

URBAN CAPACITY STUDY

Gloucester City

April 2025



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Executive Summary

- This Urban Capacity Study (UCS) has been prepared using data available at the time of production. It reflects the best information currently accessible regarding land availability, site constraints, and development potential. However, urban environments are dynamic and subject to ongoing change. As such, this study should be regarded as a snapshot in time and will require periodic review to ensure its continued relevance and accuracy. Future updates will incorporate more recent data, including outcomes from ongoing housing monitoring, updated HELAA site assessments, and any changes in planning policy or local circumstances.
- An UCS is a realistic assessment of sites with potential to come forward for residential development within the city's boundaries. It provides evidence to Gloucester City Council regarding options to meet its housing requirements.
- This study is undertaken in the context of the emerging Strategic and Local Plan (SLP), fulfilling our duty to cooperate and working together with Cheltenham Borough Council and Tewkesbury Borough Council to produce an appropriate development strategy and meet the area's needs.
- The assessment is informed by 'current' sources, such as sites with planning permission, site allocations, and deliverable sites on the HELAA (Housing and Economic Land Availability Assessment) and brownfield register, as well as 'potential' sources, such as long-term vacant properties, public owned sites, windfall sites, and Regulation 18 sites. Elected members and parish councils were consulted on potential sources during early 2025. Density multipliers were applied to potential sources to calculate the net developable area of the site.
- The main finding is that Gloucester cannot meet its housing requirement by solely relying on its urban land. Even if all the current and potential sites were to come forward, it would only meet a small proportion of the overall requirement.
- Therefore, to meet Gloucester's requirements in full, a Green Belt Study will be undertaken, particularly considering 'Grey Belt' land deemed suitable to help meet the need across the SLP area. In addition, effective joint working on the SLP will need to continue under the duty to cooperate and the appropriate development strategy determined to ensure that the needs of the SLP area are met.

1. Part 1: Current Sources of Supply

1.1 Part 1 of this report covers analysis of the urban capacity of current sources of housing supply in Gloucester that are already in the planning system, namely:

- Supply from Commitments (permissions) over the plan-period;
- Allocated Gloucester City Plan supply over the plan-period;
- Deliverable sites assessed through the Housing & Economic Land Availability Assessment (HELAA); and
- Sites on the Brownfield Land Register.

A. Supply from Commitments over the Plan Period

1.2 Table 1 below highlights sites that have detailed or reserved matters planning permission for residential development as of end March 2024. For full details please see the latest Housing Monitoring Report 2024 available at: [Monitoring & Five Year Housing Land Supply | Gloucester City Council](#)

Table 1 - Sites with planning permission

Table 1: Commitments by Gloucester ward as of 31/03/2024	
Ward	Net consented dwellings (yet to be completed)
Abbeydale	1
Abbeymead	1
Barnwood	27
Barton & Tredworth	4
Coney Hill	5
Elmbridge	3
Grange	0
Hucclecote	-1
Kingsholm & Wotton	23
Kingsway	142
Longlevens	83 (this includes 1 unit at outline)
Matson & Robinswood	619 (including the allocated capacity at Little Winney)
Moreland	13
Podsmead	31
Quedgeley Fieldcourt	104 (this includes 4 at outline)
Quedgeley Severn Vale	0
Tuffley	9
Westgate	616 (this includes 23 at outline)
TOTAL	1,680

1.3 The 1,680 figure is what is permitted as of 31/03/2024. But clearly every year new applications for large and small developments are granted. Sections B, C and D below identify where some of these likely future permissions may come from, for example:

- City Plan allocations;
- Sites identified through the HELAA process; and
- Sites on the Brownfield Land Register (BLR)

1.4 Inevitably some windfall permissions will be granted on small and large sites that, at this point in time are not known about or anticipated. For further discussion on the potential windfall contribution to urban capacity see Part 2: H of this report.

B. Allocated supply over the plan period

1.5 Table 2 below details all the sites allocated in the adopted Gloucester City Plan and shows the total available capacity of 920 dwellings. Please see the following webpage for more information: [Adopted Development Plan - Gloucester City Council](#)

Table 2 - City Plan Allocations

Table 2: City Plan Allocations			
Ref	Site	Indicative capacity - dwellings	Indicative capacity - employment land
SA01	Land at the Wheatridge	10	N/A
SA02	Land at Barnwood Manor	30 (Note, this figure is counted as a commitment – see Section 1 above)	N/A
SA03	Former Prospect House, 67-69 London Road	60	N/A
SA04	Wessex House, Great Western Road	40	N/A
SA05	Land at Great Western Road Sidings	300	N/A
SA06	Blackbridge Sports and Community Hub	N/A	N/A
SA07	Former Quayside House - Greater Blackfriars	50	1.6 ha
SA08	Former Fleece Hotel and Longsmith Street Carpark	25	N/A
SA09	Land at St Oswalds	300	N/A
SA10	Former Colwell Youth & Community Centre	20	N/A
SA11	Land off New Dawn View	30	N/A
SA12	Land south of Winneycroft Allocation	30	N/A
SA13	Land off Lower Eastgate Street	15	N/A
SA14	Land South of Triangle Park	N/A	4.2 ha
SA15	Jordan's Brook House	10	N/A
SA16	Land off Myers Road	10	N/A
SA17	White City Community Facility	None	N/A
SA18	Part of West Quay, the Docks	20	N/A
		TOTAL = 920	TOTAL = 5.8 ha

1.6 Table 3 below details the Strategic Allocations in Tewkesbury Borough that are allocated through the Joint Core Strategy to meet Gloucester's housing need. It shows the total available capacity of 4,895 dwellings.

Table 3: JCS Strategic Allocations in Tewkesbury Borough Meeting Gloucester's Need

Table 3: JCS Strategic Allocations in Tewkesbury Borough Meeting Gloucester's Need					
Ref	Site	Dwellings Allocated and Permitted at Outline	Dwellings Delivered to Date (31.03.24)	Remaining Dwellings	Indicative Employment Land
A1	Innsworth & Twigworth	2,295	981	1,314	9.1 ha
A2	South Churchdown	1,100	399	701	17.4 ha
A3	North Brockworth	1,500	629	871	3 ha
		TOTAL = 4,895	TOTAL = 2,009	TOTAL = 2,886	TOTAL = 29.5 ha

*Note: Figures for the Winneycroft Strategic Allocation (A6) in Gloucester City are recorded in Table 1 of this report.

C. Deliverable sites in the HELAA

1.7 Owner/developer and officer found sites have been submitted to the LPA and assessed through Gloucester City's latest HELAA. This process is regularly updated and assesses sites based on their suitability, availability and achievability (the latter effectively meaning financial viability). [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-and-economic-land-availability-assessment).

