Strategic & Local Plan
Cheltenham, Gloucester & Tewkesbury

Cheltenham Borough, Gloucester City and Tewkesbury Borough councils' Strategic and Local Plan (SLP)

City / Town / Local Centres Topic Paper

October 2025

CHELTENHAM BOROUGH COUNCIL
Gloucester City Council Transforming Your City
Tewkesbury Borough Council

Contents

1 Non-executive Summary

1.1 This Topic Paper explores how city, town, district, and local centres across the Strategic and Local Plan (SLP) area are performing, what challenges they face, and how planning policies can help them thrive in the future. It draws on national guidance, recent legislation, and feedback from the 2024 consultation to understand what's working and what needs attention. The paper looks at how centres like Gloucester, Cheltenham, Tewkesbury, Bishops Cleeve, and Winchcombe are adapting to changes in shopping habits, the rise of online retail, and the lasting impact of the pandemic. It highlights national trends such as the shift toward mixed-use spaces, the importance of leisure and community activities, and the growing role of residential development in town centres.

1.2 This paper also highlights how town centres are being considered nationally, reflecting on how national policies and legislation have been updated to give town centres more flexibility to evolve. These changes support a broader vision of centres as places to live, work, learn, and socialise - not just to shop.

1.3 Locally, Cheltenham town centre remains the most financially successful destination in the SLP area, with a wide catchment for comparison shopping and strong resilience against out-of-centre competition. Its thriving food and beverage sector benefits from year-round events like Cheltenham Festivals and the racing festival, while leisure services now dominate the land use mix, occupying around one third of all units.

1.4 Gloucester city centre continues to face challenges with a persistently high vacancy rate affecting one in five units, and a decline in comparison and service retailers, largely due to strong competition from Gloucester Quays, nearby retail parks, and Cheltenham. While the Quays outlet centre draws visitors and dominates food and beverage spending, it also competes with the historic 'Gate Streets' and central shopping areas. More positively strategic opportunities exist to repurpose surplus retail space, as demonstrated by successful developments like The Forum and the University of Gloucester's reuse of the former

Debenhams building, offering a foundation for future mixed-use regeneration.

1.5 Tewkesbury town centre has seen little change over the last several years, maintaining a modest market share for convenience and comparison shopping within a limited catchment. Tewkesbury's vacancy rate has notably improved and now sits below the national average and retail and service sectors remain stable. Bishops Cleeve and Winchcombe centres have also shown minimal change, however, a new Aldi store recently approved in Bishops Cleeve is expected to impact the market share of the existing defined 'town centre' retailers there.

1.6 This paper highlights shared challenges and opportunities across Gloucester, Cheltenham, and Tewkesbury, calling for a coordinated yet locally responsive policy approach to support centre vitality. Key priorities include defining a clear hierarchy of centres, promoting urban renewal, increasing residential and mixed-use development, enhancing accessibility and public realm and encouraging evening and community activities. Future policies should also support the repurposing of vacant units, resist unsustainable out-of-town retail expansion, and embed climate resilience and sustainable transport. Wider considerations, outside the remit of the SLP, should include business support, tourism promotion and the potential use of High Street Rental Auctions to tackle persistent vacancies and drive regeneration.

1.7 The volume of responses and depth of feedback received during the regulation 18 engagement demonstrate that this topic holds significant importance for residents and stakeholders, highlighting the need for the SLP to reflect their concerns and suggestions in shaping an effective centres strategy. Through future robust policies, the areas centres must be encouraged to evolve to balance retail with complementary uses that boost local demand and business resilience.

2 Introduction and Purpose

2.1 This paper sets out the existing context for the SLP areas City, Town, District and Local Centres. It considers national policy and existing and emerging corporate centre policies, along with the emerging evidence base which is being prepared for town planning issues in the SLP. It also assesses ongoing work that is being undertaken to revitalise and regenerate the centres of Gloucester, Cheltenham, Tewksbury, Bishops Cleeve and Winchcombe by other council departments or separate organisations to address any issues and ensure their continued vitality and viability.

2.2 This paper considers responses received to the regulation 18 consultation undertaken in 2024 and how these will help shape the future of the centres through the drafting of the SLP.

2.3 The purpose of this Topic Paper is to assess the baseline information that is published or ongoing in relation to the SLP areas city, town and local centres in terms of any objectives, commitments and requirements to gain a full understanding of the nature of the issues experienced.

2.4 This understanding, along with results from previous consultations undertaken on the SLP, will evidence and inform the policy response that will be incorporated into the emerging SLP as well as helping ensure that measures are embedded into wider plan-making principles. This in turn will drive the area in terms of positive economic growth, output and processes.

2.5 National guidance advocates establishing a network and hierarchy of town centres defining their extent and primary shopping areas, making clear the range of uses permitted in such locations. This is part of a positive strategy for the future of centres. However, we need to marry this with recent legislation that allows greater flexibility in permitted changes of use within centres, reflecting the changing nature of retail, enabling more residential and wider uses that better reflect the needs of active centres.

2.6 Therefore, it is imperative that centres are enabled to evolve and be redefined. This ethos should inform the SLP approach to city / town / district / local centre policies and any future associated use allocations. With positive planning policies we can acknowledge the continued importance of retail whilst supporting uses which increase demand and spend for local retailers and businesses.

3 National policy and trends

National Planning Policy Framework (NPPF)

3.1 The **NPPF** represents the Governments position on planning policy. It is a material consideration in plan making and planning decisions. The most up-to-date iteration of the NPPF was published in December 2024 which sets out the Government's planning policies for England and how these should be applied (para 1).

3.2 Para 90 states that: *"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation".*

3.3 It stresses that planning policies should:

a) "define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;

c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;

d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;

e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate *edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and*

f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites".

3.4 Criteria set out in para 86 c) now require LPAs to identify appropriate sites for commercial development which meet the needs of a modern economy. It states that planning policies should: *"pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics".*

3.5 Criteria within para 87 c) now requires planning policies and decisions to make provision for *"the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience".*

3.6 These changes could potentially have an impact on centres and their types of uses in the future.

3.7 The Governments web-based **Planning Policy Guidance** (PPG) which is technical guidance that supports the NPPF advises on Town Centres and Retail[1] and states (para: 001: Reference ID: 2b-001-20190722) that:

"Local planning authorities can take a leading role in promoting a positive vision for these areas, bringing together stakeholders and supporting sustainable economic and employment growth. They need to consider structural changes in the economy, in particular changes in shopping and leisure patterns and formats, the impact these are likely to have on individual town centres, and how the planning tools available to them can support necessary adaptation and change."

[1] Town centres and retail - GOV.UK (www.gov.uk)

3.8 The PPG also states that a wide range of suitably located complementary uses can help to support the vitality of town centres, including residential, employment, office, commercial, leisure/entertainment, healthcare and educational development. In addition, the guidance encourages temporary activities, such as 'pop ups', which will often benefit from permitted development rights. The expansion of evening and night time activities are also considered within the guidance to have the potential to increase economic activity within town centres and provide additional employment opportunities.

Changes to the Use Class Order and potential impact on centres

3.9 The **Town and Country Planning (Use Classes) Order 1987**[2] essentially categorises different types of property and land into classes. Changes between uses within the same class does not constitute development and therefore does not require planning permission.

3.10 The **Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020**[3] amended the Use Classes Order and introduced significant changes to the system of use classes.

3.11 These changes were made in parallel to additions to permitted development rights, with the aim being to support the high street revival and allow greater flexibility to change uses within town centres without the need for express planning permission.

3.12 Introduced in September 2020, Class E brought together a number of former uses under one broad 'commercial, business and service' heading and permits changes of use between shops, restaurants, cafés, clinics, crèches, banks, offices, light industrial, indoor sports to another (or multiple and changing uses across the whole day) use within the use class E. It covers many of the activities traditionally found in high streets or town centres and is intended to support flexibility and diversity.

3.13 Bringing these uses together and allowing movement between

[2] The Town and Country Planning (Use Classes) Order 1987 (legislation.gov.uk)
[3] The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (legislation.gov.uk)

them gives businesses greater freedom to adapt to changing circumstances and to respond more quickly to the needs of communities.

Permitted Development (PD) Rights

3.14 The **Town and Country Planning (General Permitted Development etc.) (England) Order 2021**[4] (as amended) identifies some permitted development rights allowing the change of use from one class to another, subject to conditions.

3.15 New PD rights to allow the change of use in England from any use, or mix of uses, from the Commercial, Business and Service use class (Class E) to residential use (Class C3) was introduced under Class MA of the Town and Country Planning (General Permitted Development etc.) (England) Order 2021. It came into effect in August 2021.

3.16 This allows unused commercial buildings to be granted permission for residential use via a fast-track prior approval process which can only consider flooding; noise from commercial premises and adequate light to habitable rooms (also includes the impact of the loss of a health service) and in Conservation Areas the impact of the loss of a ground floor Class E use.

Other Legislation

3.17 The High Street Rental Auctions legislation, introduced under the Levelling Up and Regeneration Act 2023, allows local authorities in England to auction leases of commercial properties that have been vacant for over a year, without requiring landlord consent. Aimed at revitalising town centres and reducing high street vacancy rates, the process involves issuing notices to landlords, setting permitted tenancy terms and running competitive auctions to attract suitable tenants. Landlords retain limited rights to appeal and comment but must cooperate with the process. The scheme targets economic, social, and environmental improvement by enabling faster occupation of

[4] The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 (legislation.gov.uk)

unused premises.

3.18 The Pride in Place programme (announced on 25th September 2025) is a UK government initiative aimed at revitalising communities by improving public spaces, local infrastructure, and civic pride. It forms part of the broader Levelling Up agenda and provides funding to local authorities to regenerate high streets, parks, cultural venues, and community hubs. The programme supports projects that enhance the look and feel of neighbourhoods, promote local identity, and foster social cohesion, with a strong emphasis on engaging residents in shaping their environment. Its goal is to create safer, more attractive, and vibrant places where people feel proud to live and work.

3.19 In July 2025, the Minister for Services, Small Businesses and Exports announced a new National Licensing Policy Framework designed to simplify and modernise licensing rules across England, aiming to support small businesses, boost hospitality, and revitalise high streets. The framework introduces streamlined national guidance while preserving local flexibility, fast-tracks permissions in designated “hospitality zones,” extends pavement licence durations and revises Temporary Event Notices to allow more frequent events. It also adopts the Agent of Change principle to protect existing venues from noise complaints due to new developments, all as part of the broader Small Business Plan and Plan for Change strategy.

4 SLP Public Consultation

4.1 The SLP brings together four core elements – formerly the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy and the individual local plans for each of those areas – under a single examination setting out a long-term vision for development.

