eastgate. These are complemented by a number of adjacent areas around the cathedral, Westgate Island and the docks area.

9.8 Careful consideration has also been given to the Gloucester Quays area, bearing in mind it provides a range of retail and leisure uses and is a key attractor for trips to the city. As outlined below, it does not form part of the natural primary shopping area in the city centre, and therefore consideration is focused upon whether it is adjacent to the primary shopping area. The southern edge of the primary shopping area is at the junction of Southgate Street and Road, with the docks area separating the two locations. The docks area contains a mixture of uses, including leisure, retail and residential, although it could be argued that main town centre uses are not necessarily predominant in this focused area. That said, adjacency may be viewed in a number of different ways, which could include linkages, and there are obvious linkages between the quays and the core historic part of the city centre. Therefore, whilst there is a drop in the intensity of main town centre uses in the docks area, we consider that the JCS policies map is correct to include the quays area as part of the city centre boundary.

9.9 Turning now to the primary shopping area, the adopted JCS boundary covers an area bounded by Black Dog Way to the north, Bruton Way to the east, Commercial Road to the South and Three Cocks Lane to the west. This therefore includes the four historic 'gate' streets, Kings Square, Eastgate shopping centre, Kingswalk shopping centre plus the southern part of Worcester Street. Having reviewed this area with reference to the latest land use surveys for this project, along with the on-going trends facing city/town centres generally, we consider it is now too large and that its extent should be reduced. We consider that the following areas should be removed: Worcester Street, the area of Eastgate Street to the east of its junction with Clarence Street, Northgate Street to the north of its junction with St Aldate Street, along with the area of Westgate Street adjacent to Shire Hall.

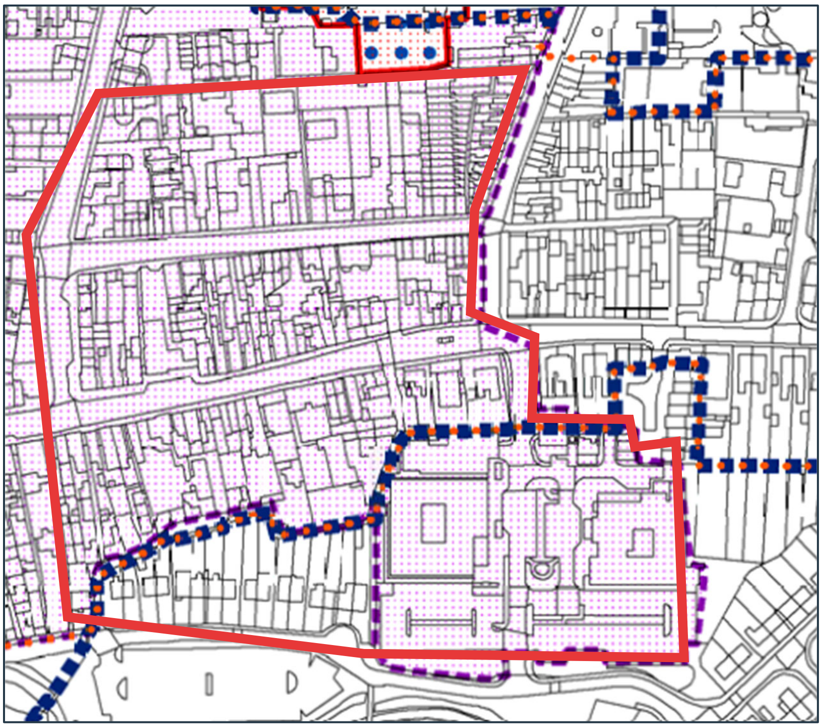
9.10 Staying with Westgate Street, and as noted above, this area is experiencing on-going change (including an increase in food/beverage outlets) and is, in its own right, a particular asset to the city centre. This area includes key development sites such as The Fleece Hotel and it is also a Heritage Action Zone. As such, it is important that this area remains as part of the defined city centre but there is merit in removing this area from the primary shopping area and applying a separate 'cathedral quarter' designation which promotes specialist retailing, food and beverage uses, heritage and culture uses. The focus should remain on Westgate Street retaining and enhancing active street level frontages, although the uses which provide this activity are likely to be more varied.

Tewkesbury

9.11 Our review of the various boundaries in Tewkesbury town centre has focused upon the adopted 2006 Local Plan and the October 2019 consultation documents comprising the Pre-Submission Tewkesbury Borough Plan. The 2006 Local Plan has three definitions across the centre: primary retail frontages, mixed use frontages and a 'Back of Main Streets' definition. The latter doesn't directly relate to a standard town centre defined area but is instead intended to improve the character and appearance of the town centre. In the draft Tewkesbury Borough Plan, the October 2019 consultation outlines two areas: a town centre boundary and primary frontages. We have concentrated our review on the October 2019 Pre-Submission Plan.

9.12 Our initial comment is that the proposed primary frontage definition should be amended to refer to a primary shopping area in light of current national policy in the latest NPPF. In terms of the area covered by the primary frontage definition, this stretches from Bishops Walk in the north along High Street up the junction with Barton Street and Church Street. We consider it accurately reflects the area of the centre where retail uses are concentrated and therefore no amendments are recommended. In relation to the proposed town centre boundary, this covers a wide area from Tewkesbury Abbey in the south to Tewkesbury Community Hospital and Spring Gardens in the east, and up to the junction of High Street and Mythe Road in the north. The proposed boundary also includes the Healings Mill site on the opposite side of the River Avon to the west. We consider this proposed area to be too large in terms of the NPPF definition for town centres and recommend that TBC consider removing an area around East Street, Chance Street and the southern part of Oldbury Road from the proposed boundary. The area which we recommend to be removed is outlined in red in Figure 9.1 below and the overall recommended primary shopping area and revised town centre boundary is shown on the plan at Appendix III.

Figure 9.1: area recommended to be removed from proposed Tewkesbury town centre boundary



Winchcombe

9.13 The new draft Borough Plan proposes to define the 'Retail Centre' in Winchcombe as lying across both sides of the southern part of North Street, the western end of Hailes Street and along both sides of the eastern end of High Street. We consider that this accurately reflects the town centre boundary for Winchcombe and we consider that the primary shopping area boundary should cover the same area on the basis that: (A) there are very few main town centre uses to be found outside of this area, and (B) there is no particular differentiation across this area in relation to the intensity of retail uses.

