



**University of Gloucestershire  
City Centre Campus**

**Planning Statement**

## Document Control Sheet

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# 1 Executive Summary

- 1.1 This application by the University of Gloucestershire (UoG) is for the change of use of the former Debenhams building in Gloucester City Centre from a Class E(a) retail use to a mixed Class F1(a) education, (d) public library and (e) public hall uses, along with refurbishment works to the exterior of the building.
- 1.2 The building will be occupied by the UoG for the provision of education in the fields of Health and Social Care, and Education and Humanities, with flexible space provided for general and specialist teaching as per the University's requirements.
- 1.3 This Planning Statement highlights the significant benefits of putting a currently vacant landmark building to a more effective and efficient re-use, in accordance with the aims of national planning policy, which encourages the use of previously developed land.
- 1.4 The social and economic benefits associated with revitalising a core part of the City Centre demonstrates that the overall planning balance weighs heavily in favour of planning permission being granted. The application will serve to deliver the following:
  - The provision of a new city centre campus, within the heart of Gloucester City Centre, which will continue to enhance the role and function of the University as a key community facility;
  - A proposal which will bring a new demographic of users into the city, with staff and students utilising the exiting retail, leisure and hospitality uses currently available, contributing towards the vitality and viability of the city centre;
  - A use that provides positive economic benefits, through the creation of direct and indirect jobs;
  - Tailored learning spaces that expand the range of learning and development opportunities, increasing the skill set of the local community; and
  - A use that will secure an optimum viable use of a non-designated heritage asset, which make a positive contribution to the City Centre Conservation Area, ensuring that it is preserved and maintained for future generations.

## 2 Introduction

### 2.1 The University of Gloucestershire City Centre Campus

- 2.1.1 This planning application is made by Stantec, on behalf of the University of Gloucestershire (UoG). The application seeks full planning permission for the change of use of the former Debenhams building in Gloucester City Centre from a Class E(a) retail use to a mixed Class F1(a) education, (d) public library and (e) public hall uses, along with refurbishment works to the exterior of the building.
- 2.1.2 The proposal will also facilitate the creation of a limited amount of new floorspace within the service courtyard to the rear to the building, which will be used to accommodate proposed cycle and bin storage buildings (approx. 120sqm in size), in addition to some plant and machinery (i.e. a generator and transformer).
- 2.1.3 The UoG intend to use the building to form and develop a new City Centre campus within the heart of Gloucester, expanding the capabilities of their teaching provision, particularly in relation to their School of Health & Social Care and Education & Humanities.
- 2.1.4 This is an exciting opportunity for both the University and the City; the proposal has the potential to revitalise a core part of the City Centre, bringing a new demographic of users into Gloucester by creating a new and vibrant hub that will benefit the local community; the building acting as a shop front for the University. The chance to transform a building originally dedicated to consumerism, into a positive, and more inclusive building, that places accessibility, connectivity, community, sustainability, and wellbeing at its heart contributes significantly towards enhancing the vitality and viability of the city centre.
- 2.1.5 The former Debenhams building has an important place in the history of Gloucester City Centre; the proposal offers the opportunity to retain and convert the key historic parts of the building, putting it to a more effective re-use that will benefit the local community.
- 2.1.6 The National Planning Policy Framework (NPPF) (paragraph 88) identifies that planning decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and **adaptation**. The NPPF (paragraph 119) also reaffirms that planning decisions should promote an effective use of land in a way that makes as much use as possible of previously developed or 'brownfield' land. The proposals accord with these key aims of the NPPF.

### 2.2 The University of Gloucestershire

- 2.2.1 The University of Gloucestershire (UoG) is a pioneering University based primarily in Gloucester and Cheltenham, focused on enabling transformation for their students. Their vision is for each student, during their time at the University, to gain the skills, knowledge, insight and confidence to transform their own lives for the better.
- 2.2.2 The UoG is seeking to significantly grow its teaching provision over the next decade and is anticipating increasing its student numbers by 65% to a total student body of 14,565 by 2030/31. The University's current infrastructure is not sufficient to facilitate the growth ambitions.
- 2.2.3 The purchase of the former Debenhams building within Gloucester City Centre, provides a fantastic opportunity for the University to realise their vision of opening a new city centre campus. A brand new UoG campus located in the iconic building will transform the redundant site into an asset that can breathe new life into Gloucester city centre, making both the University and the region a more inviting place for young people and helping to achieve the

University's mission of supporting the 'growth and development of the community economically, socially and culturally.'

## **2.3 Planning Application Material**

- 2.3.1 This application submission for Change of Use comprises the necessary plans (Site Location Plan, Existing and Proposed Block Plans, Elevations, Floor Plans, Sections and Visualisations) and a comprehensive suite reports and technical assessments. The scope of the technical reports and assessments has been informed through the pre-application process with Gloucester City Council (GCC) and the Highways Authority, Gloucestershire County Council and are Appended to this Planning Statement.