4.2 As part of the preparation for the plan a public consultation (Regulation 18)[5] was undertaken in autumn/winter 2023, known as an 'Issues and Options Consultation' that focused on spatial options and key policy areas. The publication of this Topic Paper is also part of the ongoing engagement under Regulation 18.

4.3 One of the policy areas investigated was Retail and City / Town centres. Two questions were put forward to initiate debate on this topic and the summary of responses received to each is set out below:

Q 21. How could the Strategic and Local Plan best enable change and encourage investment to support our city and town centres to adapt, evolve and thrive?

- Many respondents considered that there should be more emphasis on urban renewal, together with more residential and less shopping in town centres and more employment uses.
- There were suggestions to consider repurposing the centres to include uses such as student accommodation, education, health care provision, leisure, small scale learning centres, elderly persons accommodation and gyms with more vibrant nightlife, as well as consideration of space for festivals and events to bring in additional revenue.
- The densification of town centres was often suggested, increasing densities and allowing change of use of upper floors to residential. It was suggested to increase density for residential within both centres and within walking distances of centres. Suggestions included mixed development based around 'Urban Concentration' so that all services are central and within a safe environment.

[5] SLP-Consultation-Document-Reg-18-1.pdf (strategiclocalplan.org)

- There were suggestions to reclaim large scale supermarket sites for houses and local retail, given that shopping habits for groceries have changed. Additionally, it was suggested that out of town retail parks with high vacancy levels could also be repurposed to provide housing and employment uses such as research and development. Although some respondents do not wish to see shops replaced with housing.

- Incentivising modifications to existing buildings to make them more accessible and energy efficient was suggested along with the repurposing of existing structures and sites for new businesses and accommodation. A further suggestion was for under used offices in town centres to create multi occupancy rentals for people / companies involved in hybrid working. It was recognised that in transitioning the centres there will need to be a high level of flexibility in the use and reuse of existing properties particularly being more open minded in the use of brown field sites and existing buildings / uses.

- Parking was a recurring theme amongst respondents. Accessible and free/low-cost parking was often suggested to encourage people to the town centre with better managed car parks for residents, not companies. In addition, a suggestion for the release of a vast area of redundant car parks was introduced.

- Sustainable travel, improved transport links and public transport investment was another common issue with suggestions such as ensuring that places are created where daily needs can be met in a short walk or cycle, provision of community transport, better use of scooters, dedicated bus corridors, cycle lanes and bicycle parking, more Park and Ride facilities and the consideration of the strategic relationship between the towns/city and its railway stations being put forward.

- Some respondents wish to see tax incentives for new businesses, with a reduction in business rates for town centre businesses so they can compete more fairly with out-of-town businesses. Suggestions to offer 'green' incentives were also put forward. It was considered that the SLP needs to better support local and small retailers, encouraging independents and designating some areas for local independent and small retail and hospitality businesses. It was further suggested that free business consultation services should be available, alongside grants for small business start-ups, with the councils working closely with commerce and industry to actively seek out diversity of tenants and businesses for a more varied range of uses.

- There was some recognition that needs may need to be met on land which is susceptible to flooding and that the emphasis should be instead on appropriate management of these sites including access/egress management plans and warning systems.
- There was concern for existing empty retail sites as these can make centres unwelcoming, discouraging people to visit. A suggestion was to reduce the total number of retail outlets and concentrate them together, repurposing dispensable units to provide housing.
- Out of town retail parks were often discussed, with most respondents wishing to see these restricted, however, some considered that they provide convenient places to shop, where parking is free and in abundance and that they complement shopping sites elsewhere.
- Some suggestions for local projects / regeneration schemes were put forward to entice people to the town centres with the encouragement to create tourist attractions for the town.
- Heritage and quality of the centres was a prominent theme in the respondents' comments. They emphasised the importance of consideration of the character and heritage value of such important properties, suggesting that well-preserved heritage can be the key to economic success. Respondents considered that attractive environments, clean streets and an effort to create a special quality of place would entice visitors to the centres.

Suggestions for improvement include benches and seating areas with planting for shade and carbon capture, consideration of safety and security and more public green spaces and town squares to provide a focus for social gatherings, such as festivals and markets.

- There was a recognition that large scale developments will require a new, focused centre which is sustainable and accessible for residents, creating its own character comprising retail, leisure, education and play to provide viable and deliverable new centres.
- It was also considered important to recognise the role of Key Rural Service Centres such as Bishops Cleeve, through the plan-making process.

Q 22. How can the Strategic and Local Plan protect and encourage essential shops, services and facilities in villages and rural areas?

- Many respondents considered that allowing limited housing in villages will help revitalise rural areas and safeguard essential shops, services and facilities with an emphasis on affordable / family and high-quality housing for locals, not commuters. There was reference to the NPPF which requires housing to be located where it will enhance or maintain the vitality of rural communities. The reasoning being that an expanded customer base supports existing businesses and creates opportunities for new services to flourish as rural shops, community centres, post offices and other essential facilities often face the threat of closure due to dwindling patronage. A suggestion was to remove or redraw existing settlement boundaries to accommodate expansion with policy criteria to facilitate this. Within the comments there was a preference to resist further urban extensions to Cheltenham and Gloucester and support small-scale development at dispersed rural locations supported by good public transport links. It was often stressed that that the council should ensure key villages have an optimum population to support appropriate levels of growth and services.

- Conversely, some respondents wish to see no building on farmland and a stop to what some respondents considered urban sprawl subsuming the villages and rural areas. There is concern that more housing isn't the answer as facilities may not be capable of expansion to meet the needs of additional residents. There were also comments suggesting that nothing can be done in this regard as it is market led and these services and facilities can only thrive if there is sufficient support.

- Respondents placed great emphasis on active and sustainable travel being key to help residents access essential services without relying solely on private vehicles, fostering more sustainable living patterns. The idea of village clusters or the '20-minute neighbourhood approach' to rural areas is linked to this - areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village. Similarly, it was suggested that the plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. It was suggested that the plan should facilitate car-free travel between these villages, for example, by facilitating the use of bicycles and include measure such as 'quiet lanes', reducing speed limits, setting up e-bike 'hubs' and car-free routes. Another suggestion was for autonomous electric or hydrogen powered transport available to all to transport goods or people at any time, connecting rural areas together and with urban centres and transport hubs.

- One response suggested that a comprehensive assessment of essential services be conducted alongside a housing market analysis to ensure that new developments effectively meet community needs and support the growth of necessary services and facilities with an emphasis on recognising that new housing should be a catalyst for reinvigorating rural communities, rather than a threat to existing businesses and services.

- Respondents noted a lack of medical facilities and post offices in the more rural and suburban areas, resulting in people driving to access basic services. It was suggested that the council work with health providers and the Post Office to provide more locations for these so that people can access such services on foot from their homes.

- The importance of having robust policies to prevent the loss of village facilities, including facilities for sport and physical activity play was stressed in the responses. There was a suggestion to require a marketing requirement before the use could be repurposed. It was further suggested that a retail impact assessment on existing uses and facilities be undertaken if a large supermarket wishes to develop in an area.
- Reference to para 97 of the December 2023 version of the NPPF was given which requires LPAs to *'plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space…) and other local services to enhance the sustainability of communities and residential environments'.* Suggestions to further prevent losses were made through investigating options such as community ownership, crowdfunding or diversifying of usage.
- It was considered that policies within the plan should ensure flexibility in consideration of applications for business growth and support and encourage rural employment. The concepts of rural mobility hubs were suggested to encourage pass through trade as well as hyper local use. Emphasis was also placed on supporting and encouraging rural employment and growth sectors of the rural economy such as locally grown / reared food, sustainable forms of tourism, renewable energy generation and schemes for carbon capture. Also, it was suggested that incentives be provided to ensure landlords are made to upkeep empty units.
- Respondents noted that the evidence supporting the plan should fully consider the range of settlements and the role that these play, which should inform decisions regarding distribution of growth and infrastructure requirements

across the Plan area. In terms of evidence, one respondent stressed that a review of the Retail and City/Town Centres should consider all other settlements, not just the city and town centres. It was also suggested that a return to identifying 'Service Villages' should be considered in the plan.

- Suggestions to help retain small shops were provided in responses, including introducing low / no rates, consortium of shops from different areas to increase buying power – managed by the councils, introduction of high street rental auctions, encouraging volunteer staff, providing smaller units for use by local businesses at low rent and facilitating medical representatives. The importance of ensuring developer contributions were secured to assist with promotion and enhancement of existing amenities or services was also suggested, along with using contributions to fund council facilities such as libraries and schools.
- There was concern that large out-of-town shopping developments only encourage car travel and take business away from existing suppliers and these should be discouraged with support instead given to the Town / City centres as shopping habits are changing fast.
- To help drive a more localised ecosystem it was suggested to encourage rural craft uses and farm shops, allowing them to sell a more diverse range of goods not just from their own farm but also from the local economy.
- Some respondents suggested that part of the problem is holiday homes, Airbnb's, second homes and councils selling off carparks and that these should be resisted.
- It was considered important that green infrastructure improvements should be part of any plans to enhance the vitality and vibrancy of the retail and town centres, creating opportunities to enhance and create green and blue infrastructure which is important to climate change adaptation. It was noted that there is disparity in proportions of land for green infrastructure within the

boundaries of the indicative site layouts for the JCS strategic allocations.

4.4 As part of the 2024 consultation, online workshops were held based on different topic areas, one of which was 'Improving our city, town, and village centres'. Two sessions were held on the 5th and 7th March 2024 attended by 23 people. A summary of the discussions held at these events are set out below:

- There was general support that the consultation documentation recognised that further retail space is not required as it was considered that the JCS allocated too much, especially employment land. There was some general discussion about out of town / out of centre retail, and its disadvantage but recognition that for many people it is very convenient. There was acceptance that retail policy in the SLP is now questionable due to class E changes (Commercial, Business and Service uses as defined in legislation). However, there was also support for protecting retail as there was a danger recognised that we are losing our sense of identity in the traditional centres.
- It was felt that online shopping will continue and to expect further shrinkage in centres. There was concern that in rural areas pubs, shops and other services are disappearing and recognition that there is no point in supporting them if there is no demand.
- It was discussed that we need more green spaces in city/town centres and some good examples in Cheltenham were given including Montpellier Gardens and Imperial Gardens. There was a suggestion to close The Promenade in Cheltenham and use it for green space. It was stressed that we need to change the reason why people come into the town centre and instead of looking at footfall, which is very retail based, we should look at need. There was suggestion that more residential, provision for the elderly and a better diversity and mix in centres is needed. There was recognition that the regeneration of brownfield sites in Gloucester has been good, but it has taken a very long time.

