Gloucester City Council
Transforming Your City

Gloucester City Plan

Employment Background Paper
September 2019

Gloucester City Council
Transforming Your City

Contents

1. Introduction and overview

1.1 The Local Plan for Gloucester consists of Development Plan Documents; the Joint Core Strategy (JCS) and the Gloucester City Plan (GCP). The JCS was adopted by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council in December 2017 and sets out the strategic planning strategy and policies for the three local authority areas between 2011 and 2031. The sits underneath the JCS, delivering it locally, and addressing local issues and opportunities. This background paper sets out further information to explain the rationale and evidence to support the proposed pool

2. National Planning Policy Framework

2.1 The National Planning Policy Framework (NPPF) (2019) sets out three overarching and interdependent planning objectives that are key in achieving sustainable development and which should be delivered through the preparation and implementation of plans; economic, social and environment. The economic objectives states that local authorities should help to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types in available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure. Planning policies and decisions to 'help create the conditions in which business can invest, expand and adopt', 'support economic growth and productivity' and 'recognise and address the specific locational requirements of different sectors'.

2.3 Specifically, paragraph 81 sets out that 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;
(b) Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
(c) Seek to address potential barriers to investment, such as adequate infrastructure, services or housing, or a poor environment; and
(d) Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

2.4 Paragraph 121 further sets out that authorities should take a positive approach to proposals for alternative uses of land that are currently developed but not allocated for a specific purpose in plans, where it would help to meet identified development needs. In particular, support proposals to 'use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework'.

3. Industrial Strategy: Building a Britain Fit for the Future

3.1 The UK Government recognises the significant economic strengths the nation already possesses that can be built upon to drive the national economy. However, clear direction is needed to increase productivity and maximise domestic workforce earnings potential.

3.2 Five foundations to drive this change have been established, to support this vision for a transformed economy:

- Ideas: the world's most innovative economy
- People: good jobs and greater earning power for all
- Infrastructure: a major upgrade to the UK's infrastructure
- Business Environment: the best place to start and grow a business
- Places: prosperous communities across the UK

3.3 The Industrial Strategy defines how this approach will be delivered, and how government and business will be expected to cooperate.

3.4 The Gloucestershire Local Enterprise Partnership (LEP) is in the process of preparing its Local Industrial Strategy, a translation of the national strategy tailored to Gloucestershire's economy. Similar to the national strategy, it will build on the County's local recognised strengths, and subsequently deliver on economic opportunities. It is expected this will be released in draft towards the end of 2019. It will be for the Joint Core Strategy Review, which has already commenced, to take forward the spatial implications of the LIS once complete.

4. Joint Core Strategy

4.1 The JCS, adopted in December 2017, sets out the strategic economic development strategy for the three local authority areas. The strategy and policies within the plan were subject to significant debate through the JCS examination in public, and the preparation of new evidence, to reflect and deliver the Strategic Economic Plan (SEP) prepared by the Gloucestershire Local Enterprise Partnership.

4.2 The JCS takes an urban focussed spatial strategy, strengthening the role of the key urban centres of Gloucester and Cheltenham, the market town of Tewkesbury and wider rural area of Tewkesbury Borough. The approach supports the role of M5 corridor as a focus for economic activity, supported by maximising urban capacity and the identification of mixed-use strategic allocations as urban extensions. It aims to balance the need for economic growth and new homes, locating jobs near to the economically active population.

4.3 The following policies are particularly pertinent:

- **Policy SP1: The need for new development:** Provision will be made for approximately 35,175 new homes and a minimum of 192 hectares of B-Class employment land to support approximately 39,500 new jobs.
- **Policy SP2: Distribution of new development:** The above will be delivered by development within existing urban areas through district plans, existing commitments,

urban extensions to Cheltenham and Gloucester, and the provision of Strategic Allocations at Ashchurch. Of this, 84 hectares of B-Class employment land will be delivered on Strategic Allocation sites, with further capacity being identified in district plans.
- **Policy SD1: Employment – Except retail development:** Employment related (B Class) development will be supported in a range of different locations, including at Local Plan allocations, at existing and new sites within the urban areas and where it would support the expansion of existing businesses.
- **Policy SD2: Retail and city/town centres:** Sets out strategic level policies for retail and city/town centres, aiming to protect the vitality and viability of designated centres and provides key principles relating to proposals for 'main town centre uses'. For Gloucester, it identifies city centre boundaries and an approach for development within the city centre. It supports proposals that deliver the City Council's Regeneration and Economic Development Strategy.