Bishops Cleeve

9.14 The October 2019 Pre-Submission Borough Plan proposes the define a 'Retail Centre' in Bishops Cleeve which covers the Tesco and Lidl stores (and their car parks) along with Church Road between Cheltenham Road and Tobyfield Road. This area contains all of the main town centres in Bishops Cleeve and there is distinct and noticeable change to residential use outside of this area. Like Winchcombe, there is no particular differentiation in the intensity of retail uses across the defined area and therefore we consider that the town centre boundary should cover the same area as the primary shopping area boundary.

Retail, Leisure & Main Town Centre Land Use Policies

The JCS

9.15 The brief for this Study also requires advice on the content of retail and main town centre land use planning policy in the JCS Review with a specific focus upon the setting of impact thresholds for retail development proposals located outside of defined 'town centres'.

9.16 The main policy in the adopted JCS is SD2. Its contents have been summarised in Section 2 of this document and therefore are not repeated here. Our comments on the content of the policy and whether refinements are required for the JCS Review are as follows:

- Part 1 of SD2. Based upon the review of the health, role and function of the main town centres across the JCS area, we do not consider that there is any need to alter the approach to the five main 'town centres' including the three separate tiers. However, in the absence of a local hierarchy for smaller district and local centres in the Tewkesbury, Cheltenham and Gloucester Local Plans, we consider that an update to SD2 should include these centres. Elsewhere in this report, we have provided recommendations regarding the definition of these centres.
- Part 2 of SD2. Our comments on the retail policies in the latest draft Tewkesbury Local Plan document are outlined below.
- Part 3 of SD2. Earlier in this section we have provided detailed comment on the appropriate areas for the town centre and primary shopping area boundaries in Gloucester city centre. There is now no requirement to define primary and secondary retail frontages and therefore reference to these should be removed from the updated version of SD2. However, the remainder of Part 3 remains relevant insofar as it relates to assessing retail proposals outside of town centres and the in principle support for a wide range of uses in the town (city) centre boundary. It is recommended that Part 3 is replaced with development management text which outlines the approach to change of use and new development proposals in the defined primary shopping frontages and this is discussed in more detail below.
- We would recommend that serious consideration should be given to changing the content of Part 4 of SD2 and moving towards a descriptive retail strategy for each of the main five settlements. As set out earlier in this Study assessments of need are not just quantitative in nature and will also incorporate qualitative factors. Retail strategies should also take into account the health of 'town centres'. Therefore, whilst reference can be made to areas where there is capacity for additional retail floorspace, such as

convenience goods floorspace in Cheltenham, a wider retail strategy can explain the pressures and opportunities facing retail provision in a particular settlement.

- We consider that Part 5 of SD2 remains relevant and robust having regard to the findings of this Study.
- Part 6 of SD should be refined in order to explain that all proposals for main town centre uses located outside of a defined 'town centre' and not in accordance with the JCS should be subject to the sequential test. Retail and leisure uses are the only uses to be subject to the impact test. We deal with the recommended impact assessment threshold later in this section.
- Finally, Part 7 of SD2 can now be removed following the completion of this Study.

9.17 In relation to the latest version of the NPPF, one of the most notable changes in relation to town centre policy is the removal of the direct requirement to define primary and secondary frontages, with reference now only being made to town centre and primary shopping area boundaries. The updated version of the NPPG does still include reference to primary and secondary frontages although it gives local authorities discretion as to whether they need to define such frontages:

> *"Authorities may, where appropriate, also wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres".*

9.18 In our view, the recent trends in town and city centres across the country have clearly prompted the changes in the latest version of the NPPF, with an acknowledgement that a wider range of uses can support the vitality and viability of town centres.

9.19 This trend has been intensified by the impact of the COVID-19 epidemic, which has the potential to affect a range of town centre uses, including retail, food/drink and leisure uses. For example, retail and leisure uses may not be able to operate at the same capacity as pre-COVID levels and this will affect turnovers and floorspace efficiency.

9.20 In light of these events, and whilst there is hope that the health of high streets will make a speedy recovery after the events of 2020 and 2021, there is a need to rebalance the suite of land uses in town centres in order to ensure that a wider range of opportunities exist to visit, work and live in town centres.

9.21 The impact of the COVID-19 pandemic has intensified this direction of travel and has led to the government introducing significant changes to the use classes order. These changes introduce an amalgamation of certain retail, service, leisure and office use classes into a single Class E. This will transform how the pattern of land uses in town centres are considered and managed, leading to the need to consider how local authorities will now need to formulate town centre and main town centre use development management policies.

9.22 Even before the outbreak of the COVID-19 pandemic in the UK, there has been an emerging trend away from the traditional primary and secondary retail frontage definitions. Even leaving aside the effects of COVID-19 and the government's most recent response, our advice to the JCS Councils would have been to delete these frontage definitions.

9.23 However, the recent changes suggest:

- No control over straightforward changes of use within a certain use class, such as the new Use Class E.[28]
- Whilst frontage definitions may need to change such changes cannot affect the principle of the permitted change of use
- In certain circumstances, it may be appropriate for development / redevelopment proposals to be potentially controlled (by planning condition) regarding the range of retail and other main town centre uses
- There are other main town centre uses outside of Class E which will be required to be assessed in terms of the suitability for certain town centre locations

9.24 In light of these various events, it is our recommendation that:

- As the Councils move onward with the preparation of the JCS Review, new policies are brought forward to replace the various saved town centre development management policies.
- there is no requirement for the retention of primary and secondary retail frontages in light of (A) the changing approach at the national planning policy level; and (B) the changing nature of the retail sector and town centre environments.
- For the present time, and based upon current national planning policy, there should be defined primary shopping areas and town centre boundaries in the main 'town centres' across the JCS area. Given the on-going changes in national policy and secondary legislation, there will be a need to keep the wording of the accompanying development management policy under review as the preparation of the JCS Review progresses.

9.25 In light of the above, we propose a single strategic town centre development policy which acknowledges the changing policy and legislative landscape. The recommended policy:

- Gives in principle support for the suite of land uses which are covered by the new Class E of the use classes order.
- Ensures that where physical development works are required to accompany either a change of use (permitted development or otherwise), or a redevelopment proposal, they meet certain criteria to protect the character and appearance of a town centre.
- Within town centre boundaries preference given for other main town centre uses not covered by Class E subject to compliance with a set of assessment criteria.

9.26 Whilst at the present time national policy requires Local Plans to define primary shopping areas and town centre boundaries, we can see some potential inconsistencies between the definition of primary shopping areas in the NPPF (2019) and the rationale behind the new Class E. Therefore, this aspect should be kept under review as the preparation of the JCS Review progresses.

