

# **GLOUCESTER CITY PLAN EXAMINATION**

**INSPECTOR'S MATTERS, ISSUES, AND QUESTIONS FOR  
DISCUSSION AT THE EXAMINATION HEARINGS**

**VERSION 1**

**MATTER 12:**

**BUILDING A STRONG, COMPETITIVE ECONOMY**

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*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 The submitted GCP and the associated track changed version (CD010b) do not expressly state the quantum of employment land to be provided within the administrative area of the city for the plan period up to 2031 and our client is supportive of this approach.

91.2 Policy SP1 of the JCS states that;

**"During the plan period, provision will be made to meet the need for ....a minimum of 192 ha of B-class employment land to support approximately 39,500 new jobs"**

91.3 JCS Policy SP2 states at criteria 9 that;

**"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."**

91.4 The GCP Employment Background Paper Sept 2019 (EE01) identifies 15.3ha of employment land to be allocated and states at paragraph 6.3 that;

**"Overall, this represents a capacity/supply of more employment land than that identified at the JCS examination."**

91.5 The GCP therefore doubles the employment land supply assumptions identified by the JCS (para 2.7 of EE004 (JCS Economic Update Note (Exam 180) 2016)) in terms of proposed employment land allocations to be brought forward in the City.

91.6 It is clear therefore that there is an adequate supply of employment land within the City. The GCP states at paragraph 3.2.1 that;

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**"Evidence shows that the city has a good range of different types of employment sites, supporting a diverse economy and with high occupancy rates."**

- 91.7 Moreover since the JCS was adopted there have been ongoing changes to the nature of employment with more people working from home, these trends are likely to continue and the GCP should be flexible in its approach to employment land in order to address the changing nature of the sector.
- 91.8 It should also be noted that the employment needs of Gloucester City are met by employment land delivered on the Innsworth strategic allocation in association with JCS Policy A1 – Innsworth and Twigworth.

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- 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 GCP Employment Background Paper Sept 2019 (EE01) identifies 15.3ha of employment land supply and states at paragraph 6.3 that;
- "Overall, this represents a capacity/supply of more employment land than that identified at the JCS examination."**
- 92.2 The GCP therefore doubles the employment land supply identified by the JCS (para 2.7 of EE004 (JCS Economic Update Note (Exam 180) 2016)) in terms of proposed employment land allocations to be bought forward.
- 92.3 Our client makes no comment on Policy SD2.

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- 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 The NPPF (2019) states at Section 6 national planning policy for 'Building a strong, competitive economy'. Paragraph 81 states that planning policies should have regard to Local Industrial Strategies and '*other local policies for economic development and regeneration*' and that they should seek to address potential barriers to investment in an area, such as housing or poor environment. The matter of skills development is not specifically addressed by the NPPF.
- 93.2 While reference to skills development appears in the second bullet point of JCS Strategic Objective 1 'Building a strong and competitive urban economy' and again in the supporting text to JCS Policy SD1 there is no explicit mention made of the requirement for skills plans to be a policy requirement of each partner authority's local plans.
- 93.3 No evidence is presented to the Examination to justify why all major development, both residential and commercial, requires the submission of an Employment and Skills Plan.

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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 Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 incorporate the former B1 Use Class into new Use Class E alongside former A1; A2; A3; D1(a); D1(b) and D2(e) Use Classes. Use Class B2 and B8 remain unaffected.
- 94.2 The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 allows for the change of use of a building and any land within its curtilage from a use falling within Class E (commercial, business and service) to a use falling within Class C3 (dwelling houses) subject to certain provisions and restrictions.
- 94.3 Therefore, as written Policies B2, B3 and B5 only now relate to sites containing uses falling within B2 and B8.
- 94.4 Paragraph 3.2.15 should be amended as it currently states;
- " For the avoidance of doubt, this policy covers sites and buildings currently in employment use, as well as extant consents. This is because the existing urban capacity of employment land is an important component in meeting the quantum of employment land required in the JCS."**
- 94.5 It is clear from paragraph 92.2 above that the GCP allocates more land than was proposed through the JCS and therefore paragraph 3.2.15 is incorrect.
- 94.6 Policy B2 should be considered in the light of NPPF paragraph 118 (d) and paragraph 120 with regard to making the best use of brownfield land to meet unmet development needs within an area including residential.
- 94.7 Some sites currently used for employment purposes are located within zones of transition adjacent to regeneration and existing residential areas and are unsuitable for the needs of modern business or better suited to alternative uses. It is unrealistic of the GCP to retain such sites for B2 or B8 purposes

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when there is no realistic prospect of these sites being redeveloped for these Use Classes owing to a lack of adequate highway infrastructure and the potential to harm the amenities of adjacent residential uses.

- 94.8 Moreover, existing old employment sites, such as Mill Place, could be redeveloped to allow for mixed use schemes by providing opportunities for modern business premises that sit alongside new residential development without impacting on residential amenity. Appropriate redevelopment would make better use of existing land in accordance with NPPF paragraph 118 and 120.

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

95.1 Redevelopment of old employment sites situated adjacent to the canal could help to facilitate the implementation of Policy B4.

**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 Our client has no comment on this matter.