4.4 Importantly, the need for B Class employment development is provided at a JCS level, rather than for each local authority. As identified above, this figure is 192 hectares between 2011 and 2031 and reflects the needs of the SEP and the strategic cross-boundary nature of the local economy. The JCS housing requirement of circa 35,000 new homes during this time includes an 'economic uplift' to balance the needs of the economy, reflected in the SEP, and the need for new homes.

4.5 The JCS makes five mixed-use allocations that include the provision of B Class employment land. They will also likely include other retail and community uses to support the needs of these new communities. These are:

- A1: Innsworth and Twigworth
- A2: South Churchdown
- A4: North West Cheltenham
- A5: Ashchurch
- A7: West Cheltenham

4.6 In addition to these, land to the east of Junction 10 and to the west of the West Cheltenham Strategic Allocation is identified as 'safeguarded land' to meet longer-term development needs and will be considered through the forthcoming JCS Review.

4.7 The JCS further sets out that the district plans will consider further employment land capacity as well as the need to safeguard / protect existing employment sites and allocations from redevelopment to alternative uses.

4.8 At the time of writing, the JCS Review has already commenced and it will include consideration of economic growth considering the Local Industrial Strategy and supported by a full evidence base.

5. Planning for Gloucester's economy

5.1 The role of the City Plan is to deliver the JCS locally, and address any locally important issues and opportunities, reflecting the requirements set out in the NPPF. To frame this, it is necessary to understand relevant local evidence and strategies.

Strategic Economic Plan, Local Enterprise Partnership

5.2 The Gloucestershire Strategic Economic Plan (SEP) outlines the LEP's intentions for growth locally and outlines projects where funding will be sought through the Local Growth Fund. Produced in 2014 and refreshed in 2018, the SEP identifies three strategic priorities:

- **Business Environment**: attracting and retaining successful businesses in high value sectors and the next generation of talented workers.
- **Skills**: Providing and nurturing talented, highly employable, and productive individuals to meet the needs of local business, especially those in sectors with high growth potential.
- **Connectivity**: delivering digital and integrated transport connectivity to stimulate business growth, ensuring infrastructure meets the future needs of businesses and people

5.3 Gloucester is identified as one of the two key urban centres in the County. It describes a prosperous and resilient County and sectors with high growth potential, but also an ageing demographic and evidence that growth has slowed. The JCS and SEP seek to improve the attractiveness of Gloucester as a business location, improve productivity, improving skills, improving infrastructure and transport constraints and providing business support.

5.4 The strategy identifies priority projects in Gloucester that will drive the economic performance of the County, which will be supported with funding. To date, the UK Digital Retail Innovation Centre, a Growth Hub at the University of Gloucestershire and the new bus station (transport hub) have been delivered and are operational. Other city centre regeneration projects are also in the pipeline.

Gloucester Economic Growth Strategy 2019 - 2022

5.5 The Gloucester Economic Growth Strategy (EGS) has been prepared by the City Council and informed by the 'Strategy Options for the Gloucester Economy' (My Local Economy, 2017). The EGS builds on the Council Plan Vision which is '…for the Council, our partners and our residents to work together to make Gloucester a city that works for everyone. To City Council will deliver economic prosperity by:

1. Improving connectivity, communication and travel infrastructure;
2. Creating business opportunities that meet the needs of younger residents;
3. Attracting a greater number of shares shoppers and visitors to both Gloucester Quays and the City Centre;
4. Attracting niche and specialist retail and leisure operations, and offices to the City Centre;
5. Ensuring that the benefits of growth and regeneration are felt by all within the community;
6. Unlocking the economic and business value of green infrastructure;

7. Supporting the development of emerging and growing business sectors such as engineering, advanced manufacturing and aerospace, cultural, cyber security, digital retail and nuclear, as well as supporting employers in traditional sectors;
8. Supporting the expansion of the University of Gloucestershire at its Oxstalls campus; and
9. Working in partnership with the other Gloucestershire local authorities and the GFirst LEP to strengthen Gloucester's position as an economic driver in the County and wider region.

