

Matter 12: Building a strong, competitive economy

Whether the GCP has been positively prepared and whether it is justified, effective and consistent with the JCS, and national policy in relation to the approach towards the provision and protection of land for employment uses, cultural and tourist, and town centre uses?

91. Should it be made explicit how much land should be provided for employment uses over the plan period within the administrative boundary of the city?

91.1 Explicit reference to employment land requirements in the administrative area of Gloucester City would be inconsistent with the Adopted JCS.

91.2 Employment land requirements are addressed across the JCS, rather than each local authority having a separate employment land requirement. Policy SP1 'The need for new development' states that provision will be made for a minimum of 192 hectares of B-Class employment land to support approximately 39,500 jobs. Policy SP2 'Distribution of new development', criterion 9, further states 'To support economic growth in the JCS area, the JCS will make provision for at least 192 hectares of B-Class employment land. At least 84 hectares of B-Class employment land will be delivered on Strategic Allocation sites as detailed at Policy SA1. Any further capacity will be identified in district plans.'

91.3 In answering the Inspector's question 92, the City Council has confirmed that the JCS authorities have made site allocations that provide more than the 192-hectare figure identified in the JCS.

92. Notwithstanding the ongoing review of the JCS, does the GCP identify enough land capable of being delivered within the GCP period, consistent with policies SP1, SP2 and SD1 and SD2 of the JCS?

92.1 The Adopted JCS sets development requirements as set out below.

Development type	Policy	Quantum (2011 – 2031)
Housing	SP1: The need for new development	14,359 dwellings (Gloucester City)
Employment	SP1: The need for new development	192 ha B-Class employment land (across the JCS)
Retail	SD2: Retail and City/Town Centres	Comparison goods 41,542 sq m Convenience goods 3,664 (Gloucester City)

92.2 Policy SP2 'Distribution of new development' sets out the strategy for the delivery of housing and employment development.

92.3 Policy SD1 'Employment development – except retail development' sets out the locations where employment development, excluding retail development, will be acceptable.

Housing development

92.4 See response to Question 87.

Employment development

- 92.5 An analysis has been undertaken to show the amount of B-Class employment land that has been allocated across the JCS area, across both large-scale site allocations in the Adopted JCS, and urban capacity in the respective district plans, including the GCP. This demonstrates that overall, the JCS authorities have made allocations amounting to 213.5 hectares of B-Class employment land.
- 92.6 This is summarised in the Table below. Further information is provided at Appendix 1 to this matters statement.

Development Plan Document	Employment land (ha)
Joint Core Strategy	89.5
Tewkesbury Borough Plan	86.6
Cheltenham Plan	6.0
Gloucester City Plan	15.3
Gloucester City extant consents	16.1
TOTAL	213.5

Retail development

- 92.7 The Adopted JCS sets out a high-level policy relating to retail and city/town centres, with criterion 7 committing the JCS authorities to an immediate review relating to this specific issue. However, for various reasons, including the changes to the NPPF (2019) relating to the review of Local Plans, the authorities have taken the decision to include this as part of the wider review of the JCS. This review is progressing, and a new Local Development Scheme (Submission Document CD009) has recently been approved by the City Council, which provides the programme from here-on-in.
- 92.8 In relation to the review, the JCS authorities have undertaken a new Retail Study, which will be published shortly. This shows that whilst additional capacity for net additional convenience and comparison goods retail floorspace in Gloucester was identified in the Adopted JCS and the Retail Study that informed the policy, it is now the case that, following extensive recent analysis (including the use of the latest economic forecasts), there is now no quantitative and qualitative need for net additional floorspace in the city, and in fact Gloucester City has an oversupply of retail floorspace.
- 92.9 This material change is as a result of a number of factors, including changing consumer spending habits (a trend which is likely to be exacerbated and accelerated by the Covid-19 pandemic), changing retail expenditure forecasts, and commitments (i.e. planning permissions) for new retail floorspace across the city.
- 92.10 The latest study also confirms that the health of Gloucester City Centre is vulnerable and is at risk from further edge/out-of-centre development, in contrast to a relatively healthy assessment in the previous study.
- 92.11 Notwithstanding the current oversupply of floorspace, opportunities remain for allocations made in the City Centre where retail is acceptable as part of ‘main town centre uses’.
- 93. Is the requirement for a skills plan set out within Policy B1, consistent with the JCS and national policy? Is the wording of the policy effective?**

