

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Retail Study 2011-2031 Phase 1



Prepared on behalf of
Gloucester City Council
Cheltenham Borough Council
Tewkesbury Borough Council

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EXECUTIVE SUMMARY

The three authorities of Gloucester City, Cheltenham Borough and Tewkesbury Borough commissioned DPDS Ltd to undertake a retail study to inform the emerging Joint Core Strategy (JCS) based on a comprehensive retail evidence base. This study is intended to inform and guide the preparation of a retail strategy for the JCS area to 2031, based on a two phase approach. The current study represents Phase 1 with Phase 2 to be prepared once further progress is made arising from the consultation responses to Developing the Preferred Options.

The objectives of the Phase 1 study are:

- § to provide a health check analysis of the main centres in the JCS area;
- § to estimate the quantitative capacity for additional retail floorspace over the period to 2031 for convenience and comparison (bulky/non bulky) goods;
- § to assess qualitative needs in the JCS area;
- § to assess the role and function of existing centres;
- § to identify a potential supply of sites for retail use;
- § to provide development management policy recommendations; and
- § to provide a retail monitoring baseline.

The study provides a detailed health check of fourteen centres across the JCS area and draws on previous retail evidence bases available for the authorities of Gloucester City, Cheltenham Borough and Tewkesbury Borough.

Health Check Analysis

The study confirms that the JCS centres provide differing roles and functions relevant to their respective positions in the retail hierarchy. From a health check perspective, the study centres are, in the main, considered to be healthy, well performing retail centres in vitality and viability terms given the current economic situation. However, the JCS authorities should not be complacent and it is important for them to continue to foster vitality and viability to ensure the study centres do not to lose ground to larger competitor centres.

Gloucester City

Gloucester is ranked lower than Cheltenham (70th compared with Cheltenham's 25th place in the MHE Shopping Index), is considered to offer a more limited level of retail facilities for a city of its size and is subject to a number of underlying concerns (limited comparison offer, poor environmental quality in areas and relatively high vacancy rates). However the city centre shows signs of improvement and investment and is the focus for regeneration activity increasingly focused on the central area. The proposed Kings Quarter development is considered vitally important to the city in enhancing its retail offer and perception as a retail destination. Importantly, the city centre offers a genuine opportunity for a combined retail and tourism attraction – an issue which Cheltenham has successfully promoted and provides for its visitors and shoppers.

The district centres at Abbeydale and Quedgeley are both anchored by large superstores and effectively represent car borne destinations. The Quedgeley centre is comprised of two distinct elements, relating to a large superstore and retail warehouse units, and both district centres appear to be performing well and are well used by shoppers.

Cheltenham Borough

Cheltenham town centre represents the main retail centre in the JCS area and performs a wider sub regional role, which reflects its ranking within the top 25 retail centres in the country. The centre supports a quality offer of retail provision complemented by good levels of services, an attractive shopping environment and good levels of retailer representation and commercial demand. The strength of the town centre is further supported by the high levels of satisfaction noted from the NEMS Household Survey.

Away from the town centre, the Bath Road district centre is performing well, even allowing for its proximity to Cheltenham town centre whilst Caernarvon Road district centre is effectively a superstore anchored centre serving a large residential area. Coronation Square is considered excessive in size for the role it performs and is in need of investment. The redevelopment and qualitative improvement of the centre is considered a priority.

Tewkesbury Borough

Tewkesbury town centre is the main retail centre in the Borough and as a small rural market town performs a very different function from the two largest JCS centres, Cheltenham and Gloucester. It acts as a focus for the town and local hinterland's day to day needs in terms of food shopping, services and leisure and cultural activities. It also provides for frequently bought comparison goods and as an attractive town with a rich history, Tewkesbury benefits significantly from tourism. A number of potential development sites exist in the central area which provide the opportunity for new investment.

Elsewhere within the Borough, Winchcombe and Bishop's Cleeve provide very different retail environments but appear vibrant and healthy centres, with tourism particularly important to the retail offer in Winchcombe. Both centres however are considered to offer limited opportunities for new development.

The other retail areas in the Borough assessed in the JCS Study are relatively small and effectively represent local centres. This is reflected in the limited levels of retail provision available. In addition, a number of the Borough's centres, such as Brockworth, are subject to significant competition from out of centre facilities.

Additional Floorspace Capacity

Alongside the health check analysis of the JCS centres, the study provides a quantitative and qualitative assessment of the need for convenience and comparison (bulky and non bulky) retail floorspace. This exercise is supported by a 1,200 sample household survey to assess the market share of survey centres, which confirms the dominant role of Cheltenham and Gloucester within the JCS catchment area.

Convenience Floorspace

The study identifies the following capacity for convenience floorspace by local JCS authority:

§ Gloucester City: Current commitments are considered more than sufficient in the short term although a requirement for additional convenience floorspace will emerge after 2016, rising to 3,500 sq. m (net) by the end of the JCS period.

§ Cheltenham Borough: There is no capacity in quantitative terms for convenience goods floorspace in the Borough over the period to 2031.

§ Tewkesbury Borough: A relatively modest capacity for additional convenience floorspace exists for Tewkesbury town post 2021, rising to approximately 550 sq. m (net) by 2031. A higher requirement exists for Bishop's Cleeve in the short term (circa 650 sq. m by 2016) whilst in Winchcombe a more limited level of floorspace is identified. In Winchcombe and Bishop's Cleeve, it is considered the opportunity to secure a suitable site will be limited.

Comparison Floorspace

By contrast, the capacity for additional comparison goods floorspace is more considerable over the JCS period, particularly for the main centres of Gloucester and Cheltenham. This is due to expected population growth and a relatively rapid increase in the projected expenditure per head related to comparison goods.

§ Gloucester City: A significant level of comparison floorspace requirement is identified (non bulky and bulky goods) in the short, medium and long term. This includes capacity for over 26,900 sq. m (net) by 2016 rising to over 47,500 sq. m (net) by 2021. By the end of the JCS period in 2031, a requirement for over 103,000 sq. m (net) is identified.

§ Cheltenham Borough: A similar capacity for comparison floorspace exists in Cheltenham, of up to 26,400 sq. m (net) by 2016 and approximately 50,000 sq. m (net) by 2021. Over the period to 2031, the study indicates capacity for over 112,000 sq. m of comparison floorspace.

§ Tewkesbury Borough: Within the main centres of the Borough, the opportunities for comparison floorspace are significantly lower. The greatest requirement is in Tewkesbury town with capacity for 1,500 sq. m (net) identified by 2016, rising to 2,500 sq. m (net) by 2021. Over the longer term, the potential for up to 5,300 sq. m (net) is identified to 2031. Lower levels of floorspace have been identified for Bishop's Cleeve and Winchcombe although both centres are considered limited in their ability to deliver additional sites.

From a qualitative perspective, of all the JCS centres, two are considered in need of greatest attention and further investigation. Coronation Square (Cheltenham Borough) is in need of improvement and investment, particularly in terms of its convenience provision. The other centre is Northway, but more specifically the wider Northway/Ashchurch area (Tewkesbury Borough) which is considered to be limited in provision terms despite the large areas of housing and employment in the area.

Sites Potential

The study has identified a number of key sites within the main JCS retail centres of Gloucester, Cheltenham and Tewkesbury which are considered suitable and capable of accommodating the identified capacity for new floorspace.

In Gloucester, Kings Quarter represents the first major opportunity of new retail investment in the city centre for many years. It will be expected to improve the attractiveness of the city centre to major retailers and leisure operators. The development of this key site also offers scope for spin off regeneration in the immediate area. There are also opportunities at Greater Greyfriars and Greater Blackfriars, both major city centre regeneration sites that have the potential to make an important contribution to city centre retailing and other town centre uses, environmental improvements as well improved linkages with the wider city centre.

Within Cheltenham town centre, a number of key identified regeneration sites offer good prospects, including the area to the north of Beechwood; the Royal Well area (to build on the strength of the Promenade); and North Place/Portland Street car parks, which offer wider regeneration benefits associated with enhanced links to the town centre. It is understood a planning application for the North Place/Portland Street sites could be submitted in mid 2012.

In Tewkesbury Borough, whilst a number of sequentially preferable development sites exist in Tewkesbury, the focus is likely to be in identifying commercially viable developments and the attraction of investment.

Overall, where a quantitative and qualitative need has been identified to exist, there is considered to be a suitable and realistic level of site supply which can provide for the identified floorspace needs for at least the next 5 - 10 year period.

Policy Recommendations

In accordance with PPS4, the study concludes with a number of policy recommendations to inform the preparation of JCS policy for retail development and town centres. Whilst there is little significant change proposed, the main issue relates to the need for a consistent JCS wide policy approach, notwithstanding the range of retail centres which exist across the JCS area.

Addendum

The JCS Retail Study was prepared in advance of the publication of the National Planning Policy Framework (NPPF). In view of the changes to national planning policy, an addendum has been prepared to be read in conjunction with the study. This highlights the main changes to the policy for town centres and assesses the extent to which the Retail Study continues to reflect government policy.

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1.0 INTRODUCTION

Background to the Study

- 1.1 DPDS Ltd has been commissioned by the local authorities of Gloucester City, Cheltenham Borough and Tewkesbury Borough to prepare a retail evidence base to inform the emerging Joint Core Strategy (JCS) for the three authorities. As a result of formal working arrangements, the authorities have resolved to bring together their respective evidence bases to prepare a comprehensive joint evidence base which will inform the JCS.
- 1.2 The purpose of the study is to inform and guide the preparation of a retail strategy for the JCS area which draws on an up to date retail evidence base for the study centres and which will ultimately form part of the overall evidence base for the JCS area to 2031. The Joint Core Strategy 'Developing the Preferred Option's is currently on consultation to February 2012, and includes emerging core principles for retail and other main town centres uses in the JCS area.
- 1.3 The study provides a health check assessment of the main centres in the study area (fourteen in total) and has utilised existing retail information (where available), and updated information to provide a current baseline position. Alongside this exercise, the study has assessed the capacity for additional retail floorspace in the JCS area over the period to 2031 based on the guidance set out in Planning Policy Statement 4: Planning for Sustainable Economic Growth (2009), including consideration of the potential of existing centres and key sites to accommodate future retail development. The study further considers the emerging National Planning Policy Framework (NPPF) which seeks to deliver sustainable development, including planning for prosperity and the objective to promote the vitality and viability of town centre. The recommendations of the Portas Review (published in early December 2011) into the future of town centres are also discussed in brief.
- 1.4 The findings of the study are intended to assist in the preparation of recommendations for policies and proposals for the JCS area, in order to provide the authorities with a detailed strategy on which to base their assessment of future retail applications. It also provides a basis for ongoing retail monitoring within the study area.

Objectives of the Study

- 1.5 The overall objective of the study is to provide a retail strategy for the JCS area, and is based on two distinct outputs as follows:

Phase 1

- § To undertake a health check of the city, town and district centres in the JCS area (fourteen in total);
- § To estimate the quantitative capacity for additional retail floorspace in the JCS area over the period to 2031 for convenience and comparison (bulky/non bulky) goods, with a particular emphasis on the period 2011 – 2016,
- § To undertake a qualitative assessment of retail needs in the JCS area;
- § To assess the role and function of existing centres to establish whether any additional need can be accommodated on existing sites, or whether additional sites are required;
- § To assess the suitability and capacity of key identified sites (identified in the study brief) for accommodating future demand for retail floorspace;
- § To identify a suitable and realistic 5 - 10 year supply of sites for retail use within the JCS study centres from 2011;
- § To provide policy recommendations for the JCS area, including:
 - the extent of the Primary Shopping Area (PSA) for the city and town centres, to include defined primary and secondary shopping frontages;
 - the type and mix of uses considered acceptable within the primary and secondary shopping frontages;
 - review of the city, town and district centre boundaries;
 - existing and potential edge of centre retail development;
 - existing and potential out of centre retail development;
 - existing and potential retail development in rural areas; and
 - retail monitoring;
- § To provide a retail baseline for the monitoring of retail development for the retail areas of Tewkesbury Borough.

Phase 2

- 1.6 As a consequence of the pending revocation of the Regional Spatial Strategy for the South West (RSS SW) and the Royal Assent of the Localism Bill on 15 November 2011, it has been necessary to amend the preparation of the JCS which would previously have incorporated strategic policy issues set out in

the Regional Spatial Strategy. This has impacted on the preparation and programme for the JCS, which is now focused on a preferred strategy for the JCS area to 2031. The 'Developing the Preferred Option' is currently on consultation to mid February 2012.

- 1.7 To ensure full consideration of the preferred option for growth, a second phase of the study will be undertaken once information is available with respect to the preferred option, and will provide the following output:

§ An assessment of the suitability of any peripheral broad locations identified as part of the preferred option process to accommodate any future demand for retail floorspace that cannot be accommodated within existing JCS centres.

- 1.8 This report is concerned with the requirements of Phase 1 of the study and is supported by technical appendices. Phase 2 will be provided by way of a supporting addendum when completed.

- 1.9 The study is concerned with retail policy and strategy only and does not consider leisure issues.

Scope of Work

- 1.10 To fully address the requirements of the brief, this study incorporates a comprehensive up-to-date review of the main centres of the JCS area. It is focused on those centres which are either designated within the relevant adopted Local Plan or which perform the function of a city, town or district centre in accordance with the definitions set out in PPS4. The relevant study centres are as follows:

Gloucester City

- § Gloucester City Centre
- § Quedgeley District Centre, Bristol Road
- § Abbeydale District Centre, Glevum Way

Cheltenham Borough

- § Cheltenham Town Centre
- § Bath Road District Centre

- § Coronation Square District Centre
- § Caernarvon Road District Centre

Tewkesbury Borough

- § Tewkesbury Town Centre
- § Bishop's Cleeve Retail Area
- § Brockworth Retail Area
- § Churchdown Retail Area
- § Innsworth Retail Area
- § Northway Retail Area
- § Winchcombe Retail Area

- 1.11 The retail areas identified in Tewkesbury Borough relate to those centres identified in Policy RET3 of the adopted Local Plan, which fulfil a function as district centres (as defined in the Local Plan). Whilst the Local Plan does not specifically designate district (or local) centres, a number of the retail areas are considered local centres in the context of the definition set out in Annex B of PPS4.
- 1.12 To inform the capacity for additional retail floorspace, a household telephone survey of 1,200 local residents was conducted in June 2011 by NEMS Market Research to establish current shopping patterns and views on the quality of retail provision within the JCS centres. This survey, based on twelve sub-areas covering the JCS area, complements the household surveys undertaken to inform previous retail studies in each local authority over recent years, which include Gloucester Retail Study Update (2008), Cheltenham Retail and Leisure Study (2006), and Tewkesbury Borough Vitality, Viability and Vulnerability Study (2008), which was undertaken for the three largest centres; Tewkesbury, Winchcombe and Bishop's Cleeve.
- 1.13 The study utilises local retail expenditure and population data for each zone and forecasts of national retail expenditure change as supplied to DPDS Ltd by Experian at the time of the study together with Retail Planner Briefing Note 9 (September 2011) for expenditure growth trends.
- 1.14 Population change is based on population projections prepared by Gloucestershire County Council in May 2011. The base date for this

information is 2009. This data has been updated to 2011 and combined with results from the household survey to provide an estimate of shopping patterns across the JCS area in 2011.

- 1.15 All monetary values are quoted on a 2009 price base.
- 1.16 Forecasts of the capacity for new retail floorspace are given at five year intervals to 2031, taking account of any planning permissions unimplemented at the time of the survey. These capacity estimates for new retail floorspace are given in square metres of net sales floorspace – that is the area used for the display and sale of goods and the circulation space for members of the public (excluding storage, staff and administrative areas, lobbies, toilets and any in-house cafes). As with all forecasts they are subject to uncertainty and this increases over time. These forecasts have been prepared at a time of considerable economic uncertainty and reflect the current pessimism about economic growth in the next 5 years and a cautious approach to longer term growth.
- 1.17 The health checks undertaken for each centre are based on published documents and research carried out by the local authorities, on site visits and on interviews with local commercial property agents carried out in the summer of 2011. The base data varies on a centre by centre basis.
- 1.18 This study has due regard to prevailing planning policy at the national, regional and local level, and has drawn on existing retail research and strategies undertaken by, and/or on behalf of the three JCS authorities. Where necessary, the study has updated baseline data to address information gaps in order to provide a consistent baseline for the JCS centres.
- 1.19 Section 2 of this study provides a summary of the relevant national planning policy background, with a focus on Planning Policy Statement 4: Planning for Sustainable Economic Growth, together with the emerging National Planning Policy Framework and consideration of the Portas Review into the issues facing town centres. Section 3 provides a summary health check assessment of each centre to assess vitality and viability. A detailed assessment of each centre is provided in the supporting appendices. This section draws on the existing evidence base and has been updated to ensure a baseline snapshot

of the performance of each centre when considered against the key health check indicators of PPS4.

- 1.20 Section 4 provides a quantitative assessment of convenience and comparison goods expenditure capacity drawing on the results of the household survey as the basis for assessing existing shopping patterns. It provides an overview of the methodology and assumptions adopted for the assessment alongside a review of the key shopping patterns identified from the household survey. This provides an in depth analysis of the capacity for additional retail floorspace in the period to 2031, with emphasis on the period 2011 – 2021.
- 1.21 A qualitative assessment of the need for additional retail floorspace with regard to the advice set out in paragraphs 3.10 – 3.20 of the supporting PPS4 Practice Guidance Planning for Town Centres is provided in Section 5 to complement the research.
- 1.22 Section 6 assesses the potential of key sites to accommodate any identified capacity for additional retail floorspace. This section also considers the scale and function of the survey centres, and whether any identified capacity for retail floorspace can be accommodated on existing sites or whether there is a requirement for additional sites. As part of this process, sites considered suitable for meeting retail floorspace capacity over the period to 2021 in the JCS centres are identified.
- 1.23 Section 7 sets out a number of policy recommendations to inform policy formulation and to assist with decision making in the consideration of future planning applications for retail development. The policy recommendations outlined in the study draw on PPS4 and practice guidance. A framework for Tewkesbury Borough to undertake future monitoring and update the baseline data for its retail areas is contained in this study, together with recommendations for all JCS centres in terms of retail monitoring as part of Section 7.

2.0 NATIONAL PLANNING POLICY BACKGROUND

- 2.1 The objective of the study is to provide a retail evidence base which will assist in the formulation of a retail strategy for the JCS alongside policy recommendations for guiding retail development in the area to 2031.
- 2.2 The importance of the evidence base forms a fundamental element of relevant national guidance, and in this section the study considers the key elements of PPS4: Planning for Sustainable Economic Growth which has superseded the national guidance under which the existing adopted Local Plan policies for the JCS authorities were formulated. The same situation exists with regard to the existing retail evidence base relevant to the three authorities.

PPS 4: Planning for Sustainable Economic Growth (December 2009)

- 2.3 A fundamental change from PPS 6 Planning for Town Centres is the focus on sustainable economic growth, within which main town centre uses (which incorporates retail development) form part of a wider definition of economic development. To support the promotion of sustainable economic growth, PPS4 sets out a number of objectives of the planning system which include:

- § The building of prosperous communities through improved economic performance at all levels of the settlement hierarchy;
- § Reduction in the economic disparity of regions;
- § Delivery of sustainable patterns of development which reduce the need to travel;
- § Promotion of the vitality and viability of town and other centres, based on:
 - Economic growth and development of main town centre uses focused in existing centres which provide a wide range of facilities, and address deficiencies of provisions in areas of poor access;
 - Provision of innovative town centre services based on competition and enhanced choice to provide for the needs of all sections of the community; and
 - Conservation of the built environment of centres.
- § Raise the quality of life and environment in rural areas.

2.4 The national guidance provides advice relating to plan preparation, monitoring and development management. In respect of plan preparation, Policy EC1 outlines the role of evidence to plan positively. At the local level, Policy EC1.3 states that the evidence base should, amongst others:

- § Assess the need for land or floorspace for economic development, including all main town centre uses over the plan period;
- § Identify any deficiencies in the provision of local shopping facilities and other facilities which serve people's day to day needs;
- § Assess the existing and future supply of land available for economic development;
- § Assess the capacity of existing centres to accommodate new town centre development.

2.5 As part of the assessment of need for retail (and leisure) development, PPS4 states that account should be taken of the quantitative and qualitative need for different types of retail (and leisure) development. In assessing quantitative need, to ensure a realistic assessment, Policy EC1.4c outlines the need to consider existing and forecast population levels, forecast expenditure for specific classes of goods, and forecasts of retail sales density improvements.

2.6 In regard to assessing the qualitative need for retail development, Policy EC1.4d advocates that local planning authorities should assess whether there is a provision and distribution of shopping (and leisure and local services) which allow genuine choice to meet the needs of the whole community, particularly those in deprived areas. It also advises that regard be taken as to the degree to which shops may be overtrading and whether there is a need to increase competition and retail mix.

2.7 In developing plan policy, an important change is contained in Policy EC3 (Planning for Centres). At the local level, it includes support to define the extent of the centre and the PSA, alongside consideration for the setting of floorspace thresholds for the scale of edge of, and out of centre development. It also advises local authorities to identify locally important impacts on centres which should be tested as part of the impact assessment associated with the determination of planning applications.