5.6 The EGS then goes on to set out an Action Plan based around the four key objectives of Business, People, Place and Impact. Of particular relevance for the GCP are those that have a spatial component, including:

5.7 It then sets out an Action Plan, framed within the context of three strategic priorities for business, people and place. Some of these actions have a spatial component that should be reflected in the City Plan, including:

- Articulate the economic priorities for Gloucester and secure the necessary resources to provide the physical infrastructure to enable sustainable growth. To achieve this by:
  - Ensure that Gloucester's infrastructure needs, and priorities are recognised through planning policy, and in the funding plans of relevant County-wide partners.

- Create and promote a City Centre 'rich mix'. To achieve this by:
  - Securing a quality mix of occupiers to new regeneration schemes, includi9ng King's Quarter and Gloucester Quays.
  - Securing business opportunities within smaller regeneration projects.
  - Creating business opportunities within the City Centre culture and leisure programme, through supporting the Gloucester Culture Trust.

- Improve the place-making role of planning policy to provide a cohesive, market driven development programme. To achieve this by:
  - Ensure than planning policy contains policies that support business growth, identifies appropriate site allocations that enables business investment, and protects existing employment land from redevelopment to alternative uses, where appropriate to do so.

- Implement initiatives to build interest in the City Centre and test the market for new businesses and roles. To achieve this by:
  - Support Marketing Gloucester's plans for a Full Fibre Network and test bed for new types of business with expertise in digital marketing.

- Maximise social value in all Council activity. To achieve this by:
  - Require applicants seeking planning consent for major housing development and major commercial development to produce Employment and Skills Plans, identifying opportunities for the employment and skill development of local people.

Strategy Options for the Gloucester Economy (My Local Economy) (2017)

5.8 'My Local Economy' was commissioned in 2017 to provide insights and recommendations to inform a new economic strategy for Gloucester, based on a programme of research, analysis and consultation with a range of local stakeholders. To evidence supports the EGS and forms a part of the evidence base for the GCP.

5.9 The document provides an analysis of the performance of the Gloucester economy and how it contributes to the wider Gloucestershire economy. It found, amongst other things, the following:

- Gloucester has 68,000 working age people and 3,425 businesses;
- There are a high proportion of larger businesses and sector strengths in manufacturing, energy, finance and insurance services;
- There are high rates of economic participation but with slightly higher levels of unemployment than the county average;
- Excellent connectivity and communications by road and rail;
- High occupancy rates within business premises; and
- Stakeholder consultation revealed strong business confidence and demand conditions, and a strong business park offer that provides the quality, type and size of accommodation at competitive prices that meet diverse business needs within the city.

5.10 At the same time, a range of challenges were identified, including;

- Negative perceptions of the city centre;
- Pressure for the loss of B-class employment land to alternative higher value uses;
- Loss of B1 Class employment stock with revisions to permitted development rights, which the City Council cannot control;
- A finite site supply of land within the city to provide for economic growth, and concern over the delivery of employment land through JCS strategic allocations given phasing and long lead in times;
- Relatively low rent and investment return on office premises in the city centre;
- A pressured road transport system and under-investment in business environment and amenities.

5.11 The assessment further provided an analysis of existing employment locations within the city. It provides commentary of the desirability of potential land allocations for B Class uses available at that time. It also reviewed the performance of the existing business stock within the city and found overall that it performed very well. Whilst business stock to the north and south of the city boundary is in high demand and generally of high quality, those trading estates/business parks in the core of the city tend to score lower, due to poorer building standards and non-conforming uses. That said, they are well occupied and provide affordable business accommodation, reflecting the diversity of Gloucester's economy.