- 93.1 Section 6 of the NPPF sets out the Government’s approach towards ‘Building a strong, competitive economy’. Paragraph 80 states *‘Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.* The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.’ Paragraph 81 further states *‘Planning policies should (a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.’*
- 93.2 Paragraph 2.30 of the Adopted JCS highlights challenges within the JCS area, and states *‘...there are now high numbers of young people aged 16 – 18 years who are not in education, training or employment. All of this indicates a need for more employment and training opportunities so that the JCS area will remain a competitive location, providing companies with the opportunity to move or expand within the area and supporting young people entering the workforce.’*
- 93.3 JCS Strategic Objective 1 ‘Building a strong and competitive urban economy, states *‘Develop the potential of the JCS area for further economic and commercial investment by...Providing the right environment, in partnership with others such as the Local Enterprise Partnership (LEP), for business start-ups, entrepreneurship and the improvement and expansion of education and training facilities to develop the skills employers need.’*
- 93.4 JCS Strategic Objective 9 ‘Promoting healthy communities’, states *‘Promote development that contributes to a healthy population by...In partnership with others, creating stronger communities by reducing inequality and social exclusion, enhancing opportunities for high quality education, and thereby increasing social well-being.’*
- 93.5 The Explanation section to Policy SD1 ‘Employment’ states *‘Where specialised skills are available, clusters of enterprises can add value to the economy. This spatial strategy can support skills development by encouraging the provision and expansion of suitable education and training facilities with access in person and by electronic means.’*
- 93.6 The City Council’s justification for Employment and Skills Plans is set out in the Economic Growth Strategy (2019 – 2022) and supporting evidence (Submission Document OTH006). Gloucester City Council is already implementing the proposal and is currently progressing schemes with three developers in the city, with more planned in the future. Further information is available on the [City Council’s website](#).
- 93.7 In addressing comments made through the Pre-Submission GCP consultation, the City Council has submitted a proposed change in response to supportive comments to this policy, made by the Home Builders Federation. The change to the supporting text seeks to strengthen the effectiveness of the policy through dialogue with housebuilders and liaison with the Gloucestershire Employment and Skills Board. The proposed change is shown in CD010a ‘Schedule of Changes Pre-Submission Gloucester City Plan Addendum’ (reference PM012) and CD010b ‘Appendix 1 – Tracked Change Pre-Submission Gloucester City Plan’.
- 94. Since, the publication version of the GCP was consulted upon, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 came into force amending the Town and Country Planning (Use Classes) Order 1987. What, if any, is the**

implication of the amendments to the Use Classes Order on policies B2, B3 and B5. What modifications can be made to ensure that the policies remain consistent with the objectives and policies of the JCS and national policy? Should the reference to the Cultural Strategy and Vision be included within the policy text of Policy B5??

- 94.1 The changes to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 created two new Use Classes, which came into effect on 1 September 2020. The new Use Classes are E ‘Commercial, Business and Service’ and F ‘Local Community and Learning’.
- 94.2 Both new classes broadly amalgamate previous Use Classes, as follows:
- Use Class E: Broadly covers uses previously defined in the revoked classes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafés), D1 a – b (Non-residential institutions) and D2 (indoor sport).
 - Use Class F: Broadly covers uses previously defined in the revoked classes from parts of D1 (Non-residential institutions), D2 (Assembly and Leisure), and provides for newly defined community uses.
- 94.3 The changes to the Use Classes Order does have some implications for policies contained in the Gloucester City Plan. Table 2 below provides the conclusions of a review in relation to policies B2, B3 and B5.

Generic policies	Pre-Submission wording	Proposed amendment to address September 2020 update to Use Classes Order
Policy B2: Safeguarding employment sites and buildings	Refers to safeguarding sites and buildings in B Use Class employment, with change of use to non-B Use Classes generally resisted.	Amend policy to refer to Use Classes B2, B8 and E(g).
Policy B3: New employment development and intensification and improvements to existing employment land	Supports developments for B Use Class employment uses.	Amend policy to refer to Use Classes B2, B8 and E(g).
Policy B5: Tourism and Culture	Refers to ‘main town centre uses’.	Defined by the NPPF and it is not therefore considered a change is necessary.

95. Is the scope of Policy B4 too restricted? Should the interests of existing employment uses be referenced within the policy?

- 95.1 It is accepted that Policy B4 ‘Development within and adjacent to Gloucester Docks and Canal’ would be improved by requiring proposals to demonstrate that development would not adversely affect the functioning of existing businesses. In responding the comment made from the Canal and River Trust on this matter, the City Council has submitted a proposed change for consideration at the examination in public. The wording of the proposed change is included in Submission Documents CD010a ‘Schedule of Changes Pre-

Submission Gloucester City Plan Addendum (reference PM017) and shown as a part of the GCP in CD010b 'Appendix 1 – Tracked Changed Pre-Submission Gloucester City Plan.

96. Is Policy B6 written in such a way that it is clear what is required to enable Planning permission to be granted? Is it appropriate that criteria a)- e), set out within paragraph 3.2.29, appear to be determinants of whether Planning permission would be granted?

96.1 The City Council is of the view that the criteria within Policy B6 make clear how an applicant should respond when submitting a planning application. It is further considered that criteria (a) to (e) at paragraph 3.2.29 provide clarity to the applicant on provisions within the policy can be satisfied. If considered necessary, these could be brought into the policy text box.

Appendix 1: JCS employment land position

Total cumulative employment land allocations

In total, across the Adopted JCS, Tewkesbury Borough Plan, Cheltenham Plan and Gloucester City Plan, the following employment land is allocated/in supply:

Development Plan Document	Employment land (ha)
Joint Core Strategy	89.5
Tewkesbury Borough Plan	86.6
Cheltenham Plan	6.0
Gloucester City Plan	15.3
Gloucester City extant consents	16.1
TOTAL	213.5

JCS/Local Authority breakdown of allocations

Joint Core Strategy strategic allocations

The following strategic employment site allocations are made in the Adopted Joint Core Strategy (2017).