- 2.8 Policy EC9 outlines the importance of monitoring and the need for local planning authorities to monitor the health of town centres. This is considered essential in informing policy recommendations.
- 2.9 A major change from PPS6 relates to the determination of planning applications for main town centre uses. Whilst previously need was a fundamental consideration (alongside the sequential approach and impact), the assessment of need is now restricted to its role in plan preparation, as outlined under Policy EC1, including the development of robust town centre strategies. It also remains an important consideration in the interpretation and application of the sequential approach.
- 2.10 Policies EC10 to EC19 relate to development management, and includes the guidance set out in Policy EC14 that identifies the supporting evidence required for planning applications for main town centre uses. This includes two key tests for those applications for main town centre uses that are not in an existing centre, and not in accordance with an up to date development plan. This relates to the sequential assessment (Policy EC15) and the impact assessment (Policy EC16), the latter of which is required for retail and leisure developments over 2,500 sq. m gross floorspace (unless locally set thresholds indicate otherwise).
- 2.11 The requirements of the sequential assessment are well known, and are set out under Policy EC15.1 which requires that local planning authorities ensure all in-centre, and edge of centre sites are assessed with regard to their availability, suitability and viability, prior to the consideration of less central option. It also seeks to ensure flexibility in the consideration of sites, in terms of scale, format, car parking provision and scope for disaggregation.
- 2.12 Where required, the impact assessment set out in Policy EC16.1 states that a relevant application should be assessed against the following impacts on centres:
- § Impact on existing, committed and planned investment (public or private) on a centre or centres in the catchment area of the proposal;
 - § Impact on vitality and viability, including local consumer choice and the range and quality of the comparison and convenience retail offer;

- § Impact on allocated sites outside the town centre;
- § Impact on trade and turnover, with regard to current and future expenditure capacity up to five years from the time the application is made;
- § Scale of a proposal if located in, or on the edge of a town centre; and
- § Any locally important impacts on centres.

2.13 Policy EC10.2 is relevant to all planning applications for economic development. This requires consideration against the sustainability, accessibility, design, regeneration and employment implications of a proposal.

2.14 Policy EC17 provides the framework for the determination of planning applications for main town centres uses that are not in a centre and not in accordance with an up to date development plan. It states that an application should be refused where there is either non compliance with the sequential approach, or where there is clear evidence of a significant adverse impact in relation to any one of the impacts tests. Where there is no clear evidence that such a proposal would raise any significant adverse impacts, it advises that applications should be determined on the balance of impacts (positive and negative) alongside other material considerations and outstanding commitments.

2.15 Practice Guidance on Need, Impact and the Sequential Approach has been issued with PPS4. This sets out more detailed advice on assessing need, impact and the sequential approach and supports the implementation of national policy. The advice has been followed during the preparation of this retail study.

Ministerial Statement: Planning for Growth

2.16 On 31 March 2011, the Chief Planner wrote to all Chief Planning Officers in England to advise on the implications of the Ministerial Statement: Planning for Growth (23 March 2011) which focuses on the key role of planning in supporting sustainable economic growth and job creation. The Statement outlines a presumption in support of development where it will not compromise the key sustainable growth principles, and should seek to support enterprise and economic growth, including the need to support

economic recovery, and to ensure planning applications that secure sustainable growth are treated favourably, subject to consistency with PPS4.

Draft National Planning Policy Framework

- 2.17 The Draft National Planning Framework (July 2011) carries forward the thrust of the Ministerial Statement and outlines a presumption in favour of sustainable development. It focuses on planning for prosperity in terms of economic growth and the promotion of development. The emerging framework, as set out in paragraphs 76 – 80, retains the main thrust of PPS4 advice.
- 2.18 The emerging framework states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. It states that local planning authorities should, amongst other objectives, allocate a range of suitable sites to meet the scale and type of retail (together with leisure, commercial, community and residential development) in town centres, and states that it is important that retail (and leisure) needs are met in full and not compromised by limited site availability. This will require local planning authorities to undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites exist.
- 2.19 Paragraph 80 states that planning policies and decisions should assess the impact on retail (and leisure) proposals, including the impact of retail proposals on existing, committed and planned investment in centres, and the impact on vitality and viability, including local consumer choice and trade in the town centre and catchment area (up to ten years from when the application is made, as opposed to the five years identified in PPS4). Impact assessments for retail planning applications outside of town centres (and not in accordance with an up to date development plan) will be required over a proportionate, locally set threshold, or 2,500 sq. m where no local thresholds apply.

The Portas Review: An independent review into the future of our high streets

- 2.20 In December 2011, the Portas Review was published following the request of the Prime Minister to undertake a review of the high street and town centres

in England. The purpose of the review sought to identify what the Government, local authorities, businesses and others could do towards promoting the development of new models of prosperous and diverse high streets set against changes in retail trends over many years which have impacted on the high street.

2.21 The report recognises the vital role played by high streets and town centres in general although equally recognises the challenges that impact on the high street, including the growth of out of centre retail facilities particularly retail parks and supermarkets, online retailing, changing retailer offers and portfolios, and the impact of the economic recession. The overall Portas vision focuses on bringing economic and community life back into the high street and town centres although it recognises that there is no generic high street and therefore there can be no generic solution. The underlying aim seeks to broaden the scope and function of high streets, and encourage a broader mix of uses, such as housing, offices, sport, schools or other social, commercial and cultural enterprises to ensure the high street of the future becomes the hub of the community.

2.22 The report outlines 28 key recommendations for town centres which are grouped under five main categories as follows:

§ *to get town centres running like businesses*; focuses on the need for management of the town centre and the need to operate as a business in order to compete with the co-ordinated, planned and managed out of centre facilities. Recommendations include the establishment of 'town teams'; new Super-BIDs; legislation to allow landlords to contribute to their Business Improvement District; promote the development of markets, including the promotion of a National Market Day.

§ *get the basics right to allow businesses to flourish*; focused on changes to tax and business rates, regulation - including rents, the development control system and parking, and qualitative enhancements in the town centre to ensure unnecessary regulation to support new business.

§ *level the playing field between large and small retailers*; a mix of changes to national planning policy and corporate social responsibility, including a

moratorium on new out-of-town developments and strengthening of the town centre policy within the emerging National Planning Policy Framework, together with mentoring role of larger retailers to local business and independent retailers.

§ *define landlords' roles and responsibilities*; seeks to address the diverse ownership with high streets which impact on the achievement of objectives, and the need to promote the high street as a long term asset by investors. Recommendations include, amongst others, exploring disincentives to prevent landlords leaving units vacant and greater use of CPO powers by LPA's.

§ *giving communities a greater say*; seeks to promote greater public involvement in the planning system to ensure greater community input in plan making and to ensure the system is not dominated by a vocal minority.

2.23 Whilst not a formal policy document, this wide ranging review has raised the performance of town centres to the political level. It is anticipated the Government's response to the Portas Review will be reported in spring 2012.

3.0 HEALTH CHECK ANALYSIS

3.1 In order to assess the vitality and viability of the city, town and district centres, the study has undertaken a health check of fourteen centres. Regard has been had to the key headline indicators set out in Annex D of PPS4 although the level of background information varies on a centre by centre basis. In view of this, the health checks provide a baseline position and allow the opportunity for data to be added during the course of future monitoring by the JCS authorities.

3.2 For information, the indicators identified in Annex D (together with the sources of information adopted for the study) are summarised as follows:

- § Diversity of main town centre uses (by number, type and amount of floorspace); as available in published Experian Goad reports for the town centres of Cheltenham (October 2009), Tewkesbury (October 2009), Winchcombe (March 2008), and Gloucester (August 2010). This base data has been updated as part of the DPDS survey of each centre to ensure a 2011 baseline. The remaining JCS centres do not benefit from published data and have been assessed by DPDS surveys, all of which were undertaken in June/July 2011.
- § The amount of retail floorspace in edge of, and out of centre locations; identified from site survey.
- § The potential capacity for growth or change of centres in the network; addressed as part of the assessment of capacity and need.
- § Retailer representation and intentions to change representation; based on DPDS site survey, Focus reports and discussions with local commercial agents.
- § Shop rents; based on published Valuation Office information and discussions with local commercial agents.
- § Proportion of vacant street level property and length of time properties have been vacant; derived from the 2011 DPDS site survey and comparisons with historic information (as contained in the relevant Goad reports), supplemented with commercial information from local agents.
- § Commercial yields based on published Valuation Office information and discussions with local agents.

- § Land values and length of time key sites have remained undeveloped; addressed later in the report in assessing potential key sites.
- § Pedestrian flows; based on published data and survey observations.
- § Accessibility; derived from published data and survey observations.
- § Customer and residents views and behaviour; focused on published surveys and the household survey undertaken for the study.
- § Perception of safety and occurrence of crime; from published surveys and the household survey undertaken for the study.
- § Town centre environmental quality; based on survey observations and published data of residents and visitors surveys (relating to issues such as air pollution, noise, litter, graffiti, landscaping and open spaces).

3.3 The study has drawn on baseline health check information from previous evidence studies, and updated (where necessary) to provide a revised baseline position. Relevant key background documents adopted for the study include:

- § Gloucester Retail Study (2008)
- § Gloucester District and Local Centre Health check (2010)
- § Cheltenham Retail and Leisure Study (2006)
- § Tewkesbury Borough Vitality, Viability and Vulnerability Study (2008)
- § Tewkesbury, Winchcombe and Bishop's Cleeve Pedestrian Footfall Reports (2008, 2009, 2010)
- § Tewkesbury, Winchcombe & Bishop's Cleeve User Surveys (2009, 2010)

3.4 To ensure a comprehensive and consistent approach, health check assessments have been undertaken for a number of centres which do not benefit from any baseline data. In all cases, PPS4 compliant information is presented (where available) although the level of detail varies. This is indicated in the report and is intended to assist the JCS authorities in identifying information gaps for future research and monitoring purposes.

3.5 In accordance with the requirements of the study brief, the health checks undertaken for the retail centres of Tewkesbury Borough are intended to provide a baseline position for future monitoring of retail development.

- 3.6 A detailed health check assessment of each of the fourteen centres is provided in Appendix A. This section provides a summary overview for each centre.

Gloucester City

Gloucester City Centre

- 3.7 Gloucester city centre is characterised as a compact, modern shopping centre interspersed with attractive historic features including Gloucester Cathedral, Blackfriars and Greyfriars. The main retailing area is focused on the pedestrianised interchange of Northgate, Westgate, Southgate and Eastgate Streets and contains two covered shopping malls (Eastgate and Kings Walk) which are considered somewhat dated and in need of investment. Some of the City's historic commercial buildings also require investment in order to make them attractive to modern retail operational requirements. The centre contains a number of key regeneration sites within and adjacent to the PSA (Greater Blackfriars, Greater Greyfriars and Kings Square/Bus Station), whilst Gloucester Docks and Gloucester Quays offer alternative visitor attractions in close proximity to the centre. A number of emerging proposals in the central area are increasingly focusing attention in the city centre.
- 3.8 The Gloucester Quays Outlet forms a separate retail location outside of the city centre retail area. It forms part of the significant tourist attraction of the Docks and is aimed at a wide catchment area. The household survey indicates that it attracts significant levels of expenditure for local clothing.
- 3.9 At the national level, Gloucester was ranked 70th in the 2008 MHE Shopping Index. This is significantly lower than Cheltenham (25th) and other competitor centres in the sub region including Bath and Bristol. This ranking measure confirms the potential for improvement in the performance of Gloucester city centre which lags behind its sub regional competitors. Certainly the absence of any recent retail development in the city centre is acknowledged to have impacted on the attractiveness of the centre to retailers.
- 3.10 The city centre (as measured by Goad, 2010) supports over 121,000 sq. m of floorspace in total in approximately 480 units. In terms of retail uses, the 2011

survey identified 33 units (6.8% of total composition) in convenience retail use (below the national average of 9%), with the largest units focused at Sainsburys and Iceland. Provision will be improved with the opening of a small Tesco outlet near the bus station when the refurbishment of the existing units is complete. The centre also contains the indoor market (within the Eastgate Centre), the weekly farmers market at the 'Cross' and the 'Cherry and White' market at Kings Square.

- 3.11 The level of comparison retail uses accounts for 38% of total units in the centre (191 units out of 481). This is 3% lower than the national average and approximately 9% lower than Cheltenham. In total, comparison floorspace accounts for approximately 50,000 sq. m of floorspace. Provision is focused at Eastgate and Kings Walk Shopping Centres together with the pedestrianised sections of Westgate, Eastgate, Southgate and Northgate Streets. The Goad assessment of the comparison offer confirms a below national average representation in a number of sub categories, including female and general clothing. Respondents to the 2011 household survey stated scope for improvement in the range and quality of comparison shops in the city centre; this issue represented one of the major dislikes of the centre.
- 3.12 The 2010 Goad survey identified approximately 30% of all units as in service uses. This is lower than the national average (34.7%) and surprising given the administrative and tourist function of the city centre although the 2011 centre update identified a net gain of 11 units since the 2010 Goad survey.
- 3.13 The Goad survey confirms a limited mix of cafes and restaurants for a city of its size. Such facilities represent an important contribution to the vitality and viability of a centre although our survey observations also identified that many facilities are considered lower end national chains and there is a need for more mid to upper market restaurants. The results of the household survey further confirmed scope to improve the range and quality of the food and drink offer of the centre. At present, a concentration of facilities is largely focused at Gloucester Docks and Gloucester Quays Designer Outlet although new facilities are expected as part of Kings Quarter. A copy of the Goad report for Gloucester is attached at Appendix B.

- 3.14 In retailer representation terms, the city centre supports 168 multiple outlets, which accounts for 34.9% of all units in the city centre. This represents a high level of multiple retailer representation which exceeds the national average (30.49%). The strength of the multiplier offer in Gloucester is further confirmed by the presence of major retailers. Of the 31 major retailers measured by Goad, 24 are represented in the city centre. Notable exceptions are Next and TK Maxx. It is further noted that the Goad report does not take account of the Tesco (Metro) unit which is currently under refurbishment at Station Road, which will add to the number of major retailers in the centre. Debenhams occupies a large unit at the Oxbode whilst two Marks and Spencer units exist at Northgate and Southgate (the Northgate store will relocate to the former Woolworths unit on Eastgate Street in 2012).
- 3.15 By contrast, the level of independent provision is more limited and lower than that expected for a city the size of Gloucester. This could be attributed to a variety of factors such as the limited supply of new retail floorspace and shortage of modern units of suitable and available which can limit retailer representation together with commercial considerations, consumer expectations and the socio economic profile of the catchment area.
- 3.16 As at January 2010, Focus identified a total of 40 retailer requirements for Gloucester, which placed the city as the 67th ranked centre nationally in terms of retailer requirements. Over recent years, the level of retail requirements for the city increased substantially to a peak of 97 (January 2009) although this has since fallen back. Given recent economic conditions, it is unsurprising that retailer requirements have fallen although the position remains that Gloucester city centre continues to attract reasonable levels of retailer demand. It should however be noted that Focus data in relation to retailer interest needs to be interpreted with caution in that not all retailers will register interest, whilst others register general interest across a wide number of centres. It is however an industry accepted source of information and the only source which allows comparison between centres over time.
- 3.17 Local agents active in the city confirm that the prime Zone A rent in 2011 was £105/sq. ft although a number of agents report lower rents in the range £80-£90/sq. ft. This represents a fall over recent years (typically £125 - £130/sq. ft over the last five years, which peaked at a high of £145/sq ft in 2008/09). It

would appear that Gloucester has experienced a steady level of prime rental growth although a marked reduction in Prime Zone A rents has occurred over recent years.

3.18 Retailer demand for the city centre is reported as stable if somewhat low for a city of its size, with many requirements focused on the discount and lower end multiple retailers. There is growing confidence in the attraction of the city centre and that this will improve with the delivery of the Kings Quarter scheme. In addition, the pending take up of the former Woolworths unit on Eastgate Street by Marks and Spencer is considered important in strengthening the Eastgate Centre, which has also recently been subject to refurbishment works. The absence of new development in the city centre in recent years is stated by agents to be a major reason for lower levels of retailer demand, whilst for some agents the issue remains the perception of the city, particularly in securing retailer interest which has over recent years focused on Cheltenham.

3.19 The vacancy rate in the city centre (adopting the Goad city centre boundary) remains relatively high (86 units in June 2011), which accounts for 17% of total units. This is significant when compared to the national average (12.9%) although this represents an improvement when compared to the 101 vacant units (21%) measured by the Goad survey in 2010 which is encouraging. It is also recognised that an element of vacancy is likely attributed to the pending regeneration of Kings Square and ongoing economic conditions. Elsewhere in the centre, concentrations of vacant units exist at the more peripheral secondary retailing frontages although there is evidence of take up for service uses, particularly along Southgate Street and Kings Square. Evidence of take up and investment is further confirmed by the pending occupation of the largest vacant unit in the city centre (former Woolworths Store at 12-18 Eastgate Street) by Marks and Spencer.

3.20 Gloucester supports a large number of out of centre retail facilities, as confirmed by the Gloucester Retail Review (March 2008) which estimated that the amount of out of centre retail floorspace provision was over 76,000 sq. m. This exceeds the level of convenience and comparison retail floorspace in the city centre (as measured by Goad), even excluding the

Gloucester Quays Outlet (which forms part of Gloucester Docks). This has since provided an additional 26,000 sq. m of retail and food/drink uses.

- 3.21 Traditional out of centre retail warehouse provision is concentrated at a number of retail parks on Eastern Avenue, together with the Peel Centre, Westgate Retail Park and St Oswalds Retail Parks, which are located in closer proximity to the city centre. There are also a number of standalone retail units at different locations in the City.
- 3.22 Similarly, foodstore provision is largely out of centre with major facilities at Asda (Bruton Way), Sainsburys (St Ann's Way and Barnwood) and Tesco (St Oswalds). The Tesco foodstore at Quedgeley and Morrison at Abbeydale also form anchors for these district centres. Consent has also recently been granted for a Morrisons store at the railway triangle site off Metz Way together with an extension to the Tesco store at St Oswalds, although both are subject to call in.
- 3.23 It is considered the city centre performs as a relatively robust and healthy centre, and has shown good resilience in a difficult economic climate, including a marked reduction in vacant units. However underlying weaknesses remain. The absence of modern development (and investment) in the centre over recent decades (and the resultant inability to attract more anchor stores and higher quality stores) has resulted in a below national average composition of comparison units. This limited range and quality in the retail offer is identified as a major weakness by respondents to the 2011 NEMS Household Survey together with concerns over the unattractive environment. This is supported by information collated as part of the Gloucester Retail Study which identified similar concerns with regard to shopper attitudes and perceptions of the city centre.
- 3.24 The comparison (and particularly the fashion) offer is considered somewhat limited for a city of its size, (although the fashion offer is strengthened by the Outlet Centre at Gloucester Quays) whilst the lower level of retailer requirements and fall off in Zone A retail rents are considered by local agents to be an indicator of limited supply of modern retail units and a dated retail environment. However positive opportunities for change exist, particularly associated with the potential of the Kings Quarter scheme, which seeks to

transform the unattractive environment of Kings Square and deliver a new retail destination based on larger units (suitable and attractive for securing anchor and mainstream retailers) alongside an enhanced food/drink offer.

3.25 The city centre benefits from excellent public transport accessibility, via bus and rail. Whilst in need of modernisation, the bus station supports a comprehensive network of services whilst the railway station is subject to ongoing qualitative improvements. The Kings Quarter regeneration seeks to deliver a new, modern bus station as part of a transport interchange with the railway station and it is considered an integral element of the overall enhancement of the city centre as a retail and leisure destination. It also offers the opportunity for environmental improvement, particularly elements of 1960s style architecture which in parts detract from the other more attractive areas of the city centre.

3.26 In summary, Gloucester city centre offers an interesting and vibrant shopping centre which benefits from its historic past. Linkages with the Gloucester Docks (via Southgate Street) have been improved and have benefitted from environmental improvements and investment. The Kings Quarter redevelopment will be crucial in maintaining investment momentum in the city centre, and offers a significant enhancement to the north east area of the city centre (and its wider retail offer), to balance the draw of the significant areas of out of centre development which exist in the city. The fundamentals of a successful retail centre exist in Gloucester although there is need for more positive perceptions of the centre, environmental improvements and an enhanced retail offer. Gloucester city centre is, in our view, fundamentally sound in terms of vitality and viability but it suffers from a rather negative image, a poor environment in parts, and a rather unexciting retail offer. It is important in our view that these negative factors are addressed if the city centre is to prosper.

Quedgeley District Centre

3.27 The centre is located on the Bristol Road (B4008) just off the A38 and lies approximately 4 miles (6.4 km) to the south west of the city centre and 3 miles (4.8 km) from junction 11, M5. It comprises two distinct areas served by a central roundabout and Bristol Road and Severnvale Drive. The western area of the site is dominated by a large Tesco superstore, a small retail parade

together with a number of community uses. The east of the site supports a mix of large format retail units, an Aldi foodstore, a small retail parade and a pub restaurant.

3.28 The centre serves as a district centre but in many ways has the characteristics of an out of centre retail park based on large format comparison operators (Next, Matalan, Brantano). The quantitative analysis carried out as part of this study suggests a significant comparison goods turnover in the centre (approximately £12m, largely associated with the sale of clothing and footwear to Gloucester residents). Alongside these large units, the centre contains a retail parade which supports a range of small, independent retail and services uses. The centre is physically divided by the Bristol Road which together with the car parking, creates a dispersed centre which encourages travel by private car.