[28] Unless there are specific restrictions already in place

Cheltenham Plan and Pre-Submission Gloucester City Plan

9.27 Section 4 of the draft Cheltenham Local Plan and the Pre-Submission Gloucester City Plan intend to rely on policies in the JCS Review and therefore there are no further proposed policies to comments upon.

Draft Pre-Submission Tewkesbury Borough Local Plan 2011-2031

9.28 Within the nine proposed policies in the October 2019 Pre-Submission version of the draft Tewkesbury Local Plan, we make the following comments:

- RET1. The proposed three tiers of retail hierarchy are in line with the findings of this Study in terms of the roles and functions of the various centres.
- RET2. This policy should be amended to remove references to primary frontages and replaced with a defined primary shopping area. Our recommendations regarding the extent of the defined town centre and primary shopping area boundaries in Tewkesbury town centre are discussed elsewhere in this section.
- RET3. We do not recommend any changes to the first part of RET3 which outlines support for Class A uses in second and third tier centres. In terms of assisting the development management process, it would be helpful if qualitative criteria could be added to the proposed policy in order to deal with the 'exceptional circumstances' element. This could include criteria relating to: the location of the premises, the proposed appearance of the 'shopfront' and the propensity for the proposed use to attract visitors to the centre and maintain/enhance vitality levels.
- RET4. We recommend that RET4 is restricted in order that it requires all main town centre use proposals located outside of defined town centres to be subject to the sequential test and only retail and leisure proposals located outside of defined town centres to be subject to the impact test. RET4 should also include reference to the chosen impact assessment threshold for the Borough which is discussed elsewhere in this section.
- RET5. National policy does not invite local authorities to set a threshold for the sequential test.
- RET6, RET7 & RET8. We do not have any particular comments to make on these three policies.
- RET9. The content of this proposed policy, which seeks to allocate two sites in Tewkesbury for mixed use development, has been discussed in the previous section of this document with particular reference to Spring Gardens and Healings Mill.

Impact assessment thresholds

9.29 With regards to the setting of impact assessment thresholds, national policy allows for a default threshold of 2,500sq m gross unless a different locally set threshold is set. The adopted JCS does not set an alternative threshold and neither do the adopted plans in Cheltenham and Tewkesbury. The recent draft Tewkesbury Borough Plan did propose to set an impact assessment threshold of 280sq m gross for retail, leisure and office development proposals outside of town centres but this has now been removed. The draft Cheltenham and Gloucester Local Plan documents intend to rely on the current JCS and then, once adopted, the JCS Review.

9.30 In relation to the issue of setting a local impact assessment threshold for retail and leisure land use proposals, we consider that the following three issues need to be addressed:

- Should there be lower locally-set thresholds across the JCS area than the national threshold?
- Should any thresholds differ across the three main urban areas (Gloucester, Cheltenham and Tewkesbury)?
- How should proposals in the rural parts of the JCS area be treated?

9.31 With regards to setting a local impact threshold, the NPPG provides guidance on the indicators which should be taken into account by local planning authorities seeking to identify local impact assessments. These relate to the consideration of the following factors:

- Scale of proposals relative to town centres;
- The existing vitality and viability of town centres;
- Cumulative effects of recent developments;
- Whether local town centres are vulnerable;
- The likely effects of development on any town centre strategy;
- The impact on any other planned investment.

9.32 In relation to the scale of proposals relative to 'town centres', there size of the various tiers of 'town centres' across Tewkesbury, Gloucester and Cheltenham varies quite considerably. According to Experian, the three town centres have a total amount of retail floorspace of between 26,600sq m[29], 107,000sq m[30] and 117,000sq m[31].

9.33 Conversely, whilst there is not any up-to-date floorspace data for the local centres, it is likely that some of the smallest local centres in Cheltenham and Gloucester have less than 1,000sq m of floorspace.

9.34 The national default threshold is therefore equivalent to 2% of Cheltenham town centres and Gloucester city centre's Class E(a) (former Class A1) retail floorspace but two and a half times as high as the likely total size of the smallest local centres. Therefore, in 'scale' terms this would suggest that a very low threshold should be set as it should relate to the 'lowest common denominator' – i.e. local centres.

9.35 However, we consider that other factors should be considered, including the type of retail provision and how modern out-of-centre retail developments across the UK compare to retail units in town centres (including their format, range of goods offered and accessibility).

9.36 In relation to convenience retail provision, there is a wide range of store sizes from a number of large supermarkets in the three main towns to a large number of stores which are below 1,000sq m gross and are located in district and local centres. Indeed many convenience stores in district and local centres do not

[29] Tewkesbury
[30] Gloucester
[31] Cheltenham

extend beyond 200-300sq m gross. In many cases, particularly in district and local centres, small foodstores provide an important contribution to the health of centres and in some cases provide an anchor role. In many cases they are also the largest units in district and local centres.

9.37 Therefore, we consider that a trigger point of 280sq m gross for retail proposals involving the potential sale of convenience goods should be introduced for proposals across the entirety of the Cheltenham, Gloucester and Tewkesbury local authority areas. This should apply to new stand-alone retail floorspace, proposed extensions to existing stores and applications to vary the range of goods to be sold from existing floorspace. The figure of 280sq m gross has been set as it is a commonly used threshold which matches the maximum size of convenience store which can trade for longer hours via the Sunday trading hours regulations.

9.38 Turning to comparison goods retailing a similar exercise has been undertaken. This has found a wide variety of unit sizes, varying from smaller units in general in local and district centres with a larger average size of unit in the three main town centres and the modern district centre at Quedgeley in Gloucester. In out of centre locations, unit sizes vary from the traditional bulky goods retail units over 1,000sq m gross and, alongside our experience across the UK, indicates that unit sizes have become increasing smaller in recent years, particularly for non-bulky goods retailers. For example, units at 500-600sq m are now common in some retail parks in edge and out of centre locations.

9.39 Generally speaking, single comparison goods retailers do not provide a lone sole anchor to defined centres, although the range and quality of comparison goods retailers provides a very important contribution to its health and attractiveness. With such a range of retailers present in the Cheltenham, Gloucester and (to a lesser extent) Tewkesbury area, it is difficult to be precise over the exact scale of floorspace which could have a detrimental impact upon the health of defined centres. However given trends in the retail sector in recent years and the evolution of the retail warehousing sector, we consider that floorspace of trigger of 500sq m gross should be applied to impact assessments for comparison goods floorspace. This should apply to new stand-alone retail floorspace, proposed extensions to existing stores and applications to vary the range of goods to be sold from existing floorspace. In addition, this threshold should apply to bulky and non-bulky goods proposals and, like convenience goods uses, be applied consistently across the whole of the JCS area for both edge of centre and out of centre locations.