## 3 The Site and Surrounding Area

### 3.1 Site Location

- 3.1.1 The application site (approximately 1.35 acres in size) relates to the former Debenhams building situated within Gloucester City Centre. The imposing four-storey structure (with basement beneath) is a key landmark building within Gloucester.
- 3.1.2 The Site's northwestern frontage fronts on to Northgate Street, and the existing landmark entrance is situated on the Northgate Street / The Oxebode junction. The building runs along the length of The Oxebode and comprises the northwestern edge of Kings Square. The Site's northeastern frontage and car park access are along St Aldate Street, where there is also a small collection of other buildings on the junction of Northgate Street and St Aldgate Street. The Site shares party walls with some of these buildings.
- 3.1.3 The building has an associated service yard to the rear, which is accessed from St Aldate Street.
- 3.1.4 The Site is well related to a number of services and facilities within the City Centre, including being only 400m from Gloucester Train Station and 190m from the nearest bus stop along Market Parade. Its location in the City Centre means there are an abundance of other recreational, employment and retail services and facilities within the immediate vicinity

### 3.2 Site Context

- 3.2.1 Northgate Street has historically been an essential part of the retail core of the City. However, just as with other high streets there are a number of challenges which it faces. Structural changes in the retail market, particularly as a result of the COVID-19 pandemic, coupled with a shift in consumer patterns to online shopping have effected the viability and vitality of primary shopping high streets.
- 3.2.2 Northgate Street is an historic road which once sat within the City's Roman walls. It experienced some morphological change during the Saxon years however, the historic form of the area changed fundamentally following an abundance of 1930's and post-WWII development. While the Site dates back to 1928 and was erected in place of former historic buildings, it is recognised as a positive contribution to the area.<sup>1</sup>
- 3.2.3 While the building itself is not listed, there are a number of designated heritage assets within 100m. These include:
- a. Church of St John Northgate, Grade II\* Listed, List UID: 1245673 (c.20m)
  - b. 11, Northgate Street, Grade II Listed, List UID: 1245713 (c.60m)
  - c. New Inn, Grade I Listed, List UID: 1245714 (c.60m)
  - d. 62 Northgate Street, Grade II Listed, List UID: 1245716 (c.70m)
- 3.2.4 Within the wider setting of the Site, other designated heritage assets can be found. These include the Cathedral Church of the Holy and Indivisible Trinity (Gloucester Cathedral), which is Grade I Listed (List UID: 1245952) and is circa 130m from the Site.
- 3.2.5 The Site is also directly adjacent to part of the Glevum Roman Colonia Scheduled Monument (list entry number: 1002101) which is scheduled in numerous locations across Gloucester City

<sup>1</sup> Gloucester City Centre Conservation Area Appraisal Map, 2007, Gloucester City Council

Centre. It is understood that this area, in addition to that occupied by the Site, was formally a churchyard and recent works to Kings Square have uncovered Roman mosaics.

### 3.3 Site Designations

- 3.3.1 The Site is subject to the following national and adopted Development Plan designations:
- a. Flood Zone 1 – the lowest level of flood risk on the Government’s flood risk maps;
  - b. Gloucester City Centre Conservation Area – to which the building provides a positive contribution;
  - c. Gloucester City Centre – assigned by Policy SD2 of the Joint Core Strategy;
  - d. Primary Shopping Area – assigned by Policy SD2 of the Joint Core Strategy; and
  - e. Primary Shopping Frontage – assigned by Policy SD2 of the Joint Core Strategy

### 3.4 Relevant Planning History

3.4.1 The following planning history records are associated with the site:

Application Number	Proposal	Decision	Decision Date
95/00077/FUL	Alterations to shopfront.	Granted	22/03/1995
95/00236/FUL	Installation of air conditioning units and acoustic screening yard	Granted	18/07/1995
95/00635/FUL	External painting of windows to Kings Square and St Aldate Street elevations	Granted	07/02/1996
96/00074/FUL	Installation of plant on roof.	Granted	26/03/1996
96/00365/FUL	Installation of air conditioning units and acoustic screen walls.	Granted	15/07/1996
11/00131/ADV	Scheme A - Display of various illuminated and non -illuminated signage. (Signs B1, B2, B3, B4, C, D, E1, E2, E3, F,H, I, J, K, L1 & L2) Scheme B - Display of 1 no. two sided, wall mounted, projecting sign (Sign M)	Split Decision	01/04/2011
11/00471/ADV	Internally illuminated vertical projecting sign comprising individual lettering.	Granted	14/06/2011

## 4 Development Proposals

### 4.1 Application Overview

4.1.1 This Planning Statement supports a full planning application for:

*“Full planning permission for refurbishment works to the exterior of the building and change of use to create circa 20,000sqm of F.1(a), (d) and (e) uses from E(a).”*

4.1.2 The proposal will also facilitate the creation of some new floorspace within the service courtyard to the rear to the building, which will be used to accommodate proposed cycle and bin storage buildings (approx. 120sqm in size), in addition to some plant and machinery (i.e. a generator and transformer).

4.1.3 The building will be occupied by the University of Gloucestershire for the provision of education in the fields of Health and Social Care, and Education and Humanities, with flexible space provided for general and specialist teaching ad hoc as per the University’s requirements. These uses amount to the F.1(a) use proposed. A café is also proposed to serve students, which would be ancillary to the F.1(a) use.

4.1.4 The building will also include a university library and a separate public library on some of the lower ground and ground floor spaces, accommodating the relocation of part of Gloucester Library on Brunswick Road. The public library would amount to the F.1(d) use proposed.

4.1.5 Full details of the exterior alterations proposed to the building are set out in the accompanying suite of plans and Design & Access Statement submitted in support of the proposals. The most significant changes are proposed to the Kings Square elevation, which will form the principal entrance to the building. The design approach to the exterior of the building seeks to respect and enhance the historic importance of this key landmark building.

4.1.6 With the exception of five blue badge disabled spaces within the service courtyard, no on-site car parking is proposed. Instead, a total of 128 lockable cycle parking spaces is proposed and staff and students will be encouraged to use other forms of transport (including public transport).

4.1.7 A separate sewer system for foul and surface water drainage is proposed to be constructed to serve the development (see Drainage Statement for details).

4.1.8 The building is proposed to be refurbished and opened in phases, with Phase 1 anticipated to be completed by September 2023. The accompanying D&A Statement sets out the full extent of the works that are anticipated to be completed during Phase 1 but in summary this includes all works to the central part of the building (i.e. the atrium) and ground floor. Around 50% of the basement and first floor levels would also come forward in Phase 1. The second, third and fourth phases would be developed sequentially following the completion of each phase (see phasing plan within the D&A Statement for details).