1.8 Please note that inclusion within the HELAA does not indicate that planning permission would be granted at a later date. The HELAA considers sites at a high-level and does not go into the level of detail that would be required to allocate a site or grant a permission. Table 4 below details the deliverable HELAA sites that were published in the SLP Regulation 18 consultation (between January and March 2024). The small number of new sites that were submitted through the consultation will be considered in Part 2 of this study. In order to avoid double counting, the table below clearly indicates if the figures are recorded elsewhere.

Table 4: Deliverable sites in the HELAA

Table 4: Deliverable sites in the HELAA				
Sl. No.	Reference	Site Name	Dwellings Potentially Suitable, Available and Achievable in Years 1-5, 6-15 or later	Figures recorded elsewhere?
1	HA11	Former MoD Oil Storage Depot	70	Yes, in Commitments as the site is building out. At the next review this site will be removed from the HELAA
2	HA17	Greater Blackfriars - The Former Fleece Hotel & Longsmith Street Carpark	25	Yes, in City Plan allocations
3	HA20A	Railway Corridor – Great Western Road Sidings	300	Yes, in City Plan allocations
4	HA20B	Railway Corridor – Southern Railway Triangle	0 (The site is suitable for employment use. The HELAA recognises that the site is only potentially developable for a residential use; it is unlikely to be suitable. No yield figure is given).	Yes, in City Plan allocations
5	EA03	Land east of Waterwells Business Park - Lynton Fields	0 (The site is suitable for employment use. The latest HELAA recognises that the site is only potentially developable for a residential use; further investigation/information is needed. A residential yield figure is not currently given, but it could be when sites are assessed again against the updated HELAA methodology).	No
6	EA06	Land south junction between Eastern Ave and Barnwood Road	20 to 25	No
7	SUB02	GWRSA Social Club	20	No
8	SUB09	Land at The Wheatridge	10	Yes, in City Plan allocations
9	SUB28	Land at St Oswalds (Rear of former Cattle Market)	300	Yes, in City Plan allocations
10	SUB51	Wessex House	40	Yes, in City Plan allocations

11	FS16	Land adjacent to Eastgate Shopping Centre	20	No
12	ED044	67-69 London Road	60	Yes, in City Plan allocations
13	01NEW17	Blackbridge Sports & Community Hub	0 (The site is suitable for sports use. The HELAA recognises that the site is only potentially developable for a residential use; it is unlikely to be suitable. No yield figure is given).	Yes, in City Plan allocations. The site is building out and so at the next review it will be removed from the HELAA
14	03NEW17	Land at Blackbridge (Land off New Dawn View)	30	Yes, in City Plan allocations
15	05NEW17	Land off lower Eastgate Street	15	Yes, in City Plan allocations
16	06NEW17	Moat site - Land East of Winnycroft Lane & North of Green Farm	180 dwellings have been permitted, and this will be appropriately recorded in commitments in the requisite monitoring year.	No
17	07NEW17	Land East of Sneedhams Road	30	Yes, in City Plan allocations
18	02NEW18	Jordans Brook House	10	Yes, in City Plan allocations
19	03NEW18	Land off Myers Road (Cheltenham Surfacing)	10	Yes, in City Plan allocations
20	06NEW18	Colwell Youth & Community Centre	20	Yes, in City Plan allocations
21	01NEW19	Land at Netheridge (East of STW)	0 (The HELAA recognises that this site is only potentially developable for a residential use; it is unlikely to be suitable, and no yield figure is given).	No
22	02NEW19	Land at Netheridge (West of STW)	0 (The HELAA recognises that this site is only potentially developable for a residential use; it is unlikely be suitable and no yield figure is given).	No
23	04NEW19	West Quay, the Docks	30	Yes, in City Plan allocations
24	05NEW19	White City Replacement Community Facility	0 (The site is suitable for community use. The HELAA recognises that the site is only potentially developable for a residential use; it is unlikely to be suitable. No yield figure is given).	Yes, in City Plan allocations
25	01NEW20	12 Llanthony Road	22	No
26	02NEW20	269-277 Barton Street	20	No
27	03NEW20	Glevum House, Bristol Road	0 (The site is suitable for employment use. The HELAA recognises that the site is only potentially developable for a residential use; it is unlikely to be suitable. No yield figure is given).	No
28	04NEW20	Site south of Winneycroft Allocation	53 to 65	No
29	05NEW20	Frogcastle Farm	0 (Not suitable or developable for a residential use on flood risk grounds).	No
30	01NEW22	9 Park Road	10	No
31	02NEW22	20-26 The Oxbode	10 to 12	No
32	03NEW22	55 Northgate Street	5	No

33	04NEW22	74-78 Southgate Street	5	No
34	05NEW22	Above Wilkinson 74-84, Northgate Street	65 to 85	No
35	06NEW22	Beaufort House & Granville House – former Ecclesiastical offices	0 (The site is suitable for employment use. Although the HELAA recognises that the site is developable for a residential use, it is unclear which parts due to flood risk. No yield figure is given).	No
36	07NEW22	Former Hatherley Centre	20 to 30	No
37	08NEW22	Former Holly House	40 to 50	No
38	09NEW22	Former Poundstretcher, 32-34 Westgate Street	20	No
39	10NEW22	Former Sainsbury's, 63-69 Northgate Street	50 to 60	No
40	11NEW22	NEM House, 37-41 Clarence Street	15 to 20	No
41	12NEW22	Spread Eagle Court, Lower Northgate Street	15 to 20	No
42	13NEW22	EDF Barnwood Campus	260 to 325	No
43	14NEW22	The Knoll, Stroud Road	0 (The HELAA recognises that the site is only potentially developable for a residential use; it is unlikely to be suitable. No yield figure is given).	No
44	16NEW22	Land east of Stroud Road	0 (The HELAA recognises that the site is only potentially developable for a residential use; it is unlikely to be suitable. No yield figure is given).	No
45	17NEW22	Mill Place & Madleaze Industrial Estate	300 to 400 are estimated and this is lower than the submission by the landowner (Picton) in 2022 due to uncertainties over flood risk.	No
46	01NEW23	Land at Hempsted Lane	0 (Not suitable for dwellings due to flood risk. No yield figure given).	No
			Total range (not including sites counted elsewhere) = 970 to 1,214	
Note: All figures are a best estimate of dwelling capacity factoring in many variables.				