3.29 Notwithstanding this, the centre remains attractive to retailers (and has been subject to recent investment following the extension and refurbishment works at Tesco). It supports a good mix of uses, vacancies are limited to a single unit whilst the centre has a good level of representation from national multiples. Accessibility by car is good although this reflects its role as a principally car-based destination. Overall, users of the centre consider the centre to be satisfactory, particularly with regard to accessibility by car and parking arrangements, whilst the centre remains an important main food shopping facility for residents in Gloucester.

Abbeydale District Centre

3.30 The Abbeydale District Centre is located to the south east of Gloucester city centre and is situated within a large residential area with access from Heron Way via Glevum Way. The centre is dominated by a large Morrisons supermarket with a modern parade of five retail units (all occupied) to the south of the Morrisons store. An extensive area of car parking exists to the south and east of the store. In addition, the centre is located adjacent to a number of important community uses (surgery, sport and community centre, public house) and complemented by a number of services located at Commercial House (located outside the defined district centre).

- 3.31 The centre benefits from good accessibility (via car and bus services) and is well used. The household survey indicates good levels of satisfaction from local users of the centre although it is recognised the main use of the centre serves as a main food destination together with complementary retail uses and services.
- 3.32 It is considered the centre more than adequately provides for the needs of its users although the site is largely a car based destination. There is considered scope for enhancement of the pedestrian linkages with the adjacent community facilities to strengthen the opportunities for linked trips.

Out of Centre Provision

- 3.33 Notwithstanding the Gloucester Quays Outlet Centre, there is a significant amount of out of centre floorspace in Gloucester, located primarily at St Oswalds, Westgate Retail Park, the Peel Centre (currently subject of a planning application for the change of use of the cinema to retail) and Eastern Avenue. These are generally subject to conditions limiting the range of goods to bulky goods.
- 3.34 The newest and most successful of the retail parks is St Oswald's, with a major B & Q, alongside operators such as Comet, DJ Sports and Argos and various A2/A3/A5 uses. There are signs of a lack of investment in some of the other retail parks and free standing units. The major bulky goods chains are already represented in Gloucester and, with a history of vacant units even before the current economic downturn, there are indications that the supply of retail warehouse units in Gloucester may exceed demand.
- 3.35 The Council is likely to be faced with applications to relax conditions to allow a wider range of goods and/or the subdivision of units. The amount of floorspace subject to these conditions is substantial and a widespread relaxation of conditions would represent a threat to the vitality and viability of the city centre and to investment proposals in the centre. Retailing is a dynamic industry and it may be possible to amend conditions to allow new forms of retailing to operate from these units, but it is important in our view that any such applications are scrutinised closely and that conditions are not relaxed unduly to allow vacant buildings to be occupied.

- 3.36 The Gloucester Quays Outlet is aimed at a wider catchment area, with shopping as part of leisure activity and which operates as an additional visitor attraction alongside the Waterways Museum and other attractions. As discussed, it also attracts local clothing expenditure, particularly from the Gloucester zone where it accounts for approximately 8% of the clothing market (circa £7.6m) according to the NEMS household survey. The Centre is a significant investment for the City but has opened at a very difficult time for retailing and has struggled to secure occupiers at present. The Council are currently determining a planning application for a cinema at the Gloucester Quays Outlet based on a relocation of the cinema from the Peel Centre.

Cheltenham Borough

Cheltenham Town Centre

- 3.37 For the purpose of the study, Cheltenham town centre is taken as the area of the Goad report which is largely covered by the Local Plan Central Shopping Area (CSA), together with Montpellier and Lower High Street. The Local Plan confirms these three distinct sub areas as representing the shopping area of the town centre. Whilst the Goad report does not fully accord with the defined Central Shopping Area, this has no discernable impact on the overall conclusions on vitality and viability in the town centre.
- 3.38 Cheltenham town centre represents a key retail centre at the regional and national level. In terms of benchmarking, the 2008 MHE Shopping Index ranked Cheltenham town centre as 25th in the country, and also considered the centre to be of a 'Major Regional' tier. In the wider sub regional context of other 'Major Regional' centres, only Cardiff (21st) ranked higher than Cheltenham with Bristol and Bath ranked at 29th and 35th respectively.
- 3.39 The town centre is characterised by a historic and regency environment, particularly in the smaller, retail areas which form part of the wider town centre (such as Montpellier). The central area benefits from an overall pedestrian friendly shopping area, and is largely focused along High Street (pedestrianised in a number of distinct areas) together with Regent Street and Promenade. Two covered shopping centres exist in the centre, located off High Street; the Beechwood Shopping Centre and Regent Arcade. The centre has been characterised by six distinct areas:

- § Central High Street (includes the two shopping centres (Regent Arcade and Beechwood) and focus for the national multiples.
- § The Promenade - high quality retail uses set within an attractive environment.
- § North West High Street – the eastern part of which has been semi-pedestrianised, with only buses and service vehicles allowed.
- § Lower High Street – the area extending west of St Georges Square towards the railway bridge; discussed separately.
- § South East High Street – focus for national multiples and larger chain restaurants and pubs.
- § Montpellier – physically separated from the main retail area but offering a mix of specialist shops and services (discussed separately).

3.40 The town centre (as measured by Goad) identifies over 660 units supporting over 141,000 sq. m of floorspace. Within this, adopting the Goad survey base (as updated by the 2011 DPDS survey) identifies 37 units (5.5% of total composition) in convenience uses. This is low when compared to the national average of 9.23%. In particular, the number of butchers and greengrocers is low and the centre lacks a fishmonger altogether. A Farmer's Market is held fortnightly on the Promenade and the Henrietta Street Market sells some food.

3.41 Food retail provision in the town centre is largely focused on top up shopping at Marks and Spencer together with Tesco Metro, Iceland and Lidl. The nearest main food facility to the town centre is Waitrose (Honeybourne Way) which does not form part of the CSA but is located within the Core Commercial Area (CCA).

3.42 By contrast, the number of comparison units is significant and accounts for over 47% of the total composition of the centre. In total, over 317 comparison units exist in the centre and support over 79,000 sq. m of floorspace. This represents 56% of the total floorspace in the town centre. This level of comparison provision is typical of major centres with large catchment areas. The level of comparison units and floorspace is above the Goad national average for town centres of 41.89% and 47.35% respectively.

- 3.43 Given the strength of Cheltenham as a comparison retail centre, it is unsurprising that the centre has representation in all of the sixteen Goad comparison sub-categories. Fashion and clothing is well represented in the centre, with footwear, mens/boyswear, mixed/general clothing, and particularly womens/girls and childrens clothing all well above the national average. In total, these four fashion categories account for a third of total comparison units in the centre.
- 3.44 The role of Cheltenham as a service centre is confirmed by the high number of service units (228) although this is broadly comparable to the national average (34.78%). A significant number of restaurants, cafes, and fast food establishments exist, accounting for approximately half of all service uses in the town centre, although again this is considered comparable to the national average (15.7%).
- 3.45 The importance of Cheltenham as a shopping destination is confirmed by the high level of multiple retailer representation in the centre. In total Goad identifies 271 multiple outlets in the town centre which account for 40.69% of all units. This represents a very healthy level of multiple retailer representation and significantly exceeds the Goad national average for town centres of 30.49%. This is unsurprising since multiples are attracted by the large catchment populations of major centres. The strength of the multiple offer of the centre is further confirmed by the presence of 26 of the 31 major retailers identified by Goad. A copy of the Goad report for Cheltenham is attached at Appendix B.
- 3.46 Retailer demand is also strong with high levels of retailer requirements noted. In 2010, Focus identified a total of 70 retailer requirements for Cheltenham, which placed the town as the 31st ranked centre nationally in terms of number of retailer requirements. Local agents confirm a continued healthy level of retailer demand for Cheltenham, particularly from upmarket retailers, with most demand now focused on the Promenade. The lack of suitable sized units and poor unit configuration is considered an issue in the Promenade and in need of attention if retailer demand is to be met. Agents further reported good demand in the town from discount retailers, and to a lesser extent, from mid market traditional multiples.

- 3.47 Healthy retailer demand has positive implications for prime rents; local agents confirm a Prime Zone A of £170/sq. ft (focused on the Promenade) and £140 - £150/sq. ft on the High Street, which are both significantly higher than any local competitor centres. However, these headline figures have changed by location over recent years (circa 2005 onwards) with agents reporting a shift in the highest Zone A rents away from the High Street (circa £200/sq. ft - £210/sq. ft end 2005) to the Promenade (£140/sq. ft in 2005). The strength of the upmarket appeal of the Promenade is reflected in the sub 5% retail yields reported by local agents.
- 3.48 In addition to the large retail offer in the town centre, Cheltenham supports a leisure led scheme at the Brewery, located to the north of the North West High Street, but adjoining the Central Shopping Area. Anchored by a large cinema, the scheme supports a health club and food/drink uses together with a number of retail uses (including a number of large vacant units). The need for enhanced linkages with the town centre is recognised, which include the potential for redevelopment of the frontage to Lower High Street (refer to Section 6)
- 3.49 Out of centre comparison provision in Cheltenham is concentrated along Tewkesbury Road, which contains the Gallagher and Kingsditch Retail Parks. In addition, there is a large B & Q superstore at Golden Valley Retail Park (Hatherley Lane).
- 3.50 The majority of the main foodstores in the town are also located out of the town centre, with Tesco and Sainsbury located on Tewkesbury Road, Marks and Spencer Simply Food (Kingsditch Retail Park) and Sainsbury at Oakley Park. A new Asda superstore has recently opened at Hatherley Lane.
- 3.51 A Waitrose Food and Home store (combined convenience and comparison offer) is located on Honeybourne Way within the Core Commercial Area whilst Morrisons anchors the Caernarvon Way district centre.
- 3.52 The vacancy rate in the town centre has improved over recent years, falling from 100 units (over 15%) in 2009 to 80 units (11.9%) in 2011. This compares favourably with the national vacancy rate average of 12.9% and reflects continued good levels of retailer demand.

- 3.53 The town centre benefits from excellent accessibility, which is supported by good road links, a mainline railway connection (via Cheltenham Spa station located out of centre, approximately 1.5 miles to the west) and a comprehensive network of local bus services with the surrounding hinterland. This is supplemented by two park and ride schemes from the north and west of the town. Car parking is comprehensive with over 10 car parks providing approximately 2,600 spaces. However traffic circulation associated with the one way system and flow of traffic can impact on easy accessibility to the car parks for visitors arriving from the west (via junctions 10 and 11 of the M5) given that the majority of facilities are located to the north and east of the town. The NEMS household survey confirmed a broad satisfaction with accessibility issues although the adequacy of parking arrangements (and cost of parking) was identified as an issue of concern by some survey respondents.
- 3.54 Pedestrian and cyclist accessibility (and facilities) in the town centre is considered good although the Northern Relief Road and Inner Ring Road have a negative severance impact on those seeking to walk or cycle to the town centre. The improvement of the public realm and transport is an important aim of the Cheltenham Development Task Force, which includes the promotion of sustainable travel for the benefit of pedestrians, cyclists and public transport users, improvement of signage and access including simplified parking arrangements, and greater priority for pedestrians in the centre.
- 3.55 The health and performance of the centre is confirmed by the high levels of satisfaction expressed by users of the centre. Over 80% of respondents to the 2011 NEMS household survey (who identified Cheltenham as their main shopping centre) considered the range and quality of comparison shops (and service facilities) to be good/very good although the more limited convenience offer is reflected by lower levels of satisfaction. Respondents also considered the environmental quality of the centre to be high.
- 3.56 The attractiveness of the town centre is considered an integral part of the high environmental quality of the centre. This reflects a unique mix of historic Regency architecture, distinct sub-areas of the town centre (particularly in the

Promenade and Montpellier), well used public open spaces together with areas of soft landscaping with mature trees, well-designed street furniture, and public art. The centre is considered generally well maintained and benefits from private investment and Council commitment to provide a pleasant and attractive shopping environment. However, there are areas of the wider town centre in need of environmental enhancement to ensure the quality and attractiveness of the overall town centre is maintained for residents, business and visitors alike. The improvement of the public realm remains an important ongoing objective of the Cheltenham Development Task Force.

- 3.57 A number of key regeneration sites are identified in the town centre with the potential to support future retail led, mixed use development. Sites include Royal Well and the car park sites at Portland Street and North Place. These sites form a key objective of the Cheltenham Development Task Force. Other important town centre sites include land to the north and west of Beechwood Arcade, and Lower High Street, which offer future scope for qualitative improvements and provision of modern floorspace. Further commentary on these sites is provided in Section 6.
- 3.58 Overall, Cheltenham town centre is considered to be a healthy and well performing centre, which benefits from its shopping and tourist destination role, based on a retail offer of national importance. The centre also contains a number of distinct sub areas which contribute to the overall shopping and visitor experience.

Montpellier

- 3.59 Montpellier is located to the south west of the town centre and is not designated within the CSA but is located within the Core Commercial Area. It is also specifically defined as the Montpellier Shopping Area in the Local Plan. Montpellier does not form part of the town centre as defined by Goad but represents an integral element of the centre given its long established shopping role and distinctive offer.
- 3.60 It is considered a generally successful retail area which offers an independent led, niche and up market comparison retail provision not generally available in the town centre. Approximately half of all units (44 out of 89) are in

comparison uses whilst the centre also supports a healthy level of services (focused on restaurants and bars) which complement the shopping experience. It also contains a convenience store which appears to be well used.

3.61 There are signs that some of the shops are experiencing difficulty as a result of the general economic climate. The relatively high overall vacancy rate (13.5%) arises from the number of vacant units in the Courtyard, which could be attributed to low pedestrian flows and the specialist destination of the scheme. Local agents report a fall off in demand over the last 12 months and also raised issues related to low footfall, with the Promenade now identified as the preferred location for upmarket retail requirements. It is considered sites for further development and redevelopment are unavailable, although the high level of vacancy in the Courtyard offers a potential opportunity for reconfiguration.

3.62 The centre is located in relatively close proximity to the main town centre although there is a severance issue associated with the need to cross the ring road. Overall the centre complements the range of goods and variety of the town centre, and represents a prominent and positive asset to the town, particularly the Promenade which remains the upmarket retailer preference in the town. It is considered that any current weaknesses are likely attributable to the general economy and whilst there are considered areas for improvement, particularly in terms of signage from the town centre, the centre should retain and enhance its distinctive character derived from the specialist, independent retailers.

Lower High Street

3.63 The area is identified in the Local Plan as the Lower High Street Shopping Area and relates to the western fringe of the town centre beyond the Ambrose Street/High Street junction. The centre falls within the Core Commercial Area and lies immediately west of the CSA. The southern extent of Lower High Street (to Devonshire Street - south side, and to 377 Lower High Street, north side) is covered by the Goad report for the town centre and is included within the overall retail composition (and floorspace) summary of the town centre. To ensure a comprehensive overview of the entire 'town centre', a health check overview of the remainder of Lower High Street is provided.

- 3.64 The centre is considered remote from the town centre and serves a dual role as the local centre for the St Paul's area and as a location for specialist shops (both convenience and comparison) which are reliant on low rents. In total, 34 units are identified in the centre which falls outside the Goad area, of which 6 units are vacant.
- 3.65 Whilst the centre has suffered from a lack of investment over a long period, there are signs of recent investment and improvement stretching out from the High Street end which contributes to an improved impression of the southern extent of the shopping area. However this environmental quality is in sharp contrast to that found toward the south east.
- 3.66 There is considered a need for action to improve the centre, including the scope for improved links between the Brewery Centre and the High Street which may provide the opportunity for general improvement in the area. Although it is recognised that the fragmented nature of ownership is a major constraint, scope exists to review traffic and parking management, and a particular need for public realm improvements to ensure benefits that could be expected to arise from any future development of Phase 2 of the Brewery mixed use scheme. It is considered this would help to encourage further private investment along the street.
- 3.67 There is considered little prospect for significant improvement to the area beyond Poole Way, largely as a consequence of the volume of traffic levels. In view of this, it is recommended that the Lower High Street shopping area boundary is redefined to exclude this area.

Bath Road District Centre

- 3.68 Bath Road is the largest of the district centres in the Borough, and is located on a key arterial route into the town centre, approximately 0.6 mile (1 km) south of the main town centre. Retail provision is focused along Bath Road, from Kew Place in the north to the junction of Norwood and Leckhampton Roads, and extends slightly into Shurdington Road. The centre falls entirely within a Conservation Area and is characterised as a traditional linear high street of terraced shops (with residential over) interspersed with modern development.

- 3.69 The level of convenience and service offer in the centre is well above the national average and incorporates a Sainsbury Local store and a Co-op supermarket. The proportion of comparison uses is less (reflecting its proximity to the main town centre and its lower order function). In total, the centre supports 79 units, of which only one unit is identified to be vacant – a broad indicator of a healthy centre.
- 3.70 Whilst the size of the centre is relatively large, this does not appear to have impacted on the performance of the centre despite the vulnerability of many district retail centres in the current economic climate. The centre supports a relatively high number of independent traders which positively contribute to the offer and performance of the centre, and ensure a unique distinctiveness compared to many retail centres. It will be important to enhance and consolidate this independent representation to continue the success of the centre.
- 3.71 The overall environmental quality of the centre is considered good whilst customer perceptions of the centre, as evidenced from the 2011 Household Survey, indicate a broad level of satisfaction in terms of the range, offer and role of Bath Road. The centre benefits from good levels of accessibility whilst the linear configuration provides a defined and contained retail parade.
- 3.72 However there are a number of issues associated with traffic and there is good scope for environmental improvements given the limited planting, seating and cycle parking provision in the centre. Traffic in the centre does detract from its quality whilst pavements are considered narrow and crossing points are limited. On-street parking is also limited and busy which adds to congestion. It is considered opportunities to improve the availability of convenient, cheap/free car parking in the centre could be explored. To address these issues, a County Council highway safety scheme and parking review is underway, together with a local resident led initiative to deliver environmental improvements.
- 3.73 Overall, Bath Road is considered a well performing, busy and attractive retailing centre offering a number of national retailers and a large number of independent retailers. The review of parking and traffic movement, coupled

with environmental enhancements will help to further strengthen the district centre.

Coronation Square District Centre

- 3.74 Located 1.5 miles (2.5km) to the west of the town centre, Coronation Square is accessed from Princess Elizabeth Way which provides an important linkage between the A40 and A4019. The centre used to provide a local centre for residents to the west of the town centre, particularly for the residents of Hesters Way but over recent years has suffered a loss of function with the advent of larger out of centre foodstores. The centre is characterised as a 1970's purpose built shopping precinct with retail units at ground floor level and one/two storey development over the units, and is considered in urgent need of modernisation.
- 3.75 Given its proximity to larger foodstores, the retail element of the centre is now considered too large for its current function. The centre is recognised as in need of regeneration and the Cheltenham Development Task Force is considering this.
- 3.76 Coronation Square has been subject to developer interest over recent years to redevelop the centre which may in part account for the current health and performance of the centre in terms of vacancy and business confidence. The centre is clearly struggling and does not display a healthy level of vitality and viability. Whilst the multiple retailers (e.g. Lloyds Pharmacy, the Co-op and Greggs), and the discount convenience retailer (Farmfoods) act as key attractors, the vacancy rate and, in particular, the level of long term vacant units, clearly demonstrates a low level of business confidence in the centre.
- 3.77 The number of vacant units in the centre account for almost half (45%) of all units, with 10 additional vacant units noted since the 2006 Retail Study. It is recognised that the uncertainty associated with the regeneration of the centre and the implications this has for leases (and term length) is likely to have contributed to the overall increase in vacancy levels.
- 3.78 Other issues include the enclosure of the centre by a number of busy roads which inhibit easy and convenient pedestrian links, whilst the overall environmental quality and appearance of the centre does not contribute to its

attractiveness. However, the proximity of the centre to the Gloscat campus offers good opportunities to improve trade but this will require an improved retail offer and enhanced pedestrian linkages, coupled with an improvement in the vehicular access and parking in order to contribute to the success of the centre. At present, the walled car parking arrangements to the rear does not benefit from natural surveillance and does not appear well used.

- 3.79 In summary, it is considered the centre has lost a substantial part of its retail function for the local catchment. There is a clear need for action to reduce the level of retail floorspace and particularly the number of retail units in the centre, in order to help attract a larger foodstore, which would act as an anchor, and to encourage the introduction of complementary new uses, such as residential and leisure uses.

Caernarvon Road District Centre

- 3.80 The Caernarvon Road District Centre is the smallest of the Borough's district centres in unit terms. Located to the south of the town centre, it is situated within a large, modern residential area. It is accessed from Caernarvon Road, which itself is linked to Uphatherley Way which forms a distributor road around the southern edge of Cheltenham. The centre is dominated by a large Morrisons foodstore and also supports a small row of shop units to the north of the foodstore. A large area of surface level parking exists to the front of the units and the defined centre also contains a pub and other community uses in the centre.
- 3.81 The superstore has recently been extended which will consolidate its role and offer. The centre is easily accessible by car with significant passing trade and appears well used. The main retail area is assumed to be privately owned and in our view there is little opportunity or any need for significant change with the exception of improved pedestrian links to the community uses.
- 3.82 It is considered the centre has the potential to be most affected by the recently opened Asda store at Hatherley Lane in terms of trade diversion and in view of its centre designation, the impact on its vitality and viability should be monitored, primarily with regard to the units shops.