5.12 The study then provided a variety of strategy options that have fed into the EGC, discussed above.

Employment Land Review (2019)

5.13 To support the GCP an update has been undertaken of existing employment locations within the city. It provides a partial update to the 'Strategy Options for the Gloucester Economy' work discussed above, which itself was informed by the Review of Business Parks undertaken by NLP to support the JCS. It undertook a review of existing employment land located within the administrative area of Gloucester City Council during summer 2019, providing a health check of sites and premises. In total, it examines over 70 individual locations in order to understand spatial characteristics, mix of uses, occupancy/vacancy rates and relevant planning history over the past five years. It includes industrial estates, business parks and substantial units/premises; it doesn't however include smaller-scale business space, for example those above retail units in the city centre.

5.14 The assessment confirms previous evidence around the performance of Gloucester's existing employment land. At the time the survey was undertaken, occupancy levels were at over 90% and vacancies at less than 10%. Most employment areas were operating at between 80% and 100% occupancy. 61% of occupied units were within Use Classes B1, B2 and B8. When Sui Generis Uses are included, that increased to 70%. The review of recent planning activity indicates continuing demand for new high-quality business space and didn't reveal activity that would suggest a site was struggling or failing as a business location. There is also evidence of business expansion on some sites.

5.15 The quality of different locations, and therefore the rents, differed quite substantially but occupancy levels suggested strong demand. The higher quality business parks and industrial estates tend to be located to the north and south of the city, in locations such as Barnwood and Quedgeley, closest to the main trunk road network and M5 motorway. Within the urban core, in areas that developed around the Victorian and early 20th Century tend to provide lower quality accommodation, with poor access arrangements and environment. That said, they are well occupied and provide affordable accommodation to meet the diverse needs of the Gloucester economy.

5.16 Overall, it can be concluded that Gloucester's existing stock of employment land remains strong, fit for purpose, providing a range of different types, quality and location that meets business needs. There remains additional demand for new business space and for the expansion of existing businesses.

Employment monitoring / delivery 2019

5.17 Every year the City Council undertakes monitoring of losses and gains for all employment generating uses, including offices, industrial, storage, retail, leisure and care homes. The monitoring provides the baseline for performance in delivering employment land as set out in the adopted JCS; in the case of B Class employment uses this is 192 hectares that supports the delivery of 39,500 jobs across the three JCS local authority areas.

5.18 The most recently public Employment Monitoring Report was published in September 2019 and is available to download from the City Council's website. To support the GCP, employment monitoring has been undertaken annually, covering the 2018/19 monitoring period. Before this, it was undertaken every two years.

5.19 As part of the JCS examination, in order to understand employment land supply, an analysis was undertaken of existing site allocations and extant consents in each of the local authority areas, plus potential new site allocations of the district plans (EXAM180). For Gloucester City, the following sites were identified as current existing extant supply:

Application Number	Site Name	Site Size Ha
11/00902/OUT	Triangle Park	1.94
00/00749/OUT	Kingsway Framework 5	13.42
02/00271/OUT	Gloucester Quays	0.89
14/01035/OUT	Land at Barnwood Link	5.7

5.20 Since this time, employment monitoring confirms that consents at Triangle Park and Gloucester Quays have com forward (albeit on the case of Triangle Park for a wider range of uses than B Use Class). Land at Barnwood Link remains undeveloped and a technical start has been made and further planning applications are now moving for site forward. In the case of Kingsway, a significant proportion of this has developed for retail purposes, rather than the consented B Use Class.

5.21 Outside of this, the monitoring demonstrates that planning consents for new employment uses are delivered, with a net gain of circa 8,700 sq m gross during the 2018/19 monitoring period. During the same period, only 2% of planning consents for employment generating uses lapsed. Further B Use development has been delivered at Waterwells Business Park and there is evidence of windfall activity and churn within existing employment development.