D. Deliverable sites on the Brownfield Land Register

- 1.9 The BLR identifies brownfield sites (also known as 'previously developed sites') that are suitable for housing development. Sites should be at least 0.25 ha in size or capable of delivering at least 5 dwellings. It is a statutory requirement for local authorities to keep an up to date, register. Further information is available at: [Gloucester Brownfield Land Register](#)
- 1.10 Many sites on the BLR are also identified in the HELAA and some are also allocations, so there is a crossover. However, sites have not been double counted in this report. Table 5 below details only those BLR sites that are not counted elsewhere.

Table 5: Suitable BLR sites

Table 5: Suitable BLR sites

BLR Reference	Site	Indicative dwellings capacity
GLOSBR054	St James Church Building, Bristol Road	10 to 22
GLOSBR025	12 to 16 Quay Street	30 to 45 (This is a lapsed permission for purpose-built student accommodation. The figure given here is for dwellings not student flats).
GLOSBR031	The Lodge, 19 Brunswick Square	10 to 15 (This is potentially a slightly low/conservative estimate)
Total		50 to 82

Totals for Part 1

1.11 The total urban capacity from current sources of supply in Cheltenham Borough as of 31st March 2024 is highlighted in table 6 below.

Table 6: Totals for current sources of supply

Table 6: Totals for current sources of supply	
Source	Indicative dwellings
A. Commitments as of 31 March 2024	1,680
B. Allocated supply in City Plan	920
C. Allocated supply in the JCS meeting Gloucester's housing need (yet to deliver)	2,886
D. Deliverable HELAA sites	970 to 1,214
E. Deliverable BLR sites	50 to 82
Total	6,506 to 6,782

2. Part 2: Potential sources of supply

2.1 Potential sources of supply in Gloucester are fairly wide ranging across different wards but clearly many sites lack the certainty of committed or allocated sites or those on formal registers. Table 7 below highlights some of these sources.

Table 7: Potential sources of supply

Table 7: Potential sources of supply	
Supply	Information sources
A. Housing strategy opportunities	Housing & homelessness strategy, National council tax database
B. City Council owned sites	Parking strategy, Open space strategy, Playing pitch strategy, Allotment strategy, Asset management plans
C. Other publicly owned sites	Sites submitted by public bodies following targeted consultation
D. Member identified sites	Sites submitted by Members / Town Councillors following targeted consultation
E. Officer identified sites	Information from Gloucester officers based on local knowledge
F. Estate regeneration	Planning applications
G. Call for sites	Submitted information
H. Small sites windfall allowance	Council 5 year supply and monitoring documents

A. Housing Strategy opportunities

2.2 The City Council's current adopted Housing Strategy is the 'Housing, Homelessness and Rough Sleeping Strategy 2020-25'. See: [Housing, Homelessness and Rough Sleeping Strategy | Gloucester City Council](#). It has three priorities:

- **Increasing supply:** Increasing the number of new homes that are built making sure they are built to a high standard of design with the right balance and mix of homes to meet the needs of the local community.
- **Making best use of existing stock:** Maximising opportunities for regeneration and conversion to create more homes through interventions, improving housing quality and standards, enforcing them when necessary, contributing to improving the health and wellbeing of our communities.
- **Reducing homelessness and rough sleeping:** Proactively intervening 'upstream' to prevent homelessness by working with our partners to enable people to find the right housing solutions and responding promptly to immediate homelessness.

2.3 In terms of making the best use of existing stock, the reports highlights the issue of the number of empty homes in Gloucester. These empty homes represent a significant resource which could contribute towards resolving the challenge of meeting housing needs. However, the latest reported year in the report is 2018 (7 years ago). Importantly the figures do not distinguish between short term and long-term empty homes. It is likely that a significant proportion are short term only. It is the long-term vacant properties that would make the biggest difference to meeting housing needs if they could be brought back into productive use. In terms of more recent trends for Gloucester and other districts in the County the information in Table 8 is based on the latest data from the National Council Tax Database.

Table 8: National Council Tax Database

Table 8: National Council Tax Database – Local Authority Level Data Council Taxbase 2024 in England - GOV.UK		
Authority	As of 15 Sept 2024: Total number of dwellings on the Valuation List	As of 15 Sept 2024: Number of dwellings that are classed as empty and have been empty for

		more than 6 months excluding those that are subject to the empty homes discount or empty due to flooding
Gloucester	59,968	447
Cheltenham	57,469	590
Tewkesbury	45,783	259
Cotswold	46,109	821
Stroud	56,756	615
FoD	40,886	486
TOTAL for SLP	163,220	1,296
TOTAL for Gloucestershire	306,971	3,218

2.4 Gloucester's strategy points to the following actions that could help to make the best use of existing stock:

1. Continue the programme of bringing upper stories of heritage buildings into residential use in the city centre, in accordance with the Council's Heritage Strategy.
2. Explore opportunities to enable schemes that encourage owner occupiers to rent rooms to individuals, such as key workers.
3. Adopt a targeted approach to prioritising problem and long-standing empty homes. Develop a model to enable the identification and response to opportunities that arise to repurpose stock, where its current use is redundant, to meet housing need.

2.5 Currently the council has an empty homes premium council tax charge for long term empty properties. This operates as follows:

- For properties that have been empty for 2 years or more an extra 100% council tax applies.
- For properties that have been empty for 5 years or more an extra 200% council tax applies. This is increased to an extra 300% for properties empty 10 years or more.

2.6 The council also operates a Landlord Incentive Scheme which includes a number of significant measures to try to assist landlords to bring properties back into use.

2.7 Given that the corporate work on empty homes is ongoing and measures are being put in place it is likely that an element could eventually contribute towards meeting housing needs. However, this is difficult to anticipate and therefore until further information is known it is considered that there is no urban capacity potential at this point in time from bringing unoccupied and unfurnished homes back into use.

B. City Council owned sites

Potential from Parking Strategy

2.8 In July 2018 the City Council published a Parking Strategy which was produced by Phil Jones Associates, and JLL. It focused on public car parking in the city centre. The report highlighted that many of the city centre car parks were well used but that there were potential opportunities for re-purposing. Table 9 below (taken from the report) indicated that the two car parks on Ladybellgate Street (effectively on one site) were due to close in 2022. In recent communications with the Council's Asset Management Team no indication was given as to the potential availability of the council owned part of the site for uses other than parking in the near future. In terms of other council owned car parks, see the commentary 'Potential from Asset Management Plans' below. In September 2023, Longsmith Street car park was closed by the council for safety reasons. It recently reopened following the necessary works being completed. If the car park were to become available in the near future for an alternative use, this could and should be in accordance with the adopted City Plan Policy (policy SA: Gloucester City Plan Site Allocations – SA08: Former Fleece Hotel / Longsmith Street Car Park).