9.40 The need for this lower level of floorspace is also reinforced by factors such as cumulative impact issues and the health of the main town centres. In relation to cumulative impact, whilst it might be that the individual impacts associated with a circa 500sq m retail proposal do not cause any particular cause for concern, the combined effects of this proposal plus others starts to become significant. Therefore, the JCS authorities must consider how the cumulative build-up of a certain scale of development could affect the health of town centres. In other words, if it is considered that the individual impacts of say a 500sq m retail proposal are unlikely to ever be significant then this would allow all future 500sq m proposals to avoid the assessment of cumulative impact. Should half a dozen or so of these come forward then this would equate to 3,000sq m of new retail floorspace which would have avoided any consideration of impact despite it being over the national impact threshold.

9.41 A particularly problematical area for this scenario could be retail parks, either existing or committed, where several units collectively could be over 2,500sq m but individual each unit is, say, between 500-1,000sq m.

Should a series of separate applications be submitted, with the red line area around just one unit, then the impact test would be avoided.

9.42 As noted above, the health of a centre may not rely on just one retailer but when the cumulative build-up comprises a range of retailers selling different types of goods then the longer term effects on the health of a centre could become an issue. This would be reinforced where there is potential for store relocations.

9.43 We also recommend that the impact threshold is extended to leisure proposals on unallocated sites outside of defined town centres. For the avoidance of doubt, we consider that leisure uses in this instance should comprise uses such as Class E(b) and sui generis food and beverage uses, along with commercial leisure uses such as cinemas, health and fitness and bowling alleys.

9.44 In relation to whether there should be any variations between impact thresholds in the main centres there are clearly variations in the amount of retail floorspace in Cheltenham, Gloucester, Tewkesbury, Bishops Cleeve and Winchcombe, but all these centres face similar pressures retaining existing retailers. Therefore, we cannot find an identifiable reason why the floorspace threshold should be varied between different settlements.

9.45 Finally, it is important to note that there are also many smaller villages across the rural parts of the JCS area. Retail uses provide an important focus for these local communities and the loss of shops has the potential to cause significant harm to the everyday life. As a consequence, alongside Local Plan policies which control the proposed change of use of local shops and services, we recommend that a lower impact threshold is imposed for retail proposals outside of the five main settlements in the JCS area. We consider that a threshold of 100sq m gross is an appropriate one in order to ensure that the JCS can protect the role and function of local shops and services.

9.46 In relation to the consideration of the impact test at the local level and how the impact policy in the JCS should be framed, we consider that the following factors are important:

- The test of impact will apply to all retail (convenience and comparison goods) and leisure proposals outside of the boundaries of defined 'town centres' in the JCS area. This will include proposals for new units, extensions to existing floorspace and proposals to vary the terms of planning conditions and legal agreements in relation to the range of goods to be sold in retail stores.
- It will be important for the JCS authorities and applicants to agree the scope of any impact assessment before applications are submitted. This will include: the characteristics of the proposed development (including the various scenarios for its retail offer), the catchment area of the proposal, the 'town centres' whose health could be affected by the proposal (including an assessment of their health), the pattern of trade draw and trade diversion to the proposal and any restrictions[32] which applicants are willing to accept on the proposed retail floorspace.
- It will also be necessary to agree the committed retail development which should be included in the cumulative assessment of retail impact.
- The list of alternative locations which should be included in the sequential test, including an agreement over the approach to flexibility in terms of scale and format.

[32] In terms of range of goods to be sold, net and gross floorspace and the number of retail units in the development.

The Identification of New Centres

9.47 As noted earlier in this Study, the creation of new communities across the JCS area, primarily in the form of large scale urban extensions, are likely to require the provision of new retail and service uses in order to provide day-to-day facilities for these growing communities. A number of existing allocations in the adopted JCS already propose new local centres including North West Cheltenham, Innsworth/Twigworth, South Churchdown and North Brockworth. These allocations require 'the provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community'.

9.48 In our view, these new centres are very important for the overall provision of retail and service uses across the JCS area as they will provide easily accessible facilities for these new communities although they need to be controlled in order that they serve local needs and not affect the health and attractiveness of higher order centres, and existing centres within the catchment. They must also be placed in an appropriate location to serve these new communities and not be attractive to a wider catchment.

9.49 We set out below (not in any order of importance or preference) a basket of factors which we feel may be appropriate for the JCS authorities to take into account when considering the amount and location of expanded retail and service provision to serve new residential neighbourhoods:

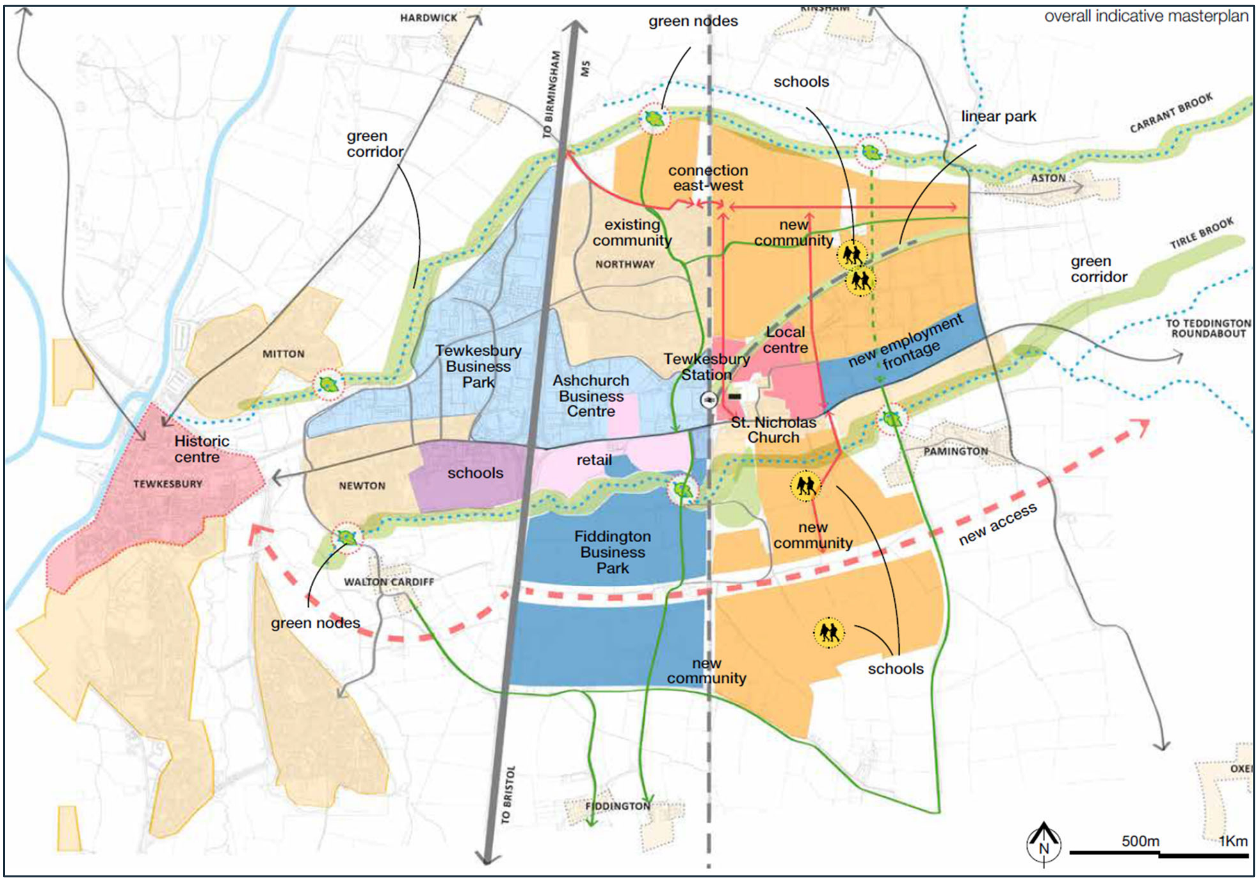
- The size of the new community which the new local/neighbourhood centre should serve. The number of new homes/residents within a new community will provide an important guide as to the scale and function of any new centre, which can be calculated the level of expenditure capacity arising from the size of the new community.
- Geographic distribution of retail floorspace and main town centre uses. The size of a new local or neighbourhood centre in a new community will also be influenced by the proximity to existing retail provision. For example, if an existing local or district centre lies nearby then there may not be a need to plan for a further new centre.
- Walk-in catchments and public transport accessibility. It will be important when planning for the provision of new centres that they are easily accessible by public accessible and on foot.

9.50 The largest planning urban extension in the JCS area is North West Cheltenham (also known as Elms Park). It is also currently subject to an outline planning permission which remains undetermined at the time of finalising this Study. The submitted application proposes 4,250 new homes, a large amount of employment floorspace (40,000sq m), 1,900sq m of Class D1/2 floorspace and 6,500sq m of Class A floorspace. The retail floorspace is proposed to be provided in a neighbourhood centre and a smaller local centre. The supporting information has tested a scenario where there will be a 2,000sq m net supermarket in the neighbourhood centre, a 400sq m net convenience store in the local centre and a further 300sq m of comparison goods floorspace in the neighbourhood centre. The applicant has submitted an analysis which attempts to demonstrate that there is sufficient capacity from residents and workers in the new development can support the turnover of the proposed convenience and comparison goods floorspace in the development. It is not the purpose of this Study to provide a critique of the analysis supporting the planning application although the level of available convenience expenditure/floorspace capacity shown in Table 9b would be broadly supportive of the floorspace figures quoted in the outline application. The size of foodstore in the neighbourhood centre is also of a size which is capable of meeting a sizeable amount of main and top-up food shopping trips thus reducing the need to travel elsewhere, whilst we are supportive of limiting the amount of comparison goods floorspace in order that the new centres remain day to day destination for local resident and not a destination in its own right (competing with the town centre).

9.51 In addition to the already planned centres at North West Cheltenham, Innsworth/Twigworth, South Churchdown and North Brockworth, we recommend that CBC considers the provision of a new centre in West Cheltenham given the level of quantitative capacity available in the town. The scale of the urban extension, which will provide both new homes and a substantial number of new job opportunities, suggests that there is a need to provide local retail and service facilities, which is reinforced by the general lack of existing stores and centres in this part of Cheltenham.

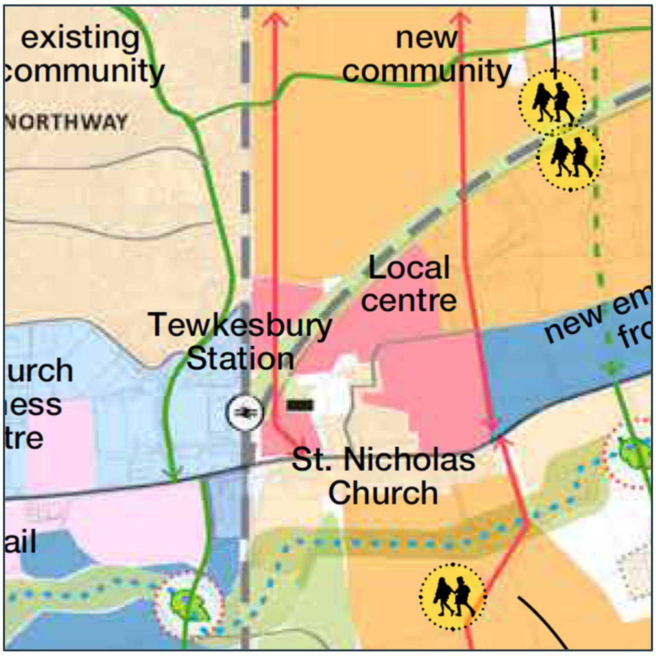
9.52 The final area which the JCS authorities have requested be included in this part of the Study is in relation to the proposals for Tewkesbury Garden Town. The Garden Town is not included in the adopted JCS and is currently not part of the housing/employment/main town centre use allocations in the October 2019 Pre-Submission Tewkesbury Borough Local Plan (although there is a reference to the on-going masterplan work for the project). At the present time, the only defined 'town centre' in Ashchurch/Northway area is on the north-eastern edge of the urban area. There are some out of centre units on the A46 and, as noted earlier in this report, planning permission for a large retail outlet centre and large garden centre to the south of the A46. The January 2018 Concept Masterplan report suggests that should a total of circa 8,000 new homes be built in the Garden Town then there should be a local centre (centred around the church) and a series of neighbourhood centres (possibly up to 4) located through the new communities to the north and south of the A46.

Figure 9.2: Tewkesbury Garden Town Concept Masterplan



9.53 The proposed local centre would be located close to the existing railway station, with mixed use areas to the east of the railway line, employment areas to the west of the railway line. The Concept Masterplan indicates that the defined local centre will be located to the east of the railway line. This is shown in Figure 9.3 below.