Tewkesbury Borough

Tewkesbury Town Centre

- 3.83 The largest shopping centre in the borough, Tewkesbury is an historic market town located approximately 11 miles to the north of Cheltenham. It serves a more localised catchment than Gloucester and Cheltenham, operating as the main focus for food shopping in the north of the study area with residents looking to the larger towns for much of their comparison shopping needs. The Rivers Severn and Avon converge at the town and the town centre retains an historic character with the retail area focused on High Street together with the northern section of Church Street and the western extent of Barton Street. The primary retail area is focussed towards the northern end of the High Street where pedestrian access from the car parks off Oldbury Road is most convenient. The centre also serves the Ashchurch/Northway area and a large rural hinterland.
- 3.84 The centre contains 188 units which in retail composition terms (by outlet and floorspace) is considered broadly comparable to the national average with a good range and diversity of retail uses. In terms of convenience retailing, the DPDS survey identified 17 units with the main supermarket offer in the centre provided by Tesco Metro and Co-op. This accounts for 9% of total units and is comparable with the national average of 9.25% as identified by Goad. Within the convenience category, there is an above national average representation in butchers, bakers, grocers/frozen foods and, 'greengrocers and fishmongers' sub category (although the reality is the town does not have a fishmonger). By contrast, off licences, and particularly convenience/CTN are underrepresented.
- 3.85 A Marks and Spencer Simply Food outlet has recently been lost from the High Street although this is likely to have been more the result of company-wide policy. It is however noted that a Simply Food outlet operates at a forecourt shop on Ashchurch Road, outside of the town centre on the A46.
- 3.86 The main foodstore for the town is a Morrisons store, located approximately 750m from the town centre on the Ashchurch Road whilst an Aldi store is under construction on Gloucester Road. At the time of the 2011 survey, there

had been no net change in the number of convenience uses since the 2009 Goad survey of the town centre.

- 3.87 A copy of the 2009 Goad report for Tewkesbury town centre is attached at Appendix B.
- 3.88 In comparison terms, the centre supports 86 units (2011 DPDS survey) which account for 45% of the overall composition of the centre which is higher than the Goad national average of 41%. In floorspace terms, and adopting the 2009 baseline Goad figures for the town centre, comparison floorspace accounted for 44.3% of the centre which is lower than the Goad national average. However, since 2009, it is anticipated that an increase in comparison floorspace has occurred in the town centre given the net increase in comparison uses identified by the 2011 survey.
- 3.89 With regard to the representation of the comparison sub categories, two are absent from the centre (men and boy's wear, and variety, department and catalogue). The level of clothing in the town is considered below average, with three of the four Goad sub categories (footwear/repairs, mixed & general clothing, and men/boy's wear) either below or absent when compared to the Goad national average. This lack of clothing offer is confirmed by our site survey with national multiple representation limited to Dorothy Perkins and M & Co. Other under-represented comparison sub categories in the town centre include gifts, china, glass and leather good; sports/toys/hobbies; and cars/motor accessories. By contrast, the centre has an above national representation in furniture/carpets/textiles, chemists/toiletries/opticians and charity/pet/others.
- 3.90 There is no significant out of centre comparison goods provision in the town although a number of trade counter units exist at the Tewkesbury Business Park and Bredon Road, which are focused on the DIY market.
- 3.91 The 2011 DPDS survey identified 59 units in service use, accounting for approximately 31% of the total number of units. This is slightly below the Goad national average of 34%. The town centre also supports a number of important leisure and cultural uses which contribute to the vitality and viability of the centre, including the Roses Theatre and the library on Sun Street. The

tourist attractions of the town, including Tewkesbury Abbey and Tewkesbury museums and visitor centre are also important and contribute positively to the overall performance of the centre.

- 3.92 However, the food and drink offer is considered limited, particularly given the tourist role of the town. This position is confirmed by the 2011 household survey and 2008 Vitality Viability and Vulnerability Survey which both indicate low satisfaction amongst residents with the leisure and entertainment facilities when compared to other facilities in Tewkesbury.
- 3.93 Local agents report a stable if low level of retailer demand for the town, focused on local and small multiples requirements with the general consensus there is a limited demand from the national multiple retailers. Prime Zone A rents are reported to be circa £40/sq. ft (source: local agents) which is broadly comparable with headline rental evidence over recent years confirming stable prime rents.
- 3.94 Within Tewkesbury town centre, the vacancy rate has improved since the last centre survey, with 24 vacant units identified at the time of the DPDS survey compared to 26 units measured at the time of the 2009 Goad survey. This represents a vacancy rate reduction from 13.5% to 12.5%, which is marginally below the national average measured by Goad (12.9%) and is considered positive in view of the difficult economic conditions facing retail centres.
- 3.95 Tewkesbury is considered an attractive historic centre, characterised by a mix of timber framed Tudor and Georgian buildings interspersed with more modern development which in places does not seem sympathetic to the historical character of the centre. The overall environmental quality of the centre is considered good, particularly in relation to the overall shopping environment (as confirmed by the 2009 user survey and 2011 household survey). However, there are issues to address and a need for improvement with regard to town centre traffic and congestion. This is confirmed by DPDS observations, results of the aforementioned resident's surveys, and designation of the High Street as an Air Quality Management Area.
- 3.96 As an historic market town, it is unsurprising that the town centre is largely characterised by small retail units although this has implications for attracting

the requirements of modern retailers. Modern unit provision is currently largely focused to the north of the High Street at Bishops Walk although it is apparent that for its size, the town does not contain many multiple retailers. In part this contributes to the attractiveness of the centre although from an investment perspective, the ability to accommodate national multiple retailers forms part of maintaining the vitality and viability of centres. In this context, the town centre benefits from a number of potential development sites, which offer good long term opportunities to extend the PSA. While the lack of retailer multiples must be seen as a weakness, the independent sector is an attractive feature of the town and includes a number of very high quality shops which are important in attracting people to the town centre.

3.97 Whilst the centre is considered broadly healthy in vitality and viability terms, there is no doubt that the comparison shopping role of the town for its local population, as with many market towns, has faced significant competition over recent decades from larger centres supported by the growth in car ownership and changing retailer trends. As a consequence, the town provides for more limited comparison needs given that a wider range and choice of comparison offer is provided in the larger centres in close proximity to Tewkesbury, and as a result, the town has come to rely more on tourism. It is considered that the opportunities associated with its riverside location and enhanced access to the town centre could further contribute to the role and performance of the centre.

3.98 The proximity of Cheltenham and Gloucester (particularly for comparison retail), necessitates that Tewkesbury consolidates its role as a market town which meets the immediate needs of local residents but which also offers a distinct and attractive experience for visitors based on its historic environment and the riverside.

Bishop's Cleeve

3.99 Bishop's Cleeve is located 3 miles to the north of Cheltenham, and 5 miles to the west of Winchcombe and represents the second largest settlement in the Borough. The retail centre is comprised of three distinct and compact blocks focused around Church Road. The largest designated area is located to the south of Church Road (anchored by Tesco and the modern purpose built units fronting Church Road), whilst another distinct retail area is located to the

north of Church Road. A smaller self contained retail area exists at the junction of Church Road and School Lane. In total, the centre supports 51 units. In addition, a small parade of shops (7 units) exists at The Green, located to the south of the aforementioned retail areas, off Bishops Drive and Tobyfield Road.

- 3.100 The settlement provides an important retail centre (totalling 51 units as measured by the 2011 DPDS survey) for local residents, including those on the northern side of Cheltenham. The centre provides a large, convenience and service led facility, which is principally focused on a large Tesco and supporting car park which acts as the main car parking facility for the centre. The centre also supports a good diversity of smaller convenience uses, including a number of specialised, independent retailers which add to the attractiveness of the centre. Similarly, our survey of the centre confirmed broadly healthy levels of comparison provision for a centre serving a local function, although the proximity to Cheltenham has implications for the extent of the comparison offer. Service provision is also considered good for the size of the centre in supporting the needs of the local population and surrounding hinterland.
- 3.101 Low levels of vacancy confirm a healthy centre in vitality and viability terms. At the time of survey in June 2011, three vacant units were identified, which comprise 5.8% of total retail composition. This is approximately half the Goad national average of 12.9%.
- 3.102 Bishop's Cleeve represents a modern centre which is considered functional and performs a key local role although it is estimated to be overtrading in convenience goods (discussed in section 4). Our observations of the retail centre combined with previous survey evidence as contained in the Vitality, Viability and Vulnerability Study confirm a well used centre, primarily for convenience purposes, although the generally limited provision of restaurants is considered a weakness. However, proximity to alternative facilities in Cheltenham must be recognised in this context. The 2011 household survey confirmed a general satisfaction with the facilities available in the centre and its performance as a retail centre.

- 3.103 The ability of the existing Bishop's Cleeve centre to accommodate physical expansion is considered relatively limited. Equally, large scale development could offer the opportunity of relieving pressure on the existing centre but this would need to be assessed in relation to individual proposals.

Winchcombe

- 3.104 Winchcombe is an historic market town, located in the east of the Borough within the Cotswolds, lying midway between Broadway and Cheltenham (9 miles to the south west), and 14 miles to the east of Tewkesbury. The retail centre is focused along the High Street together with the southern extent of North Street and the southern area of Hailes Street with the prime frontage focused on North Street, principally in proximity to the Co-op store. Within the town centre, there is limited on street parking although the town benefits from a significant tourist attraction at Sudeley Castle, which hosts special events through the summer, and as a walking centre for the Cotswolds.
- 3.105 The town is relatively isolated and not located on the strategic road network. Tourism is considered an important influence on the town given its location within the Cotswolds (and Sudeley Castle), which helps to support a high quality offer, dominated by independent retailers, including restaurants, antiques and fashion shops. Winchcombe represents an important local centre (60 units, DPDS 2011 survey) for a rural area with little other retail provision. As a consequence, the town is considered a relatively successful centre which benefits from its role as a tourist centre. This ensures that the level and mix of retail offer is wider than would be expected in a town serving a local population only.
- 3.106 The changes in the nature of shops over the last three years (comparing the 2008 Goad and 2011 DPDS surveys) suggest that the tourism role is becoming more dominant. The strength of the centre is reflected in the low levels of vacancy (4 units totalling 6.6% as measured in the 2011 survey) together with evidence that good demand exists for the larger units in the centre as evidenced by the relocation of a number of established retailers within the town between 2008 and 2011. A copy of the Goad report for Winchcombe is attached at Appendix B.

3.107 The centre is characterised by a historic and attractive central core which supports a range of small independent retailers. The role of tourism in the town is important and is reflected in the range of service and tourist related uses. The niche offer available in Winchcombe is considered a distinct and attractive feature, particularly when many centres are considered clone towns. The environmental quality of the centre, based on its historic townscape, is a major attribute of the centre, but the narrow streets and pavements together with traffic levels reduce the environmental quality to some extent. This historic character limits opportunities for future development whilst unit configuration, front servicing and narrow roads represent constraints for modern retailer requirements. The limited provision of parking is an issue.

Brockworth

3.108 The settlement is located to the east of Gloucester, and to the south east of junction 11A of the M5. The Brockworth bypass (A417) runs to the north of the settlement with the A46 abutting the settlement to the south east. The large employment site at Gloucester Business Park adjoins the western boundary of Brockworth. A Tesco superstore (recently extended) exists off Delta Way, in the business park, to the north west of the settlement whilst new retail units have come forward as part of the Whittle Square development.

3.109 Brockworth contains three defined Retail Areas, with the main concentration and diversity of offer focused at Court Road, in the centre of Brockworth and to the north of Ermin Street. The 2011 DPDS survey confirmed a well performing centre for its size, which is reflected in the diversity of uses, including a high level of convenience offer (4 units, anchored by a Co-op store), the high level of national multiple representation (4 out of 12 units) and the overall modern, quality environment. However there are a number of issues, principally related to the indirect access by car, limited parking and the need for enhanced signage to the centre given its limited visibility.

3.110 Additional retail provision is provided at Abbotswood Road, a smaller centre to the south of Ermin Street, anchored by the Co-op store. The centre has a number of vacant units, which in our opinion is compounded by the configuration of the inward facing shops and the proximity to the prominence

of the service yard. Parking is also considered poor whilst the overall external environment of the centre offers scope for improvement. A small parade exists at Boverton Road (north west of Court Road) although this is dominated by service uses and no longer effectively performs a retail role. There would appear little purpose in protecting this area as a retail location.

Churchdown

- 3.111 Located midway between Gloucester (to the west) and Cheltenham (to the east), Churchdown is split by the A40, with the southern area of the centre bounded between the M5 and A40. Junctions and 11A of the M5 are in close proximity to the centre, and linked by the A40 respectively.
- 3.112 The Retail Areas at Churchdown comprise three distinct areas at St Johns Avenue, and two smaller retail areas at Blacksmith Lane and Church Road.
- 3.113 The main centre at St Johns Avenue provides a good mix of uses and essential services, which is anchored by a Co-op foodstore together with a number of other convenience facilities including a bakers and newsagents. The centre also includes a Post Office, bank and everyday services, and is considered to represent a well performing centre with good quality retailers, including national multiples. The size and flexibility of units is considered important in securing a number of the occupiers.
- 3.114 The southern retail area is focused on Blacksmith Lane and Church Road, and is based on a convenience led offer with supporting services. Neither centre has any vacant units which indicate that retailer demand is relatively stable in both centres. Planning permission has recently been granted for a foodstore (Tesco) on the site of the former Hurrans garden centre on Cheltenham Road East, close to the St Johns Avenue centre and this may have implications for the performance of the retail areas.
- 3.115 Given the geographical proximity to the major centres of Gloucester and Cheltenham it is unsurprising that the facilities at Churchdown provide a local convenience and service led offer.

Innsworth

- 3.116 Innsworth is located to the north east of the Gloucester urban area, and is located to the north of the A40 and B4063. The Retail Area is focused on a parade of shops at Blackbird Avenue which serves a large residential area and provides a local shopping facility.
- 3.117 The small centre (6 units) is focused on a services and convenience led offer. All units are fully occupied and the centre is effectively anchored by the Premier Foodstore. The centre does not benefit from any comparison uses although this is unsurprising given its localised role and function.

Northway

- 3.118 Located to the east of Tewkesbury (4 miles) and the M5 (junction 9), the local centre is surrounded by established residential areas together with large scale employment uses focused on industrial estates accessed from the A46. The centre represents a local shopping centre which serves a large residential area focused on Northway and Ashchurch, and is comprised of a purpose built neighbourhood facility (5 units), anchored by a Co-op foodstore.
- 3.119 The centre appears to operate effectively as a top up centre, primarily through the Co-op foodstore (which also acts as the Post Office) although it also supports a number of essential uses, including a pharmacy. Access to the centre is good and there are good levels of parking. The centre provides for local top up shopping needs but it is considered the local facilities are limited in serving the Northway/Ashchurch area given the scale of surrounding residential and employment areas, even when account is taken of the Marks and Spencer Simply Food forecourt shop on the main road.
- 3.120 The opportunity to extend the existing retail centre at Northway is limited reflecting the nature of surrounding uses and the need for comprehensive redevelopment, which would need to consider parking provision to the rear of the centre, and the public house and open space to the front of the parade. It remains that the existing centre performs an important role but is considered insufficient for the population it serves. This is compounded by the absence of any other retail provision which is effectively limited to the Morrisons foodstore and Tewkesbury town centre. As part of the JCS process, it is considered the Council should investigate opportunities to improve the level

of retail provision for the Ashchurch and Northway area particularly if major residential development is considered appropriate for the area. This should focus primarily on meeting convenience goods needs.

4.0 QUANTITATIVE ASSESSMENT

4.1 Policy EC1 of PPS4 outlines the key role of an up to date and sound evidence base in order to plan positively for town centre uses. At the local level, the guidance states that the evidence base should be informed by an assessment of the need for land or floorspace for main town centre uses over the plan period – in this case retail. This section provides an assessment of the quantitative and qualitative need for retail floorspace for convenience and comparison retail uses over the plan period, which subsequently allows for advice on the capacity of existing centres to accommodate new retail development (if needed), and whether existing sites are suitable, or new sites are required, to accommodate any identified need.

4.2 The quantitative analysis of future retail floorspace requirements is based upon the telephone survey of 1,200 households carried out for this Study in June 2011. A step by step approach to estimating the capacity for additional floorspace, as advocated in the PPS4 Practice Guidance has been adopted based on the following defined steps:

- § Step 1: Define the study area and zones within it;
- § Step 2: Forecast the population in the study area;
- § Step 3: Identify the retail expenditure per head in the base and forecast years;
- § Step 4: Calculate the total expenditure available in the study area;
- § Step 5: Assign the expenditure to centres as turnover according to the result of the household survey;
- § Step 6A: For convenience goods expenditure, compare the estimated turnover for foodstores against a benchmark based on company average sales density (turnover per sq. m) to estimate the current trading performance of the foodstores;
- § Step 6B: For comparison goods expenditure, calculate the share of total comparison goods expenditure that the centre attracts (the market share); and
- § Step 7: For future years, calculate the turnover for each centre (separately for convenience and comparison goods) by applying the market shares to the revised estimate of convenience goods expenditure in the study area,

taking account of population and expenditure growth. This is then compared with the available floorspace in the centre, taking account of new retail floorspace likely to be created from existing planning commitments, and the increase in the efficiency with which sales floorspace is likely to be used, to identify any need for additional floorspace.

- 4.3 The definition of the study area and the data adopted is described in relation to these stages. Stages 1 to 4 are common to both the comparison and convenience goods assessments and are treated jointly.
- 4.4 The study area is shown as Plan 1 in Appendix C and the capacity tables are attached at Appendix D.
- 4.5 The price base adopted throughout this study is 2009.

Step 1: The Study Area

- 4.6 The study area was defined by examining the household survey results used in the 2006 Cheltenham Retail Study, the 2008 Gloucester Retail Study Update and the 2008 Vitality, Viability and Vulnerability Study of Tewkesbury, Winchcombe and Bishop's Cleeve. These surveys provided a good understanding of where the main towns drew their shoppers from. The 2006 survey for the Cheltenham area was based on an extensive catchment designed to include most of the town's comparison goods shoppers, and also covered Gloucester. The 2008 survey for the Gloucester area indicated that the centre draws trade from a wider area to the south and west of the city, and the Cheltenham base study area was therefore expanded to include zones in the Forest of Dean, and the Stroud/Dursley area.
- 4.7 As shown in Appendix C, the study area extends from Coleford in the west, to Cirencester in the south-east, and Moreton-in-Marsh and Evesham in the north. It excludes Ross-on-Wye, Malvern and Worcester. The zones are based on post codes given that this is compatible with the way the local expenditure data is provided by Experian.
- 4.8 The study area is clearly larger than the JCS area, and not all the expenditure generated in the area will be spent in the JCS centres. In fact the study

results indicate that about 53% of the comparison goods expenditure in this area is spent in the JCS centres – overwhelmingly in Cheltenham (30%) and Gloucester (21%).

- 4.9 Convenience goods expenditure tends to be much more local and little is spent outside the zone of origin and adjacent zones. However, the non-JCS centres within the study area, such as Cirencester and Stroud, will also attract expenditure from outside the study area, and the estimates of turnover indicated in this study should not be used as reliable estimates for these non-JCS centres.
- 4.10 A copy of the household survey results which has informed this retail study is attached at Appendix E.

Step 2: Study Area Population

- 4.11 The population for each zone is shown at Table 1 (Appendix D). The 2009 base population is taken from local population and expenditure data provided by Experian (in 2009 prices).
- 4.12 The population forecasts are based on the appropriate district rate of growth as derived from the latest Gloucestershire County Council forecasts, “Housing Trends Analysis and Population and Household Projections Final Report (May 2011). The exception is in Zone 8 where the latest (2008 based) ONS forecasts for Wychavon District have been adopted.

Step 3: Study Area Expenditure per head

- 4.13 The retail expenditure per head figures for convenience and comparison goods are shown in Table 2 (Appendix D). For comparison goods, expenditure for ‘bulky’ and ‘non-bulky’ is shown separately. Table 3 (Appendix D) shows comparison goods by defined goods categories and is used to estimate the turnover of the JCS centres from the household survey results. The 2009 figures are derived from the Experian local population and expenditure data (in 2009 prices).
- 4.14 For forecasting, the 2009 Experian figures have been projected forward and calculated on the basis of the Experian’s Retail Planner Briefing Note 9 (September 2011), based on the contents of Table 1.

Table 1: UK Retail Spend per head 2007- 2027 - % Growth

Vol Growth per head %	2007	2008	2009	2010	2011	2012	2013	2014 to 2018	2019 to 2028
Convenience Goods	0.4	-1.4	-2.4	0.8	-0.3	-0.4	0.5	0.5	0.6
Comparison Goods	2.7	3.9	-0.5	0.1	0.5	1.6	2.1	3.0	3.0
Retail Spend	1.9	20	-1.1	0.3	0.2	0.9	1.6	2.2	2.3

Source: Experian Retail Planner Briefing Note 9.1 (September 2011)

4.15 The figures in Table 1 are based on Experian's Econometric Model for the UK Economy and represent the central forecast from a range that provide assumptions relevant to economic growth. For the period from 2029 to 2031, the rates for 2019 - 2028 have been used. The effects of the recent recession can clearly be seen in the figures for the period 2007 - 2010. These forecasts indicate less of a dip in the recent past than previously estimated, but a slower recovery, and slower long-term growth for spending on convenience goods. The forecast for comparison goods spending indicate a deeper recession in 2011 and 2012 than previously forecast, but very slightly higher levels of growth in the longer term.