Table 9: Parking strategy assessment of 2 city car parks

Table 9: Parking strategy assessment of 2 car parks on Ladybellegate Street						
Car Park	Assumptions by Car Park			Assumptions by Zone		Notes
	Zone	Parking Change	Zone	Parking Change		
Ladybellegate Street	1	-28	1	-109	Ladybellegate Street closed NCP Blackfriars closed	
NCP Blackfriars	1	-81	2	0		
			3	0		
			Total	-109		

Potential from Gloucester's Open Space Strategy

2.9 Gloucester's most recent Open Space Strategy was adopted in February 2021. [Gloucester Open Space Strategy](#).

2.10 Open spaces of all kinds are hugely valuable to the city's residents and to wildlife and there are over 200 areas of public open space in the city, including formal and informal green spaces, allotments, cemeteries, Robinswood Hill Country Park and Alney Island Nature Reserve, a total open space area of over 555 hectares. Almost 14% of the city's total land area is publicly accessible green space.

2.11 The Strategy does highlight some areas of Open Space that are currently of 'low quality' and 'low community value'. However, there are significant caveats: On page 107 of the published strategy, for sites of low quality and low community value it is stated:

"Consideration should be given to new or additional uses for these sites – new features, improved maintenance and clearly defined functions would be of benefit. Some sites might be considered for disposal (with all proceeds invested in other nearby open space improvement). Any disposals should only comprise very small spaces or a small part of a larger open space and would need to meet the planning policy exemption criteria. Full community consultation is highly recommended."

2.12 Table 10 below outlines the sites that fall into this category.

Table 10: 'Low quality' areas of Open Space

Table 10: 'Low quality' areas of Open Space provision in Gloucester		
Ward	Site	Notes
Abbeydale	AD12 – Awebridge Way (0.23ha)	Management unclear – parts should be left quite wild (badger sett was present on lower area), others need better management, priority for wildlife.
Coney Hill	CH1 – Maytree Square (0.26ha)	Underused space on busy road with unclear function – seating & path through centre. Perhaps plant lots more trees or add extra functions?
Coney Hill	CH5 – Savernake Rd (0.32ha)	Secluded space to rear of housing and alongside railway line. Backs on to Friendship Café. No clear function, old

		bike humps. Care should be taken if providing new use to take account of close neighbours. Possible community food-growing space (subject to contamination) or potential disposal?
Elmbridge	EL4 - Estcourt Gardens (0.53ha)	Series of linear spaces along Wotton Brook and Estcourt Rd. Overgrown conifer trees, unmanaged flower beds – gives an air of neglect. Could be improved for wildlife (watercourse improvements?) or for other uses such as food growing or fitness route. One part used to house a public toilet block.
Elmbridge	EL5 – Cross Keys Rest Garden (0.09ha)	On busy road, underused space, degraded low-level dry-stone retaining wall and flower beds. Could be re-used for food-growing or potential disposal? Mature ash tree and fruit trees on site.
Elmbridge	EL7 – Horton Rd Cemetery (0.15ha)	No longer managed by City Council, but potentially a much more pleasant space currently very overgrown. Historic burial ground with gravestones, ideally managed for wildlife.
Grange	GR4 – Tuffley Lane (The Gladiator) (0.63ha)	Large ‘verge’ on very busy Cole Ave with mature poplar trees – potential site for diversification of habitat, native tree planting/biodiversity improvements/climate mitigation along connected road corridor green spaces.
Grange	GR8 – Meredith Way (0.83ha)	Site with play area under management company. Not well maintained and currently play area closed 108 off – play equipment needs to be upgraded and suitable future management secured.
Grange	GR11 – Greenhill Drive (0.12ha)	Rather secluded space – it is unclear that it is actually POS. Would benefit from better management and possibly additional orchard planting with wildflower margins.
Hucclecote	HU6 – Green Lane/ The Orchards (0.2ha)	Area of woodland next to housing. No clear management plan.
Hucclecote	HU10 – Bircher Way (Hucclecote Centre) (0.7ha)	Issues with lack of grass cutting etc (possibly now resolved). More tree planting would be beneficial. Play area now installed in this space (Dec 2020).
Kingsholm & Wotton	KW2 – Kingsholm Rest Garden (Estcourt Rd) (0.05ha)	Development of Civil Service site may disrupt this space – issues with crumbling low-level stone wall & unclear function. New planting would be of benefit.
Kingsholm & Wotton	KW6 – Great Western Rd Rest Garden (London Rd) (0.02ha)	Space closed off due to anti-social behaviour. Proposed improvements still to be implemented.
Kingsholm & Wotton	KW7 – Great Western Rd Rest Garden (Horton Rd) (0.16ha)	Space underused, function unclear. May benefit from adjacent development of railway sidings for housing (size and facilities may increase).
Matson & Robinswood	MR8 – Saintbridge Recreation Ground (1.94ha)	Previously a rugby pitch but currently unused for sport, function now unclear, needs a new use such as outdoor fitness, other sports use, biodiversity improvements or food growing.
Moreland	MO1 – Sydenham Gardens (0.29ha)	Valuable space containing monument, but damaged paths, poor quality perimeter railing and overgrown conifer trees. Could be given additional functions suitable for local community. Would benefit from a proper railing fence to provide safe enclosure for small children and dog exercise.
Quedgeley Fieldcourt	QF4 – Needham Avenue (0.17ha)	Access off private road, this poorly located local space has no facilities and function is unclear. Waterwells Playing Field is now very close by. Other uses possible, could be a site for disposal?
Tuffley	TU2 - Brookthorpe Close (0.55ha)	Linear ‘wild’ space to rear of properties, not well overlooked, poor access, no defined management plan.
Tuffley	TU6 – Grange Park (0.34ha)	Small ‘wild’ space to rear of properties, not well overlooked, poor access, no defined management plan.

Tuffley	TU8 – Grange Road Rest Garden (0.17ha)	Degraded formal flower garden. Poor quality, lack of function – consider new use such as outdoor fitness, food growing, tree planting or disposal?
Westgate	WE8 – Jubilee Gardens (0.04ha)	Small, former ornamental garden 'Aviation Garden' - with plane sculptures (now relocated to Jet Age Museum). Much anti-social behaviour resulted in site being closed off. Consider new uses (or possible disposal?). Next door to Conservative Club and former Greyfriars bowling green.

2.13 In recent discussions and through a call for sites process, the Council's Asset Management Team has not formally indicated that the sites listed above are going to be available for development in the short to medium term. An exception is KW7 – Great Western Road Rest Garden which looks as though it could be considered as an opportunity to facilitate and improve any housing scheme which comes forward on City Plan allocation SA05: Great Western Road Sidings.