### 4.2 Pre-Application Engagement

4.2.1 The UoG have entered into a Planning Performance Agreement (PPA) with the Local Planning Authority (LPA) in order to agree appropriate timescales, actions and resource for the handling of the planning application. This has been particularly important for the University given that they are seeking to open their City Centre Campus by September 2023. They have therefore been keen to engage with the LPA at an early stage in order to streamline the planning process with a view of securing the timely re-purposing of the building, not only to meet their requirements, but also for the benefit of the local community.

- 4.2.2 The PPA process has allowed for effective pre-application engagement and collaboration with the City Council, which has included a pre-application meeting and two Project Review Meetings.
- 4.2.3 In addition to this, the University have engaged in pre-application discussions with Gloucestershire Highways and have presented the proposals to the Gloucester Design Review Panel.
- 4.2.4 A summary of the pre-application engagement undertaken is set out below.

#### **Pre-application engagement with Gloucester City Council**

- 4.2.5 As part of the agreed PPA, an initial Project Review Meeting was held between the project team and the LPA on the 14<sup>th</sup> October 2021. The primary purpose of this meeting was to introduce the emerging proposals to the Council, agree the content of the pre-application submission and discuss technical planning considerations.
- 4.2.6 The pre application submission, which included a summary report and initial concept drawings, was submitted to the LPA on the 27<sup>th</sup> October 2021. A pre-application meeting was held with the Council on the 3<sup>rd</sup> November 2021, who confirmed their advice in writing the following day.
- 4.2.7 The LPA's written response focused predominantly on matters relating to the principle of development, along with some high-level commentary on technical matters of detail (given that these matters were still being progressed). The LPA stated that the proposals would lead to a range of public benefits both in terms of the physical works and the uses proposed.
- 4.2.8 It was acknowledged that department stores have been closing in recent years and the continued use of the building for retail was unlikely. It was also agreed that the uses proposed would contribute towards the vitality and viability of the area. Subject to an appropriate assessment against the policy requirements of Joint Core Strategy Policy SD2 (as set out in detail in section 5 of this Statement), it was agreed that the principle of development ought to be capable of being supported.
- 4.2.9 A second Project Review Meeting was held on the 26<sup>th</sup> November 2021, specifically as a means of discussing heritage and archaeological matters. The information required to accompany the planning submission was agreed, along with the approach.

#### **Pre-application submission to Gloucestershire Highways**

- 4.2.10 A Transport Scoping Note was prepared by Arup to aid pre-application discussions with Gloucestershire Highways. The pre-app request was made on the 22<sup>nd</sup> October 2021.
- 4.2.11 Gloucestershire Highways are yet to provide any comments in response to the pre-app submission.

#### **Design Review Panel**

- 4.2.12 The emerging proposal was presented to the Gloucestershire Design Review Panel (DRP) on the 15<sup>th</sup> November 2021, and a follow-up report was provided by the DRP on the 30<sup>th</sup> November 2021.
- 4.2.13 The panel were provided with a suite of information, which explored and explained the opportunity, context and concepts of the proposal, in addition to floor plans and elevation studies.

- 4.2.14 The panel identified that the proposed change of use of the building, from a department store to an educational building for the University of Gloucestershire, was an appropriate and positive use of the building. The panel agreed alternative uses were unlikely to be forthcoming and that the building could functionally house the proposed use. The new use would safeguard the buildings long term use and beneficially bring people and thereby vibrancy to the city centre.
- 4.2.15 The panel agreed that the treatment of the elevations needed further consideration, particularly the Kings Square elevation, which the panel agreed could have a more dramatic intervention (i.e. through the removal of the canopy and enlargement of the 'picture window'). It was also identified that the evolution of the building should be acknowledged better on the St Aldate Street elevation.
- 4.2.16 An assessment of how the DRP findings have shaped the proposals is set out in the accompanying D&A Statement.

## 5 Planning Balance

### 5.1 Introduction

- 5.1.1 This Statement will now turn to consider the principle of development. It will highlight the significant benefits of putting one of the city's key landmark buildings, which is currently vacant, to a more effective and efficient re-use, thereby revitalising a core part of the City Centre.
- 5.1.2 Importantly, this section of the Statement will highlight how the proposal will contribute substantially to the viability and vitality of the City Centre by encouraging a new source of footfall and demographic of users into Gloucester. The benefits of this will demonstrate that the overall planning balance weighs heavily in favour of planning permission being granted.
- 5.1.3 Furthermore, the opportunity the proposal will bring in putting a prominent non-designated heritage asset into an optimum viable re-use is an important material consideration which weighs in favour of the proposals. The building makes a positive contribution to the City Centre Conservation Area and the proposal ensures this is preserved and maintained for future generations.

### 5.2 Planning Policy

- 5.2.1 Appendix A of this Statement sets out the relevant national and local planning policy, which is an important consideration in the context of the proposals.
- 5.2.2 Section 38(6) of the Planning & Compulsory Purchase Act 2004 confirms that all planning applications and appeals should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The adopted Development Plan for Gloucester City Council comprises:
- a. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (2017); and
  - b. Saved policies of the Local Plan 1983.