Figure 9.3: proposed local centre area within Tewkesbury Garden Town Concept Masterplan



9.54 In our view, the provision of a new local centre as part of the planned Garden Town will be a vital and integral element of the project. In our opinion, the suggested location is an appropriate one as it (A) lies central to the proposed new residential areas, (B) lies close to the existing railway station, and (C) would be easily accessible to workers in the employment areas along the A46.

9.55 The text of the Concept Masterplan indicates that the local centre will have a larger format convenience store of circa 500-900sq m, with additional retail space of 2,000sq m. it goes on to state that smaller format convenience stores of circa 400sq m will be provided in the neighbourhood centres along with 600sq m of additional retail space. Assuming those figures were gross estimates then that would give a total gross figure for food/convenience stores (for one local centre and up to four neighbourhood centres) of 2,500sq m gross. Making reasonable deductions to go from gross to net sales and a small area of comparison goods sales that would provide a net sales area for all (up to) five stores of circa 1,600sq m. We have, alongside this, undertaken a crude assessment of the potential convenience goods expenditure capacity which 8000 new homes in the Garden Village could support. On a conservative basis of an average of 2 persons per dwelling, that would provide an overall population of circa 16,000 people. Based upon the per convenience goods expenditure for Zone 7 (the Tewkesbury/Ashchurch zone in our quantitative assessment) (£2,046 at 2019) that provides a total pot of available expenditure of £38.5m. Assuming that new stores in the Garden Village are able to retain 50% of this locally generated expenditure, and assuming that the new floorspace has a sales density of £12,000/sq m, that would support the circa 1,600sq m net proposed for the new centres. In relation to other retail uses, particular comparison goods floorspace, we would suggest that these are kept to a minimum in order to protect the health of Tewkesbury town centre and also controls imposed to ensure that the amount of floorspace is kept to a modest size and also ensuring a mix of A1/2/3/4/5 uses across each centre.

9.56 In relation to the identification of new centres comprising clusters of shops, services and other main town centre uses, GCC has asked for this study to consider Mead Road and Bristol Road. Mead Road lies in the south-east part of Gloucester and the cluster of units includes a public house, a Tesco Express convenience store, two take-aways and an estate agent. Whilst this is a small centre, it is similar in scale to a number of local centres in the city and we agree with GCC's decision to propose it be identified as a local centre in the retail hierarchy.

9.57 The other cluster of retail and other commercial units suggested for assessment is Bristol Road. Bristol Road is one of the main vehicular routes across the southern part of the city and has retail and other commercial uses intermittently across a number of areas. The area with the highest concentration of main town centre uses is between Madleaze Road and Price Street where a number of take-aways, restaurants and health/beauty uses can be found, along with a bank and a public house. It is of a size which would place it comparable to a number of other local centres and therefore is recommended to be identified as such.

10. Summary and Strategy Recommendations

10.1 This Retail and City / Town Centre Review report has been prepared by Avison Young for Tewkesbury Borough Council, Gloucester City Council and Cheltenham Borough Council in order to provide up to date retail and town centre evidence for a review of the Joint Core Strategy. The content of this study responds to the content of part of Policy SD2 of the existing adopted JCS which notes that:

> *"Following adoption of the JCS, this policy will be subject to an immediate review. The single issue review will take approximately two years to complete. It will cover strategic planning matters relating to the three JCS authorities including issues such as a revised assessment of retail needs, market share between different designated centres, city / town centre boundaries, site allocations, primary and secondary shopping frontages and locally defined impact thresholds".*

10.2 This study has provided the following information and assessments:

- Comprehensive health checks of Gloucester city centre, Tewkesbury town centre, Cheltenham town centre, Winchcombe and Bishops Cleeve, including their role and function and place in the existing hierarchy.
- Review and make recommendations on the role, function and existing hierarchy of these centres.
- Undertake an assessment of the strengths, weaknesses, opportunities and threats for these centres, and make strategy and policy recommendations in relation to opportunities to improve their long-term vitality and viability that reflect their character, role and function.
- Provide intelligence on existing retail and leisure parks located outside of town centres in terms of how they operate and impact upon designated centres.
- Undertake an assessment of the need for retail floorspace in each of the designated centres, including a review of market share trends.
- Undertake a review of sites to accommodate identified retail needs, alongside a review of retail and town centre planning policies and the identified town centre and primary shopping area ('PSA') boundaries.
- Undertake a proportionate review of the health of district, local and neighbourhood centres across the three local authority area, including identification of opportunities to improve their vitality and viability, and to make recommendations on the need for any new or expanded centres.
- Make recommendations on proportionate locally set impact thresholds for retail proposals outside of designated centres.

10.3 We outline our recommended strategy for the main centres in turn below.

Recommended Strategy for the Main Town Centres

Cheltenham

10.4 Overall, Cheltenham remains a healthy town centre which is the strongest of the three main 'town centres' at the top of the JCS centre hierarchy. It has the highest amount of surveyed retail units and has a proportion of comparison retail and services uses which are above their respective national averages. Vacancy levels have fallen over the past year and remain below the national average. Overall, the centre has seen considerable development over past few years, with the completion of the second phase of the Brewery development and the redevelopment of the Beechwood shopping centre to provide a new John Lewis store. These projects have cemented Cheltenham's position as the largest and most successful centre across Gloucestershire.

10.5 However, the town centre is not without its challenges. A comparison between the 2015 and 2019 household surveys reveals that, despite its continuing strong market share across a number of comparison goods categories, market share has been lost which has led to a 10% dip in its overall annual turnover level. The most significant influence on this loss of market share is, like most towns, due to the influence of the internet which has seen strong growth amongst Cheltenham residents particularly in sectors such as clothing/fashion.

10.6 Our assessment of need has identified that there is the potential for a net increase in quantitative amount of convenience goods floorspace in the town over the short to medium term. We have identified that it would be advantageous for part of this need to be directed to the town centre which currently does not have a main food shopping function and the remainder is best directed to new district and local centres to be provided in new urban extensions, which should be appropriate in terms of their scale and function.

10.7 In relation to our need assessment for comparison goods floorspace in Cheltenham, the recent addition of the new John Lewis store along with the second phase of the Brewery Quarter project, has provided the level of qualitative improvement which has previously been aspired to.