- Trends were discussed and how they are accelerating, with the problem being that change is happening faster than the potential solutions. It was suggested to look at town centres in the historical context as places for people to meet. It was also stressed that we need more residential on upper floors and that for Cheltenham it would be good to have a town square, with The Promenade area suggested. There was support for the Gloucester Debenhams building scheme becoming a university campus building and how this highlights that we need a 'City/Town Centre Vision' and not retail policies.
- It was stressed that rural housing can only come forward if the services are there first and concern was raised about the loss of services and how this will impact on the future provision of sustainable and affordable housing.
- There was recognition that councils need to support community assets, post offices etc. which is adding to increasing commuting times and it was suggested that funding should be put in place to support this. There was discussion about the great synergy between rural services and rural transport links and that links are needed to future proof rural settlements for the long term. There was concern that there is an aging population in rural areas and the system we currently have for care is 'care in the community' and to support this we need the services in the community like shops, pubs, libraries, surgeries, emergency services etc. It was considered that we need high speed broadband in rural areas and to continue to provide computer training for the elderly, so they don't lose out on services e.g. online banking.
- There was discussion about the need to consider transport and housing together with retail, particularly as the UK currently has some of the longest commute times. It was stressed that we need to get people living and working in the same area and improve transport infrastructure and the importance of local employment.
- The benefits about the health of town centres were also discussed as some people don't like digital services, on-

line banking etc., instead preferring real places and people. The difficulties of maintaining a sense of community if centres and their services are lost was discussed, especially in smaller centres like Tewkesbury, where it is hard to replicate through technology.

- There was concern raised on behalf of town and parish councils with regards the JCS and how they felt that the plans were imposed on them. There was a recognition that we need to work meaningfully with them on the SLP to create more collaborative outcomes in the long run, particularly concerning site allocations. Officers stressed that they are engaging with town and parish councils as part of the SLP consultation.

- Winchcombe was debated, particularly about how the town has developed over time to the west, due to constraints. It was discussed how development or housing can be achieved on the east side of the town that is currently underdeveloped. It was suggested that if housing and development were provided to the east, those people will likely walk to the town centre to do their shopping. Conversely it was considered that if development is on new estates to the west these people will drive and not use the high street. It was stressed that new housing needs to be permeable to allow residents to walk to the centre to access services and facilities.

- Other issues of concern in Tewkesbury were reported, including building houses on areas that flood and the importance of having as much green space with flood accommodation as you do housing. Officers reported that through the SLP we are doing a new Strategic Flood Risk Assessment (SFRA) (Level 1) and also a water cycle study and there is a commitment to engage with the Parish Councils in that process.

- Other issues of concern reported were building without infrastructure, dealing with sewage and examples as to how settlements developed historically were provided for consideration. It was suggested that the SLP looks at smaller communities that can manage their own area and ways to stimulate community feeling in a new development.

- There were suggestions to facilitate this by encouraging independent shops including food shops, health food shops and encouraging the identity of a place. It was suggested in new development it is about having food, education, nurseries and green spaces nearby.

- The importance of connectivity in terms of housing and retail was highlighted, along with the crucial role of active travel. It was stressed that civic space is important in trying to connect communities together and to ensure that the centres attract and retain young people. Also providing workspaces, co-working, working from home and using the centre in different ways. There was recognition that lots of work involving young people is taking place in Gloucester generating footfall and other benefits.

- The issue of the accessibility of our city centres was highlighted as important and ensuring that a range of people with different mobility needs can access them and making sure that spaces are inclusive highlighted. Also, it was reported that attracting the younger and older generations into the centres, particularly in terms of the night time economy, is an important consideration. There were particular concerns about safety being an important factor in regeneration, with suggestions for more street lighting etc.

- Officers reported that food security and the use of the best and most versatile land will be considered through the plan. A concern was raised relating to food security, and the proliferation of solar panels on agricultural land in the area. It was discussed that in comparison there are no factories in Tewkesbury with solar panels on their roofs – it was suggested that this requirement should be part of the SLP. There was also a question about the time span of agricultural solar panels and concern that when they expire, the land may then be classed as brownfield which could lead to further development.

- It was suggested that Gloucester needs to make more of its history and heritage – stressing that it is top 5 in the country for heritage and yet there is nothing to suggest this. It was also considered that Tewkesbury should do the same.
- There was discussion around issues with bus links with the train station at Ashchurch and Tewkesbury town centre that needs to be addressed. Another concern questioned whether it would be prudent to replace an existing Neighbourhood Plan. Officers stressed that the qualifying body (i.e. Parish / Town Councils) should look to keep their Neighbourhood Plans up to date.
- There was concern that if shops are being replaced by housing those areas no longer feel like part of the centre or the high street. Officers explained that Gloucester city centre has a core but there are more peripheral areas like lower Northgate Street that have large numbers of vacancies. A recent study has shown that it might be best to let these areas go for other uses and consolidate the core. The importance of keeping retail at street level was recognised as important.
- There was some discussion about issues with city centre redevelopment and the lack of parking, with Airbnb's making things worse. Officers explained that in bigger centres like Gloucester with a central bus and train station the council is keener on low or no parking developments.

4.5 The number of respondents and detailed comments received through engagement highlight that this topic is important to residents and other stakeholders and therefore the policy response should take on board concerns and suggestions raised to inform a suitable centres strategy through the SLP.

5 Sectoral Changes – natural trends

5.1 There are several key national trends that impact the vitality of centres and summarised below.

The High Street

5.2 The Covid-19 pandemic brought to a head a long trend of transition for high streets. The periods of national lockdown forced all but 'essential' retailers to shut and reimagine how they would sell their produce and serve shoppers. There are examples of some businesses never recovering and others using this opportunity to reassess their business model and move fully online. Data published by Green Street and PwC, on store openings and closures across the UK reported that there has been a consistent net loss in store numbers, with circa 5,000 premises lost in 2023 and 3,800 in 2024. The number of store openings has been consistency lower in recent years (2023-2024) than the period 2015-2019, following the Covid pandemic.

5.3 Consumer habits have changed significantly since the pandemic. Although footfall and visitor numbers have shown growth in the last two years to 2025, in many places these are still not at pre-Covid levels. This shift in consumer behaviour has led to a range of outcomes for high streets nationally. While some with uniqueness and locational advantage have flourished, others have seen increased vacancy rates and more challenging recovery paths.

5.4 Whatever the location, retail and hospitality businesses are generally reporting a challenging macroeconomic backdrop, consisting of high inflation, increasing staff costs and the cost-of-living crisis that has resulted in less spending generally for average households.

5.5 The High Streets Task Force, in its 2023 review of High Street Footfall in England, found that traditional shopping activities are no longer the main driver of visits, and evening and leisure activities are now just as likely a reason to visit a town centre[6]. This is demonstrated by the proliferation of activity businesses which have opened units in centres, including axe throwing, darts, escape rooms, and gaming centres.

5.6 Although a challenging time for the hospitality sector, there are notable examples of new businesses in the various centres which attract visitors, increase dwell time and encourage further

[6] CDP-2024-0128.pdf

spending, such as Gloucester Food Dock which opened in 2024. The growth of these sectors also creates opportunities for innovative changes to the public realm in terms of outdoor dining, wider pavements, etc.

5.7 At the same time, there is a return to the office for workers who had to work remotely during the pandemic. Despite well-publicised examples of some organisations requiring staff to return to the office on a full-time basis, the majority of businesses are currently supporting a hybrid working model which enables staff to work from home for part of the week[7]. This shift has also led to an increase in the provision of shared office space businesses in centres. It has also had an impact upon daytime spending levels in those town and city centres which have a large amount of office space.

5.8 Another significant trend in recent years is the rise of mixed-use spaces on the high street. Retail spaces are increasingly being combined with residential, office, and leisure facilities, creating multifunctional hubs, evolving high streets into 'live-work-play' environments. These mixed-use developments are attracting a steady flow of visitors throughout the day, boosting footfall and economic activity.

Retail Sector

5.9 Mintel, the leading Market Intelligence agency stated in October 2024 that: *"the UK retail industry has navigated multiple periods of consumer uncertainty, including the pandemic and the cost of living crisis. Over the next couple of years, the retail industry will undergo significant transformation, shaped by evolving consumer behaviours, technological advancements and potential political and economic changes".*[8]

5.10 Successful retail spaces are therefore evolving to provide more than just products; they are becoming community hubs and places where consumers can engage in enriching experiences. This includes creating spaces for socialising, learning and hosting community events, which helps to build emotional connections between the retailer and consumer and therefore

[7] Analysis | What are employers' return to the office plans for 2025? | CIPD
[8] Retail Trends: Navigating the Evolving UK Retail Industry (mintel.com)

enhances customer engagement and loyalty. As an example, John Lewis operates a community room in some of its stores, including Cheltenham, with free meeting space, community groups, social activities and charity engagement. This is part of the company's wider CSR strategy and supports community engagement in and around the store.

5.11 Public opinion tends to blame two things for the perceived decline of the traditional high street model, namely online retail and the rise of out-of-town shopping centres since the 1980's.

5.12 The impact of online shopping is reducing nationally compared to the boom experienced during the Covid 19 pandemic. In 2021, online spending had a 27.7% share of all UK retail spending, but by 2023 this had reduced to 25.4%. While this figure may lead to some cautious optimism from high street retailers, this is still higher than it was pre-Covid and shows that fewer shoppers are spending in person, ultimately leading to an oversupply of physical retail space in many town centres. What is clear is that consumers are researching online in advance of shopping experiences in retail centres. Retailers who now provide an enhanced visitor experience and the link of this to wider activities in the High Street are differentiating those centres which are prospering and those in decline.

5.13 Alongside this, out-of-town retail parks and designer outlets provide local competition to High Street retailers. Costs for retailers to base themselves in these locations can be lower than in town centres due to competitive rents and the fact that retail units are often newer and therefore more efficient. In addition, easier access for motor vehicles and longer opening hours provide incentives to shop which are not offered by traditional town centres.

5.14 While both online shopping and out of town retail is a factor, as set out above, the picture is more nuanced, with a variety of reasons contributing to the perceived decline of town centres, so the following should also be noted:

- Fewer transport options due to the availability of public transport or increased levels of traffic;
- The convenience afforded by click and collect options,

particularly in households where both adults work;

- Cost of living crisis and increased costs for associated expenses;
- More people working from home; and
- The viability of rents and investments.