2.14 Given the uncertainty, it is unlikely that any open space sites can contribute towards urban capacity at this time.

Potential from Gloucester's Playing Pitch Strategy

2.15 Gloucester's current Playing Pitch Strategy¹ was adopted in 2015. It builds upon the preceding Assessment Report and provides a clear, strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities over the period 2015 to 2025. The purpose of the strategy is to help prioritise and target resources where resources are limited. It covers the following: Football pitches, Cricket pitches, Rugby union pitches, Rugby league pitches, Artificial grass pitches (AGPs), Other grass pitch sports including American football and lacrosse, Bowling greens and Tennis courts.

2.16 At Para 1.3 the headline findings indicate that there are no surplus pitches or sites in the city and indeed there is a significant shortfall of provision for many sports. This being the case there is currently no potential for housing sites to come forward from this source.

Potential from Allotment Strategy

2.17 There is a statutory duty on local authorities to provide allotments if there is demand. Gloucester's Allotments Strategy² was adopted in December 2014 and below, in Table 11, are the sites listed in the strategy as well as more recently added sites.

Table 11: Allotments in Gloucester

Table 11: Allotments in Gloucester		
Site	Ward	Plots
Cotteswold Road	Matson & Robinswood	7
Deans Way	Kingsholm & Wotton	8
Estcourt Close	Longlevens	215
Estcourt Park	Longlevens	102
Blackbridge	Matson & Robinswood	14
Hawthorns & Tredworth Fields	Moreland	101
Hempsted Cross	Westgate	3
Innsworth Lane	Longlevens	129
Robert Raikes	Tuffley	59

¹ playing-pitch-strategy-pdf-13-mb.pdf

² allotment-strategy-appx1-strategy-november.pdf

Saintbridge	Barnwood	271
White City	Matson & Robinswood	37
Willow Way	Barnwood	10
New site Podsmead	Podsmead	Not available / Not owned or administered by the City Council
New site Kingsway	Quedgeley Fieldcourt	Not available / Not owned or administered by the City Council

2.18 In reality, and after consultation with the relevant council team there is very little possibility of any of these sites becoming available for housing or other uses in the near future. In fact, given the demand, the council should be looking for opportunities for more allotment provision in the city and not less. Gloucester City Plan Policy C2: 'Allotments' states:

"Existing allotments are protected from redevelopment to alternative uses, unless alternative provision is made by the developer, of equivalent or better quality, in an accessible and appropriate location to the community where the loss would occur. Provision of new allotments will be supported where they would meet identified need within a community."

Gloucester is a small urban authority with an increasing population and finite land supply. Allotments are an incredibly important resource, supporting local food growth, physical activity and health and wellbeing. Within the city there are public allotments sites which collectively provide 652 individual allotments on 16 hectares of land. At the time of writing, there are waiting lists for all the allotment sites. It is therefore important to protect against the loss of city's existing allotments sites. Opportunities for new allotments are limited, however where demand arises, and the proposal is in a suitable location to meet that demand, they will be supported by the City Council".

2.19 Given that there are waiting lists for all allotments and additional plots need to be found in the future it can be concluded that there is no urban capacity potential from allotments at this time.

Potential from Asset Management Plans and engagement with Asset Management Teams

2.20 The most recent Council Asset Management Plan is 2016-2021. Table 12 below shows the listed assets in column 1 and the position of the team with regard to these assets following an update in January 2025 in column 2.

Table 12: Summary of Gloucester City Council's Assets

Table 12: Summary of Gloucester City Council's Assets (not an exhaustive list)	
Type of Asset	Position in January 2025
Office Accommodation	
Herbert / Kimberley / Phillipotts Warehouses (long lease) – listed buildings	Planning application expected Sprung 2025 for new development details as yet unknown
North Warehouse (freehold) – listed building	Currently in use as Regus offices and by the council for the Council Chamber and other meeting rooms.
92-94 Westgate Street (former prospects)	Currently on the market for sale of the freehold. Several offers received residential development expected
Cultural and Tourism Service Buildings	
Gloucester Guildhall – Grade 2 listed	In use as a cultural venue.
Gloucester Folk Museum – Grade 2* listed	Now owned by Gloucester Historic Buildings and used by the Civic Trust. Very unlikely to be suitable for residential use.
Gloucester City Museum – Grade 2 listed	In use as a cultural venue. There is an outright restriction on the title of this property that means it can only be used for culture and educational purposes. This applies to the museum and library.
Blackfriars Priory – Grade 1 listed & leased from EH	Wedding venue etc – no residential potential.

Tourist Information Centre, Southgate Street	Not available/no longer owned.
Major Sports and Recreation Buildings	
GL1 Leisure Centre, Bruton Way	Current leisure/sports use – no plans for change.
Oxstalls Tennis Centre, Plock Court	Current leisure/sports use – no plans for change.
Parks and Open Spaces	
150 areas of public open space	Limited potential. See Open Space Strategy.
Robinswood Hill Country Park	Not suitable.
Car Parks	
Hare Lane North	In use as a car park; no pending plans for a change of use.
Hare lane South	In use as a car park; no pending plans for a change of use.
Westgate Street	In use as a car park; no pending plans for a change of use.
Great Western road	In use as a car park; no pending plans for a change of use.
Longsmith Street	In use as a car park; no pending plans for a change of use. (but see the more recent update in para 4.8 of this report)
Kings Square	In use as a car park; no pending plans for a change of use.
Eastgate roof top and Boots roof top	In use as a car park; no pending plans for a change of use.
St Michaels Square	In use as a car park; no pending plans for a change of use.
Hampden Way	In use as a car park; no pending plans for a change of use.
Station Road	In use as a car park; no pending plans for a change of use.
Ladybellegate Street	In use as a car park; no pending plans for a change of use.
GL1 Leisure centre	In use as a car park; no pending plans for a change of use.
North Warehouse	In use as a car park; no pending plans for a change of use.
Castlemeads	In use as a car park; no pending plans for a change of use.
Barbican Car park	Now no longer a car park. Student accommodation complete.
Southgate Moorings	In use as a car park and no pending plans for a change to this. Was considered a few years ago in the SALA, but now not available.
The Laurels/Percy Street car park	In use as a car park; no pending plans for a change of use.
Moor Street	In use as a car park; no pending plans for a change of use.
Community Buildings	
15 Sports Clubs	No indication that these are available for other uses.
2 Community Buildings	No indication that these are available for other uses.
3 Scout / Cadet Buildings	No indication that these are available for other uses.
6 Pavilions / Changing Rooms	No indication that these are available for other uses.
Markets	
Eastgate Indoor Market	The Eastgate indoor market is currently operational. The market and indeed the whole of the Greyfriars Quarter is due to undergo significant regeneration following the receipt of central government Levelling up funding. At this early stage it is not known if there will be a residential component.
Hempsted Meadows Outdoor Market	The site is currently in use for car boot market. Flood risk is a major constraint.
Historic Monuments	
39 Monuments	Protected. Not suitable for development.
Crematorium and Cemeteries	
Coney Hill Cemetery and Crematorium	In use and not suitable for other uses.
Tredworth Road Cemetery and Chapel	In use and not suitable for other uses.
Investment Property	
Kings Walk (Landlord)	A review of the now vacant upper office floors is underway to ascertain alternative uses
Eastgate Shopping Centre (Landlord)	The City Council's Asset Management Team have not indicated that any changes of use are imminent.
Over 40 commercial premises	Only 1 row of properties in the Oxbode has been identified as being suitable for conversion of the upper floors.
Regeneration Assets	
King's Quarter	Regeneration is underway and dwelling capacity is already recorded in supply figures.