Step 4: Total Study Area Retail Expenditure

4.16 The total retail expenditure available in the study area for convenience and comparison goods is calculated in Tables 4 & 5 (Appendix D). These are the product of Tables 1 and 2, and Tables 1 and 3.

Convenience Capacity

Step 5: Assignment of Expenditure to Centre as Turnover (Convenience Goods)

4.17 Convenience expenditure is split into main food and top-up expenditure on the basis of a 70/30 ratio. In Table 6 (Appendix D), the main food expenditure is distributed to the main stores and centres according to the results of the

household survey (see Question 19 of the NEMS survey, Appendix E). In Table 7, the top-up expenditure is likewise assigned to the stores and centres, and the results are combined in Table 8 to give the estimated turnover of the food stores from the sale of convenience goods.

Step 6A: Benchmark Turnovers and Current Performance

- 4.18 In Table 9 (Appendix D), the estimated turnover of the stores calculated in Table 8 is compared with “benchmark” turnovers of stores based on the average performance of the appropriate retailers. The floorspace is taken from earlier studies and is updated from planning permission records where new floorspace has been constructed. An allowance needs to be made for the floorspace used for the sale of comparison goods and this is also based on the Verdict Grocery Report where information is available, on data submitted by applicants in relation to planning applications, and on any conditions restricting the range of goods on stores within the JCS area. The average sales densities (turnover/sq. m) are calculated from the Verdict Grocery Report making due allowance to include VAT and exclude petrol sales from the turnover figures.
- 4.19 The benchmark turnover has been calculated as the product of the convenience goods sales floorspace and the company average sales density. This can then be compared with the turnover estimated from the survey results calculated in Table 8 of Appendix D. Care is required in interpreting such figures.
- 4.20 Firstly, the survey derived turnover estimate is subject to sample variation. This is inevitable in using any sample based data and the use of a different sample of the same population would produce different estimates. The results are more reliable when aggregated to the main town level. Secondly, trading above or below the average for the company does not indicate whether a store is profitable or not – this depends on individual store costs and these vary with the level of turnover and are controlled by the retailer.
- 4.21 With these provisos, the tables indicate that in Cheltenham the existing larger foodstores are, in aggregate, under-trading by approximately £24m, and those in Gloucester are over-trading by about £25m. As a check on this general finding, the amount of convenience sales floorspace in Cheltenham

and Gloucester has been compared with the amount of expenditure in the immediate zone. This indicates that for every sq. m of convenience floorspace in Gloucester, there is approximately £9,400 of convenience goods expenditure, and in Cheltenham approximately £8,400 (given that Cheltenham is better supplied with convenience floorspace).

- 4.22 In Tewkesbury, the Morrisons store appears to be substantially over-trading, the Tesco Metro over-trading to some extent and the Co-op significantly under-trading. Overall, there is a surplus of approximately £0.88m of expenditure over benchmark floorspace. Elsewhere in Tewkesbury Borough with regard to Bishop's Cleeve and Winchcombe, there appears to be substantial over-trading in the base year when compared with the benchmark capacity.

Step 7: Capacity in Future Years

- 4.23 Tables 10 – 14 (Appendix D) estimate the need for additional floorspace in each of the centres taking account of population and expenditure growth. Starting with the total expenditure available in the study area (in each of the forecast years), an allowance is first made for non-store retail trading (or special forms of trading as it is commonly known). This comprises, primarily, mail order, catalogue and internet sales.
- 4.24 The household survey identifies that about £32.47m is spent on convenience goods through internet purchases – about 2.6% of the total expenditure. This is substantially below the national average of about 6.4% in 2009. Experian (Retail Planner Briefing Note 9) notes that a high proportion of internet convenience sales are through stores, and recommends that, in estimating floorspace requirements, only 50% of internet sales should be excluded. This advice has been followed, and the reduction for non-store sales is therefore £16.23m.
- 4.25 Internet shopping is increasing very quickly. Experian estimate that for all goods it will increase from 10.3% in 2010 and stabilise at about 15.4% from 2017 onwards. For convenience goods, Experian forecast that the market share of internet sales will reach about 12.3% by 2021 and increase to 14% by 2028. It is assumed that the study area will catch up by 2021 and will follow the national forecast thereafter. Allowing for the exclusion of 50% of

non-stores sales from the available expenditure, means that 7% of the total expenditure should be deducted by 2028.

- 4.26 The survey estimated turnover of stores has been used to calculate the market share in the study area. Market shares have been held constant for future years for this exercise. This is a neutral, baseline assumption, from which different planning policy initiatives can be examined. In relation to convenience retailing, the highly local nature of food shopping would probably limit the options available in any case. The market share is used to calculate the turnover potential for each centre in future years as the total expenditure increases with population and expenditure increases. Some of this will be met by increases in the amount of turnover the existing floorspace can handle, and some by new floorspace which already benefits from planning permission.
- 4.27 The turnover accommodated in existing floorspace is likely to increase as sales floorspace is used more efficiently by retailers, leading to higher sales densities. In view of this, the study has adopted the sales density increases recommended by Experian. These show a drop in the early years as the effects of the adverse economic conditions lead to lower sales, but are forecast to recover gradually to increases of 0.2% a year after 2017. This is insufficient to offset the reduction in sales densities in the early years and the turnover of existing stores is lower in 2026 than it was in 2009. This reduction in sales densities applies to existing and committed floorspace and therefore, taken in isolation, gives rise to a need for additional floorspace although this will, in many places, be cancelled out by current commitments. However, since shops are trading at these higher levels at present, there is a limit to the weight that should be given to need arising in this way.
- 4.28 Planning permissions in the area have been identified and the likely convenience turnover is estimated from the planning application details and company average sales densities.
- 4.29 The need for additional floorspace is calculated by subtracting the turnover of existing stores and commitments from the turnover potential to provide an estimate of residual expenditure capacity. This is then converted to floorspace using an overall convenience sales density of £12,000/sq. m. It should be

noted that the turnover of any new provision is likely to vary according to the end occupier, and could be substantially above or below this sales density. It follows that regard should also be had to the residual expenditure capacity estimate, which is, in many ways, a better guide to the requirement of additional provision. The results in terms of net sales floorspace space are shown below in Table 2.

Table 2: Floorspace Capacity for Convenience Goods (Net Sales Sq. m)

Location	Convenience Goods				
	2011	2016	2021	2026	2031
Cheltenham	0	0	0	0	0
Gloucester	0	756	1,321	2,315	3,541
Tewkesbury	0	88	184	352	558
Winchcombe	147	157	167	184	205
Bishop's Cleeve	588	657	725	839	979

Gloucester City

- 4.30 For Gloucester, the estimated floorspace capacity indicate that the current commitments are more than sufficient to meet the need suggested by current levels of overtrading although a requirement for further floorspace will emerge after 2016. It will, however, remain limited throughout the study period, and if account is taken of the proposed Morrison foodstore on Metz Way and the Tesco extension at St Oswalds Park (both subject to call in and not therefore treated as commitments), there will be no further need for convenience floorspace until the very end of the JCS period.

Cheltenham Borough

- 4.31 In Cheltenham, the survey evidence suggests considerable under-trading of convenience stores in the base year. It is estimated this would have disappeared by 2021, although once account is taken of the current level of commitments (including the Asda store on Hatherley Lane), this would mean that future requirements could be met throughout the study period. There is therefore no need, based on quantitative considerations, to allocate land for more convenience goods floorspace provision.
- 4.32 However, this consideration does not dictate the approach that should be adopted towards planning applications under PPS4, which is based on the availability of sequentially preferable central sites and the impact of the

proposal. As already noted, the fact that a convenience store may be trading below the company average level for the retailer concerned does not indicate that it is unprofitable. Although the general level of under-trading may suggest that some shops may be vulnerable, this will have to be established at a more local level in relation to specific proposals.

Tewkesbury Borough

- 4.33 For Tewkesbury town, there is a modest need for additional convenience floorspace at present but this will be met by the commitment for the Aldi store on Gloucester Road (currently under construction). Additional need, albeit on a limited scale, does not emerge until 2016. There is scope for identifying a suitable site in the town which has a reasonable chance of attracting investment.
- 4.34 Elsewhere in Tewkesbury Borough, both Bishop's Cleeve and Winchcombe appear to be trading well. It is considered there is scope to accommodate limited additional floorspace in Winchcombe and a slightly higher quantum in Bishop's Cleeve. However, the challenge for both centres would be to find a suitable site given the constrained nature of both centres which has implications for attracting investment for an appropriately sized store.

Comparison Capacity

Step 5: Assignment of Expenditure to Centre as Turnover – Comparison Goods

- 4.35 For comparison goods, the centre turnovers are built up zone by zone from six expenditure categories, namely;

Non-bulky comparison

- § Clothing, footwear and other fashion goods;
- § other non-food goods (e.g. books, jewellery, toys, gifts, DVD/CD);

Bulky comparison

- § Furniture, carpets and floor coverings;
- § DIY goods;
- § large electrical goods; and
- § small electrical goods.

4.36 The floorspace required to sell the same value of bulky goods is considerably greater than for smaller, higher value items, and since bulky goods make up approximately one third of all comparison goods, it is important in our view to reflect this in the floorspace requirement. It implies nothing about the location of the provision, which is all subject to the sequential approach to site selection. Tables 21 & 22 (Appendix D) demonstrate there are considerable sales of bulky goods in Cheltenham town centre and Gloucester city centre and, to a lesser extent, of non-bulky goods in out of centre locations.

4.37 This exercise is carried out in Tables 15 – 23 (Appendix D). As shown in Table 23, the estimated annual comparison goods turnovers for the main centres in 2009 are as follows:

§ Cheltenham town centre	£393.45m
§ Gloucester city centre	£261.29m
§ Tewkesbury town centre	£25.28m
§ Bishop's Cleeve	£5.49m
§ Winchcombe	£2.53m

4.38 This demonstrates the dominance of Cheltenham and Gloucester in the local shopping hierarchy. Both Cheltenham and Gloucester also have substantial levels of out of centre turnover (£126.6m and £149.6m respectively).

4.39 Within Gloucester, Quedgeley district centre and Gloucester Quays were identified separately and the household survey results suggest an annual turnover of £9.6m for Quedgeley and £12.1m for Gloucester Quays. For the Quays, this arose from the sale of clothing, of which £7.3m was from the Gloucester zone and £1.9m from the Stroud zone. It is recognised that Gloucester Quays has a much wider catchment area and this figure does not indicate the total turnover of the Quays Outlet centre. It does, however, indicate that the Outlet centre has a significant attraction to local residents, but a more limited attraction from elsewhere in the study area. The only other district centre in Gloucester, Abbeydale, did not emerge as a significant comparison goods shopping destination.

Step 6b: The Assessment of Market Share

- 4.40 Benchmarking against an average turnover is not possible in relation to comparison goods because there is no reliable source of information on the turnover of most comparison goods shops, or the centres in which they operate. It is therefore not possible to assess over or under trading in the base year, and the base year is taken as “in equilibrium” with demand matching supply.
- 4.41 The market share for each town is calculated in Tables 24 to 28 (Appendix D). The first adjustment is to make an allowance for non-store trading in the study area. The survey suggests that non-store retail sales account for about 16% of all comparison goods sales in the study area. This is substantially higher than for the UK as a whole (11.7% in 2010) and, on the basis that Experian expect growth to stabilise at around 16% of comparison goods sales after 2018, the study has not forecast further growth from current levels in the future. A significant amount of internet retailing takes place through existing shops and the advice of Experian has been followed in deducting 75% of internet sales when calculating floorspace needs. This is larger than the 50% that Experian advise for convenience goods because less internet shopping for comparison goods is supplied by businesses operating from retail outlets.
- 4.42 Table 24 (Appendix D) indicates that Cheltenham attracts approximately 32.5% of the non-bulky comparison goods expenditure in the study area, and about 31.3% of the bulky goods expenditure. Gloucester (Table 25) attracts approximately 22.3% of non-bulky goods expenditure, and 31.7% of bulky goods. These figures appear reasonable given the provision in the towns. The town centre offer in Gloucester is generally recognised as markedly weaker than in Cheltenham, but both centres have a substantial range, and nearly all of the major bulky goods retailers and the market shares for bulky goods would be expected to be similar.
- 4.43 Tewkesbury town’s market share is substantially below these levels - at 2.0% for non-bulky and 1.0% for bulky goods. The market shares for Bishop’s Cleeve and Winchcombe, are lower still; 0.4% (non-bulky goods) and 0.2% (bulky goods) for Bishop’s Cleeve, and 0.1% (non bulky) and 0.2% (bulky) for Winchcombe.

Step 7: Capacity in Future Years

- 4.44 The quantitative need for comparison goods floorspace is assessed as the difference between the turnover of existing stores and the turnover potential (calculated as the total expenditure in the Study Area in each forecast year multiplied by the market share). Market shares have been held constant for the reasons described above – as a policy neutral position against which to assess possible policy responses. The turnover potential increases rapidly as the result of population and expenditure growth.
- 4.45 In comparing turnover that can be accommodated in existing stores against this figure, account must be taken of floorspace efficiency increases. The study has used the figures advised by Experian, which after decline and slow growth in the early period as a result of adverse economic conditions are forecast to be 3% a year after 2014. .
- 4.46 Given the expected population growth and the relatively rapid increase in expenditure per head on comparison goods (3% per annum between 2019 and 2028), it is not surprising that the tables show an increasing residual expenditure capacity in all centres. Some of this will be met by developments which already have planning permission. There are however few proposals providing individual shops rather than large units (such as retail warehouses) and no proposals for substantial town centre developments permitted.
- 4.47 The estimated turnover from commitments arises primarily from the comparison goods elements of foodstore proposals, and mezzanine floor proposals in retail warehouse parks. In Gloucester, the permissions for new floorspace are partly off-set by consents involving the loss of retail floorspace. The new floorspace is subject to rising sales densities as a result of increases in sales efficiency over time in the same way that the existing floorspace is.
- 4.48 The requirements for additional comparison (bulky and non-bulky) goods floorspace in terms of net sales floorspace (square metres) are set out in Table 3.

Table 3: Floorspace Capacity for Comparison Goods (Net Sales Sq. m)

Location	Comparison Goods (bulky and non bulky)				
	2011	2016	2021	2026	2031
Cheltenham	9,982	26,428	49,675	78,280	112,339
Gloucester	12,557	26,945	47,562	72,922	103,080
Tewkesbury	756	1,502	2,496	3,801	5,352
Winchcombe	114	222	361	532	735
Bishop's Cleeve	161	321	549	828	1,161

4.49 This estimated floorspace capacity for comparison goods will need to meet a range of retailers needs and it is important in our view that the requirements also reflect the future need for floorspace for the sale of low value to bulky items. These figures include a mix of 'bulky' and 'non-bulky' floorspace appropriate to each centre based on the market share of the towns for these types of goods.

4.50 Tables 24 to 28 (Appendix D) estimate the different floorspace requirements separately for bulky and non-bulky goods, but it should be remembered that bulky goods are not automatically suited only to out of centre locations and that all proposals need to comply with the requirements of the sequential approach. The study outlines elsewhere that as a matter of fact, both Cheltenham town centre and Gloucester city centre sell a considerable range of bulky goods.

Gloucester City

4.51 In Gloucester, there are very considerable requirements for additional floorspace for comparison goods which present considerable opportunities, rising from over 12,500 sq. m (net) in 2011 and a marked rise to over 47,500 sq. m (net) by 2021. This increases significantly towards the later part of the JCS plan period, exceeding 100,000 sq. m (net) by 2031.

Cheltenham Borough

4.52 The situation for Cheltenham is similar to Gloucester with the same considerable requirements for additional comparison floorspace. It is estimated that offers good opportunities for additional floorspace, from an estimated circa 10,000 sq. m (net) in 2011, to over 49,600 sq. m (net) by 2021. Long term estimates identify scope for over 112,000 sq. m (net) by the end of the JCS period.

Tewkesbury Borough

- 4.53 In the smaller centres of Tewkesbury Borough, the requirements for comparison floorspace are correspondingly less. Notwithstanding this, the capacity for floorspace is greater in Tewkesbury town, with capacity for circa 2,500 sq. m (net) identified by 2021. This doubles to over 5,300 sq. m (net) by 2031.
- 4.54 In the centres of Winchcombe and Bishop's Cleeve, a smaller level of comparison floorspace is identified, with greater capacity identified in Bishop's Cleeve. As discussed in regard to convenience floorspace capacity, the main issue will be to identify appropriate opportunities given the size, configuration and constraints relevant to each centre.
- 4.55 In general, it can be difficult to devise retail developments of a suitable size for small centres like these, which are commercially viable and the issue is likely to be focussed more on trying to attract the investment required to provide such floorspace and ensuring that any development is appropriate for the centre. These matters will be considered in more detail in Section 5.

The Use of the Floorspace Capacity Figures

- 4.56 It will be apparent from this analysis that the figures are subject to some uncertainty, arising amongst other things, from the use of sample data to estimate turnover, and market share, and the uncertainties relating to forecasting future events of any kind. In addition, there can be changes in retail provision over which the local planning authorities have no control. There is, for instance, generally no need to apply for planning permission (unless restrictive conditions apply) to change from selling convenience to comparison goods, or vice versa, or for the change of use of some other A class uses to A1 retail. Even the sale of a shops portfolio from one retailer to another may change the market share and turnover significantly. An example relates to the sale by the Co-op Group of former Somerfield outlets to other grocery retailers. It follows from this that the figures should not be used with undue precision.
- 4.57 It is also true that the uncertainty increases over the study period. With the proviso that undue precision should be avoided, the figures are regarded as reasonably reliable in the period up to 2016 and this represents a reasonable

first development horizon. It also gives some indications of where events might lead in the period to 2021 to guide decisions that have longer term implications. However, the study is likely to be updated before decisions are taken on development occurring solely in this second period.

- 4.58 Proposals for major town centre retail development are generally large scale and are likely to have implications for retail needs beyond the immediate time period. Thus for the post 2021 period, guidance is offered on the general scale of provision that might be needed, although the study will need to be reviewed prior to 2021 to inform decisions on planning applications at that time.
- 4.59 The study has been based on the use of current market shares throughout the study period. This is considered a policy neutral starting point, but a strategy could reasonably be developed that sought to increase the market share of some centres or not to plan to maintain the existing market share in others. There are at present no commitments of such a scale that would be considered to substantially alter the market share of any of the centres in the study area although the Kings Quarter scheme in Gloucester city centre has the potential to change this in future years. Similarly, Gloucester Quays is not yet fully established and is intended to substantially increase the retail attraction of Gloucester, but at a sub-regional level beyond the study area rather than at this more local level.
- 4.60 No account has been taken of tourist spending in this study. It is clear that tourism is an important factor in the health of most of larger centres examined, in particular to Cheltenham, Gloucester, Tewkesbury and Winchcombe. This is primarily of concern to comparison goods shops and leisure services in centres, and of more limited significance to convenience retailing. It means that the centre comparison goods turnover figures are likely to be underestimated because they exclude tourist expenditure. However, this does not affect the figures of floorspace requirements which are related only to growth in the study area and exclude tourist spending throughout.
- 4.61 It is recognised that an increase in tourist spending in a centre above that in the base year would give rise to additional floorspace requirements. There could be some additional leeway in the figures where there is good evidence

of a growth in tourist spending. The development of tourism undoubtedly offers a good opportunity to improve the vitality and viability of centres. However, this will only happen where the development is in the centre and it would be important to assess any tourist related retail development in terms of the sequential and impact tests.

4.62 In conclusion, the purpose of the capacity exercise is to identify the broad scale of floorspace that could be provided in the main centres of the JCS area over the plan period, the need (if any) to identify sites for it, and to guide the preparation of planning briefs for any such sites. However, the proposals which do come forward will not fit neatly into categories or time periods and will need to be assessed more fully in the context of the local planning authority's objectives for the sites and centres concerned, the sequential approach to site selection, and the impact of the proposals on the centre and other centres.

4.63 In our view, the study indicates that there is no short term need for additional convenience goods provision in the JCS area once current commitments are taken into account, and any such proposals will have to be assessed against the relevant planning policies for retail applications in accordance with national planning guidance (PPS4) and the development plan. This may change when the scale and location of housing provision in the JCS area is settled and will be considered further in Phase 2 of the Study.

4.64 The study does suggest capacity for substantial comparison retail development for town centre retailing in both Gloucester and Cheltenham, and the scope for such development at a scale appropriate to their more local function in Tewkesbury, Bishop's Cleeve and Winchcombe, should the opportunity arise in a suitable location. These matters will be considered in more detail in Section 6.

5.0 QUALITATIVE CONSIDERATIONS

5.1 Policy EC1.4d of PPS4 states that in assessing the qualitative need for retail uses that it should:

§ Consider whether the existing provision and distribution of shopping (and leisure and local services) allow for genuine choice which meet the needs of the whole community, particularly of those living in deprived areas.

§ Consider whether any shops are overtrading and whether there is need to increase competition and a mix of retail uses.