5.15 Given the changes in consumer expectations, retailers can improve their competitiveness by developing their own business models and behaviour. It has been suggested by Forbes that there are four main trends in the pipeline that will have an impact on the success of the retail industry, giving them the opportunities to evolve to exploit this. These are:

- Personalised Communication – customers want messages tailored to them, shifting tactics from transactional to empathetic;
- Social Commerce - focused on telling stories on social platforms that conclude with a commerce moment;
- Artificial Intelligence - retailers need to use AI to improve efficiencies and processes, and balance this with a human touch; and
- Sustainability – customers want retailers to show proof of their eco stance and reduce customers 'green fatigue'.9

5.16 There needs to be recognition that retail is shifting and changing and the shift away from multiples towards local retailers is an ongoing trend which generally requires a smaller area of land to accommodate this – in this sense there is a need to re-vision, innovate and rationalise high streets to ensure they are fit for the future.

Convenience sector

5.17 Convenience goods are defined as those which are required nearly every day, such as bread and milk, they are an essential necessity to shoppers because without these, people would

[9] Four Major Trends That Will Shape Retail In 2024 (forbes.com)

struggle to feed themselves.

5.18 The ongoing cost of living crisis continues to have an impact on the convenience sector and, in addition, the number of retailers engaging in rapid online grocery delivery has increased in the last two years. This has put pressure on many within the sector, particularly the smaller stores that rely more on consistent footfall, being unable to match the online capabilities of leading players.

5.19 Key headlines from the 2024 Local Shop Report[10], published 10th September by the Association of Convenience Stores highlight that:

- 71% of the 50,387 stores in the convenience sector are run by independent retailers (either unaffiliated or as part of a symbol group);
- More than half of independent retailers (56%) fund investment from their own reserves;
- Convenience stores provide local, flexible and secure employment for around 445,000 people nationally;
- More than one in six convenience stores (17%) now has a self-service till, up from just 3% in 2019;
- Almost half of independent retailers (47%) offer some form of home delivery/click and collect service; and
- 80% of independent retailers were actively involved in their community over the last year.

5.20 These headlines indicate that the convenience store sector is evolving quickly to futureproof their businesses. The Local Shop Report also states that investment in the UK's local shops has reached record highs over the last year - convenience retailers spent a combined £1bn (up from £646m in the previous 12 months) refitting their stores, installing new energy efficient refrigeration and lighting, and detecting and preventing crime.

5.21 Convenience retailers are also investing in offering an

[10] The Local Shop Report | ACS

increasingly diverse range of services like cash machines, banking services, Post Offices, prescription collections and dry cleaning – all services that previously would have taken their own place on the high street but are now being brought under one roof.

Comparison sector

5.22 Comparison goods have a higher value and are purchased less often than convenience goods, such as household items, electrical goods, clothing and shoes. People tend to go to several shops to compare products before buying them.

5.23 With relaxed planning laws in the 1980s and the rise of car ownership, the UK Government encouraged retailing to occur on the outskirts of towns and cities. Retailing land and property in the centres was very expensive, but land on the outskirts was cheap in comparison. This led to the development of out-of-town shopping centres.

5.24 There are some arguments to suggest that the success of out-of-town shopping, has led to decentralisation of retailing, whereby major retailers have moved their premises from central locations to the edges, leading to the 'polo effect' where there is an economic, social and retailing hole in the middle of the centres. On top of this the UK has seen a decline in the department store concept which have traditionally been big centre magnets.

5.25 However, out-of-town retailing, if designed appropriately, can complement the centres shopping offer – if the two are close enough and linked via means other than the car they can offer affiliation, rather than competition.

5.26 Out-of-town shopping and the decline of department stores has inevitably impacted on the comparison sector within the centres across the UK and future shifts in policy will need to address this issue locally.

Increased Residential within Centres

5.27 Increasingly, town centres are becoming attractive destinations to live for people of all ages. Younger people enjoy the vibrancy of town centre life, families with children enjoy the access to family-friendly activities and the convenience of shopping closer to home and older people benefit from being able to access services and local facilities, reducing the risk of isolation and promoting health into older age.

5.28 Town centre living will not suit everyone, but for those keen to be part of a multi-functional environment, close to amenities and transport, town centre living provides a valuable offer as part of the overall housing mix.

5.29 Residents living in town centres provide many benefits to the wider economy with increased spend in local venues as well as natural surveillance (or 'eyes on the street'[11]) which leads to increased perceptions of safety in a place.

Vacant Units

5.30 Nationally, retail unit vacancy rates are an average of between 14 and 15%[12] and the national average unit vacancy has been increasing, from 11.3% in 2018 to 14.1% in 2024[13]. There is an opportunity for empty retail units to be used by the community to provide social benefits including cultural initiatives, health and leisure-related activities and for small businesses to start and grow, providing a diversity of organisational types but mostly with roots in their local community. Although early days, there are some notable examples of this kind of activity such as Sparks in Bristol.

5.31 Vacant units can add to a sense of deterioration and increase the negative perception of town centres that are already struggling. Anti-social behaviour, often in the form of tagging or other graffiti, as well as litter can increase in areas with high vacancy rates, and this does not encourage investment by new businesses looking to move to the area.

5.32 In an attempt to address this national issue, the government has taken action in reducing vacancy through policy changes, such as the introduction of Use Class E and retail business rates relief, which enable more flexible use of existing buildings

[11] Jane Jacobs, The Death and Life of Great American Cities
[12] New levelling up powers to fill empty shops across England - GOV.UK (www.gov.uk)
[13] Source: Experian GOAD

and make accessing them affordable.

5.33 The government has also recently introduced High Street Rental Auctions (HSRA) legislation with the stated aim of helping local authorities increase the occupation of persistently vacant high street properties and improve local economies. In brief, the powers, introduced in December 2024, enable local authorities to enforce the auction of leases between landlords or building owners and potential tenants.

5.34 HSRAs have been designed to bring persistently vacant premises back into use, particularly where the landlord is being uncooperative. HSRAs will not be applicable for all buildings, for example, MHCLG have confirmed that – amongst others - ex-department stores, buildings which require significant or complex refurbishment works, or areas where there is no current tenant demand. The powers are best used where the property would require relatively little work to bring it up to standard and where the landlord is already engaged. Gloucester have recently adopted the HSRA scheme with the goal of reducing the number of empty units in its city centre.

5.35 Despite these measures and, although the picture is mixed with some notable exceptions in Gloucestershire (for example, Cheltenham's current (2025) vacancy rate is 10.5%[14]) vacancy remains high in many areas. The relationship between high vacancy rates and declining footfall is seen as a mutually reinforcing, downward spiral. Cheltenham Borough Council, working with Cheltenham BID approved a Vacant Units & Town Centre Land use Efficiency Action Plan (2023) as part of its response to recognising the issues and driving change.

5.36 In historic centres the problem can be further exacerbated due to restrictions on internal configuration of buildings, meaning the available space is often not flexible enough for larger retailers, particularly multiples. There may also be a development deficit, meaning the costs of refurbishment and redevelopment of an empty, historic property outweigh the potential commercial return. However, in some cases this can be a positive as the buildings tend to attract more

[14] Source: Retail & Town Centres Study Part 1 (2025), Nexus Planning

independent businesses rather than multiples, preserving local identity.

5.37 In addition to this, vacancies only tell part of the story. An occupied unit may still impact on a centre if it is not in a perceived ‘high value’ use that is in keeping with the local area and its visitor profile. There is a positive relationship between the share of shops that are empty and the share of retail which is ‘value’ (such as discount stores and charity shops) in different centres - stronger centres generally have fewer vacant shops, and a higher quality offer. This generalisation is a more prevalent concern in larger cities however and does not necessarily reflect the situation across the SLP area.

5.38 To be successful, innovative ways to introduce occupants to high streets will need to be found, such as ‘meanwhile’ or ‘pop-up’ uses and more arts and cultural organisations moving in, which will add diversity and interest, the challenge with this however is the business rates regime which can result in financial challenges related to these types of activities.

5.39 Nationally, proactive Local Authorities are playing an important role in encouraging and developing development in centres and are using their influence to act as enablers and facilitators. Some have purchased shopping centres both as an investment opportunity and as a means of control over the retail mix on offer in their place. They are also able to lever in external funding, acting as advocates, through different initiatives. Tewkesbury, Cheltenham and Gloucester Councils own land interests within their town and city centres with the objective of supporting regeneration.

6 Local Context and existing LPA data / studies

Overarching Information

6.1 Since the adoption of the Joint Core Strategy (JCS), two evidence based projects associated with retail and town centre land use issues have been commissioned. The first was the Gloucester, Cheltenham and Tewkesbury **Retail and City / Town Centre Review**[15]**,** undertaken by Avison Young in March 2021, to support a review of the JCS. The 2021 Study provided the following baseline information:

- health checks of Gloucester city centre, Tewkesbury town centre, Cheltenham town centre, Winchcombe and Bishops Cleeve and a review of existing retail and leisure parks located outside of the centres;
- An assessment of the need for retail floorspace in each of the local authority areas; and
- An assessment of sites and premises which may be suitable to accommodate identified retail needs, alongside a review of retail and town centre planning policies and town centre / primary shopping area boundaries.

6.2 It concluded that the strategy should set out the aspirations for each area and how each is to evolve.

6.3 The key messages around retail need / capacity in the report were that there is, to one extent or another, an over-supply of certain types of retail floorspace in certain geographic areas. The most notable area is Gloucester in this respect. Bearing in mind that these need / capacity forecasts are for settlements as a whole, this has the potential to have implications for out of centre floorspace.

6.4 At the present time, a new Retail & Town Centres Study, to inform the SLP, is being prepared. The Study has been split into two phases, with Part 1 published alongside this Topic Paper. Part 1 of the study provides:

- A review of the background context to retail, commercial leisure and town centre land use issues, including recent trends and current commercial market sector

[15] » Evidence and Documents (strategiclocalplan.org)

characteristics which will influence how the SLP plans for retail land use provision and the main 'town centres' in Gloucester, Tewkesbury and Cheltenham.

- A review of the main issues surrounding the health, role and function of the main 'town centres' in the SLP area, along with issues associated with the hierarchy of centres.
- The provision of information regarding current spending patterns on retail and leisure uses across the SLP area.

6.5 Part 2 of the study, which will be prepared over the coming months, will provide an assessment of the need for retail and food/beverage floorspace across the SLP area, along with an assessment of how best to meet identified needs and tackle issues associated with retail and main town centre land use provision. Part 2 will also provide advice and recommendations for strategic planning policy for the SLP.

6.6 On 15th May 2024 Gloucestershire County Council (GCC) adopted its **Gloucestershire's Economic Strategy (2024 to 2034)**[16] – 'Driven by innovation, built on heritage'. which introduced a new long-term vision for the county, setting out the plan to achieve greener and inclusive growth that all residents can contribute to and benefit from.

6.7 It outlined four strategic policies comprising **Sustainable Growth**, **Inward Investment**, **Employment and Skills** and **Business Innovation and Support**. These priorities are supported by two themes, **'Greener Gloucestershire'** - focusing on the county's target to be carbon neutral by 2045 and **'Inclusive Gloucestershire'**, which acknowledges the importance of all residents being able to access, benefit from and positively contribute to the economy.