### 5.3 Principle of development

- 5.3.1 Gloucester City Centre plays a key role in providing for a diverse range of services and facilities that are important to the community, as well as providing an economic function (in terms of employment generation). However, the nature of the City Centre is changing. This is largely due to the structural changes in the retail market, particularly as a result of the COVID-19 pandemic and the impact of internet shopping. It is important, therefore, that planning policy and decisions allow City Centres the opportunity and flexibility to diversify and support their vitality and viability. Indeed, the NPPF places significant weight on the importance of designated city / town centres and encourages LPAs to put in place appropriate policies that will help to maintain and enhance their vitality and viability.
- 5.3.2 JCS Policy SD2, is the principal planning policy relevant in this case. In order to achieve the above-mentioned aims, the supporting policy text identifies that *“successful centres are about more than shopping....they need a range of complimentary uses to attract visitors and to prosper.”*
- 5.3.3 Gloucester City Centre is identified within the JCS Settlement Hierarchy as a ‘key urban area’ which is the primary focus for growth. The provision of new services and facilities is encouraged within the centre to serve the city and wider area. The policy states *“within the defined City Centre boundary, proposals for leisure, entertainment and recreation, office, arts, culture, tourism, **community facilities** and residential development will be supported provided*

*they would not have a significant adverse impact on the amenity of adjacent residents or businesses.”*

- 5.3.4 The University of Gloucestershire is a well-established and important community facility not just for Gloucester but for the county as a whole. The provision of a new city centre campus, within the heart of Gloucester City Centre, will continue to enhance the role and function of the University as a key community facility. The supporting technical evidence that has been submitted to accompany this application serves to demonstrate that the proposed campus would not have any adverse impact upon the amenity of adjacent residents or businesses and, in accordance with JCS Policy SD2, the ‘principle of development’ for a new community facility is acceptable within this location.
- 5.3.5 Notwithstanding this, given that the commercial frontage of the building is designated as a ‘Primary Shopping Frontage’, it is accepted that some additional planning policy requirements apply. Within such areas, JCS Policy SD2 clarifies that the change of use of retail premises will not be permitted unless it can be demonstrated that:
- a) The unit is not suitable for continued retail use;
  - b) The proposed use will maintain or enhance the vitality and viability of the area; and
  - c) It would not have a significant adverse impact on the amenity of adjacent residents and businesses.
- 5.3.6 Taking each of the above-mentioned policy criteria in turn, this Statement will now turn to consider these in detail.

**a) The unit is not suitable for continued retail use**

- 5.3.7 Traditional High Street retail has experienced a major and sustained decline over the last decade. There has been a long succession of national corporate failures over this period, of which Debenhams and Arcadia are two. Bricks and mortar retailing involves high fixed costs which have proved unsustainable for many traditional retail business models, particularly in the face of increasing online competition and changing consumer habits. This is evidenced with the loss of House of Fraser, BHS and other large department store formats all closing high street stores in recent years.
- 5.3.8 The decline of the traditional high street has been further emphasised by the impact of Covid-19 and restrictions on everyday activities, leading more consumers towards online shopping and resulting in the number of retail premises deteriorating further. This has created an ever-pressing need for town and city centres to revitalise their high streets and create new uses for former retail units.
- 5.3.9 These patterns have had significant effects on large format high street units across the country. Numerous retail studies concur that large department store formats are no longer viable and are highly unlikely to be suitable for continued retail use:
- a. “To be successful, areas of the Oldham Town Centre... should be considered for uses other than large retail units occupied by national multiples, which are unlikely to return to the town centre.” (Oldham Retail & Leisure Study, Stantec, 2020)
  - b. “National retailers with extensive high street portfolios are struggling to maintain market shares and remain profitable in the increasingly competitive environment. The higher costs of trading from high streets compared with online and out-of-centre retailing, also means that it is not a level playing field.” (Tendering Retail & Town Centre Uses Study, Lambert Smith Hampton, 2020)

- c. “On-going budgetary pressures mean that retailers are having to increase efficiencies from current floorspace... to increase the sales performance of physical shops. This is against a backdrop of weak demand for retail property, high vacancy levels and a significant fall in new retail-led development in centres across the UK.” (Experian Retail Planner Briefing Note 17, Experian, 2020)

5.3.10 The Government also recognises this as a significant issue that is affecting towns and cities across the UK, with key urban areas experiencing an increasingly high proportion of redundant and vacant former retail premises. For that reason, former Debenhams sites are specifically referenced in the Governments ‘*Build Back Better High Streets Strategy*’. The Strategy states that several Debenhams sites are expected to be converted into university lecturing halls, new homes, art galleries and entertainment venues. These are all considered by the Strategy to “*breathe new life into high streets*”.

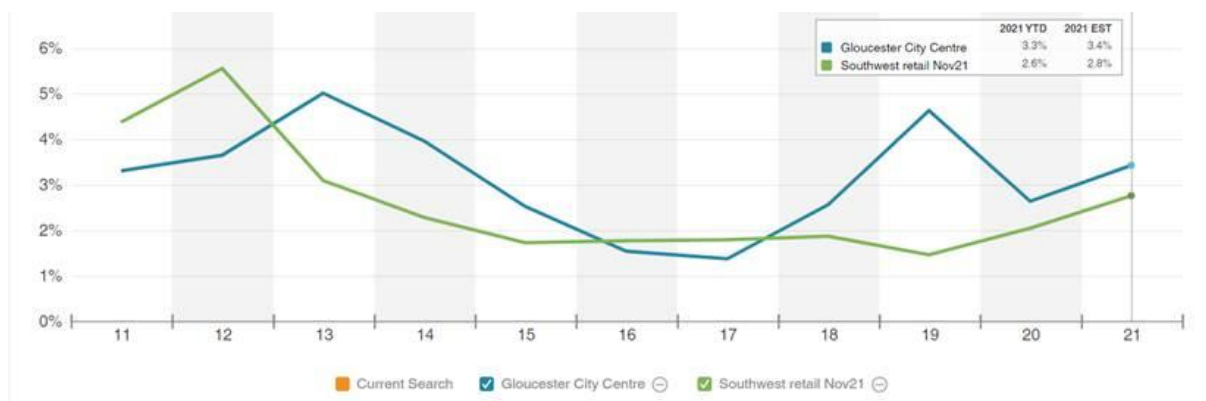
5.3.11 The Strategy is a key material consideration relevant to the proposals. The table below demonstrates how the proposals support the priorities of the *Build Back Better High Streets Strategy*:

Priority	Response
Breathing new life into empty buildings	The proposals will bring an empty building into an optimum viable use.
Supporting high street businesses	The proposals will generate footfall for the surrounding high street businesses.
Improving the public realm	The proposals will improve frontages on all elevations and enhance the Kings Square frontage as the primary entrance to the building.
Creating safe and clean spaces	The proposals will provide additional natural surveillance to the City Centre during the day.
Celebrating pride in local communities	The proposals will raise the profile of the University of Gloucestershire and promote civic pride in the capabilities of the City's skills and training provision.

5.3.12 It is evident, therefore, that the proposals support the Government’s Strategy by contributing to a more vibrant, mixed-use high street community.

5.3.13 In respect of the application site itself, a review of ‘CoStar’ commercial property data, which provides real time data and insight into the current status of commercial property, provides a good indication of vacancy levels within Gloucester City Centre based upon the number of commercial premises currently on the market. At the time of writing, there is approximately 85,600 sq ft of retail premises available within the City Centre, which translates to a vacancy rate of around 3.3%, which is slightly higher than the national average for the Southwest region. See table below:





- 5.3.14 In reviewing this, however, it is important to recognise that the former Debenhams building is not reflected in this data. This is because the University of Gloucestershire acquired the building in January 2021, which means the building is not considered part of the city’s vacant stock in respect of for the CoStar data. If the building were to be included, however, the vacancy rate for Gloucester would increase significantly to 11% (by virtue of the buildings size), which would be much higher than average for the region.
- 5.3.15 Given the change in consumer shopping habits, recent retail studies have highlighted that there is unlikely to be any demand for the retention of large retail formats; a conclusion that is also acknowledged within the Government’s ‘*Build Back Better High Streets Strategy*’. Furthermore, even if the retail unit were to be subdivided into smaller units, given the existing vacancy rates within the city centre, it is unlikely that there would be any significant demand and the application building is therefore considered to be unsuitable for continued retail use on that basis.

**b) The proposed use will maintain or enhance the vitality and viability of the City Centre**

- 5.3.16 The proposed re-use of the former Debenhams building provides an exciting opportunity for both the University and the City. The proposal brings with it a number of significant benefits that will not only revitalise a core part of the city centre, but also enhance the vitality and viability of it. The proposal will contribute to this by creating a new vibrant University hub, which will bring a new demographic of users into the city, providing a number of social and economic benefits.
- 5.3.17 The levelling-up of Gloucester and the regeneration of its city centre will be greatly enhanced by the creation of the proposed City Centre Campus. As previously confirmed, there are a number of empty retail units within Gloucester. Restoring the Debenhams building and saving the city centre from another vacant site will significantly upgrade the offerings of the area, provide a permanent fixture for the University and act as a catalyst for increased business activity in the city centre.
- 5.3.18 The increased number of students in the Gloucester area, and specifically in the city centre where the campus is proposed to be located, will have a positive economic impact on business activity as a result of increased footfall and spending of staff and students alike. It is anticipated that 1,023 full-time equivalent (FTE) students and 140 FTE staff will use the campus when the building opens in 2023/24, increasing to 1,207 FTE students and 159 FTE staff by the end of Phase 1 in 2026/27. Once Phase 2 opens, the number is expected to increase further to 3,694 FTE students and 359 FTE staff by 2030/31. The additional jobs that will be created as a result of the proposal contribute and accord with the requirements of JCS Policy SD1 (Employment Development).

- 5.3.19 As users of the building arrive, depart and access the city centre throughout the day, they will no doubt engage with the various retail, leisure and hospitality activities in the area, contributing to the viability of proximate existing uses. This will therefore encourage a greater retail and hospitality offering in the city centre as the footfall and spend of staff, students and visitors increases. Furthermore, increased student presence brings the potential for additional city centre uses, such as student accommodation. In such cases, the night-time economy can also be positively impacted through students' spending.
- 5.3.20 The proposal will have a direct impact on the construction sector through the refurbishment of the building, which will generate indirect impacts arising from the expenditure of the construction companies involved on supplies and the expenditure of employees. The capital investment will also contribute to UK based businesses that supply equipment that will be required in the refurbished building, which will also result in indirect impacts from the expenditure of these companies.
- 5.3.21 The investment in the redevelopment will also contribute to on-going operational impacts. These include the additional employment of staff employed in the new building and their consequent expenditure. Student spending in the Gloucester area is also expected to increase given that two of the University's schools will be based entirely to the new building. The investment could also result in increased student employment, volunteering and placements as the number of students based in Gloucester increases.
- 5.3.22 An Economic Impact Assessment was commissioned by the University in relation to the redevelopment of the former Debenhams building. This was prepared by 'BiGGAR Economics' in May 2021 (and can be shared on a confidential basis upon request). This assessment identified that during the construction process, the proposal will generate temporary economic benefits, including:
- £2.4 million Gross Value Added (GVA) and 120 job years in Gloucester;
  - £24.6 million GVA and 449 job years in Gloucestershire; and
  - £67.8 million GVA and 1,256 job years across the UK.
- 5.3.23 The above-mentioned assessment also identifies that the operational and purposeful activities of the University will be impacted by the creation of the new campus as a direct result of the increased number of students. This includes the impact on the University's core operations, student impact, learning impact and research and knowledge exchange impacts. Combining the quantifiable impacts generated by the operational and purposeful activities when the new campus is fully operational total:
- £86.3 million GVA and 1,235 jobs in Gloucester;
  - £317.0 million GVA and 4,424 jobs in Gloucestershire; and
  - £751.4 million GVA and 7,225 jobs across the UK.
- 5.3.24 Whilst the economic benefits of the proposal are clear, there are also social benefits. Becoming the main home of the Schools of Health and Social Care and Education, the new campus provides an opportunity to address socio-economic challenges in the local area, including mental health. Tailored learning spaces for each faculty in the building will expand the range of learning and development opportunities, increasing the skill set of local students and graduates.
- 5.3.25 Furthermore, the opportunity the proposal will bring in putting a prominent non-designated heritage asset into an optimum viable use is an important material consideration which weighs in favour of the proposals. The building makes a positive contribution to the City Centre