5.2 Further advice is provided in the Practice Guidance to PPS4 (paragraphs 3.10 – 3.20) which recognises that qualitative considerations can be subjective and identifies five factors which expand on those listed in Policy EC1.4d of PPS4:

§ Deficiencies or 'gaps' in existing provision;

§ Consumer choice and competition;

§ Overtrading, congestion and overcrowding of existing stores;

§ Location specific needs such as deprived areas and underserved markets, and

§ The quality of existing provision.

5.3 As part of the health check undertaken for each centre, regard has been had to considerations of qualitative need for new retail provision. In addition, the NEMS household survey provides a useful indication of local shopping patterns, including attitudes towards the provision and quality of existing facilities and whether stores are over-trading whilst baseline user surveys (where available) provide an indication of any qualitative deficiencies of existing provision.

5.4 Overall, the assessment of the existing pattern of retail provision for convenience and comparison goods across the JCS centres has confirmed a network of centres which broadly accord with their role and function in the retail hierarchy, and which adequately meet the needs of their local catchment areas. There are however a number of centres where the level of

provision will need to be addressed in relation to each retail category by local authority area.

Existing Convenience Goods Provision and Consumer Choice

Gloucester City

- 5.5 Gloucester is well supplied with a choice of out of centre foodstores and while wider choice would always be desirable in terms of PPS4 policy, the study does not consider that this desirability could be considered a need given existing levels of convenience provision.
- 5.6 Within the city centre, the grocery provision is limited to a medium sized, but dated Sainsbury in Northgate, Marks and Spencer's foodhall and Iceland. A Tesco Express has recently opened near the Bus Station. In addition, the Asda at Bruton Way is located in relative proximity to parts of the city centre but is separated from the centre by the ring road. Proposals which would improve the convenience goods offer to visitors and people working in the city centre would be desirable.
- 5.7 The Council has recently resolved to approved proposals (subject to call in) for the redevelopment of the Tesco superstore at St Oswalds, and a Morrisons superstore on land at the railway triangle, off Metz Way. Both are out of centre locations and reinforce the potential supply for main food convenience floorspace in Gloucester.
- 5.8 The district centres at Abbeydale and Quedgeley are both anchored by large foodstores, the latter subject to recent extension and investment.

Cheltenham Borough

- 5.9 Cheltenham is provided with a wide range of main food shopping destinations at out of centre locations which has recently been supplemented with the opening of Asda to the south of the town (Hatherley Lane). Proposals have also been discussed for a new medium sized store near the railway station. However, it is considered food retailing in the town centre is limited both in terms of general grocery provision and traditional outlets.

- 5.10 Within the centre, facilities are focused at the foodhall in Marks and Spencer, Tesco Metro on the western part of the High Street, Lidl, Iceland at the eastern end of the High Street, and a small Co-op in Montpellier. The Waitrose store is located in relative proximity to the centre (forming part of the Core Commercial Area) but is still over 500m from the CSA. Whilst little can be done to encourage small food retailers through the planning system, these facilities would be likely to significantly improve the quality of the town centre convenience offer.
- 5.11 It is considered that the needs from town centre visitors, particularly those working in the town centre are not currently well met, and the improvement of the convenience goods offer in the town centre would be desirable. The North Place site offers an opportunity to expand the convenience goods offer as part of a mixed use development in close proximity to the CSA. At the time of the study, an OJEU developer selection had been undertaken with discussions ongoing between the Council and a preferred developer.
- 5.12 The Coronation Square district centre represents an outdated centre in urgent need of attention and investment. The qualitative need for an enhanced centre is considered important particularly given the opening of the Asda superstore at Hatherley Lane in an out of centre location. It is important that proposals for redevelopment are encouraged to ensure local residents have easy access to retail facilities and to improve the environment of the local area. It has suffered in the long term from competition with the larger foodstores and while it could not accommodate a major foodstore, a larger food unit within a redeveloped centre would enable it to better meet the needs of local residents. By contrast, Bath Road is considered relatively well served by a mix of multiple and independent offers, whilst the centre at Caernarvon Road is anchored by Morrisons.

Tewkesbury Borough

- 5.13 In Tewkesbury town, the convenience provision is dominated by the out of centre Morrisons, which quantitative analysis suggests is over-trading. The other food outlets are the Tesco Metro in the town centre, a Co-op store and a number of independent food shops. The range will be expanded by the new out-of-centre Aldi store under construction at Gloucester Road, but main food shopping will still be dominated by the Morrisons store.

- 5.14 It is considered there is a qualitative need for more choice of larger foodstores in Tewkesbury which the existing town centre stores cannot meet because of their size. However this would have to be balanced against any adverse impact on the town centre, particularly the Tesco metro store which is an important main food shopping destination, and which contributes significantly to the vitality and viability of the town centre. However, a larger foodstore in, or on the edge of the town centre and well connected to it, would help balance the existing main food provision which is out of centre and it may be possible to provide a qualitative improvement without adverse impact on the town centre.
- 5.15 Certainly levels of local convenience provision are considered good in the smaller centres of the Borough, which primarily provide a top up function. There are exceptions, including the main food shopping provision at Bishop's Cleeve which is dominated by a main convenience superstore (Tesco). Similarly at Brockworth, new retail facilities (including an extension to the existing Tesco) provide a large facility although this is located out of centre and does not form part of the defined Brockworth. retail area

Existing Comparison Goods Provision and Consumer Choice

Gloucester City

- 5.16 In terms of comparison goods shopping, the major gaps in provision are focused at Gloucester city centre, particularly for fashion and anchor stores. The Kings Quarter development scheme offers scope to help address this shortfall and is considered essential in revitalising the centre as a retail destination. It is important the scheme is delivered for the city centre over the early part of the plan period.

Cheltenham Borough

- 5.17 The level of comparison provision in Cheltenham is considered healthy and whilst no additional commentary with regard to existing provision and consumer choice is provided, it is important that any proposals for retail development are considered in the context of maintaining and enhancing the strength of the comparison retail offer.

Tewkesbury Borough

- 5.18 To a lesser extent, there is considered scope for an improvement in the comparison goods offer in Tewkesbury town centre, particularly in view of the under representation of multiple retailers. The limited number of larger units is recognised as a problem in attracting multiple retailers. This applies both to goods such as fashion and clothing, and to bulky goods.
- 5.19 There is, for instance, little DIY provision in the town and although there is a range of builders merchants which cater for this market at Tewkesbury Business Park (Jewsons, Plumb Centre, Building and Plumbing Supplies, Tewkesbury Tool Centre) and Bredon Road (Travis Perkins, Handyman Centre), the 2011 household survey suggests that residents look towards Cheltenham which attracts about £6.44m of the £11.26m of the available DIY expenditure in Zone 7 (see Table 16, Appendix D). While the population of the Tewkesbury catchment area is insufficient to support a retail warehouse park, it is considered there may be scope for providing larger comparison goods units and that this may well be preferable to more small retail units for which there is, according to local commercial agents, limited demand.
- 5.20 In addition to addressing deficiencies in provision, the enhancement of comparison provision in Tewkesbury town is considered important in enhancing consumer choice and competition thereby enhancing the vitality and viability of the centre. The Practice Guidance accepts the need for a critical mass and diversity of offer which can attract shoppers and reduce expenditure leakage to other centres.

Overtrading of Existing Provision

- 5.21 The Practice Guidance states that overtrading (i.e. the extent to which the turnover of existing stores significantly exceeds benchmark turnovers) can be an indicator of qualitative need, particularly where the existing range of facilities is considered poor or there is a limited choice and a lack of new floorspace within a locality as evidenced by overcrowding and congestion. Although this guidance applies to both comparison and convenience goods retailing, it is in practice usually difficult to establish a reliable “benchmark turnover” for comparison goods retailing, particularly for town centres as a whole. It has not been attempted in the study. The quantitative analysis does

however examine convenience goods retailing performance against benchmark figures.

Gloucester City

- 5.22 Overall, the qualitative analysis has identified a significant level of overtrading in Gloucester in relation to convenience goods, and a level of undertrading in Cheltenham. However, with regard to overtrading in Gloucester, our quantitative analysis further demonstrates that there is no need for additional floorspace once the current commitments are implemented.

Cheltenham Borough

- 5.23 In relation to Cheltenham, the qualitative analysis has identified a level of under-trading in Cheltenham with regard to convenience goods. However, the Asda proposal on the south eastern edge of Cheltenham is likely to lead to a rebalancing as shoppers currently using the large foodstores on the north western edge of Gloucester change to the new store.

Tewkesbury Borough

- 5.24 In Tewkesbury Borough, there is evidence of overtrading at a number of the existing foodstores in Tewkesbury and Bishop's Cleeve. It is considered this issue can be best addressed as part of the Phase 2 Study once the scale and location of additional housing provision for the JCS area is clearer.

Location Specific Needs

- 5.25 The promotion of social inclusion coupled with deficiencies in local provision and poor access to local shops and services have implications from a qualitative perspective. There is not considered to be any overriding concerns with regard to the JCS centres in relation to social inclusion with the exception of Coronation Square in Cheltenham.

Gloucester City

- 5.26 Within Gloucester City, a new local centre is under construction at Kingsway which will help meet local needs arising from development of the former RAF Quedgeley site. The household survey indicates that in terms of comparison goods shopping, Quedgeley is operating to some extent as an alternative to the city centre rather than as a district centre serving a local area. It is

considered that any additional retail provision should be focused first on the city centre in accordance with the sequential approach.

Cheltenham Borough

- 5.27 This centre at Coronation Square is currently in a poor environmental state and in qualitative terms is failing to meet residents' current shopping needs. It is recognised as in urgent need of regeneration.

Tewkesbury Borough

- 5.28 The substantial residential and employment area at Northway/Ashchurch is served by a very small Co-op convenience store in the local centre and a Marks and Spencer forecourt shop on the A46. Other facilities are located to the west of the motorway in Tewkesbury. Although there is little prospect of providing additional local facilities at the existing Northway centre at present, there will be a need to consider additional retail and service facilities if the area is considered suitable for new housing development on a large scale.

Quality of Existing Comparison and Convenience Provision

- 5.29 The quality of existing comparison and convenience provision is an additional consideration, with regard to the age, quality and configuration of provision. In this context, in-centre foodstores are generally tired and in need of improvement. The study has also identified the limited multiple retailer representation in Tewkesbury town centre, which reflects the limited number of large retail units. A similar situation exists in Gloucester city centre although the Kings Quarter development will help to address this, whilst in Cheltenham town centre the evolving nature of the retail industry and retailer requirements will require the ability to provide for larger retail units (MSUs – medium sized units) as part of any extension to the town centre. The inability to meet occupier requirements has serious implications for any centre since they are in competition with each other for customers and it also impacts on customer expectations.
- 5.30 Of all the centres assessed as part of the JCS study, the quality and age of the district centre at Coronation Square in Cheltenham is considered in most need of qualitative improvement.

6.0 SITES POTENTIAL

- 6.1 As part of the brief, this study has considered the role and function of existing centres, with regard to the health check analysis, and quantitative and qualitative assessments, to consider whether any additional need (where identified) can be accommodated on currently identified sites, or whether additional sites are needed. A key part of this assessment includes commentary related to a number of town centre sites which offer scope to accommodate potential development, a number of which are identified and considered to offer scope for regeneration as retail or mixed use development.
- 6.2 In view of the role and function of the existing JCS centres, attention has focused on the main centres of Gloucester, Cheltenham and Tewkesbury. An assessment of potential sites, including identified redevelopment options are discussed below.

Gloucester City

- 6.3 In Gloucester, a core number of sites (known as the Magnificent Seven) have been identified by Gloucester Heritage Urban Regeneration Company (GHURC), with significant investment committed to a number of the sites as part of the objective to revitalise historic areas of Gloucester city centre and the wider central area. This includes Gloucester Quays together with Gloucester Docks, Greyfriars, Blackfriars, and Kings Square and the bus station.
- 6.4 The Gloucester Quays site is partly built out and includes the Gloucester Quays Outlet, Gloucestershire College and Sainsburys foodstore. Other mixed uses associated with residential uses, employment units and a hotel, permitted as part of the outline consent, have not yet been developed. Land to the south of Gloucester Quays (Bakers Quay) is currently being actively marketed and benefits from an unimplemented consent for leisure and employment uses. The Council are currently considering two planning applications in the area, including a cinema proposal for the Quays Designer Outlet, and additional retail development as part of the Peel Centre.

- 6.5 The regeneration sites at the Railway Triangle and Canal Corridor represent important development sites outside the city centre identified by GHURC. The Council have recently resolved to approve (subject to call in) a mixed use development at the Railway Triangle, to include a Morrisons superstore.
- 6.6 Although changes in funding as a consequence of the Government Spending Review have resulted in the restructuring of the GHURC, the regeneration of these key sites remains a priority.

Kings Square and the Bus Station

- 6.7 Of the seven key opportunity sites, Kings Square and the bus station (now known as Kings Quarter) represents the preferred location for a major retail led, mixed use development in the city centre, based on an extension to the Primary Shopping Area to create a new shopping destination. The site comprises Kings Square, an area of open space surrounded by retail and leisure units together with the main bus station, located between Kings Square and Gloucester railway station. It is considered an important area wide regeneration scheme and seeks to improve the retail offer of the centre and deliver an improved public transport facility. In total, the overall site area is 4.5 ha and is located to the north east of the Primary Shopping Area.
- 6.8 The area is identified as a draft allocation (Policy CA20) in the Preferred Option Central Area Action Plan (2006) and is identified for mixed use development, including up to 25,000 sq. m of comparison retail uses and 500 sq. m for convenience retail uses. A revised draft Planning Brief (2007) has also been prepared for the site and is being reviewed and taken forward as part of a new 'Concept Statement', which will be subject to public consultation in early 2012.
- 6.9 In July 2010, the Council announced the selection of a preferred development partner (Stanhope) which led to the signing of an exclusivity agreement with the City Council. A development concept for the site has been published by Stanhope which set out initial thoughts on a masterplan/development options underpinned by key objectives to enhance the retail experience in Gloucester alongside a transformation of the retail offer around Oxboode, St Aldate Street, Northgate and Kings Walk. It also focuses on opportunities to revisit the overall configuration of the area, an enhanced approach to the railway station,

enhanced linkages with the retail and leisure offer at Gloucester Docks and Gloucester Quays, and public realm improvements. The current lack of an anchor store beyond Kings Walk coupled with lack of a cohesive retail circuit is considered a particular weakness of the city centre.

- 6.10 An indicative scheme has been published, based on 18,500 sq. m comprising 5 Medium Sized Units (MSU) ranging in size from 1,300 sq. m – 4,645 sq. m, together with 21 shops (93 sq. m – 836 sq. m). The range and type of offer is intended to provide for modern retailer requirements based on a quality provision of floorspace. This is considered essential in helping to attract new comparison, particularly fashion and anchor (larger store) occupiers to the city, but also to retain existing retailers in the city who seek larger floorspace requirements.
- 6.11 Alongside the retail provision, scope exists for a new food and leisure offer, to ensure footfall at the site and to address the recognised limited catering offer available in the city centre. Improvements to local transport infrastructure form an integral element of the Kings Quarter redevelopment, based on a new bus station and transport hub with the railway station. Current arrangements are recognised as outdated and in need of modernisation to help deliver an integrated transport strategy for Gloucester. In the longer term, it is recognised that the development of Kings Quarter offers the scope for development opportunities in the wider area. Specific areas to consider include Kings Walk Link, the car park to the north of the Bruton Way/Metz Way junction, Twyver House, Debenhams/Northgate Street/Oxbode and Aldate Street.
- 6.12 In suitability and capacity terms, the Kings Quarter represents the key retail site for the city centre, which accords with the draft allocation and Planning Brief for the site. It seeks to strengthen the north east quarter of the city centre as a destination, to ensure Gloucester competes with regional competitor centres and provides an improved arrival point to Gloucester (by bus and train). It also provides the capacity to accommodate the significant levels of comparison floorspace identified in Gloucester over the short and medium term. Subject to Council Cabinet approval in early 2012, a planning application could be expected in 2012 with an indicative opening date of

2016. The proposal is expected to meet the identified quantitative need over the next five years.

Greater Blackfriars

6.13 The Blackfriars area, located to the south west of the city centre, is identified as a mixed use, cultural development opportunity and seeks to reuse Blackfriars Priory alongside the provision of retail and leisure uses, an hotel and a new public square which is intended to act as a key linkage between the city centre, the Cathedral, the Docks and the Quay. The site was previously considered a major retail development opportunity although the emphasis has changed to mixed uses. The area supports a number of surface level car parks and borders the rear of Westgate and Southgate Streets.

6.14 A Planning Brief (November 2009) has been adopted for the site and represents interim supplementary policy for development control purposes whilst the site is subject of a draft allocation (Policy CA.19) in the Central Area Action Plan Preferred Options (2006). In addition, a masterplan has been prepared by consultants for GHURC to interpret the Planning Brief and has been endorsed by the City Council (November 2009). The Brief identifies a wide mix of uses, with scope for up to 4,000 sq. m of comparison retail, together with B1 employment, leisure/cultural and residential uses.

6.15 Given the focus on Kings Quarter as the main retail priority, Blackfriars continues to offer the opportunity for additional retail floorspace, albeit as part of a speciality retail offer related to the emphasis of heritage led regeneration.

Greater Greyfriars

6.16 The Greater Greyfriars area is located to the south east of the city centre and is identified for a residential-led mixed-use redevelopment. The site consists of a number of sub areas, including the former Gloucestershire College (since moved to a new site to the south of Gloucester Docks) and a disused bowling green and surface car parks. Planning permission was granted in November 2011 for the former Gloucestershire College sites, including 254 residential units and other uses, including small scale retail floorspace facing onto Brunswick Road.

- 6.17 A Planning Brief (February 2010) has been adopted for the site and represents interim supplementary policy for development control purposes whilst the site is subject to a draft allocation (Policy CA.18) in the Central Area Action Plan Preferred Options (2006).
- 6.18 The northern boundary of the Greater Greyfriars development area abuts the Eastgate Shopping Centre. In this regard, the Planning Brief accepts the principle of an extension to the shopping centre onto the adjacent bowling green and market hall, subject to archaeological investigation.
- 6.19 These sites offer the opportunity to make an important contribution to the provision of additional retail floorspace in the heart of the city centre, linked with an improved urban environment and setting for the Greyfriars monument. Certainly a good level of capacity for comparison floorspace has been identified for Gloucester, even allowing for Kings Quarter and Greater Blackfriars.

Cheltenham Borough

- 6.20 Within Cheltenham, the Cheltenham Development Task Force has identified two key sites which seek to promote and implement the Civic Pride initiative to enhance the town centre.

Portland Street and North Place

- 6.21 The two sites occupy an edge of centre location, to the north of the Primary Shopping Area and St Margaret's Road. The sites provide surface level car (and coach) parking (around 730 spaces). Surrounding uses include residential and commercial uses, including the Brewery development to the south west across St Margaret's Road. A Development Brief was prepared for the two sites as part of the Civic Pride Urban Design Framework SPD (2008). The Council adopted revisions to the SPD in 2010 which included revisions to the site Development Brief (as a technical appendix to the SPD) to ensure greater flexibility to ensure delivery of the sites in the light of the new economic environment. The brief does not specify the full range of acceptable uses but seeks uses which will deliver the requirements of the brief, including a number of minimum requirements which include car parking (300 public spaces minimum), provision of residential uses (including affordable) alongside a commitment to high quality design given the setting of historic

neighbouring buildings (Holy Trinity Church and St Margaret's Terrace) and a bus interchange.

6.22 The two sites are currently subject to an OJEU developer selection exercise with a preferred developer selected, and a public consultation undertaken in autumn 2011 based on a mixed use development incorporating a retail foodstore. Any development proposal will need to have regard to the key principles of the development brief to ensure development delivers a catalyst for mixed use regeneration north of the High Street, complemented by high quality design, enhanced linkages with the town centre and the Brewery development, and a northern gateway to the town centre. The site is recognised as peripheral to the town centre, primarily as a consequence of the physical barrier of St Margaret's Road, and the need to secure vibrant pedestrian linkages through the Brewery to Lower High Street, and along North Place to Pittville Street is recognised. At present these do not exist.

6.23 The site was previously regarded as too remote from the centre to be suitable for large scale, town centre type retail development. The links to the town centre were considered as unlikely to encourage movement between the main town centre and such development would tend to disperse activity. The pedestrian linkage issue forms a key objective of the Brief, and represents a key component of the preferred developer's scheme to meet the objectives of the overall development brief. As part of a mixed use development, it is considered the site is more suitable for convenience goods retailing which would not compete with the town centre in the same way. The town centre is characterised by a top-up convenience offer with Waitrose the only main convenience facility located in the core commercial area.. A main convenience shopping use of an appropriate scale would strengthen the convenience role of the centre. Coupled with retained parking, it could offer the opportunity to attract shoppers to the Brewery and the northern part of the High Street. However, given its edge of centre location, any retail proposal would need to ensure compliance with the requirements of PPS4 and local planning policy.

The Royal Well

6.24 The Royal Well site represents the second development site identified in the Civic Pride SPD and is also subject to an adopted development brief (2008)

although the Council and Development Task Force have outlined an intention to update the brief in 2012 to ensure greater flexibility for end uses. The site comprises the municipal offices on the Promenade and the area to the rear of the offices facing Royal Well Road. The brief currently identifies the site as a mixed use development opportunity for leisure, retail and residential uses. The site is located adjacent to the Primary Shopping Area and fronts the Promenade which is now regarded by retailers as the prime retail location in the town centre.