Land at Blackfriars & Fleece Site	Land at Blackfriars has been developed for student accommodation with all phases now complete. The Fleece site is allocated in adopted City Plan and there is the potential for c.25 dwellings on this site which includes Longsmith Street car park.
Gloucester Bus Station	The new bus station / transport hub has been completed and has been in use for a number of years.
Grosvenor House	Now demolished and part of the Kings Quarter scheme
Bentinck House	Now demolished, part of Kings Quarter scheme.
NCP Car park Bruton Way (Landlord)	Now demolished, part of Kings Quarter scheme.
Southgate Moorings	Although this site has been considered by the SALA process in the past, it is currently in use as a car park serving the Docks and the Quays and according to the City Council's Asset Management there are no plans in the near term for this to change.
16-18 Commercial Road (Landlord)	This site is currently in use by the Gloucester Bike Project, no indication that there will be a change to this arrangement in the near future.
23-29 Commercial Road	Food Dock now open and operational with restaurant use.
Docks Headlease	51% of the buildings on the Docks are already residential with the others occupied on commercial tenancies.
Strategic Landholdings	
Gloucestershire Airport, Staverton - 170 acres of land (being a 50% share with Cheltenham Borough Council)	Not in Gloucester's administrative area therefore not within the scope of this study but currently on the market for sale of the freehold as an operational airport.
Parton Farm, Churchdown - 68 acres of land (owned only by GCC)	Not in Gloucester's administrative area therefore not within the scope of this study.
Toilets	
Westgate car park toilets	Not suitable.
The Bus Station toilets	Demolished.
Robinswood Hill Country park toilets	Not suitable.
Swiss Cottage Gloucester park toilets	Not suitable.
The Depot, Eastern Avenue	
Depot comprising site of c.7 acres with mix of industrial, office.	In use and no indication that this use will change in the near/medium term.

C. Other publicly owned sites

2.21 Through both the SLP Regulation 18 consultation and direct contact via the UCS study, CBC consulted public bodies including the NHS, police, County Council and Network Rail. This sparked discussions and highlighted awareness to the public bodies to better understand the SLP process and how their assets could feed in. When these organisations periodically undertake their own asset management reviews, they will now endeavour to contact the SLP to enable consideration for housing if they wish to repurpose or dispose of any of their assets in the future. At this present time, it is considered, for the purposes of the UCS that there is no urban capacity potential to be realised from other publicly owned sites, however this situation may change in the future and will be reported in a subsequent iteration of this report.

D. Member identified sites

2.22 All elected Members in the city administration were consulted through the SLP Regulation 18 consultation which included a 'Call for Sites' providing the opportunity for Members to suggest a site for consideration. No formal responses were received through this process, however, the SLP team also provided another direct opportunity through a more targeted approach. Presentations were given to Gloucester City's Member Working Group (MWG) and the Joint Planning Policy Reference Panel/Working Group (Joint MWG/PPRP) comprising Members from all 3 LPAs with information subsequently emailed to each Member and all relevant Town and Parish Council's in built up areas across the SLP area, giving them the opportunity to submit a site for further analysis through an interactive form.

2.23 The following sites in Table 13 are those sites identified that are not featured elsewhere within the report.

Table 13: Member Identified Sites

Table 13: Member Identified Sites			
Site Name	Site Area (ha)	Notes	Estimated Capacity
Land beside 161 Bristol Road, Quedgeley, Gloucester	0.16	Small site. Not on BLR. No planning history. Mature trees on site boundary. The site is not of a size sufficient to be considered within the UCS or HELAA but could come forward as a windfall opportunity.	0
Land opposite 143 Bristol Road, Quedgeley, Gloucester	0.08	Not on BLR. No planning history. Mature trees on site boundary. The site is not of a size sufficient to be considered within the UCS or HELAA but could come forward as a windfall opportunity.	0
Old BT unit, Bristol Road, Quedgeley, Gloucester	0.67	This site has not previously been promoted. Not on BLR. Considered previously developed despite existing vegetation. Considered to have some UCS potential.	Approximately 36 (@60dph)
Disused Railway Sidings, along Great Western Road, Gloucester	3.34	Site falls within HELAA (HA20A) and already featured on the BLR.	Site already considered.
Disused land off Horton Road, Gloucester	0.43	Has been on BLR in the past and was a previous HELAA site. However, site is not available as planning permission for storage has recently been granted. Not suitable for housing due to pollution risk from former gas works.	0
Metz Way Maintenance Depot, Triangle Way, Gloucester	2.41	Site is an existing HELAA site (HA20B) and is on the BLR. Network rail maintenance depot - only part of the site is in use.	Site already considered.
Parkend Road / Weston Road, Gloucester	0.04	Site sits on the corner of Parkend Road and	0

		Weston Road, facing the skateboard ramp. There appears to be several derelict buildings and some outdoor space. Not currently in the HELAA or on BLR. The site is not of a size sufficient to be considered within the UCS or HELAA but could come forward as a windfall opportunity.	
Lloyds TSB building, Barnett Way, Gloucester	2.45	Site is not on BLR or within the HELAA. Currently being marketed and there is uncertainty about availability for uses other than for the current (or recent) large scale office use. Further assessment is required to determine land ownership, compatibility and appetite for redevelopment. The huge building offers c.138,500 sq. ft. of office accommodation and continued office use (e.g. for a company HQ) is the most likely use outcome in the short to medium term.	0
Total			36

E. Officer identified sites

2.24 The following sites in Table 14 are officer identified sites that are not identified elsewhere i.e. in the HELAA or BLR. These sites may have some future potential and will continue to be explored but, at this point in time, their inclusion is somewhat speculative. There is no certainty and very limited information, and so timescales and future residential potential are not estimated.