Conservation Area and the proposal ensures this is preserved and maintained for future generations.

- 5.3.26 For the reasons identified above, it is evident that the proposals would contribute significantly to the vitality and viability of the city centre. When combined cumulatively, these are highly significant material considerations that weigh strongly in favour of the principle of development being supported.

**c) The proposal would not have a significant adverse impact on the amenity of adjacent residents and businesses**

- 5.3.27 The proposals would not give rise to any unacceptable impacts to the amenity of adjacent business / residents by way of noise, air quality or traffic. To the contrary, the proposals would actually complement existing city centre uses and enhance the viability of local businesses by bringing a new demographic of users into the city centre to use the existing services and facilities available.
- 5.3.28 Indeed, the supporting technical evidence that has been submitted to accompany this application serves to demonstrate that the proposed campus would not have any adverse impact upon the amenity of adjacent residents or businesses.

**5.4 Summary**

- 5.4.1 It has been demonstrated that the former Debenhams building is unlikely to be suitable for a continued retail use, particularly given the size of the building and the availability of other vacant units within the city centre. In accordance with the aims of the NPPF, the proposal would put an existing redundant and vacant building within the city centre to a more effective and efficient re-use.
- 5.4.2 Importantly, it has been demonstrated the proposals would provide a number of significant benefits (both economic and social) that contribute significantly to the vitality and viability of the city centre. It can be seen, therefore, that there would be overall benefits of the proposal that outweigh the very limited, if any, disadvantage of the loss of retail use.
- 5.4.3 The principle of development is therefore fully supported by the Development Plan.

## 6 Conclusions

- 6.1 The proposal would revitalise a core part of the city centre, putting a currently vacant and redundant landmark building to a more effective and efficient re-use. This approach is consistent with the aims of the NPPF, which encourages the re-use of previously developed land.
- 6.2 The proposal aligns directly with the Government's 'Build Back Better High Streets Strategy', which acknowledges the challenges facing high streets across the country and encourages the re-use of former Debenhams stores.
- 6.3 The proposal will significantly enhance the vitality and viability of the city centre, with the proposals bringing a new demographic of users into the city. This will provide a number of economic and social benefits.
- 6.4 Students and staff will engage with the various retail, leisure and hospitality activities in the area, contributing to the viability of proximate existing uses. This, in turn, will likely encourage a greater retail and hospitality offering in the city centre as the footfall and spend of staff, students and visitors increases.
- 6.5 The building makes a positive contribution to the City Centre Conservation Area. The proposal will bring a non-designated heritage asset into optimum viable use, ensuring that it is preserved and maintained for future generations.
- 6.6 The proposal is in accordance with the Development Plan and should therefore be approved to enable the University to realise their vision to accommodate students within the city centre by September 2023.

# Appendices

## Appendix A – Assessment of Relevant National and Local Planning Policy

- A.1.1 The National Planning Policy Framework (NPPF) sets out the Government’s planning policies at a national level and how these are expected to be applied. The NPPF is therefore an important material consideration in planning decisions.
- A.1.2 At the heart of the NPPF is the presumption in favour of sustainable development. This is a consistent theme running through both plan-making and decision-taking defining what sustainable development in England means in practice for the planning system. It advises that development should be approved where it accords with statutory policies (Paragraph 11). Moreover, the NPPF states that local planning authorities should approach decision taking in a positive way to foster the delivery of sustainable development.
- A.1.3 The NPPF policies of specific relevance to the planning application are summarised in the table below.

NPPF paragraph	Commentary
88	<p><b>Summary</b></p> <p>Confirms that planning decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and <u>adaptation</u>.</p> <p><b>Compliance</b></p> <p>The proposal seeks to utilise and adapt an existing redundant building within the city centre for an appropriate re-use that supports the role and function of city centre. This accords with the positive approach set out within the NPPF.</p>
108	<p><b>Summary</b></p> <p>States that in assessing specific applications for development, it should be ensured that:</p> <ul style="list-style-type: none"> <li>a. appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;</li> <li>b. safe and suitable access to the site can be achieved for all users; and</li> <li>c. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</li> </ul> <p><b>Compliance</b></p> <p>The proposed campus would be situated within the heart of Gloucester City Centre, which is well placed to the population it serves. Given its central city centre location, it is well served by public transport and is easily accessible on foot and by bicycle. It is therefore accessible to all members of the community.</p>
119	<p><b>Summary</b></p> <p>Reaffirms that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.</p>