- 6.25 Whilst the frontage to the Promenade offers attractive architecture and green, open spaces, the rear of the site is recognised as in need of improvement, particularly given its effect on views from the listed Royal Crescent. It is further acknowledged that the square to the rear is hidden, dominated by coaches and requires improved integration to become a focal destination.
- 6.26 In terms of development, the brief notes that the site offers scope for a hotel together with B1 and residential uses. In addition, retail and passive leisure uses (food/drink) are identified although a review of uses will be undertaken. The availability and viability of development however will be dependent on the relocation of the Council offices. The Council's Cabinet have approved further research into alternative office locations prior to any confirmed position on vacation of the main Council offices.
- 6.27 The opportunity for a hotel use is recognised whilst retail use is considered appropriate in principle in this location. The existing building could accommodate unit shops of an attractive scale for retailers through a mix of conversion and extension to the rear and provide better access through the building to Royal Well road. The potential for retail is considered strong. Local agents confirm a high level of retailer demand for unit's in the Promenade, which now commands the highest rents in the town centre. The lack of floorspace and configuration constraints of existing units on the Promenade remains a concern to local agents, particularly where good levels of covenanted demand exist.
- 6.28 The opportunity exists at Royal Well to complement the existing offer on the Promenade, which remains the prime location for upmarket comparison retailers in the centre, and help address the mismatch between supply and

demand. It would provide a relatively immediate opportunity for additional floorspace while sites are brought forward to meet longer term need. Notwithstanding the availability of the site, the key issues relate to high quality design, and the need to incorporate retail frontages to the Promenade and to facilitate development to the rear of the municipal offices (including the wide road environment). This would require a need to balance the physical opportunity for new development against the sensitive setting towards the Grade II* Royal Crescent.

Coronation Square

6.29 The designated district centre at Coronation Square is recognised as in need of redevelopment and new investment. Whilst the centre could play an important role for local residents in the Hesters Way area, it is considered that at present it detracts from the quality of the area and the improvements that have been achieved. The size of the centre is considered excessive for the function it could now fulfil, particularly in terms of the number of units, and the opportunity exists for redevelopment to deliver a new centre which better meets retailer requirements and demand. Redevelopment would also help to deliver environmental improvements and a user friendly environment.

6.30 The site has been subject of developer interest for redevelopment although this has not progressed. Whilst it is recognised that economic conditions may have put developer interest on hold, the redevelopment of the centre should remain a priority. The uncertainty over redevelopment prospects has further implications for investment, as evidenced by the concentration of vacant units at the centre.

6.31 The centre is considered in need of redevelopment and investment although any proposal will need to be appropriate to its designation as a district centre.

Land north and west of Beechwood Arcade

6.32 The area to the north and west of Beechwood Shopping Centre was identified in the 2006 Retail Study as the best opportunity for an expansion of the town centre for retail development given its proximity to the Central Shopping Area which extends to Albion Street. The part of the site to the north of Albion Street is allocated for mixed use development under Policy PR2 and is also subject to a development brief (2001).

- 6.33 The allocation (0.60 ha) also benefits from an unimplemented planning consent (ref: 08/00372/FUL) granted in March 2009 for mixed use (residential, retail and B1 uses) on the former Baylis Haines and Strange (car sales, parts and repairs) site at Albion Street/Gloucester Place. A total of 736 sq. m is permitted for A1/A2 and A3 uses in three blocks fronting Albion Street with the majority of the site focused on residential units (161 in total), and office blocks fronting Fairview Road to the north.
- 6.34 There remains uncertainty whether this particular scheme will be implemented given the residential led nature of development with consent set to lapse in March 2012. Given its location immediately north (and abutting the Central Shopping Area with frontage towards Debenhams), it is considered the site remains a suitable opportunity for comparison goods retailing, given its ability to extend the Primary Shopping Area. This would enable the delivery of a single site to ensure the critical mass to attract new retailers and to safeguard the town centre's position in the regional and national retail hierarchy.
- 6.35 An additional area of opportunity exists to the west of the site, focused on a defined block along Winchcombe Street (to Albion Street) which includes the vacant Odeon cinema (locally listed) together with small shops, service uses and vacant units. The site falls within the Central Shopping Area and is considered suitable for supporting additional comparison goods floorspace, subject to land assembly. This area is considered of additional importance assuming consent at the former Baylis Haines and Strange site is implemented.
- 6.36 On a smaller scale, and more likely to come forward in the current economic conditions, it is considered an opportunity exists to extend the Beechwood Centre to the eastern side of Winchcombe Street without extending over Albion Street. This would help to create a new pattern of circulation within the Beechwood Centre between the Beechwood Centre and the remainder of the town centre, and help to strengthen footfall in Winchcombe Street. This is considered more realistic to progress although it is doubted that it could, on its own, provide the quantum of floorspace necessary to meet either the need identified, or to maintain Cheltenham's position in the retail hierarchy in the

longer term. Overall, it is considered this would jeopardise a larger scheme in the longer term, and consider that such a scheme should be encouraged.

- 6.37 The provision of larger units remains a key requirement in meeting retailer requirements in the town centre, and in order to enhance the role of Cheltenham as an important retail centre, there is an ongoing need to provide for a large scale development. It is considered that while a large scale scheme including land to the north of Albion Way is unlikely to be promoted in the near future, the Council should continue to identify the site as suitable for retail development given that there are considered to be no other large sites which could realistically meet the identified longer term requirements in the town centre and strengthen the pedestrian circulation patterns in the centre as a whole.

Lower High Street, adjacent to the Brewery

- 6.38 The Lower High Street functions as an important secondary retail area and is considered to be a vibrant and healthy part of the town centre. The Brewery also represents an important and distinct leisure led offer of the town centre. Given its hidden location and absence of adequate links from the High Street, the need for improved linkage is considered a priority.
- 6.39 It is recognised that the future development of the North Place and Portland Street sites offer good opportunities to improve linkage with the High Street, and in this context, such considerations are expected to form an integral element in a future mixed use scheme at North Place/Portland Street. The improvement of pedestrian linkages with the town centre is an important objective of the development vision for these sites.
- 6.40 The opportunity exists to address the area between Lower High Street and the Brewery. It is understood that the area has been subject of development interest for a mixed use extension to the Brewery, and in view of the single land ownership, there is scope to consider the Lower High Street frontage and links to the Brewery. This could help extend the nature of complementary uses between the two areas, potentially increase retail floorspace, and improve the pedestrian routes which are currently hidden and unattractive.

6.41 It is understood that negotiations are progressing on this issue and consider it is important that the Council fully investigate such opportunities to address the current poor linkage which is detrimental to both the success of this section of the High Street .and the Brewery.

Tewkesbury Borough

6.42 The study has confirmed that the majority of the retail areas identified in Tewkesbury Borough are small scale and considered to be district or local centres. Within such centres, there is no additional need for sites given their role and function in the retail hierarchy. By contrast, commentary is provided in relation to the potential of sites to accommodate retail development in Tewkesbury town. In addition, the study has identified the potential for additional provision in the Northway/Ashchurch area given the limited existing levels of provision at Northway retail area. It is anticipated this would be addressed as part of the assessment of urban extensions (with commentary to be provided under Phase 2 of this study).

6.43 A number of potential development sites have been identified as part of the Tewkesbury Town Centre Masterplan. Developed with guidance from CABI, the masterplan seeks to support the regeneration of the town to 2025, based on a Vision Statement (2010) which aims to develop Tewkesbury as a desirable place to live and visit. To deliver the vision, strategic objectives have been identified which seek, amongst other things, to improve access to and movement within the town centre; embrace the riverside; and encourage growth and quality in the town centre and the Borough.

6.44 The health check analysis of the town has identified the desirability of:

- § Providing new retail development to facilitate the needs of modern occupiers and to enhance shopping provision in town centre;
- § Creating a safer and more pleasant environment for town centre users;
- § Improving the connectivity and linkages for the High Street, the riverside and the Abbey;
- Providing well linked and managed parking for long and short stay visitors;

- Developing the Riverside as an extension of the High Street, focused on a leisure and recreation offer with complementary retail and food/drink uses; and
- Promoting and encourage visitors to the town.

These suggestions accord well with the objectives of the Tewkesbury Town Centre Masterplan.

6.45 The redevelopment of key sites across the town, and promotion of access and use of its riverside setting represent the catalyst for securing the vision. A number of opportunity sites have been identified although this study is specifically concerned with the retail suitability and capacity of the site at Spring Gardens; the former MAFF site; and Healings Mill. It is recognised there are limited opportunities for growth in the town given the constraints of the floodplain and the historic configuration of the town centre. The development sites are therefore considered of critical importance to the longer term development of the town.

Bishops Walk and Spring Gardens Area

6.46 A key town centre site, the area forms a major development opportunity in the Tewkesbury Town Centre Strategic Framework document. The site is currently subject to a consultation programme involving CABE/Design Council and stakeholders. The final report will contain a range of development principles for the site. Key to the future of the site will be decisions over the future of the Cascades Leisure Centre. This is currently under consideration by the Council. The site provides the opportunity to improve town centre access and to restore the lost east to west links. The major development opportunity includes Spring Gardens and Cascades, Oldbury Road Car Parks, the Halfords' Area and Bishops Walk, together with key town centre car parks, and can be summarised as the following development areas:

- Bishops Walk retail area and adjoining car parking - (Area 1);
- Oldbury Road car park - (Area 2);
- Spring Gardens car park - (Area 3); and
- Bishops Walk car park and Kwik Save (now Halfords) (Area 4).

- 6.47 In accordance with the requirements of the study brief, the study has focused on the sites identified as Areas 2 and 3, although consideration is also given to the car park to the west of Oldbury Road (identified under Area 1).
- 6.48 The two Council owned sites are considered to represent the main opportunity for new development in the town centre and are key sites in supporting the masterplan aspirations to deliver new floorspace which can accommodate the requirements of modern retailers. With the exception of the Bishops Walk shopping parade (together with the adjoining Boots and Tesco units), the historic configuration of the town centre is characterised by small, irregular shaped shop units. The sites are also considered sequentially preferable and offer an extension and linkages to the town centre set within a constrained and historic built environment. They also offer an opportunity to strengthen the northern extent of the primary shopping area, focused on Bishops Walk, and would encourage pedestrian activity along High Street, which already benefits from the location of the Roses Theatre and library fronting Sun Street.
- 6.49 The area provides a major opportunity for mixed use including retail, commercial, car parking and residential, as well as an opportunity to introduce an area of public open space and to improve the links between the site and historic high street.
- 6.50 It is considered the relocation of the leisure centre would, if feasible, help deliver key aspirations of the masterplan vision and would enable re-development of this key town centre site. The site also contains town centre car parking, hosts the twice weekly retail market and the annual Mop Fair. These are important activities for the town.

Former MAFF site

- 6.51 The former Government offices site has been vacant for a number of years and should be considered in terms of its wider links to potential housing and employment growth at Ashchurch and improved east west links across the town.
- 6.52 The site is in Council ownership and is currently one of three sites being considered for the Tewkesbury Health Care project, which seeks to

consolidate three GP practices into one health care centre. The site was also considered as a potential site for the Tewkesbury Hospital, although NHS Gloucestershire has confirmed that the new hospital will be built on land adjoining the existing hospital at Greenbank. It has also historically been considered as a potential site for a relocation of the Cascades leisure centre.

- 6.53 Whilst the site provides a relatively large unconstrained site, it is an out-of-centre site in PPS4 terms, located some distance from the town centre and, given the availability of other sites, not sequentially preferable. It is therefore not considered suitable for the promotion of major retail development. Subject to the continued availability of the site, should any retail proposal come forward for the site, it would be necessary to address the proposal against the requirements of national guidance, as currently contained in PPS4.

Healings Mill

- 6.54 The site is in private ownership and occupies a riverside location on the west bank of the Mill Avon, totalling 1.97 ha (4.87 acres). The site was in previous use as a flour mill, and comprises three land parcels, including the main mill site; the bridges between Quay Street and the mill together with properties on Quay Street; and part of the Hangings (land north of the mill). It represents one of the two largest historic buildings in the town.
- 6.55 A Draft Planning Opportunities Document (2007) has been prepared for the site which confirms the desirability to secure employment provision at the site. It also identifies a number of key constraints, including its Conservation Area setting, architectural and historic interest, high flood risk, and part designation as a SSSI. A number of listed buildings are also present.
- 6.56 It is considered the site offers a niche and specialist mixed use landmark development opportunity, which given its riverside location and close proximity to the High Street (via Quay Street) offers potential to enhance the linkages between the river and town centre. The key issue however is viability, particularly the costs associated with redevelopment and sensitive conversion, balanced alongside the structural conditions of the buildings and the identified constraints.

- 6.57 It is understood that the site is currently being marketed and the outcome is unknown. In retail terms, a niche tourist led retail offer is considered most realistic as part of a wider mixed use development. It may also be suitable for leisure, tourist related and employment uses. The site is considered a longer term opportunity although major challenges exist which will ultimately determine any beneficial reuse. In retail terms however, it is recommended as suitable for small scale retail development of unit shops and food and drink uses.

Site Supply from 2011

- 6.58 Our assessment has concluded that the following sites represent a suitable and realistic supply of sites over the next 5 -10 year period from 2011 for each of the centres where an additional need has been identified.

Gloucester City

Kings Square and the Bus Station

- 6.59 A major site has been identified for development, known as Kings Quarter, and it is important that this development is not compromised by competition for occupiers. Assuming the scheme comes forward in a timely fashion, the development will meet the need for additional floorspace up to 2016. It is recommended that the City Council should promote one major retail development at a time – otherwise retailer demand will be split and there is a serious risk that no development takes place.
- 6.60 In later periods there are a number of sites around Kings Square which should be considered for redevelopment. These include the Kings Walk Mall which offers the potential for refurbishment and increased floorspace, and land between the Kings Square development and Northgate Street. This area is seen as offering the opportunity for a considerable increase in floorspace and is in need of updating.
- 6.61 It is considered that the long term requirements for retail floorspace could be met in these areas around Kings Square and the bus station area, and that the Core Strategy policy should aim to concentrate retail development in this area.

Greater Blackfriars

- 6.62 The Blackfriars site offers good scope for a mix of uses although the adopted Planning Brief considers the site suitable for a certain type and level of retail (comparison) use which is linked to the heritage and tourism assets of the wider site, and should be complementary to established city centre retail uses. Given ongoing economic conditions, it is considered future retail development would most likely come forward as part of other mixed uses and form part of a critical mass of phased development. Importantly the site offers the opportunity to attract shoppers/visitors along Southgate Street from the main focus of the city centre retail area but would also help attract visitors to Gloucester Quays and Docks area beyond Kimbrose Way towards the city centre.
- 6.63 In retail terms, the site should not realistically impact on any future Kings Quarter scheme given the nature of retail envisaged in the Planning Brief compared to the upmarket, fashion led emphasis at Kings Square and the bus station. The key impact on delivery of retail uses at Blackfriars will be economic conditions and the timing/phasing of development as part of a holistic offer at the site. This is considered more likely within the next 5 - 10 year period.

Greater Greyfriars

- 6.64 There is considered good scope within Greater Greyfriars for supporting additional retail development although this is considered a medium to long term opportunity. The adopted Planning Brief identifies scope for an extension to the Eastgate Shopping Centre although this will need to consider the archaeology sensitivities of the area.
- 6.65 It is considered attention will continue to focus on residential led, mixed use development of the former College site.

Cheltenham Borough

North Place and Portland Street

- 6.66 The key need in Cheltenham is for substantial comparison goods floorspace to meet the increasing expenditure from local residents. The North Place and Portland Street site is currently being progressed with a preferred developer

selected, confirming commercial interest in the sites. Emerging development proposals for its development contain some retail development although this is focused on convenience retail.

- 6.67 It would be desirable to redevelop land at the High Street, to the south of Brewery, to improve linkages between it and the Brewery. It is understood the land ownership position could allow for this and negotiations are progressing in regard to this matter, which could help secure a net increase in retail floorspace.

Royal Well and Promenade area

- 6.68 Land to the east of Royal Well gardens is a clear opportunity which could come forward relatively quickly. It is located close to the prime frontage (The Promenade) where the highest levels of retailer demand/interest exist. Should the Council confirm a relocation of its offices, this is a site which could come forward relatively quickly through the conversion of the ground floor of the building providing access through to Royal Wells with refurbishment and extensions to the back of the building. The Council Cabinet have resolved to support further investigation of this issue.

- 6.69 In view of the high demand for retail units near the Promenade, this could be met through the creation of unit shops to create a more active frontage to the western side of Regent Street. The back of Cavendish House currently creates a dead frontage, in contrast to the eastern side which has developed into an active shopping street. It is recognised that this may not create additional retail floorspace although would be likely to accommodate more sales turnover. Development would be dependent on land owner aspirations.

North and West of Beechwood Arcade

- 6.70 It is considered this represents the best site for major retail development in Cheltenham. There is a need for regeneration of a number of the properties in the immediate area, including those fronting Winchcombe Street and north of Albion Street. The Beechwood Centre itself fails to maximise potential because it leads nowhere. Any redevelopment however would be complex and the site remains a longer term option. There are not in our view any other sites suitable for major retail development sufficiently close to the town centre which would not present similar complications.

- 6.71 The alternatives would be the St James Street and the Grosvenor Street Car Parks. The St James Street car park is a surface car park with relatively easy vehicular access routes and is well used by town centre shoppers. The Grovesnor Street Car Park is a dated multi-storey car park located over a Lidl foodstore and gym. The area is close to the High Street, but currently suffers from a lack of High Street frontage, poor visibility and unattractive links. Both these sites however could support retail development in the longer term.

Tewkesbury Borough

Spring Gardens/Cascades and Oldbury Road Car Parks

- 6.72 The Spring Gardens/Cascades site and the Oldbury Road Car Park sites offer the opportunity for a significant retail development to meet the need for larger modern shop units, as part of the strategy for attracting national multiples. It also offers the potential to meet the limited need for additional convenience goods floorspace, and the qualitative need for more choice in food shopping. An essential element of such development however would be enhanced and improved links to the High Street.
- 6.73 Whilst the sites support car parking (and revenue generation) together with an operational leisure centre, it is recognised that the future of the leisure centre site is subject to ongoing review. If the site were to become available, it represents a relatively short term opportunity (within 5 years) assuming the site is brought forward quickly. However, the need for more floorspace in Tewkesbury is identified to be relatively modest, as are retailer requirements, and any such development could likely meet the majority of the longer term needs of the town.

7.0 POLICY RECOMMENDATIONS

7.1 This final section addresses the requirements of the study brief, and sets out policy recommendations to inform the preparation of policy and strategy for the JCS. This relates to recommendations on the definition of Primary Shopping Areas (PSAs) for the city and town centres, on the mix of uses that would be acceptable in the primary and secondary frontages and on a number of more general planning policy issues. In this context it is noted that the current plan policies on these matters were developed in compliance with PPS6 and that there is a need for more updated (in accordance with PPS4) and unified policies within the emerging Joint Core Strategy.

Primary Shopping Areas

7.2 PPS4 (Policy EC3.1c) requires local planning authorities to define the extent of town centres and of the PSAs in their adopted proposals map. Town centres are defined as areas of predominantly retail leisure, business and other main town centres uses. PSAs are the area within a town centre where retail development is concentrated (generally comprising the primary and those secondary frontages which are contiguous and closely related to the primary frontage). The study does not consider the overall town centre boundaries and concentrates on the proposed boundaries of the PSA. It is noted that smaller centres may not have areas of predominantly leisure, business and other main town centre uses adjacent to the primary area, and that therefore the town centre may not extend beyond the PSA. This is a more detailed approach than advised under PPS6 and sites which might have been considered as a town centre site under PPS6 guidance, will become edge of centre if they are not already in predominantly retail use. The National Planning Policy Framework is likely to be less prescriptive, but it is considered that the current advice is well founded in general and that there is no reason to alter the suggested approach.

Gloucester City

7.3 In Gloucester city centre, the plan of the proposed PSA supplied by the Council has been considered as part of the emerging DPD (Central Area Action Plan). This proposes that the boundary of the PSA broadly follows the line of the Bruton Way/Black Dog Way to the east of the centre (with the exception of Twyver House) and the south of this area. It also extends south

along Southgate Street to include the triangle formed by Kimbrose Way and Commercial Street and the west, along Westgate Street to St Mary's Street, and excludes the Cathedral Precinct and Shire Hall. The proposed Kings Square development (and other sites identified as longer term opportunities) are predominately in retail use and fall within the proposed PSA. It is considered that this represents a reasonable definition of the PSA which complies with the advice in PPS4.

Cheltenham Borough

7.4 The Cheltenham Local Plan identifies a Core Commercial Area and within this a central shopping area, Montpellier and a Lower High Street Shopping Area. The Central Shopping Area follows the boundary of the main areas predominantly in retail use closely, and it considered to comply with the PPS4 advice. The main development sites considered all fall within the core commercial area and would be treated as edge of centre sites, or would be capable of being treated as such with sufficiently improved links. The only exception is the site of the Grosvenor Street car park and Lidl which is in the Central Shopping Area.