6.8 The strategy further concluded the following:

- Overall, Gloucestershire has a prosperous and resilient economy with a diverse industrial base, not overly reliant on any one large company or sector for employment or Gross Value Added (GVA);

[16] Gloucestershire's Economic Strategy (2024-2034) | Gloucestershire County Council

- Business survival rates are high, and the county has strengths in exporting;
- There are challenges, particularly around recruitment, which are likely to become a greater issue in the coming years; and
- The county should establish itself as a centre for world-leading, sustainable businesses in digital communications, advanced manufacturing, agri-tech, and green and nuclear energy.

6.9 The strategy recognises that in order to build a strong, responsive, and sustainable economy in Gloucestershire, it is vital to deliver effective spatial planning to meet the county's growth needs. To meet this demand, it stresses that much-needed housing, employment land, transport and digital infrastructure needs to be delivered in a coordinated and sustainable way. To achieve this, the strategy sets out **'Proposition 1: Spatial Development Strategy'** with the aim to produce a county-wide strategy to ensure the viability of new developments and support the transition to a carbon-neutral society.

6.10 As part of the 'Strategic Growth' priority, the strategy sets out **'Proposition 2: Gloucestershire City Region – Central Economic Growth Corridor'** which seeks to focus development in areas that already have established quality transport networks, which would facilitate the delivery of a mass rapid transit scheme to provide high frequency passenger transport access, offering a genuine alternative to the car for longer distance trips. Part of this proposition reflects a desire to ensure development opportunities are prioritised in areas with the lowest natural capital value. This may result in one LPA accommodating the identified needs of another if it represents the most sustainable form of development and there is agreement from the relevant LPAs in adopting this approach.

6.11 There is a commitment made by Gloucestershire's LPAs to undertake a strategic assessment to identify future infrastructure needs to accommodate future growth. Following the completion of the infrastructure needs assessment work, an Infrastructure Delivery Plan (IDP) will be prepared outlining the requirements of future infrastructure across the county, including a pipeline of delivery priorities. To ensure that the aims of the above can be realistically achieved this needs to be embedded into the SLP from the outset.

6.12 Currently GCC is developing, with stakeholders, a Local Growth Plan for the area with the primary aim of developing local actions to address local needs.

Cheltenham

6.13 Cheltenham town centre is a busy vibrant hub with a largely affluent shopper catchment though this is alongside a local population which has several areas of significant deprivation. The town is a popular destination for shopping, working, eating and drinking, attracting residents from a wide catchment and visitors from across the world.

6.14 Tourism is an important contributor to the economy. In 2023, more than 2 million people visited Cheltenham spending over £183 million and contributing to business turnover of just under £233 million. This is reflected not only in visitor numbers and footfall data, but also in the occupancy rates of local retail businesses. Currently, 10.5% of town centre round floor retail units are vacant compared to the national average of c.14%.

6.15 Other than a significant peak in December, Cheltenham's footfall is relatively consistent year-round, which demonstrates its strong position as a local convenience centre and regional shopping destination. The high peak in December and some of November is indicative of the strong retail and hospitality offer. Cheltenham also experiences slight peaks in footfall in March, May and October, which will be linked to the Cheltenham Festival, featuring the Gold Cup, Cheltenham Jazz Festival, and Cheltenham Literature Festival respectively. Cheltenham is defined as being The Festival Town and hosts other events across the year.

6.16 There are many factors supporting Cheltenham's relative success, including:

- The town's reputation as one of the most complete

Georgian towns in the UK with attractive architecture and heritage aspects.

- A varied programme of high-quality cultural and sporting events throughout the year.
- A strong retail and hospitality offer, including many independent businesses as well as High Street names, along with a growing sector of leisure-based activity businesses; this is (cumulatively) unique within the region.
- Cheltenham's position in the heart of the Cotswold's ensuring the town benefits from the global reputation of this charming and quintessentially English area, which is popular with visitors.
- Strong marketing activity carried out by a range of partners, including 'Visit Cheltenham', the official town tourism brand.

6.17 However, Cheltenham town centre is not without its share of challenges. Key risks to continued vitality and vibrancy include:

- Competition from other destinations and ensuring that footfall and visitor numbers remain strong.
- Perceived traffic and congestion issues preventing easy access to Cheltenham town centre. This can be mitigated by more use of the Arle Court Transport Hub and park and ride service and work is underway to promote this to visitors and residents.
- Housing supply and affordability – ensuring that people can afford to live and work in the town. Cheltenham has a vacant unit's action plan which highlights an intent to encourage more town centre living, where this is appropriate and in keeping with the local area.
- Public realm and infrastructure – Cheltenham town centre is partly pedestrianised and partly accessible to vehicles. Safe, effective design is essential to ensure accessibility and attractiveness while also maintaining the heritage feel of the town. The borough council

works in partnership with Cheltenham BID to lobby Gloucestershire County Council as local highways authority for continued investment and maintenance.

- Climate resilience and sustainability. While the heritage buildings are an attraction in their own right, the challenge and expense of retrofitting an existing (often listed) building means that it can be difficult to ensure that buildings are as energy efficient as they could be, impacting not only climate change but also energy bills for businesses.

- The impact of national policy on local businesses, for example, business rates, crime, and the accessibility of healthcare.

6.18 Gloucestershire's Economic Strategy concludes that *'overall Cheltenham has a prosperous and resilient economy. It compares well to other areas in terms of employment, unemployment and economic inactivity'.*

6.19 **Cheltenham Borough Council Corporate Plan**[17] (2025 – 2028) sets out five key priorities:

- **Key priority 1: Securing our future** – The council will build on its status as the UK's cyber and security hub to drive inclusive economic growth. By working in partnership, the aim is to create high-quality jobs, boost productivity, and deliver benefits for both Cheltenham and the wider Gloucestershire region. Through social value programmes and collaboration, opportunities will expand and residents will be supported to thrive.

- **Key Priority 2: Quality Homes, Safe and Strong Communities**. The council aims to increase the supply of homes, expand access to social rent, and make better use of existing housing to meet local needs and reduce homelessness. All council-owned homes will be maintained to high standards of safety and quality, setting a benchmark for other housing providers and landlords. In collaboration with partners, the council will

[17] Corporate Plan 2025 to 2028

deliver an integrated approach to strengthen community ties, enhance public spaces, and improve safety across neighbourhoods and the town centre.

- **Key priority 3: Reducing carbon, achieving council net zero, creating biodiversity**. The council is committed to achieving net zero carbon emissions by 2030 by decarbonising its buildings, operations, and housing stock. Retrofitting council homes and facilities will help lower emissions, improve energy efficiency, and reduce household bills. The council will also support residents and businesses in adopting low-carbon practices. Through its planning system, it will promote biodiversity and ensure new developments contribute positively to the natural environment.
- **Key Priority 4: Reducing Inequalities and Supporting Better Outcomes**. The council will harness its sport, leisure, arts, and cultural assets to promote healthier, more active lifestyles and improve wellbeing for all residents. Building on its reputation as a leading cultural and festival town, the council will encourage wider participation in cultural life. Investment in leisure and sports facilities will help broaden access and inclusion. In partnership with the NHS, social care, and police, the council will support initiatives that ease pressure on health services and reduce crime and disorder.
- **Key priority 5: Taking care of your money.** The council is committed to delivering high-quality services efficiently and cost-effectively. By embracing innovation and new technologies, the council aims to enhance customer experience and maximise value for money. A commercial and prudent approach to budgeting and investment will ensure long-term financial stability and resilience, securing sustainable funding for the future.

6.20 Cheltenham Borough councils **Capital Strategy**[18] (2025 to 2026) sets out a long-term, place-based investment approach focused on regeneration, sustainability, and financial

[18] Capital Strategy 2025 - 2026

resilience. It prioritises strategic capital projects that deliver social value, support decarbonisation, and enhance biodiversity, while maintaining a prudent and commercial stance on budgeting and investment. Key initiatives include housing development, infrastructure upgrades, and the delivery of major schemes e.g. the Mobility Hub, all aimed at improving quality of life, supporting inclusive growth, and ensuring the council's financial sustainability.

6.21 The Strategy has direct links to the Council's Asset Management Strategy, Commercial Strategy, Investment Strategy, Treasury Management Strategy and emerging Housing Investment Plan. It also forms a key part of the Council's Medium Term Financial Strategy (MTFS). Collectively these plans and strategies aim to develop a diverse investment programme that allows cross subsidy across the programme to balance the social, economic and environmental outcomes set out in the council's Corporate Plan and Recovery Strategy.

6.22 Cheltenham Borough Councils **Place Vision**[19] sets out a vision where Cheltenham is a place that thrives within three key areas - Business, Culture and Community. It sets out a bold ambition to position Cheltenham as a world class town to live, work, study, and visit - driven by inclusive growth, sustainability, and cultural excellence.. For each ambition and for each aspiration in the strategy there are clear actions. The aim is for local partners to work together to develop plans for how these actions are made into a reality.

6.23 Cheltenham Borough Council and Cheltenham BID have produced a **Vacant Units and Town Centre Land Use Efficiency Action Plan**[20] (2024) that has a series of objectives including to:

- Understand the current and ongoing position of empty units in the town centre;
- Encourage the conversion of empty and underused space to maximise brownfield residential development;

[19] Cheltenham Place Vision
[20] Vacant-Units-Action-Plan.pdf (movingtocheltenham.com)

- Take enforcement against unsightly empty premises to clean up the town centre;
- Work with landlords, agents, and town centre businesses to ensure that stakeholders understand key issues facing town centre development;
- Encourage flexibility of the planning system and future strategic planning to bring more residential accommodation to the town centre;
- Identify opportunities for meanwhile use where appropriate; and
- Highlight opportunities for regeneration and recognise the value of key development sites within the town acting as a catalyst for lasting change.

6.24 The plan reports that in many ways Cheltenham bucks the trend seen nationally. As footfall numbers are increasing, and the value of visitor spend is a significant contribution to the wider economy. Annually, the town benefits from hundreds of thousands of visitors to more than 30 major festivals and hundreds of smaller events, contributing to the ongoing sustainability of many high-quality restaurants and retail experiences, both independent and nationally recognised.

6.25 It states that Cheltenham is the shopping and dining destination choice for local and regional visitors. Landlords and agents cite a high demand from incoming businesses for shop units in the town, particularly in key streets where the footfall is high and while there have been a small number of longer-term vacancies, empty units in Cheltenham in the main experience active churn when users vacate.

6.26 However, despite these positive aspects, there are key areas of Cheltenham town centre that have higher vacancy rates, as well as a small number of longer-term vacant units that persistently remain unoccupied and it is therefore imperative that local and regional stakeholders take an active role in ensuring the continued vitality and viability of the town.