	<p><b>Compliance</b></p> <p>The building is vacant and Section 5 of this Statement demonstrates that it is unlikely to be suitable for a continued retail use. Instead, the building is proposed to be put to a more effective re-use, which will serve the local community, providing a number of economic and social benefits that contribute towards the vitality and viability of the city centre.</p>
123	<p><b>Summary</b></p> <p>States that planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.</p> <p><b>Compliance</b></p> <p>As identified above, the proposal would utilise a redundant building within the city centre, putting it to an alternate use, which will serve the local community.</p>
130	<p><b>Summary</b></p> <p>States that planning decisions should ensure that developments (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); and (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.</p> <p><b>Compliance</b></p> <p>Section 5 of this Statement sets out in detail how the proposals will contribute to the vitality and viability of the city centre, and how it will support local facilities (i.e. as a result of bringing in a new demographic of users into the city centre that will utilise such facilities). The design approach has been sympathetic to the historic character and appearance of the area and seeks to retain and enhance the contribution the building makes to its setting. See accompanying Design &amp; Access Statement and Heritage Statement for further detail.</p>
133	<p><b>Summary</b></p> <p>Reaffirms that local planning authorities should make appropriate use of processes for assessing and improving the design of development including design advice and review arrangements. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.</p> <p><b>Compliance</b></p> <p>The proposals were presented to the Gloucestershire Design Review Panel prior to the submission of this application and their comments and advice hve been incorporated into the overall design approach. See accompanying D&amp;A Statement for details,</p>

194	<p><b>Summary</b></p> <p>States that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.</p> <p><b>Compliance</b></p> <p>A Heritage Statement has been prepared to accompany this application, which describes the significance of the heritage asset and its contribution to the setting of the area.</p>
203	<p><b>Summary</b></p> <p>States that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</p> <p><b>Compliance</b></p> <p>The Heritage Statement that has been prepared to accompany this application provides a full assessment of the proposals effect upon the significance of the building as a non-designated heritage asset.</p>
206	<p><b>Summary</b></p> <p>States that LPAs should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.</p> <p><b>Compliance</b></p> <p>The proposal offers the opportunity to retain and convert the key historic parts of the building, putting it to a more effective re-use that will benefit the local community. The proposals will ensure that the building is preserved and maintained for future generations, thereby ensuring that its significance continues to make a positive contribution to its setting within the Conservation Area. See the accompanying Heritage Statement for further information.</p>

A.1.4 The adopted Development Plan policies of specific relevance to the planning application are summarised in the table below.

Policy	Commentary
<b>The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) 2011 – 2031 (2017)</b>	
Policy SD1 - Employment	<b>Summary</b>



	<p>Employment related development will be supported within Gloucester City.</p> <p><b>Compliance</b></p> <p>Once fully operational (expected by 2030/31), it is anticipated that approximately 359 full time equivalent (FTE) staff will be employed by the University in connection with the proposed City Centre Campus. In addition, the proposal will have a direct impact on the construction sector, which will generate indirect impacts on supplies and the expenditure of employees. See further detailed information in section 5 of this Statement.</p>
<p>Policy SD2 – Retail and City / Town Centres (3)</p>	<p><b>Summary</b></p> <p>The change of use of A1 (retail) premises will not be permitted, unless it can be demonstrated that the unit is not suitable for continued A1 use, the proposed use will maintain or enhance the vitality and viability of the area and it would not have a significant adverse impact on the amenity of adjacent residents or businesses.</p> <p><b>Compliance</b></p> <p>The above-mentioned policy tests, along with reasons why the proposal accords with them, is set out in detail within section 5 of this Statement.</p>
<p>Policy SD2 - Retail and City / Town Centres (5)</p>	<p><b>Summary</b></p> <p>New residential, retail, leisure, culture, tourism, office development and community facilities that contribute to the vitality and viability of designated centres will be promoted and supported.</p> <p><b>Compliance</b></p> <p>The proposed development will significantly enhance the vitality and viability of the city centre, with the proposals bringing a new demographic of users into the city, which, in turn, will provide a number of economic and social benefits. Further detail in respect of this is set out within section 5 of this Statement.</p>
<p>Policy SD8 – Historic Environment (3)</p>	<p><b>Summary</b></p> <p>Designated and undesignated heritage assets and their settings will be conserved and enhanced as appropriate to their significance. Development should aim to sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation whilst improving accessibility where appropriate.</p> <p><b>Compliance</b></p> <p>The former Debenhams building has an important place in the history of Gloucester City Centre; the proposal offers the opportunity to retain and convert the key historic parts of the building, putting it to a more effective re-use that will benefit the local community. See the accompanying Heritage Statement for further information.</p>

<p>Policy SD8 – Historic Environment (4)</p>	<p><b>Summary</b></p> <p>Proposals that will secure the future conservation and maintenance of heritage assets and their settings that are at risk through neglect, decay or other threats will be encouraged. Proposals that will bring vacant or derelict heritage assets back into appropriate use will also be encouraged.</p> <p><b>Compliance</b></p> <p>The proposal would revitalise a core part of the city centre, putting a currently vacant and redundant landmark building to a more effective and efficient re-use. The proposals will ensure that the building is preserved and maintained for future generations. Further information is set out within the accompanying Heritage Statement.</p>
<p>Policy SD14 – Health and Environmental Quality (1)</p>	<p><b>Summary</b></p> <p>Development should not create or exacerbate conditions that could impact on human health or cause health inequality.</p> <p><b>Compliance</b></p> <p>A full suite of technical information (including noise, air quality and ventilation assessments) have been prepared in support of this application and are appended to this Statement. These serve to demonstrate that the proposals would not give rise to any unacceptable impact by way of health or environmental quality.</p>
<p>Policy INF4: Social and Community Infrastructure (3)</p>	<p><b>Summary</b></p> <p>Social and community infrastructure should be centrally located to the population it serves and be easily accessible on foot and by bicycle. It should be located so as to have the potential to be well-served by public transport... New facilities should be accessible to all members of the community.</p> <p><b>Compliance</b></p> <p>The proposed campus would be situated within the heart of Gloucester City Centre, which is well placed to the population it serves. Given its central city centre location, it is well served by public transport and is easily accessible on foot and by bicycle. It is therefore accessible to all members of the community.</p>
<p><b>Gloucester City Local Plan 1983</b></p>	
<p>Policy A1.a: Heights of buildings and protection of views</p>	<p><b>Summary</b></p> <p>Buildings in the Inner Area as shown on the Proposals Map will be restricted to heights as existing.</p> <p><b>Compliance</b></p>

	It is not proposed to increase the height of the building. Any new or replacement rooftop plant or machinery would not be any higher than existing structures on the roof.
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A.1.5 In addition to the above, there are also a number of other material considerations relevant to the proposal, as summarised in the table below.