Strategic allocation	Employment land (ha) (JCS allocation)
A1: Innsworth and Twigworth	9.1
A2: South Churchdown	17.4
A3: North Brockworth	3
A4: North West Cheltenham	15* (23.4)
A5: Ashchurch	0** (14.3)
A6: Winnycroft	0
A7: West Cheltenham	45
Total	89.5 (112.2)

*A4 North West Cheltenham – through application/masterplanning process employment land reduced

**A5 Ashchurch – site has planning consent for Retail Outlet Centre and Garden Centre

Tewkesbury Borough Plan allocations

The following employment site allocations are proposed in the Submitted Tewkesbury Borough Plan (2020)

Reference	Site	Area
Bishops Cleeve Site 3	Land at Cleeve Business Park, Bishops Cleeve	5.4
Bishops Cleeve Site 4	Land at Malvern View Business Park, Bishops Cleeve	2.5
Bishops Cleeve Site 8	GE Aviation, Bishops Cleeve	1.6
M5 Central Site 5	Land at Meteor Business Park (adj Glos airport)	0.2
M5 Central Site 12	Land adjacent to Ashville Business Park (adj Glos airport)	3.8
M5 Central Site 15	Land at Meteor Business Park (adj Glos airport)	0.6
M5 North Site 9	Land at Tewkesbury Industrial Estate, Tewkesbury	0.4
M5 North Site 10	Land at Tewkesbury Industrial Estate, Tewkesbury	0.7
M5 North Site 11	Land at Tewkesbury Industrial Estate, Tewkesbury	0.3
M5 North Site 12	Land at Tewkesbury Industrial Estate, Tewkesbury	0.3

M5 North Site 13	Land at Tewkesbury Industrial Estate, Tewkesbury	0.5
M5 South Site 2	Land at Gloucester Business Park, Brockworth	6.8
M5 South Site 3	Land at Gloucester Business Park, Brockworth	3.6
M5 South Site 6	Land at Gloucester Business Park, Brockworth	0.6
M5 South Site 7	Land at Gloucester Business Park, Brockworth	15.7
A38 North Site 1	Brockeridge Farm Business Centre, Twyning	0.5
A38 North Site 4	Land adjacent to Duddage Manor Business Park, Twyning	0.5
A38 North Site 5	Brockeridge Farm Business Centre, Twyning	3.5
A38 South Site 1	Land adjacent to Highnam Business Centre, Highnam	1.9
A38 South Site 6	Land adjacent to Highfield Business Centre, Deerhurst	3.3
A38 South Site 7	Land adjacent to Knightsbridge Business Centre, Coombe Hill	2.1
Bishops Cleeve Site 1	Homelands Farm, Bishops Cleeve	1.7
Bishops Cleeve Site 2	Land adjacent to Malvern View Business Park, Bishops Cleeve	2.2
M5 Central Site 7	Land adjacent to Ashville Business Park (adj Glos airport)	3.5
M5 Central Site 8	Land east of Meteor Business Park (adj Glos airport)	1.6
M5 Central Site 9	Land south-west of Bamfurlong Industrial Park	3.5
Winchcombe Site 1	Land adjacent to Orchard Industrial Estate, Toddington	3.8
Winchcombe Site 4	Land adjacent to Orchard Industrial Estate, Toddington	1.8
Winchcombe Site 5	Land adjacent to Orchard Industrial Estate, Toddington	1
Winchcombe Site 7	Land adjacent to Isbourne Business Centre, Greet	1.9
Winchcombe Site 8	Park Farm Industrial Estate, Gretton	1.3
Winchcombe Site 9	Withytrees Farm, Greet	1.0
TBC	Land at Gloucestershire Airport	8.5
	TOTAL	86.6

Cheltenham Plan allocations

The following employment site allocations are made in the Adopted Cheltenham Plan (2020).

Allocation	Employment land (ha)
E1: Land south of Jessop Avenue	0.3
E2: Land adjacent to B&Q	0.9
E3: Land north-west of Grovefield Way	4.1
E4: Land at Chelt Walk	0.7
Total	6.0

Gloucester City Plan allocations

The following employment site allocations are proposed in the Submitted Gloucester City Plan (2020).

Allocation	Employment land (ha)
SA07: Lynton Fields	2
SA08: King's Quarter (mixed-use)	4.5
SA09: Former Quayside House	1.6
SA10: Former Fleece Hotel / Longsmith Street Car Park (mixed-use)	1.6
SA17: Land south of Triangle Park	4.2
SA21: Part of West Quay, The Docks	0.7
SA22: Land adjacent to Secunda Way Industrial Estate	0.7
	15.3

Gloucester City extant consents (allocations in previous plans)

In addition to the above, the following site are allocations from previous plans, that have extant consent for employment land.

Consent	Employment land (ha)
Spinnaker Park	7.5
Land at Barnwood Park	5.7
Waterwells Business Park	1
Triangle Park	1.9
	16.1