5.22 There have been numerous losses of B1 office space to residential use, through permitted development rights. As of the end of March 2019, approximately 3,000 sq m of B1 office space has prior approval for conversion.

5.23 The same JCS evidence base identified potential GCP employment allocations of at that time. For Gloucester City, this included Land East of Waterwells Business Park and Land adjacent to South West Bypass. The Pre-Submission GCP allocates a total of six sites totalling 15.3 hectares of land, wholly for employment use or partly as part of a wider mix of uses. This is set out in more detail at Section 6 of this report.

5.24 In addition, it is important to note that most of the JCS strategic allocations now have outline consent and this is being followed up with reserved matters planning applications. Positive progress is therefore being made in demonstrating delivery at these locations.

Investor demand

5.25 Gloucester is an attractive investment location, evidenced by the high demand for space over recent years. Affordable property prices, an available and relatively young workforce, and immediate access to two junctions of the M5 motorway have contributed to Gloucester’s economic success. The City Council keeps a record of investor demand and business interest more generally in the city. Officers also regularly engage with local employers and prospective investors, the GFirst Local Enterprise Partnership, and local commercial property agents and developers, to understand business needs and investment prospects. Overall this shows continued strong business demand for land and business units.

5.26 The two most recently delivered business parks serving the city, Waterwells Business Park and Gloucester Business Park have grown rapidly over the past decade as a result of consistent investor and occupier demand, and both are now nearly full. Both parks are home to a diverse range of larger businesses of various sectors with a regional and national identity. Further employment development is currently under construction at Junction 12 of the M5, located in Stroud District and, as mentioned above, the JCS makes strategic allocations of employment land within mixed-use urban extensions, located on the edge of the city in Tewkesbury Borough. This reflects the finite supply of land available within Gloucester that is both affordable for business use in the face of competition from higher value uses, and suitable for large floorplate development.

5.27 Over recent years the take-up of office space in Gloucester has remained strong, with several large businesses expanding and relocating within the city, including Horizon Energy. Supply of Grade A and secondary space remains at very low levels, leading to recent annual increases in rents for Grade A out of town space and secondary out of town space. For example, headline rent for out-of-town office space has increased from £18.50 psf in 2014, to £20 psf in 2018.

5.28 City centre rents have remained relatively static over recent years, although the ongoing regeneration of the Docks (e.g. Gloucester Quays and Baker's Quay), the completion of key residential schemes at the Barbican and Greyfriars and ongoing progress in the delivery of King's Quarter have strengthened the appeal of the city centre over the next few years. The completion of the Gloucester Transport Hub in 2018 as part of King's Quarter Phase 1, and the delivery of Phases 2 and 3, including over 3,300 m2 of new office floorspace, as well as other city centre regeneration initiatives and continued improvements to the city centre environment, will inevitably strengthen the viability of the city centre as an investment location and drive up demand for high quality office accommodation, address concerns around perception and the quality of the city centre environment. Further significant improvements are planned for the train station in the short to medium term and funding has been secured from the LEP to take this forward.

5.29 At the serviced end of the office property spectrum demand has remained strong, evidenced by Regus (Worcester Street) and Fig Offices (Southgate House) both taking second hand property and refurbishing it to create new serviced office space in 2018 in the City Centre. This has the potential to become a burgeoning market, encouraging a culture of creative enterprise, and encouraging start ups and micro businesses to grow in the city rather than commute out to surrounding cities. The Roundhouse at Gloucester is an example of how this can work at the smaller level.

5.30 However, competing priorities to deliver housing and the Government's changes to permitted development rights have led to the loss of several substantial offices and their redevelopment for residential, including the former Job Centre building on Southgate Street, the former Citizens Advice Bureau offices on Eastgate Street and former Royal Mail offices on Metz Way.

5.31 The industrial land property market has similarly remained strong, with continued upward pressure on freehold prices and rents for new build space. In 2018 three large new buildings were delivered for manufacturing businesses at Gloucester Business Park including TBS Engineering, G-TEKT and Dowty Propellers. Despite this the level of available prime, secondary and tertiary sites in Gloucester remains low, continuing to frustrate larger local businesses that wish to remain and expand in the local area.