6.27 **Gloucester, Cheltenham and Tewkesbury's Retail and City / Town Centre Review** (Avison Young, March 2021) reported overall on Cheltenham that:

- It remains a healthy town centre which is the strongest of the three main 'town centres' at the top of the JCS centre hierarchy;
- There is no requirement to allocate any sites/locations for any additional comparison goods retail floorspace in Cheltenham; There is the capacity for some additional convenience goods floorspace in Cheltenham; and
- In relation to sites / locations for assessment in and around Cheltenham town centre, the following have been identified: North Place / Portland Street; Royal Well and the Municipal Offices; and Coronation Square.

6.28 Part 1 of the **SLP Retail & Town Centres Study** (October 2025) updates the key information for the role and function of Cheltenham town centre, noting that:

- Cheltenham remains a very popular and financially successful destination, with the highest turnover in the SLP area. The catchment area of the town centre for comparison goods shopping is wide, which is no doubt influenced by a wide range of non-food stores in the centre. Like Gloucester, Cheltenham town centre does face stiff competition from out of centre stores, although the evidence suggests that it is able to better withstand this aspect of competition.
- The food/beverage sectors in the town centre are also particularly strong, with a robust financial performance and an attractiveness which extends well beyond the study area. This is no doubt heavily influenced by the events held by Cheltenham throughout the year including those organised by Cheltenham Festivals and the horse racing festival.
- One particular notable feature of the land use mix in the town centre is that the leisure services sector is now the largest sector, representing around one third of all units occupied.

Gloucester

6.29 Gloucester's city centre has, like many English cities of a comparable size, experienced a lack of investment and a general decline in recent decades. Today anyone visiting the city would see that it's a mixed picture with some areas/streets bucking the trend and others losing shops and vitality. The parts of the centre that have done well have done so partly due to a wave of regeneration during the 1990s and 2000s which transformed the adjacent Docks and Quays. Over the past 15 years there has been a focus on the 'Gate Streets' and the concerted attention given to this area is now starting to deliver results.

6.30 Allied to this, the King's Quarter area of the city has seen, and continues to see, extensive and dramatic improvements, with the demolition of the old bus station and in its place a new transport hub as well as 'The Forum' development which has introduced new office, leisure, parking and residential space to the city centre. The adjacent City Campus in a revamped Kings Square has brought a higher education campus right into the heart of the city. Improved public realm and public transport facilities will hopefully make this an attractive part of the city both for visitors as well as for residents and city centre workers.

6.31 Other parts of Gloucester are also seeing regeneration such as the railway sidings off Great Western Road and land to the rear of the St Oswalds Tesco's. Additionally, there are numerous investments in smaller sites and individual properties which are ongoing, and these are bringing gradual improvements to neighbourhoods.

6.32 A recent increase in residential development in or close to the city centre offers greater footfall and spending power, and the city centre is increasingly looking not just to traditional retail but also to leisure and cultural offers with many new food and drink outlets, event spaces and cultural outlets operating during the daytime as well as the evening. The proposed Greyfriars development (to the rear of St Mary de Crypt) is at design stage, but this mixed development could have a big and positive city centre impact. The main attractions, Gloucester Cathedral and the Gloucester Quays Outlet Centre, remain strong, and the city is witnessing new investment by hotels to augment visitor opportunities.

6.33 Despite some positive progress, many challenges remain including an overall development deficit that reflects the wealth of historic properties and archaeological remains in the city centre. But the place is changing to reflect visitors' needs and demands, and older retail establishments are gradually being replaced with newer forms of retail and other types of business outlet.

6.34 Gloucestershire's **Economic Strategy** (2023) concludes that: *'Overall, Gloucester's economic performance is mixed. It has the least productive economy in the county and does not compare well to other parts of the county in terms of unemployment. Its working age population has lower levels of qualifications and poorer health outcomes than other parts of the county and educational attainment at the end of Key Stage 4 is also lower. However, it does have a higher number of jobs than any other part of the county and a higher proportion of high growth and high turnover businesses'.*

6.35 Gloucester City's **Corporate Plan**, covering the period 2025-2028 includes an overarching vision which is 'Putting the heart back into Gloucester'. This vision is driven by the council's key objectives to:

- Strengthen civic pride;
- Build more affordable homes;
- Deliver a zero-carbon council;
- Improve the biodiversity of parks;
- Transform Council services;
- Deliver regeneration; and,
- Make the city an exciting and attractive place to live and visit.

6.36 The priorities that set out how this will be achieved are:

1. A vibrant and attractive city that celebrates Gloucester's unique heritage.

2. Inclusive, thriving communities and residents that feel safe, supported and valued.

3. An innovative and accountable council focused on providing sustainable, high quality, accessible services and facilities.

6.37 Each priority has a set of promises, and each promise is accompanied by a number of actions and projects. The key actions and projects will provide a performance framework for the Plan that identifies how progress will be measured using milestones and available data.

6.38 **Gloucester City Centre 'Our 5 Year Vision'**[21] 2023 – 2028' produced by GCC on behalf of the Gloucester City Centre Commission was prepared as the council commissioned a group of 20 organisations to join together to inform a vision for the city, comprising environmental organisations, businesses and community representatives. The vision is underpinned by 6 core principles which comprise the following:

- Nature Rich – where nature and biodiversity are at the heart of the city centre;
- Authentic – where Gloucester's unique heritage and identity is reinforced in the city centre;
- Flexibility – where the spaces and buildings need to be adaptable to changing future needs and market demands;
- Inclusive – where the city centre reflects its whole community and is mindful of the needs of all members and is a safe and inclusive space;
- Zero Carbon – with Gloucester playing its part in addressing the climate emergency; and
- Co-Created – where the public are properly engaged in new major developments and the design of public spaces and public services.

6.39 Within the 2021 **Retail and City / Town Centre Review,** the

[21] Gloucester-City-Centre-Vision-Brochure.pdf (futureofgloucester.co.uk)

conclusions for Gloucester were that:

- The city centre was a relatively robust and healthy centre which benefitted from its historic built environment and had shown resilience to difficult economic conditions;
- There was a need for an improved retail offer (particularly around the fashion sector) and for new development to improve the overall attractiveness of the centre;
- The city centre is vulnerable and open to even small levels of trade loss;
- The city centre needs to be refocused away from its traditional retail offer and accommodate a wider mix of land uses in order to sustain its health;
- It has been found that there is no requirement for any additional convenience or comparison goods floorspace in the city;
- Further out of centre retail and leisure development has the very real potential to be harmful;
- Gloucester city centre is the centre in the JCS area which is likely to require greatest diversification; and
- The strategy will also outline the role and contribution that the three 'third choice' 'inner ring' of retail and leisure locations play – St Oswalds, the Quays / Docks and Westgate Island. It will explore how they can positively complement the city centre and encourage linked trips (possibly including the need for enhanced linkages).

6.40 Part 1 of the **SLP Retail & Town Centres Study** (October 2025) provides the following information for Gloucester city centre:

- The 2025 study has confirmed many of the themes which were first established in the previous study. These include a higher than (national) average vacancy rate, which has now increased further over the past few years.

At the present time, one in five retail and service units in the city centre are now vacant, which should now be confirmed as a long-term characteristic that requires addressing through planning policy in the SLP.

- Since the previous study, the number of comparison goods retailers in the city centre has again fallen and there has also been a reduction in the number of service uses. A key influence on the performance of the historic part of the city centre is the scale of competition posed by other retail and leisure provision elsewhere in the city.
- Whilst there are reasons to suggest that the Gloucester Quays retail outlet centre (and associated leisure provision) has the potential to benefit the city centre through linked trips, the Quays nevertheless provides competition for shops and services along the four 'Gate Streets' in the city centre and the purpose-built shopping centres. Further significant competition comes from Eastern Avenue, St Oswald's Retail Park and Quedgeley district centre, along with the proximity of Cheltenham.
- The availability of surplus retail space should be seen as a clear opportunity for the future of strategic planning policy for the centre. The foundations for this strategy have already been laid with the development of The Forum area, which has provided a significant amount of office, hotel and other commercial space in a part of the city which was previously identified for retail-led mixed use development. Similarly, the refurbishment of the former Debenhams department store building by the University of Gloucester is a superb example of the re-use of a large-scale retail unit.
- The Quays/Docks area has occupied a unique position in the Gloucester retail market for a number of years. Whilst the retail outlet centre has been proven to bring new visitors to the city (including positive impacts of spin-off benefits), there is a likelihood that the outlet centre is also viewed as an alternative mainstream comparison goods shopping destination to the city centre. It is also clear that the Quays/Docks area is now

the pre-eminent location for food/beverage visits/spending in the city. The Quays has therefore had a major influence on the city centre but now faces its own challenges in relation to the new retail outlet centre in Ashchurch.

Tewkesbury

6.41 Tewkesbury remains a functional market town for its residents, meeting most of their daily needs. It is also a popular visitor destination, with the Abbey and historic environment appealing to history enthusiasts, and its proximity to countryside and waterways attracts nature lovers. The 2020-2024 High Street Heritage Action Zone programme saw attention focused on the High Street, both on heritage assets and improvements to public open spaces. The programme demonstrated how a modest investment was able to trigger large returns and there is more work to do over the coming years to further progress the foundations laid out.

6.42 The challenge in the future will be managing the population growth anticipated over the next 10-15 years, with housing built as part of the Garden Communities meeting the accommodation needs of new residents to the borough.

6.43 The Cotswold's Designer Outlet, which opened in the summer of 2025 at Junction 9 of the M5, and on the doorstep of the proposed new Garden Community, will challenge the traditional town centre and will need to be managed effectively.

6.44 The main challenges for Tewkesbury's town centre are:

- to bring forward the two major development sites to increase the resident population and provide facilities currently absent from the town, e.g. tertiary level education opportunities;
- to provide an attractive and easy-to-use east-west link between the historic town centre and the Ashchurch for Tewkesbury station;
- to protect the town centre heritage and tell its stories to continue to attract visitors;

- to mitigate the impact of flooding on the town centre;
- to effectively balance the protection of the centre's heritage assets with the ambitions for carbon neutrality; and
- to effectively manage the future range and mix of town centre uses in terms of any potential conflicts (e.g. late licenses vs living over shops).