10.8 As a consequence of the above, we consider that the recommended strategy for retail floorspace provision in Cheltenham should be as follows:

- Whilst the quantitative assessment for comparison goods floorspace in Cheltenham suggests the possibility of a net increase in provision in the town, the recent John Lewis and Brewery Quarter developments have provided material qualitative improvements. As a consequence, we recommend that there is no requirement to allocate any sites/locations for any net additional comparison goods retail floorspace in Cheltenham and that new retail proposals (outside of defined 'town centres') are closely scrutinised in terms of their impact
- There is the capacity, from a quantitative perspective, for net additional convenience goods floorspace in Cheltenham. The focus for this additional capacity should be on the town centre and new local centres within the planned urban extensions. One centre is already included within the adopted JCS for North West Cheltenham and any further new large residential allocations should also be considered for retail provision taking into account the criteria outlined in this report. We also recommend that the allocated West Cheltenham allocation is considered for retail floorspace provision due to the size of the planned development and level of existing provision in this part of Cheltenham.
- Beyond the Class A1 retail sector, Cheltenham town centre has a good and varied set of other main town centre land uses, including commercial leisure, arts, cultural, food/beverage and hotel uses. These provide the town centre with resilience and are vital if Cheltenham is to maintain its vitality and viability. Other assets include existing office uses such as the Borough Council offices on the Promenade. We

consider that such uses should remain a prominent part of the land use mix in the town centre as, apart from their obvious economic benefits, they can increase footfall through different times of the day.

Gloucester

10.9 Within the 2011 Study for the current JCS document, Gloucester city centre was found to be a relatively robust and healthy which benefitted from its historic built environment and had shown resilience to difficult economic conditions. The 2011 Study also observed that vacancy levels were falling but considered there was a need for an improved retail offer (particularly around the fashion sector) and the need for new development to improve the overall attractiveness of the centre. Since the 2011 Study, some of the indicators assessed for this latest Study show some improvement, particularly around falling vacancies and an improved comparison goods turnover. However, since the 2015 Study these trends have been reversed with a fall in the 2019 comparison goods turnover back to 2011 levels and a rise in vacancies over the past year. The comparison goods retail offer in the city centre is reducing (albeit this is a common trend in a number of town and city centres) and there has been a shift to a growing level of services. In addition, the financial performance of the convenience goods sector in the centre has fallen by one third.

10.10 All of these factors point to a centre which is vulnerable and susceptible to even small levels of trade loss. Such levels of trade loss have, in some instances, not been able to be properly scrutinised as there has been no locally set impact assessment threshold. There are likely to be a varied range of reasons for this vulnerability, including the structural changes affecting high streets nation-wide, the continuing growth of spending via the internet, the greater level of success achieved by Cheltenham in recent years and also the large scale competition available in out of centre stores in the city. It is likely that the implementation of further retail floorspace commitments outside of the city centre will continue the trends set out above and it is now likely that the city centre needs to be re-focused away from its traditional retail offer and accommodate a wider mix of land uses in order to sustain its health. The Kings Quarter and Greater Blackfriars projects will be important first steps in this process, bringing in an increased level of residential accommodation in to the city.

10.11 Our assessment of quantitative capacity in Gloucester has found that there is no requirement for any net additional convenience or comparison goods floorspace in the city. Convenience goods floorspace is now collectively trading below its comparable benchmark turnover level whilst comparison goods floorspace is now trading well below the benchmark turnover level set by the previous 2015 JCS study. In relation to qualitative matters, the choice and selection of convenience and comparison goods floorspace across the city as a whole is considered to be good and continues to grow with the grant of planning permission for additional floorspace. An area of 'need' is in relation to the quality of provision in the city centre, particularly in relation to comparison goods floorspace and we recommend that efforts are focused upon refurbishing and redeveloping existing floorspace.

10.12 The characteristics of Gloucester are somewhat unique with the retail outlet centre close to the city centre and offering a different dimension to the retail offer, albeit one which is likely to have impacted upon the traditional part of the city centre over recent years. Gloucester Quays is now, in our opinion, likely to offer an equally attractive retail and leisure destination to the city centre which suggests that the city centre needs to evolve and introduce a wider range of land uses in order to support the health of the centre. A clear sign of this is the current proposals for Kings Quarter which have moved away from the previous retail-led proposal to a more diverse offer including residential accommodation and a hotel. It should also be noted that out of centre retail development is also impacting upon other centres with the loss of Next from Quedgeley district centre.

10.13 The focus for the retail and town centre strategy in Gloucester should therefore be on a stricter control on proposals for retail development outside of defined town centres. Part of this approach will be to set a low impact assessment threshold so retail and leisure proposals can be properly scrutinised. Given the change which has occurred in Gloucester over the past 10-15 years, the strategy should acknowledge the benefits to the city of the Gloucester Quays retail outlet centre in its current form, due to its ability to attract visitors to the city which may not have otherwise come, but also indicate that further out of centre retail and leisure development has the very real potential to be harmful. We therefore recommend that the retail and leisure strategy for the primary shopping area and the Quays should be based upon 'complementarity'. Both locations have the ability to make positive contributions to the health and attractiveness of the city but they must find their own individual role. This will require careful management by the City Council and whilst it is proposed that the Quays remains part of the city centre boundary, planning applications for main town centre uses will still be required to be assessed against the sequential test (as it lies outside of the recommended primary shopping area). There is also clear merit in the City Council adopting a specific approach which requires a proportionate assessment in relation to retail/leisure impact. One area where there is potential to increase 'complementarity' is to continue to improve linkages between the two locations. The route via Southgate Street has received significant investment over the past several years and the potential for further improvements is not limited. Therefore, other links should be explored, including via the former City Council offices and Ladybellegate Street.

10.14 The St Oswalds, the Peel Centre and Westgate Island out of centre retail parks also lie reasonably close to the primary shopping area and thus have the potential to provide positive impacts on the centre in a way in which other out of centre retail provision (at, say, Eastern Avenue) cannot. Linkages with the primary shopping area will, however, need to be improved as part of future development proposals although we consider that these three areas should be identified in the strategy as 'inner ring' locations, which are out-of-centre and placed third in the sequence after the primary shopping area, and edge of centre locations for future retail and leisure development. For the avoidance of doubt, proposals in these three areas should be subject to the sequential and impact tests. This will provide clarity to the retail, leisure and centres strategy.

10.15 In relation to other areas surrounding the city centre, improvements to the railway station in the transport hub will also make the city centre more attractive for visits via public transport and making the centre attractive for rail users. There is also the potential benefit of the hospital which has a large workforce and attracts many visitors. If linkages can be improved then this will also make a positive contribution to the city centre.