Gloucester City Council
Transforming Your City

6. Gloucester City Plan policy

6.1 In order to meet the strategy and employment land requirements, it is necessary for further employment land to be brought forward in each of the district areas. The supply of additional sites includes extant consents, allocations in existing local plans and proposed allocations in the district plans. These were discussed in detail at the examination and roundtables and summarised in the 'JCS Economic Update Note' (EXAM180, February 2016). Within Gloucester City's administrative area 20ha of land from previous Local Plan allocations and extant planning permissions is identified (see paragraph 5.17 – 5.24), and 7ha from potential district plan allocations.

Site allocations

6.2 In total, the Pre-Submission GCP makes seven land allocations totally 15.3 hectares of land, for wholly employment use or as part of a wider mix:

Reference	Site	Proposed allocation	Commentary
SA07	Lynton Fields, Land East of Waterwells Business Park	2 hectare B-class employment land	This represents the remaining area of land available to the east of the very successful Waterwells Business Park.
SA08	King's Quarter	4.5 hectare mixed-use redevelopment including a range of mixed 'main town centre uses', including approximately 3,500 sq m B1 office floorspace.	City centre location and the Council's top regeneration priority. Office accommodation on upper floors will form a key part of this mixed-use city centre scheme.
SA09	Former Quayside House, Blackfriars	1.6 hectare development to include B1 office, residential, doctor surgery and pharmacy.	Redevelopment to provide additional offices for the County Council, along with GP surgery and pharmacy to provide for a locally identified need.
SA10	Former Fleece Hotel / Longsmith Street Car Park	1.6 hectare mixed-use regeneration/development.	Historic buildings, including Listed Buildings and Scheduled Monuments. Mixed-use development to include employment uses.
SA17	Land South of Triangle Park	4.2 hectare B1 employment land	The site is owned by Network Rail and this has been identified as a development opportunity during the latter part of the plan-period; it is required for operational purposes in the short term. Successful redevelopment of the northern triangle for a mix of uses including B1 light industrial provides an opportunity for an extension, accessed from Metz

			Way via the new highways arrangements.
SA21	Land at West Quay, The Docks	0.7ha mixed use main town centre uses (excluding retail).	An underutilised area of land within the Docks area with the potential to make a small but important to the wider area.
SA22	Land adjacent to Secunda Way Industrial Estate	0.7 hectare development for B Use Class employment.	Area of land adjacent to Secunda Way that can make a small but important contribution to the employment land supply.
	TOTAL	**15.3 hectares**	

6.3 Overall, this represents a capacity/supply of more employment land than that identified at the JCS examination, albeit it is accepted that in the case of Kings Quarter and Land at West Quay this is as part of wider mixed-use developments. However, the likely density of the developments, given their central location, will likely be higher than those in out-of-centre locations.

6.4 In terms of generic planning policy, Gloucester's existing stock of employment land is performing well, is attractive to the market and that Gloucester represents, along with Cheltenham, the economic driver for Gloucestershire. Evidence shows a continuing demand for employment growth. Within this in mind, it is important that the city's existing stock of employment land is protected from redevelopment to alternative uses, unless there is strong justification. Equally, considering the very limited supply of new land opportunities in the city, that the policy framework supports improvements to existing employment locations in order to increase their attractiveness and promote opportunities for growth of businesses and business premises. The Pre-Submission policies affecting B Use Class employment land and premises, are provided below.

Policy B2: Safeguarding employment sites and buildings

Employment sites and buildings will be safeguarded for B class employment uses and change of use/redevelopment to non-B class uses will generally be resisted. Such proposals will only be supported where the following criteria are met:

a. **The site or premise is redundant or no longer fit for purpose or capable of meeting employment needs; and**
b. **The proposal would not adversely impact on the continued use of adjacent employment uses; or**
c. **The proposal would bring significant benefits to the local economy and/or community that would demonstrably outweigh the loss of employment land.**

Gloucester is a small urban authority with a limited supply of employment land. Evidence from the City Council's Employment Land Review (2019), Economic Growth Strategy (2019) and Strategy Options for the City of Gloucester (2017) point to an excellent supply of existing employment sites and premises within the city, which overall are well occupied and meets the needs of and is attractive to the business community. The city provides a good range of different forms of employment space, from high profile business parks through to lower quality options, but which nevertheless provides the range of quality, type, size and price of accommodation to provide for the needs of businesses.