6.45 Gloucestershire's **Economic Strategy** (2023) concludes that: *'In summary Tewkesbury is an area that has seen significant growth in recent years. It has a prosperous and resilient economy. It compares well to other areas in terms of employment, unemployment and economic inactivity. Its business base also appears stronger than some other parts of the county. However, it's GVA is heavily reliant on the Manufacturing sector which does pose a potential risk if there are issues affecting this sector in the future. There are also challenges around recruitment which are likely to become a greater issue in the coming years'.*

6.46 Tewkesbury Boroughs **Council Plan**[22] (2024 – 2030) sets out the vision of *'Supporting People, Strengthening Communities'*. It is underpinned by 3 priorities 'caring for people', 'caring for the environment' and 'caring for place'. The plan details how the vision will be met including:

- Working towards making the borough carbon neutral by 2030;
- Providing electric vehicle charging points in our car parks;
- Working with our partners to improve flood preparedness and protection;
- Creating place plans using data and insights to address the specific challenges faced by our communities;
- Promoting the charter for the Tewkesbury Garden Communities programme, which sets out what we and our stakeholders expect from developments in the area;
- Managing growth across the borough in a sustainable way, ensuring the right infrastructure, for example sports and play facilities, is secured for the benefit of local communities;

[22] Council Plan 2024-2030 - Tewkesbury Borough Council

- Working with partners to deliver the right housing based on our communities' needs;
- Ensuring businesses and communities benefit from national funding schemes;
- Supporting businesses to flourish and continue to provide employment opportunities;
- Improving the health and wellbeing of our communities; and
- Reducing and preventing homelessness.

6.47 The plan will be monitored by the Overview and Scrutiny Committee who will review the delivery of the actions to make sure they are achieved successfully.

6.48 The council commissioned the Tewkesbury Town Centre Community Street Audit in October 2022 which informed the **Tewkesbury High Street Heritage Action Zone**[23] (2020 – 2024). The findings[24] details projects that have been undertaken in the high street to enhance the public realm and educational and cultural projects that are informing and inspiring the public to care for the high street. They comprise:

- 6 workstreams;
- 36 commercial property façades renovated;
- 6 upper floor properties being brought back into residential use;
- 12 projects to enhance the public realm;
- 10 projects to increase awareness of traditional skills;
- 3 major projects with many other cultural activities;
- Nearly £2m funding pledged; and
- £ 2,032,862 spent.

6.49 The council are also in the process of preparing a town centre masterplan with emphasis on heritage and connectedness; design guidance for the three main development sites and the importance of the town centre linking positively to the Cotswolds Designer Outlet and garden communities.

6.50 Tewkesbury was awarded garden town status in 2019 as part of the national garden towns programme, reflecting the scale

[23] Tewkesbury high street heritage action zone

[24] PowerPoint Presentation

of the proposed development iro 10,000 homes and supporting infrastructure. A new approach to the delivery of the Garden Communities programme was approved by Tewkesbury Borough Council in July 2023. The programme includes a commitment to increased community engagement and better collaboration with partners and developers. Subsequently the council has developed a charter, **Tewkesbury Garden Communities - Our charter for promoting good growth**[25] (2024) rebranding the development *as 'a series of connected garden communities'* rather than a garden town. This charter also combines new development with delivering investment in Tewkesbury town to enhance its role as a vibrant and historic market town that serves its local and wider communities.

6.51 Linked in with the Garden Communities development is the Cotswold's Designer Outlet and adjacent retail uses which are adjacent to Junction 9 of the M5. The outlet centre is being delivered in two phases with a combined total of 186,000 sq ft and up to 90 stores. Phase 1 will total 136,000 sq ft of retail space and accommodate up to 76 stores and provide over 1100 car parking spaces and the first 50 stores opened in July 2025. Prior to the opening of the outlet centre, a new build 74,000 sq ft Dobbie's Garden centre was opened in November 2022.

6.52 These projects must strike a balance between recognising the benefits of a growing population, such as increased support for town centre shops and services, and addressing the competitive pressure posed by a nearby designer outlet. If not carefully managed to ensure mutual support, the outlet could undermine the viability of local businesses.

6.53 Gloucester, Cheltenham and Tewkesbury's **Retail and City / Town Centre Review** (Avison Young, March 2021) reported that:

- The retail mix and offer of Tewkesbury town centre is broadly comparable to the national average apart from a slight under-provision of convenience retailers and a growing number of vacancies;
- With the future potential construction of the new retail

[25] Tewkesbury Garden Communities. - Borough of Tewkesbury

outlet centre at Ashchurch, Tewkesbury town centre has the potential to experience future change and pressures in the coming years and there is concern that its comparison goods and food/beverage functions could face renewed pressure;

- With regards to the need for retail floorspace, no requirement for net additional convenience goods floorspace was reported, although there is a strong case for a modest amount of new provision within the Tewkesbury Garden Town project;
- It was recommended that the JCS Review does not plan for any significant net additional comparison goods floorspace;
- The two main town centre sites which can provide a modest amount of retail floorspace are Healings Mill and Spring Gardens.

6.54 With regards to these findings, it should be noted that for Spring Gardens, Retail-led masterplans have not been progressed and the latest work for the borough council is now considering a wider mix of uses including residential.

6.55 Part 1 of the **SLP Retail & Town Centres Study** (2025) has indicated that there has not been a significant change in the overall characteristics of Tewkesbury town centre since the 2021 Study. The town centre continues to have relatively modest market share levels for convenience and comparison goods shopping, across a reasonably limited catchment area. Unlike the other two large 'town centres' in the SLP area, Tewkesbury has not experienced a fall in the proportion of comparison goods retailers in the centre over the past five years and only modest changes have occurred in the retail and service sectors. The one notable change is a fall in the vacancy rate in the town centre. The proportion of vacant property in the town centre was a cause for concern in the 2021 Retail Study, although the proportion is now well below the national average.

Winchcombe & Bishops Cleeve

6.56 Gloucester, Cheltenham and Tewkesbury's **Retail and City / Town Centre Review'** (Avison Young, March 2021) reports overall that:

- The strategy for both centres should be to concentrate upon their ability to serve the day to day needs of their local communities with it likely that any expansion in retail space will be modest;
- Winchcombe and Bishops Cleeve play much smaller and localised roles to the three large centres in the JCS area. Both have a modest range of shops and services, serving their local catchment, although Bishops Cleeve is able to retain a much larger amount of food shopping trips due to the presence of the large Tesco supermarket in the town centre;
- Policy TEW3 and Policy RET9 of the Tewkesbury Local Plan propose to allocate the Spring Gardens site (Tewkesbury) for 30-100 dwellings as part of a mixed-use redevelopment including the potential for retail, leisure, food/beverage and employment uses; and
- Healings Mill (Tewkesbury) is proposed to be allocated under the same policies in the Tewkesbury Local Plan for a mixture of residential (approximately 100 dwellings), employment, retail, leisure, tourism and food/beverage uses.

6.57 The 2025 Part 1 Retail & Town Centres Study has indicated that there have been minimal changes since the 2021 Study in terms of the land use profile of these centres and their overall shopping catchment areas. The one area of potential future change will be in Bishops Cleeve, where Tewkesbury Borough Council has recently resolved to grant planning permission for a new Aldi food store which will have an impact upon the market share of the Tesco and Lidl stores in the defined ‘town centre’.

7 Local Policy Framework

7.1 Evidence was prepared for the three respective councils to inform the preparation of the JCS and individual Local Plans. This informed the current suite of adopted development plan documents and relevant policies set out below:

Existing Joint Core Strategy approach

7.2 The overarching strategy for the Centres is set out in policy SD2 of the **Gloucester, Cheltenham and Tewkesbury Joint Core Strategy**[26] (2011-2031) which was adopted in December 2017. This provides 4 principles that are drawn upon in the determination of planning applications comprising:

i. New residential, retail, leisure, culture, tourism, office development and community facilities that contribute to the vitality and viability of designated centres will be promoted and supported;

ii. Town centre development will be of a scale that is appropriate to its role and function as set out above and will not compromise the health of other centres or sustainable development principles;

iii. Proposals that help to deliver the regeneration strategies for Gloucester City Centre, Cheltenham Town Centre and Tewkesbury Town Centre will be supported; and

iv. The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities within the identified Strategic Allocations will be permitted.

7.3 For clarity, within policy SD2, references to 'town centres' and 'town centre uses' apply to city centres, town centres, district centres and local centres and have the same meaning as the

[26] jcs-plan.pdf (strategiclocalplan.org)

definition of 'town centres' and 'town centre uses' included in the NPPF[27].

7.4 Policy SD2 sets out the key principles and subsequently each individual LPAs Local Plan policies deal differently with detailed requirements in terms of setting a hierarchy of centres and determining primary shopping areas and frontages and the sequential approach to retail development as discussed below.

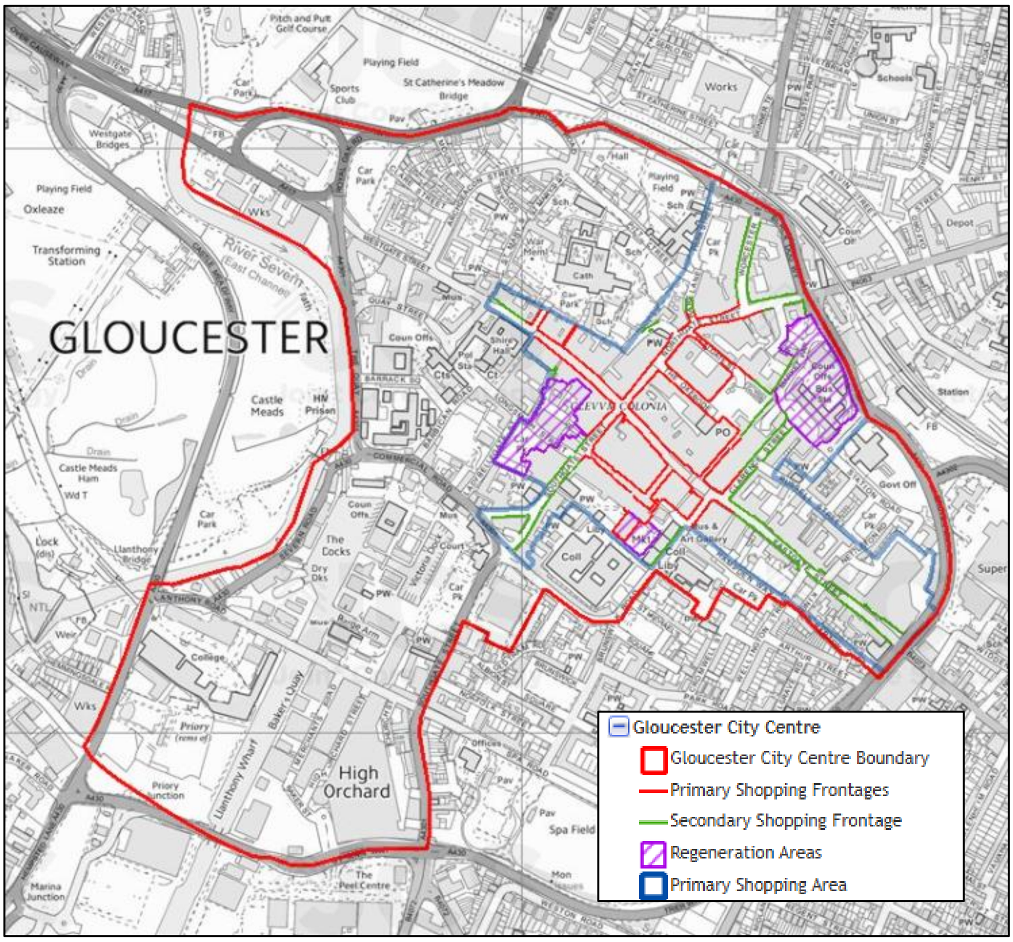
7.5 The **Gloucester City Plan 2011 – 2031**[28] (adopted January 2023) relied on the JCS to provide an immediate review of policy SD2 which would cover a revised assessment of retail, market share between different designated centres, city / town centre boundaries, site allocations, primary and secondary shopping frontages and locally defined impact thresholds.