Table 14: Other Potential Sites

Table 14: Other Potential Sites	
Site	Commentary
Go Outdoors store and car park, off Trier Way	This site is strategically located and adjoins fairly dense residential area such as All Saints Road, Pembroke Street & Barton Street. The car park is very large and is currently underutilised. Should the site become available in the future, and if the application is policy compliant, then there is potential for future housing on this site. However, the site is not available

	and thus it is currently not possible to quantify future residential numbers.
<p>The following businesses are currently located on Eastern Avenue:</p> <p><u>South Bound</u></p> <p>Weavers Shop, AHF Furniture & Carpets, B&M Superstore, Pure Gym, Starbucks, Halfords, Bennetts Coaches, Peugeot/Citroen/Warners, Homebase, Ninja Warrior Adventure Park, Currys/ PC World, Harveys, Pizza Hut, Proper Job, Farm foods, Office Outlet, Lidl</p> <p><u>North Bound</u></p> <p>Magnet Trade, Poeton, Magnet, Smyths Toys, McDonald's, Dominoes, Royal Mail</p>	Retail evidence points to the fact that there is an oversupply in Gloucester and that in future large units such as those located on Eastern Avenue could potentially become available for other uses. However, presently there is no indication that any of the units mentioned are available or what the policy position would be in terms of alternative uses in this part of the city.
Allstone Site, off Myers Road	This site is currently in use as a waste transfer station and is allocated/safeguarded for waste uses by the County Council. The site is still listed on the BLR (Ref: GLOSBR004) but effectively it has been removed and given a Register end date of 31.12.2023. The reason for removal is that the site is not available, but if this situation were to change then this site could have significant potential for residential development. A previous outline permission (now lapsed) was granted for 200 student units and 200 dwellings. At the time of writing there is no firm indication that this site will be available for residential use in the near future, but it is important for the council to be aware of its potential and to monitor events.

F. Estate regeneration

2.25 Matson and Podsmead are both large ex local authority housing estates in Gloucester. The housing stock is relatively old, and some parts of these estates need improvement and renewal to improve the quality of life of local residents. In recent years there have been formal and significant regeneration proposals at both Matson and Podsmead, but Matson has now been dropped as an estate regeneration scheme by Gloucester City Homes. Small sites will continue to come forward in Matson but these will be windfall sites. Therefore, only details about proposals at Podsmead are provided below in Table 15.

Table 15: Capacity at Podsmead

Table 15: Capacity at Podsmead	
Site	Details
Podsmead	<p>The Podsmead Estate Regeneration SPD (November 2019) is available via the below link:</p> <p>Podsmead Regeneration</p> <p>Application 24/00412/FUL was received in June 2024 and is pending consideration. The proposal is for 173 new dwellings, but 64 existing dwellings would be demolished meaning that the net gain would be 109 dwellings.</p>
	Total net dwelling increase: 109

G. Call for sites 2024

2.26 A formal call for sites was undertaken by the SLP Authorities through the Regulation 18 consultation from 16th January to 13th March 2024.

2.27 Two new sites were submitted within Gloucester's administrative boundary. These are detailed below in Table 16.

Table 16: New sites submitted through the 2024 SLP Regulation 18 Consultation

Table 16: New sites submitted through the 2024 SLP Regulation 18 Consultation			
Site	Ward	Gross Site Area (ha)	Details
Land South of Homeground Road	Tuffley	5.8 (in Gloucester) but a total of 23.24 across Gloucester and Stroud District	219 (Discounting 37% of site area to provide net developable area. Based on 60dph in accordance with HELAA methodology).
Land at Spinnaker Park	Westgate	1.07	The site is only suitable for an industrial or waste use, not for residential development
			Total = 219

H. Small sites Windfall Allowance

2.28 The council has also considered an allowance for small windfall sites, being [sites that come into development unexpectedly](#). Gloucester's small sites windfall allowance is based on the average of small sites completed over the latest 10-year period. See Table 17 below.

Table 17: Small sites completions

Table 17: Small sites (1-4 dwellings) actual completions in a given year (10-year range)										
	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Total Net Completions	554	470	439	487	544	467	610	420	534	366
Small Site Net Completions	37	39	77	55	36	43	29	39	37	20

2.29 The average small site completions over 10 years is 41 dwellings. This is the windfall allowance for the 5YHLS calculation for 2023/24 but it will change every year because every year a new 10-year average is taken.

2.30 In the 5-year supply trajectory the small sites windfall does not apply for the first 2 years because in this period permitted small sites are being completed. See below for the expected windfall delivery from small sites from 2026/27 for the next 20 years. The figure is 738 dwellings. Clearly this is an estimate as the current 41 figure will potentially change every year.

Table 18: Small sites windfall

Table 18: Small sites windfall 2026-27 to 2043-44																			
5-year period																			
2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2036-37	2037-38	2038-39	2039-40	2040-41	2041-42	2042-43	TOTAL
/	/	41	41	41	41	41	41	41	41	41	41	41	41	41	41	41	41	41	738

Totals for Part 2

2.31 The total urban capacity from potential sources of supply in Gloucester City is highlighted in table 19 below.

Table 19: Totals for potential sources of supply

Table 19: Totals for Part 2 potential sources of supply		
Source	Commentary on indicative dwellings	Indicative dwellings (net) capacity
A. Housing strategy opportunities	Housing & homelessness strategy, National council tax database.	0
B. City Council owned sites	Parking strategy, Open space strategy, Playing pitch strategy, Allotment strategy, Asset management plans.	0
C. Other publicly owned sites	Any submitted sites for consideration from public bodies.	0
D. Member identified sites	Any submitted sites for consideration from Members.	36
E. Officer identified sites	Information from Gloucester officers based on local knowledge.	0
F. Estate regeneration	Podsmead planning application.	109
G. Call for sites	Submitted information.	219
H. Small sites windfall allowance	Council 5 year supply and monitoring documents from 2026/27 to 2043/44 – see Table 16.	738
		TOTAL = 1,102

Capacity and Density

2.32 Apart from identifying more sites and opportunities from all parts of Gloucester, another way in which urban capacity could be increased is through increasing densities on windfall development as well as on allocated sites. This is an approach that the NPPF encourages in paragraphs 129 and 130 to provide minimum density standards for different areas.

2.33 Urban density is a measure of intensity of development within a given area, and due to the residential focus of this study it will be expressed in dwellings per hectare (dph), the higher the number, the higher the density.