7.5 Montpellier is a tightly defined retail area but separated from the central shopping area by a non-retail frontage. In our view, it serves a town centre retail function and should be considered as a separate part of the PSA. The Lower High Street area is partly included in the Goad definition of the town centre and, although undoubtedly secondary frontage, is contiguous with the core commercial area. It should in our view be treated as part of the PSA. However, the Lower High Street beyond Poole Way is insufficiently retail orientated to be included, and in our view is too dominated by the impact of heavy traffic to become a predominantly retail area. It is recommended that it is excluded from the PSA.

Tewkesbury Borough

7.6 It is considered that the main retail centre (Tewkesbury) is not sufficiently large to require a town centre definition in addition to the PSA. The areas identified as primary and secondary frontages on the proposals map in our view provide a good definition of the PSA, except in relation to Barton Street. The frontage area extends too far from High Street and should stop in approximately the same position as the Goad plan (at 31 and 55-56 Barton

Street). The area beyond is predominately residential in nature with few commercial premises. It is recommended that this reduced area is taken to be the PSA.

Primary and Secondary Frontages

Policy 3.1c of PPS4 also advises that local planning authorities should identify realistically defined primary and secondary frontages and set policies which make clear which uses will be permitted in such locations. PPS4 defines primary frontages as those which include a “high proportion of retail uses and secondary frontages as those which provide greater opportunities for a diversity of uses”. Primary frontage in this context is therefore different from the prime frontages which have been considered in assessing the vitality and viability of the centres.

- 7.7 There is, in our view, a need for consistency in the definition of primary and secondary frontages in the JCS area. Bearing in mind that the definitions of the PSA are considered broadly correct, the main issue is whether the distinction between the primary and secondary frontages is reasonable. The study has considered the definition of primary and secondary frontages in the Cheltenham and Tewkesbury Borough Local Plans, and as proposed by Gloucester City Council.

Gloucester City

- 7.8 In Gloucester, the primary retail frontages proposed are focussed along the four main streets, the covered malls and the shops around Kings Square. This is broadly correct although the inclusion of the following areas as primary frontage are questioned:

- § The north side of Northgate Street beyond Worcester Street;
- § The north side of Westgate Street beyond College Street; and
- § The west side of Southgate beyond Longsmith Street.

- 7.9 It appears to us that the proportion of retail units in these areas is not sufficient to justify the primary frontage designation. PPS4 suggests that the definition of primary frontages should be based on the factual position. It is also important to ensure that there is scope to accommodate the secondary retailing. Many non-retail uses are increasingly important contributors to the

vitality and viability of a centre particularly where located in close proximity to the PSA and further help to avoid long term vacancies. The final definition of primary frontages should also depend to some extent on the nature of the policies which will be applied and it is therefore difficult to consider the definition without some idea of the policy which will be applied to them. Generally the stricter the policy on non-A1 uses, the more restricted the primary frontages should be. It should also be noted that it is unlikely that policies will prevent new A1 retail uses in secondary frontages where commercial demand exists.

- 7.10 The proposed Gloucester primary retail frontages are defined by an area notation, presumably covering all frontages within the designated area. In Tewkesbury Borough, the primary frontage covers individual buildings on the frontage, and in Cheltenham they are identified by lines along the streets. In practical terms it makes little difference which way the frontages are identified, but in terms of presentation it is probably better that a consistent approach is adopted. The importance of consistency will depend on how the policies for the primary and secondary frontages are incorporated into the LDF documents.

Cheltenham Borough

- 7.11 In Cheltenham, the primary shopping frontage is defined restricted to:
- § main section of the High Street short stretch north west of Boots Corner;
 - § retail frontages of the Promenade and Ormond Place;
 - § short stretches of frontage in roads off the High Street; and
 - § Montpellier.
- 7.12 The main areas of secondary frontage are at the eastern end of High Street, Cambray Place and Bath Road (where there is a concentration of estate agents and other A2 uses) and at the north western end of the High Street (where there are a number of smaller independent retailers, cafes and restaurants). In our view, this is a reasonable definition as a matter of fact of the primary and secondary frontages.

Tewkesbury Borough

7.13 In Tewkesbury, the Local Plan defines the primary frontage of the town as running from Sun Street to Barton Street (on the eastern side of High Street), and from Quay Street to into Church Street (on the western side). The mixed use (secondary frontages) are:

- § Barton Street from High St to Chance Street;
- § Church Street from Mill Street to High Street;
- § The northern end of High Street from Quay Street and Sun Street to Mythe Road.

7.14 It is considered that the PSA should exclude the far end of Barton Street which is not sufficiently commercial in character. The primary frontage represents a considerable frontage of shops for the size of the town, and it would be desirable to have a variety of uses within the zone but not which would be constrained by a strict policy on non-A1 uses. It is further recognised that the prime focus is towards the northern end of the High Street in the vicinity of the food shops and the access to the main central car parks. Nevertheless, the significant shops and services are very much distributed along the whole of the identified frontage, and it is concluded that the primary frontage is, de facto, generally accurately identified. The only possible exception is the short frontage block between Post Office Lane and Tolsey Lane, which could be considered secondary. This would, however, make little difference to the length of the primary frontage.

The Type and Appropriate Mix of Units

7.15 PPS4 defines the main town centres to which the policies of PPS4 apply, as:

- § Retail;
- § Leisure, entertainment facilities and the more intensive sport and recreation uses including cinemas, restaurants, drive through restaurants, bars and pubs, night clubs, casinos, health and fitness centres, indoor bowling centres and bingo halls;
- § Offices; and
- § Arts, culture and tourism development.

- 7.16 All such uses should be incorporated in identified town centres wherever possible, but not necessarily within the PSA. Most such developments will be one-offs and it is primarily in the context of the change of use between shops, bars, pubs, restaurants, hot food takeaways, and professional offices (A2 uses) for which a general policy may be necessary.
- 7.17 All these uses are important in town centres and contribute to their vitality and viability. Banks and ATMs are major attractors of footfall and A2 offices, such as estate agencies, bring people to the centre although the services they offer are increasingly provided by the internet. Pubs, bars, restaurants and cafes are also important in both the evening economy, and in attracting the tourists on which successful centres increasingly rely, which further contribute to vitality and viability. Furthermore, reflecting how money is spent, food and drink uses have become more significant in centres, and have, very importantly in successful centres, filled the gap in demand left by the decline in the number of shops. It is important that all uses can be accommodated in centres. If non-retail uses are restricted to secondary frontages, then there must be sufficient opportunity for such uses to find premises balanced alongside the retention of those shops seeking lower cost accommodation.
- 7.18 In our view, there is a need for a general mix of uses within any frontage and people should not have to walk too far to find a café, restaurant or bank. Policies controlling the mix of uses need to be sufficiently flexible to allow this. The three current local plans take different approaches to the policies for controlling the mix of uses. Policy RT3 of the Cheltenham Borough Local Plan states that proposals for a change of use from A1 in primary shopping frontages will be considered with regard to the impact on the vitality and viability of the town centre taking account of :
- § The size and location of the premises;
 - § The number and distribution of existing non-A1 uses within the frontage run; and
 - § The number, distribution and duration of vacancies within the frontage run.
- 7.19 Policy S8 of the latest draft of the Gloucester Local Plan seeks to only permit changes of use from A1 in primary frontages where:

- § The proportion of non retail uses on the ground floor of properties on the same side of the street is below 30%, and
- § The proposal would not result in a continuous group of more than two non-retail uses on the same side of the street, and
- § The property is vacant and the developer is able to demonstrate that the property has been marketed for a reasonable period of time, or
- § The developer is able to demonstrate that the proposal would sustain and enhance the vitality and viability of the PSA.

7.20 In the primary frontage in Tewkesbury town centre, Local Plan Policy RET1 seeks a minimum of 75% of the units within 100m of the unit to be within A1 use before permission is granted and restricts the change of use to A2 and A3 uses. Under Policy RET2, A1, A2 and A3 uses are acceptable in the secondary frontage. Policy RET3 states that A1, A2 and A3 uses are acceptable in the retail areas of the smaller centres. It is assumed that the policies predate the change in the Use Classes Order.

7.21 In formulating a more consistent policy approach, the key question is the degree of flexibility that any policy should provide and what percentage of non-A1 use would be appropriate if that approach is taken. Adopting a percentage based policy provides a degree of certainty to its meaning and allows for an assessment as to whether permission would be granted for a change of use or not. However, in adopting a percentage approach, a key problem is that, given the general trend for service uses to increase in town centres, whatever percentage is identified, there will come a time when the percentage is reached throughout the primary area. This will certainly be a problem in a plan with a 2031 end date.

7.22 It is also difficult to justify any particular percentage in a changing commercial environment. There is a clear risk that properties would remain vacant in the long term and this can adversely impact on town centres and economic development. In our view, the imposition of a percentage based policy is contrary to the ethos of PPS4 and the Ministerial Statement and is unlikely to find favour at Examination or appeal. Although this will provide less certainty for applicants, it is recommended that a more flexible approach is adopted through a criteria based policy along the approach adopted in the Cheltenham

Local Plan policy, but also to consider qualitative considerations to include the period of vacancy, marketing evidence, and relationship with other town centre policy initiatives.

Reviewing City, Town and District Centre Boundaries

7.23 The existing/proposed city and town centre boundaries, provided by the JCS authorities have been reviewed and are considered reasonable. It is important for them to have stability if they are to function as intended as instruments of planning policy, and the only need for review should arise as and when edge of centre development has taken place. The changing role of secondary frontages can lead to a need to review whether they should still be considered as part of PSAs, but such decline is a gradual process and frequent review is not regarded as necessary. There should be no need to review the boundaries other than as part of a review of the Core Strategy, or individual LDF documents.

7.24 In relation to the district centres, it is considered important that they are defined through plans within LDF documents. The term as used here is at variance with the definition in PPS4 which defines district centres as usually comprising 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. Some of the JCS centres examined would fall within the definition, whilst others would be described as local centres in PPS4 terms.

7.25 A number of the JCS centres examined as part of the brief are considerably smaller than others which have not been included in the study, particularly a number of local centres in the urban areas. This is a reflection of the strategic nature of the JCS retail study and the different levels and scale of provision in rural areas compared to the urban areas. It is recommended that a review of the smaller centres is undertaken to distinguish between district and local centres under a common definition to ensure consistency across the retail hierarchy in the JCS area.

Edge of Centre Retail Development

7.26 Given the way that the PSA have been defined in accordance with the PPS4 advice, any large scale retail development is likely to be on edge of centre

sites. Indeed, all but one of potential sites considered are in edge of centre locations. However, it is important in promoting large scale retail developments in town centres, that potential retailers are not split between competing sites. In effect, only one large scale scheme can come forward at a time. It is therefore recommended that the preferred edge of centre sites are identified at an early stage in the LDF process and a proactive approach adopted to help bring forward sites in partnership with developers, landowners and other key stakeholders. If this is done, then other edge of centre sites which would undermine the main proposal can be resisted.

Recommendations on Out of Centre Retail Development

- 7.27 Any proposals for out of centre development will have to be considered in the context of PPS4 guidance. This requires the application of a sequential test (Policy EC.15) and the assessment of impact (Policy EC16.1, assuming the proposal is over 2,500 sq. m gross, and EC10.2). Where there is clear evidence of significant adverse impacts, planning applications should be refused. The NPPF although less detailed, follows a similar approach. It will be important for the Core Strategy to adopt this approach to be sound.
- 7.28 There will be occasions where, for specific reasons, a retail development cannot be accommodated on edge of centre sites and will be proposed in out of centre locations. In such circumstances, the LPA should consider whether any objections/concerns can be overcome by imposing conditions. PPS4 Policy EC19.1 advocates the use of conditions, amongst other things, to limit the range of goods sold and to control the mix of convenience and comparison goods. If considered acceptable by the LPA, it will be appropriate to control the use of retail developments on out of centre sites to those activities which have given rise to the need to locate in this location in order to manage any further risk of impact to designated centres in the future. In this regard, it is recommended that the LDF should contain policies on the use of planning conditions to control products ranges, unit size and sub division.
- 7.29 There is a significant level of existing out of centre floorspace in both Cheltenham and Gloucester, the majority of which is limited to the sale of bulky goods by planning condition. The concern is that a 'free for all' in this floorspace would undermine policies to focus and concentrate investment in the city and town centres and proposals to regenerate sites through retail

development. Individual proposals to vary conditions would rarely have this effect although it is necessary to protect against such situations. However, it is not desirable to prevent development which could reasonably go ahead.

- 7.30 It is recommended that there should be a policy that states that conditions limiting the range of goods, as advocated by PPS4 (Policy EC19), that can be sold in out of centre retail developments should not be relaxed and that each application should be determined in accordance with the considerations of PPS4 (or relevant policy at the time of determination) and should not create a precedent which would undermine the general retail and town centres policy.

Floorspace Thresholds

- 7.31 Policy EC14.5 of PPS4 states that the threshold for retail (and leisure) developments requiring full retail impact assessments should be 2,500 sq m (gross) unless other thresholds are adopted in plans and in accordance with PPS4 guidance. This position is supported in the consultation National Planning Policy Framework.
- 7.32 In our view this is a reasonable threshold for retail developments in Gloucester city centre and Cheltenham town centre, which are both large retail centres. For Tewkesbury town centre, it is considered that a lower threshold is justified and recommend a threshold of 1,500 sq. m gross in view of the size, role and function of the centre.
- 7.33 For small scale developments serving a local catchment area which may have an impact on district and other local centres, it is recommended that a threshold of 200 sq. m gross should be considered, with the information required proportionate to the size of the proposal. This approach for locally defined thresholds accords with Policy EC3.d of PPS4 and has regard to the role and function of smaller centres in the local retail hierarchy.

Retail Development in Rural Areas

- 7.34 The boundaries of Cheltenham Borough and Gloucester City are tightly defined and in this context the relevance of retail development in the rural areas to these authorities is limited. The rural areas are primarily located in Tewkesbury Borough which is recognised in its Local Plan and includes a

number of policies which seek to control retail development in rural areas. The issues addressed by these policies are:

- § The loss of village shops and public houses;
- § Garden Centres; and
- § Farm Shops.

7.35 Policy RET5 requires evidence of financial non-viability and marketing for 18 months, evidence of attempts to secure viability, and evidence that the community it serves can be provided for adequately by facilities elsewhere before planning permission will be granted for a change of use of shops and pubs. Given that the residential use of buildings in villages will often generate a higher value there is a clear need for a policy to protect these uses. Such policies are common in local plans and receive considerable support from inspectors at appeal. However, it is questioned whether the detail in policy RET5 is suitable for a Core Strategy and that efforts to secure viability through grant aid etc appear excessive – this is a matter which can be considered through viability. In this regard it is recommended that a simplified policy concentrating on viability, marketing history and the availability of alternative facilities be developed.

7.36 Convenience goods shopping in rural areas has seen considerable changes in recent years with the growth in the range of goods offered by forecourt shops and farm shops. Small scale farm and forecourt shops reduce the need of rural residents to travel (usually by car) without attracting trips from towns. Forecourt shops are made more viable by petrol sales and the availability of convenient parking and now form an important local shopping facility in many areas. Farm shops have come to sell a wider range of goods, including goods not grown on the site but still tend to concentrate on locally produced goods. The wider range of goods is necessary if farm shops are to meet local needs and people will not use them if they also have to go to supermarkets for other basic items. Policy RET9 is generally encouraging to farm shops and concentrates on the possible adverse environmental and amenity impacts.

7.37 It is recommended that this approach is maintained and could be extended to existing petrol station forecourts although the scale of proposals varies considerably and largely determines their impact. In this regard it is

recommended that this permissive approach is limited to small scale proposals. Larger scale proposals, likely to attract large numbers of people should be considered in relation to the main retail policies and other amenity and environmental policies.

7.38 Policy RET8 sets out the criteria by which applications for garden centres will be considered. Most of these are concerned with assessing the impact of development but the first one requires the garden centre to be directly related to an existing agricultural or horticultural business. The structure of the garden centre sector has changed radically in recent years and most garden centres no longer sell “home grown” plants. This is partly related to the viability of doing so, given the economies of scale that can be achieved (and the capital intensive nature of modern plant propagation) and partly because the range and choice that large garden centres offer cannot be provided from a single nursery.

7.39 It is also the case that garden centres are unlikely to have a significant adverse impact on even smaller centres. Large garden centres are in any case, subject to the requirements of general retail planning policies for out of centre development and do not require special consideration from a retail impact point of view. While the environmental criteria would be useful in defining what the LPA would look for in any applications, it is unlikely whether they are appropriate to a Core Strategy. It is considered that the requirement for garden centres to be related to and ancillary to an existing agricultural or horticultural business is no longer realistic or likely to be supported on appeal. In this context it is recommended that the need for a policy on garden centres is reconsidered.

Recommendations on Retail Monitoring

7.40 The importance of monitoring is outlined in PPS4. Specific advice is provided in Policy EC.9 which states that LPA’s should keep under review, via the annual monitoring reports, a number of key issues including the vitality and viability of centres, the network and hierarchy of centres, and the need for further development.

7.41 The guidance outlines that the health of centres should be monitored regularly, based on the assessment of vitality and viability. This is also

considered important in assessing the impact of planning policies. As part of this study, a consistent approach to health checks has been adopted for each centre, and has been undertaken in accordance with the key indicators identified at Annex D. The health checks form a baseline position for all the JCS centres and are considered important in establishing a baseline for the Tewkesbury Borough Retail Areas which have not benefitted from a formalised assessment.

7.42 It is recognised that a number of the health checks are more detailed than others reflecting the availability of information sources which can be more limited for the smaller centres. In addition, the Goad plans provide a snapshot of retail composition in the larger centres. Future monitoring of the centres allow for the assessment of change in the retail composition of units.

7.43 It is recommended that the health checks for each centre are updated on a regular basis (ideally annually) although certain information will be more readily available than others. In this context, it is important that the JCS authorities, as part of its monitoring process, liaise with the private sector (particularly local agents active in the respective centres) to ensure an up to date position of retailer demand, retailer requirements, rents and yields information is available. The regular monitoring of pedestrian flows on a consistent basis to build up time series data is the most direct measure of vitality and is important. The 2010 Gloucester health checks prepared for the district and local centres represent a good example of the type of monitoring advocated by PPS4. Regular monitoring is considered important in assessing changes over time, including the appropriateness of the PSA, primary and secondary frontages, the implications which new development can have on such boundaries and the overall performance of a centre.

7.44 To assist with future monitoring, an example template is attached at Appendix F. This provides a summary of the key indicators considered relevant for assessing the health of centres and ensures a consistent and concise monitoring tool.

7.45 The guidance recommends that quantitative capacity assessments be updated every five years, in order to take account of changing economic circumstances (expenditure projections, population changes, and floorspace

changes). It is recommended this position is reviewed at the appropriate time across the JCS area. To assist this process, it is recommended that a consistent approach is adopted to the monitoring of retail commitments by each JCS authority, including an annual update on status and details of floorspace gained/lost. This could form part of the Annual Monitoring Report (AMR) will assist in future updates of quantitative capacity.

Implications of the Portas Review

- 7.46 Whilst not forming part of national guidance, the recommendations set out in the Portas Review raise a number of policy initiatives which may be considered appropriate in exploring at the local JCS level, notwithstanding that some will require separate legislation
- 7.47 Importantly, the recommendations seek to engage all key high street stakeholders given that the successful implementation of recommendations is dependent on key stakeholder involvement and collaborative working. In moving forward, a key theme relates to the need to promote a vision and strategy for town centres, balanced alongside the recognition that town centres are complex and subject to significant obstacles to change, not least the multitude of land ownerships, differing landlord aspirations, the existing regulatory environment particularly business rates, the existing planning system and parking, which all impact on the realistic prospect for change in a realistic time frame.
- 7.48 The localism agenda promoted by the Coalition Government could be expected to support and encourage certain recommendations, including greater community involvement in decision making and shaping the future of the local neighbourhood. In addition, it is anticipated that changes could be expected in the final version of the National Planning Policy Framework due for publication in spring 2012, which seek to strengthen the town centre first approach, making out of centre development more difficult for developers. This is considered an early win and a key element in securing the future of the high street.
- 7.49 The promotion of co-ordination and management initiatives of the high street will be familiar to JCS authorities, and the role of effective management of town centres cannot be underestimated. The establishment of town teams

and Super BID's potentially offer easier scope for implementation as does the promotion of, and expansion of, independent markets within the JCS centres.

7.50 The issue of town centre parking is a fundamentally important one, both in terms of its accessibility for shoppers and cost, since many out of centre developments offer free and large areas of parking. However, whilst greater flexibility of car parking charges is suggested to encourage shoppers to a centre, it is recognised that car parks remain an important source of revenue for local authorities particularly in a time of fiscal constraint. It remains for local authorities to address any revenue shortfall but the importance of parking in town centres cannot be underestimated and trials are suggested to assess the effect.

7.51 The importance of investors and landlords in the process is a key element of the Review given the significant land ownership of such groups which can represent an obstacle to redevelopment and action. As such, the response from the property industry has been mixed with regard to certain recommendations, particularly where it has implications for rental income. That said, other property responses consider a 'move forward, or move out' approach is realistic to address inaction and constraints to new investment although this requires a more flexible planning and tax regime to support diversity.

7.52 Whilst the recommendations recognise the fundamental need for action, many are dependent on cross stakeholder involvement, and certain changes would require legislation by government. There are however helpful ideas which offer good scope for further investigation at the local level. The Government is due to make a statement on the Portas Review shortly.

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