10.16 The strategy in the JCS should set out the aspirations for each area and how each, particularly the traditional part of the city centre / primary shopping area / Westgate Street, is to evolve over the JCS Review period. As part of this position, the strategy for the traditional part of the city centre (i.e. existing primary shopping area) should be to aim for diversification, with a lower focus on Class A1 retail space and a greater focus on residential and leisure uses. This will require a more flexible approach to the land use mix in certain parts of the city centre, aided by changes to the defined primary shopping area and the identification of priority areas such as Westgate Street. It is likely that the City Council will need to play a significant role in this process, not only as local planning authority but also as landowner and facilitator of regeneration projects.

10.17 Gloucester city centre is the centre in the JCS which is likely to require greatest diversification. The City Council should adopt a 'curator' role in terms of both the ownership and management of property, the promotion of redevelopment and also adopt a strong focus for promoting reasons to come to Gloucester. That may be shopping, food and drink, specific bespoke events and a much greater amount of residential accommodation in the city centre. Indeed, it is likely that the City Council is able to make decisions and take actions that the private sector would not wish (or be able) to take. The increased level of residential accommodation in the city centre can achieve a number of benefits, including contributing to the supply of housing in the city, making the city centre a safer place to live and visit and also drive increased footfall (and available retail expenditure) which is a key issue for retailers and leisure businesses.

10.18 The JCS should set out the above in a strong and robust vision for the city centre which will guide development activity and also be a very useful part of the development plan strategy when the City Council is faced with proposals associated with out of centre retail and leisure floorspace. The strategy will also set out the role and contribution that the three 'third choice' 'inner ring' of retail and leisure locations – St Oswalds, the Quays/Docks and Westgate Island – which can play a positive role in complementing the city centre and encouraging linked trips (possibly including the need for enhanced linkages).

Tewkesbury

10.19 Tewkesbury town centre plays an important role for its residents and surrounding rural settlements. It is an attractive historic centre which benefits from the presence of the Abbey, many other historic buildings and the riverside location. The retail composition and offer is broadly comparable to the national average bar save for a slight under-provision of convenience retailers and a growing number of vacancies. One sixth of all surveyed retail units in the town centre are vacant and this trend may be linked to the falling market share of the centre in terms of comparison goods shopping. The number of vacancies should be of some concern regarding the health of the centre and may be a sign that there is an over-provision of retail space. This over-provision of retail space may well be corrected over the short to medium term as the recent changes to the use classes order take effect.

10.20 The key future challenge for Tewkesbury town centre going forwards will be to create and maintain its own distinctive role, which acknowledges that it is the largest 'town centre' in the Borough and adapts to the on-going changes and challenges facing the retail and leisure sectors. Widening the diversity . With the construction of the new retail outlet centre at Ashchurch, the town centre has the potential to experience future change and pressures in the coming years and there is concern that its comparison goods and food/beverage functions could face renewed pressure.

10.21 With regards to the need for retail floorspace, our quantitative assessment has found no requirement for net additional floorspace although from a qualitative perspective there is a strong case for a modest amount of new provision within the Tewkesbury Garden Town project in order to provide easily accessible provision to the east of the M5. For comparison goods retailing the new retail outlet centre at Ashchurch will provide a significant change in the type and level of provision in the local area. We recommend that the new JCS does not plan for any significant net additional comparison goods floorspace and, instead, TBC and the other JCS authorities monitor how the health of Tewkesbury town centre fares 2-3 years after the completion of the outlet centre.

10.22 The two main town centre sites which can provide a modest amount of retail floorspace are Healings Mill and Spring Gardens. Healings Mill has the potential to offer a waterside development which can offer a new dimension to the town centre, possibly in the way that the Docks area has developed in Gloucester. It is likely that provision here will be focused on food and beverage uses with a small amount of Class A1 space. The redevelopment potential of Spring Gardens has been discussed for the past several years following the departure of the leisure centre. Retail-led masterplans have not been progressed and the latest work for TBC is now considering a wider mix of uses including residential. In order to provide resilience and support the future health of the town centre, diversification is required. Residential uses will play an important role here in order to increase local spending power and drive footfall in the centre. This may require TBC to take a more flexible approach to the variety of uses in the town centre and any re-purposing of retail space should be seen as a positive change for the centre.

Winchcombe & Bishops Cleeve

10.23 Winchcombe and Bishops Cleeve play much smaller and localised roles to the three large centres in the JCS area. Both have a modest range of shops and services, serving their local catchment, although Bishops Cleeve is able to retain a much larger amount of food shopping trips due to the presence of the large Tesco supermarket in the town centre. The strategy for both centres should be to concentrate upon their ability to serve the day to day needs of their local communities with it likely that any expansion in retail space will be modest.

Wider Retail Strategy Implications

10.24 An implication of the key messages around retail need/capacity in the main JCS settlements is that there is, to one extent or another, an over-supply of certain types of retail floorspace in certain geographic areas. The most notable area is Gloucester in this respect. Bearing in mind that these need/capacity forecasts are for settlements as a whole, this has the potential to have implications for out of centre floorspace, particular when combined with the state of the retail sector in the UK. Whilst out of centre retail floorspace does not benefit from planning policy protection it is nevertheless part of the land use landscape in the JCS settlements and the JCS authorities will need to (A) plan for the future beneficial use of these areas, and (B) deal with planning applications to vary existing controls on out of centre retail units/parks.

10.25 As retailers relocate to more modern retail park premises and where vacancies arise due to (A) the failure of businesses, and (B) retailers rationalising the number of stores which they require, landlords will seek to fill vacancies. This may require variation in ‘range of goods’ and ‘floorspace’ conditions on planning permissions and/or the insertion of mezzanine floors. The JCS authorities will need to carefully consider such applications as there may be several different permutations to consider. This should not just be a financial impact assessment but should also consider the potential for retailer relocations from town centres and also the re-organisation of out of centre retailers which may free-up other retail units.

10.26 In addition, one emerging trend for retail parks is their repurposing for alternative land uses, particular where significant vacancies arise. Some grocery and non-food retailers are reducing down the size of their retail sales areas and increasing the size of storage areas in order accommodate products associated with click and collect and online sales. This may have an impact on the amount of land and premises required for storage and distribution which will need to be taken into account when planning for this type of land use.

10.27 Other trends which are becoming established are the conversion of retail premises to car showroom units and also trade counters. Some retailers, particularly grocery retailers are also downsizing their traditional grocery sales areas to accommodate new concessions, such as travel agents, dry cleaners, cafes and bulk buy wholesale-style uses. In some of these instances, the retail concessions sought are existing town centre businesses and careful consideration will need to be given to the implications for the variety of uses in town, district and local centres.

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