Local density policies and guidance

2.34 Following the ‘brownfield first’ principle, the 2023 Gloucester City Plan (GCP) refers to the 2017 Joint Core Strategy for density policies, which is derived from Strategic Objective 6 – ‘Meeting the challenges of climate change’. This objective calls to: “make the fullest contribution possible to the mitigation of, and adaptation to, climate change and the transition to a low-carbon economy, by making the best use of land, by maximising the use of previously developed land and encouraging higher-density developments in central locations, whilst promoting food security by protecting the highest-grade agricultural land and allotments”; (JCS, p. 14).

2.35 Specifically, policy SD4: ‘Design Requirements’ states that developments: “(...) should be of a scale, type, density and materials appropriate to the site and its setting.” (p.41). Further explanation is provided for layout considering assessing sites based on “the urban grain (the pattern and density of routes, street blocks, plots, spaces and buildings of a locality) and topography of an area”; (p. 45)

2.36 Similarly, policy SD10: ‘Residential Developments’ states that: “residential development should seek to achieve the maximum density compatible with good design, the protection of heritage assets, local amenity, the character and quality of the local environment, and the safety and convenience of the local and strategic road network”. (p. 61) and paragraph 4.10.6 provides further explanation stating that: “careful and innovative design is the key to achieving the highest appropriate density in a particular location. A proposal

which would harm the character of a neighbourhood or site through excessive density, poor design or inadequate open space will not be acceptable". (p. 62)

2.37 Policy A1 of the GCP: 'Effective and efficient use of housing, land and buildings', also seeks to ensure the best use is made of land, consistent with its location and character and, alongside the policies in the JCS, density considerations in Gloucester City are considered under this context.

Site Assessments

2.38 In assessing sites, Gloucester, along with Cheltenham and Tewkesbury, will use the joint HELAA methodology which is based on the standard methodology set out in the PPG. This methodology has been updated to take into account a detailed internal work stream undertaken on densities across the SLP area and changes in legislation.

Estimating development potential

2.39 The PPG advises that development potential of sites should be guided by the existing or emerging planning policy, including locally determined policies on density.

2.40 The assessment of development potential through the HELAA methodology is based on a number of factors and the development potential within the HELAA does not in itself determine that it is suitable for development or that it should be allocated for development. The potential is indicative only and does not prejudice assessments made through the development plan or planning application process.

2.41 Site capacities are assessed based on evidence from promoters of sites, urban design principles and other local information. Where evidence is unavailable, individual density assumptions have been applied to each local authority. The density categories align with the [National Model Design Code \(p. 14\)](#) (NMDC) (2021), which include 'Urban Neighbourhoods' 60 - 120 dph, and 'Suburbs' 40 - 60 dph. It is intended they are developed in more detail when the Design Code for the SLP areas is published (scheduled for 2026).

2.42 For Gloucester City the following densities are deemed appropriate to apply in assessing capacity:

- 60 - 120 dph is used for the main built-up area (examples include, Westgate, Kingsholm & Wotton, Matson, Robinswood and White City and Barton & Tredworth)
- 40 - 60 dph for all other areas

2.43 For the HELAA calculations the lower end of the density range is used (e.g. 60 for Urban Neighbourhoods) as a cautious approach. However, applications at the higher range of the density are encouraged in the appropriate site context (e.g. sites close to public transport links).

3.19 To account for a proportion of the site that will be taken up by infrastructure and landscaping, a density multiplier is applied to achieve a net developable area based on the following assumptions set out in table 20 below.

Table 20: Density Multiplier Assumptions

Site Size (ha)	Discounted site area	Area for housing
0 - 0.4	10%	90%
0.4 - 2	17%	83%
2+	37%	63%

3. Conclusion and next steps

3.1 This study has looked in detail at the potential urban capacity of Gloucester City as of March 2024. It has considered a wide range of sources from a. current supply and b. potential supply. Some potential sources need further investigation and will be reported on in future iterations of this report.

3.2 Some figures in this report are indicative because, particularly for potential supply, there are a wide range of variables and uncertainties in terms of the extent and timing of delivery on sites. It's challenging to accurately predict the development patterns of certain sites or schemes, and a downturn or recession could significantly change trajectories.

3.3 This report forms part of the evidence base for the SLP and the winter 2023/24 Regulation 18 Consultation. It will be updated with the latest monitoring data as soon as this becomes available.

3.4 In terms of employment land, this report recognises that further monitoring needs to be undertaken (see paragraph 1.0 and Table 2) but 5.8 ha of employment land is allocated in the adopted City Plan.

3.5 In terms of dwellings, from current supply (as of end March 2024) and potential supply over the SLP plan period to 2040/41 the total indicative figure from this report (only including capacity in Gloucester's administrative area) is provided in table 21 below.

3.6 Given the push to increase densities through legislation an optimistic approach to the total capacity has been taken and, where the figures are variable (e.g. on HELAA sites), the higher figure has been used to inform both this study and the joint results for the SLP area.

Table 21: Total Urban Capacity within Gloucester City

Part 1: Current sources of supply = 6,782 dwellings
Part 2: Potential sources of supply = 1,102 dwellings

Total urban capacity = 7,884 dwellings

Note: These figures are indicative and subject to variations and changes through more detailed site analysis work. An update to this report will add in:

- a. An up-to-date estimate of long term empty homes in Gloucester.
- b. More details on the Greyfriars Quarter/Eastgate market development.

It is important to consider that this report has only considered future urban capacity in the administrative area of Gloucester City and that other supply elements include:

- Completions to date within the plan period (both in Gloucester & in JCS Strategic Allocations in Tewkesbury meeting Gloucester's need).
- The significant commitments still to deliver in JCS Strategic Allocations in Tewkesbury meeting Gloucester's need.

3.7 Gloucester's current housing need is 696 dwellings per annum (or 13,920 dwellings over a 20 year time frame) using the Standard Method in the NPPF. Even after applying the appropriate higher density multipliers, it is clear that Gloucester cannot meet its housing demand by solely relying on urban land within its administrative boundary. The urban capacity identified within Gloucester City would only equate to the provision of 394 dwellings per annum (just over half of their overall need) even if all current and potential sites were to come forward to meet the need within the plan period.

3.8 Therefore, to meet Gloucester's needs in full, further evidence is required in terms of an SLP Green Belt Study, to understand if there are any parcels of land that could be released for development, particularly taking into consideration any 'Grey Belt' land deemed suitable to help meet the overall need. In addition, effective joint working on the SLP will need to continue under the duty to cooperate and the appropriate development strategy robustly determined to take into account the baseline capacity of the Gloucester (and Cheltenham and Tewkesbury) administrative boundaries and other pertinent evidence based workstreams.

REPORT END