Policy	Commentary
<b>CD010b Appendix 1 – Tracked Change Pre-Submission Gloucester City Plan with CD010a Gloucester City Plan - Draft Schedule of Proposed Changes Version 3: Up to 20/05/2021</b>	
Policy C1: Active Design and accessibility (2)	<p><b>Summary</b></p> <p>Development proposals must clearly demonstrate that the proposal meets the highest possible standards of accessible and inclusive design, meeting the following principles:</p> <ul style="list-style-type: none"> <li>i. The development can be used safely, easily and with dignity by all regardless of ability, age, gender, ethnicity or economic circumstances; and</li> <li>ii. The development is convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment.</li> </ul> <p><b>Compliance</b></p> <p>Given the significance of the building, which is a landmark building within the city centre, the design approach will seek to maximise accessibility and inclusivity to enable all within the local community to use the building. Further information on the design approach is set out within the accompanying D&amp;A Statement.</p>
Policy C7: Fall prevention from taller buildings	<p><b>Summary</b></p> <p>On buildings or structures above 12 metres in height, planning permission will be granted where mitigation measures have been taken to help prevent suicide and accidental falls. Where mitigation measures are used, such as anti-climb methods, fences, barriers and rails, these will be well designed and integrated into the overall design of the building.</p> <p><b>Compliance</b></p> <p>Although access to the roof will be restricted for members of public, the University would be willing to accept suitable mitigation measures as appropriate (details of which could be secured by way of a suitably worded planning condition).</p>
Policy D1: Historic environment	<p><b>Summary</b></p> <p>Development proposals must conserve the character, appearance and significance of designated and non-designated heritage assets and their settings. Proposals should demonstrate:</p> <ul style="list-style-type: none"> <li>1. The protection and enhancement of existing heritage assets and their settings in proportion with the significance of the asset; and</li> <li>2. The conservation of features that contribute to the significance of a heritage asset, including structures forming part of the curtilage; and</li> </ul>

	<p>3. The proposed use of the heritage asset is compatible with the sustaining or enhancing its significance; and 4. The proposal conserves and enhances the character, appearance and architectural quality of the area and wider setting in terms of siting, scale, form, proportion, design and materials; and 5. The use of high quality and locally distinctive materials following traditional building methods and detailing, where appropriate; and 6. Retains important views into or out of the Conservation Area.</p> <p><b>Compliance</b> The proposals would seek to conserve and enhance the character and appearance of the non-designated heritage asset and its setting. Full details of how the proposal responds to the above-mentioned requirements is set out within the accompanying Heritage Statement.</p>
<p>Policy D2: Non-designated heritage assets</p>	<p><b>Summary</b> Where development affects a non-designated heritage asset, development proposals should: 1. Be of high quality and designed sympathetically to preserve the historic, architectural and archaeological interest. 2. Respect the surrounding landscape and its setting. 3. Seek to enhance the character of the non-designated heritage asset.</p> <p><b>Compliance</b> As above, the proposals would bring a non-designated heritage asset into optimum viable use, ensuring that it is preserved and maintained for future generations, having regard to the above-mentioned policy requirements (see accompanying Heritage Statement for further information).</p>
<p>Policy D5: Views of the Cathedral and historic places of worship</p>	<p><b>Summary</b> Development proposals should not harm any key views of the Cathedral and other historic places of worship.</p> <p><b>Compliance</b> Given that the proposal relates to the change of use of an existing building, there would be no impact upon key views of the Cathedral or other historic places of worship. The proposals would not impact upon any publicly available views.</p>
<p>Policy F1: Materials and finishes</p>	<p><b>Summary</b> Development proposals should achieve high quality architectural detailing, external materials and finishes that are locally distinctive. Developments should make a positive contribution to the character and appearance of the locality and respect the wider landscape. Innovative modern materials will be encouraged where they strongly compliment local distinctiveness.</p> <p><b>Compliance</b> The proposals would utilise good quality materials and finishes that respect and enhance the historic significance of the building, whilst also preserving the local distinctiveness of its setting. Further information in</p>

	<p>respect of the proposed material finish of the building is set out within the accompany D&amp;A and Heritage Statements, and is also shown on the plans.</p>
<p><b>Waste Minimisation in Development Projects SPD (2006)</b></p>	
<p>Supplements Policy 36 in the Gloucestershire Waste Local Plan</p>	<p><b>Summary</b></p> <p>Planning applications need to abide by the principles of waste minimisation:</p> <ul style="list-style-type: none"> <li>• To design proposals sustainably;</li> <li>• To reduce the amount of waste generated from development;</li> <li>• To conserve natural resources through re-using waste arising from construction</li> <li>• To re-use waste materials on-site to reduce transportation;</li> <li>• To use recycled materials where possible; and</li> <li>• To reduce waste generation during the operational lifetime of the development, and facilitate recycling where waste does arise.</li> </ul> <p><b>Compliance</b></p> <p>A Waste Minimisation Statement has been prepared and submitted to accompany the application, in accordance with the guidance set out within the above-mentioned SPD.</p>