Gloucester is a primary focus for economic activity in the county and it is important this in maintained. In order to achieve this, existing sites and premises are protected from redevelopment to alternative uses, unless the proposal can meet the criteria outlined in the above policy. Where opportunities exist, the City Council will support proposals to intensify and improve the quality and offer of existing employment sites – see Policy B3 below.

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.

In demonstrating compliance with criteria a) of this policy, the City Council will normally expect the submission of a Marketing Appraisal, prepared by a suitably qualified person, demonstrating that the site or premises have been marketed for a reasonable period of time, details of any expressions of interest received and expert opinion of why the site was not acquired/leased.

For the avoidance of doubt, this policy applies to all employment falling into Class B of the Town and Country Planning (Use Classes) Order 1987 (as amended) including Class B1 (a, b and c), B2 and B8. It applies to all existing employment land and premises, consented employment land and premises, and allocations made in the GCP.

Policy B3: New employment development and intensification and improvements to existing employment land

Development proposals for new 'B' class employment development, and/or to improve the quality of accommodation, the environment and intensify the use of existing employment sites will be supported where the following criteria are met:

1. **Any increase in traffic can be accommodated by the transport network; and**
2. **Satisfactory vehicular access, parking and maneuvering space can be provided; and**
3. **The proposal would not result in significant adverse impact on the amenity of neighbouring uses, particularly residential properties; and**
4. **The scale and design of the proposal is compatible with the character of the location; and**
5. **It would not result in unacceptable adverse environmental impacts, for example in terms of noise, air, water, soil or light pollution.**

Proposals for limited non-B class uses will be supported where they are genuinely ancillary / complementary to the primary use of the site for B class uses. Where such uses are defined as 'main town centres uses', they will be considered in the context of Adopted JCS Policy SD2 'Retail and City / Town Centres'.

Policy SP2 of the Adopted Joint Core Strategy (JCS) identifies a need for 192ha of new employment land across the JCS area. Gloucester is a small urban authority with a finite supply of land and therefore the opportunity to allocate land with the administrative area is limited. Most new employment land therefore has to come forward through the adopted JCS on strategic allocations outside of the City Council's administrative area. JCS Policy SD1 further supports employment development at locations allocated for employment development within Gloucester City and for the redevelopment of existing sites or the change of use from non-B class employment to B class where of an appropriate scale and character. This policy goes a step further in specifically supporting the intensification of existing employment sites where they meet set criteria.

The city's existing employment stock makes an important contribution to the economy of the city and the wider county and region and, in light of the above, it is fundamentally important that the very best use of made of existing employment stock, whilst ensuring the impacts of doing so are adequately considered and addressed.

The City Council's Employment Land Review (2019), Economic Growth Strategy (2019) and Strategy Options for the City of Gloucester (2017) point to an excellent supply of existing employment land within the city, which overall meets of and is attractive to the business community. However, it also identifies that there are opportunities for environmental improvements and/or intensification that could support increased productivity/economic growth and the needs of growing businesses. This is particularly true within the city centre where concerns around the quality of the environment has been identified as an issue in attracting businesses to the area.

In some circumstances additional uses within employment areas can provide an important local service within employment areas. In order to maintain the primary function of B use class employment sites, these will be genuinely ancillary to and, where constituting 'main town centres uses', assessed in accordance with the sequential test and impact test.

Other policies

6.5 Outside of this, there are a range of other policies within the GCP that support quality business environments, for example in relation to high speed broadband, infrastructure improvements and the re-use of vacant floors above commercial premises in the city centre.