7.6 The review commenced but became delayed with the different JCS approach subsequently agreed by the three councils. Therefore, the local plan does not deal directly with retail, relying on the JCS policy which, for Gloucester, identifies the Primary Shopping Area, primary and secondary shopping frontages, the City Centre boundary and which uses will be supported in the different locations on the interactive mapping and within the policy wording.

7.7 The Gloucester City mapping is provided in the JCS and illustrated on the map below:

[27] National Planning Policy Framework - Annex 2: Glossary - Guidance - GOV.UK

[28] gloucester-city-plan-low-res.pdf



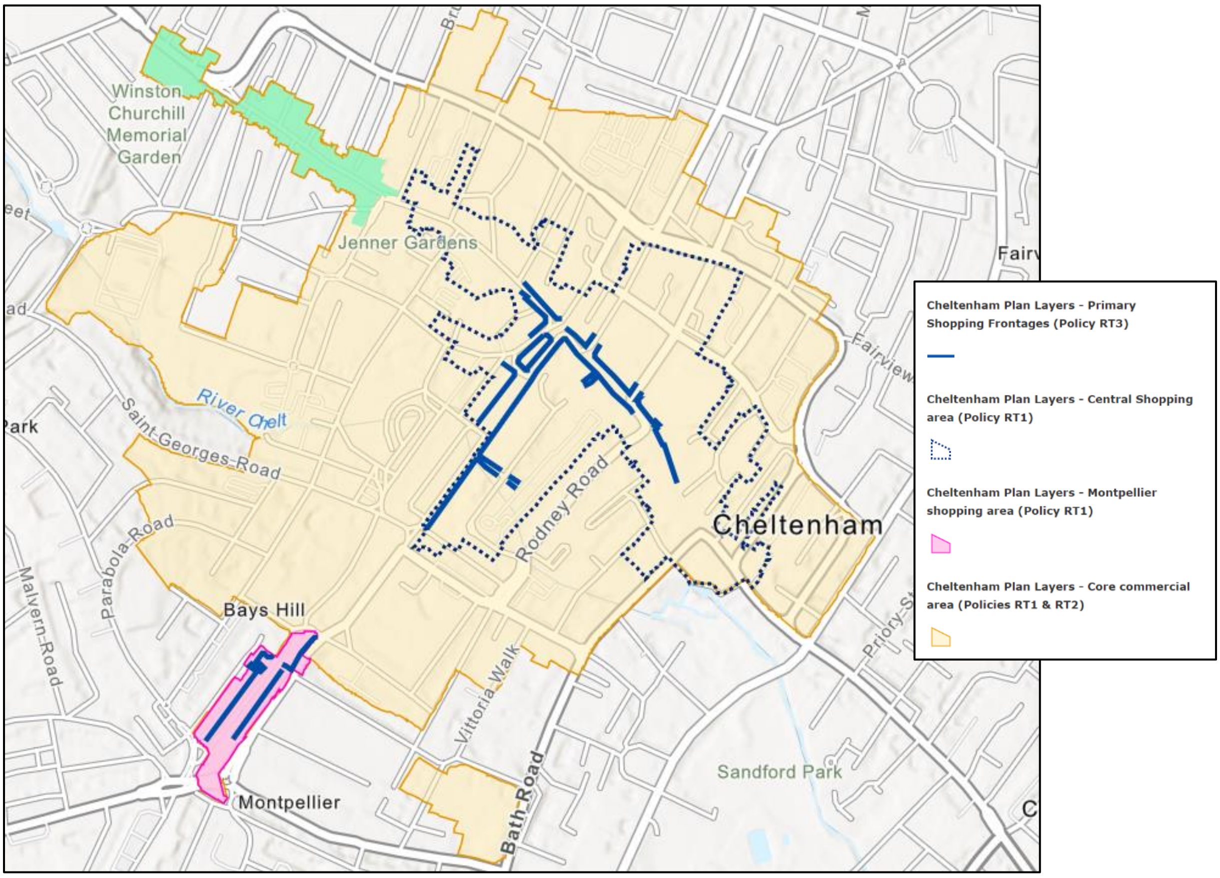
7.8 The council have also been working on defining the locations of local and district centres within the administrative boundary. These can be found at appendix 1.

7.9 **Cheltenham Boroughs Local Plan**[29] (adopted July 2020) also relied on the JCS to provide an immediate review of policy SD2. The JCS specifically states that for centres located in Cheltenham, saved policies in the local plan will be used. These saved policies comprise - **RT 1 - Location of Retail Development**, **RT 2 - Retail Development in the Core Commercial Area**, **RT 3 - Non-A1 Uses in Primary Shopping Frontages**, **RT 4 - Retail Development in Local Shopping Centres**, **RT 5 - Non A1 Uses in Local Shopping Centres** and **RT 8 - Individual Convenience Shops**. Within the local plan the following wording explains the approach: *'where 2006 Local*

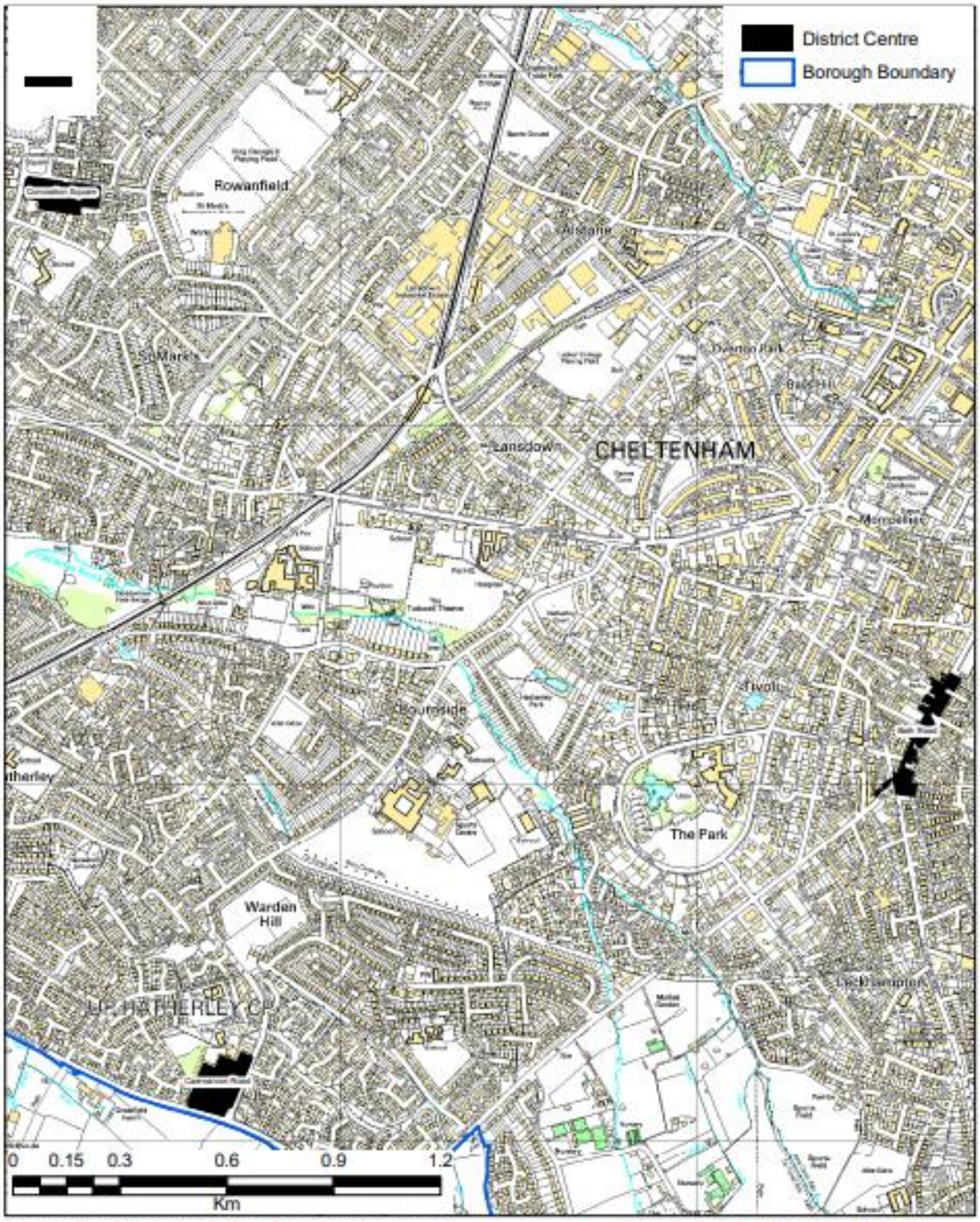
[29] [Cheltenham Plan | Local Plan core documents | Planning policy | Cheltenham Borough Council]

Plan policies are not superseded by the JCS, they will remain saved but will be superseded by the new Cheltenham Plan once adopted. The exception is Retail, which will be subject to the JCS Retail Review'.

7.10 The Cheltenham Borough interactive map [CHELTENHAM PLAN] defines the primary shopping frontages, Central shopping area, Montpellier shopping area and Core commercial area as referred to in the respective saved policies and illustrated on the map below:



7.11 The interactive map also illustrates three district centres (at Coronation Square, Bath Road and Caernarvon Road), which provide a wide range of shops and services, and where custom is drawn from beyond the immediate locality which can be seen on the map below.



Please visit www.cheltenham.gov.uk to see an electronic copy of the map

7.12 The mapping also illustrates neighbourhood centres in the Borough, of which there are 26 in total, which comprise small groups of shops selling mainly convenience goods and providing local services for the surrounding residential town. The locations of these centres can be found at appendix 2.

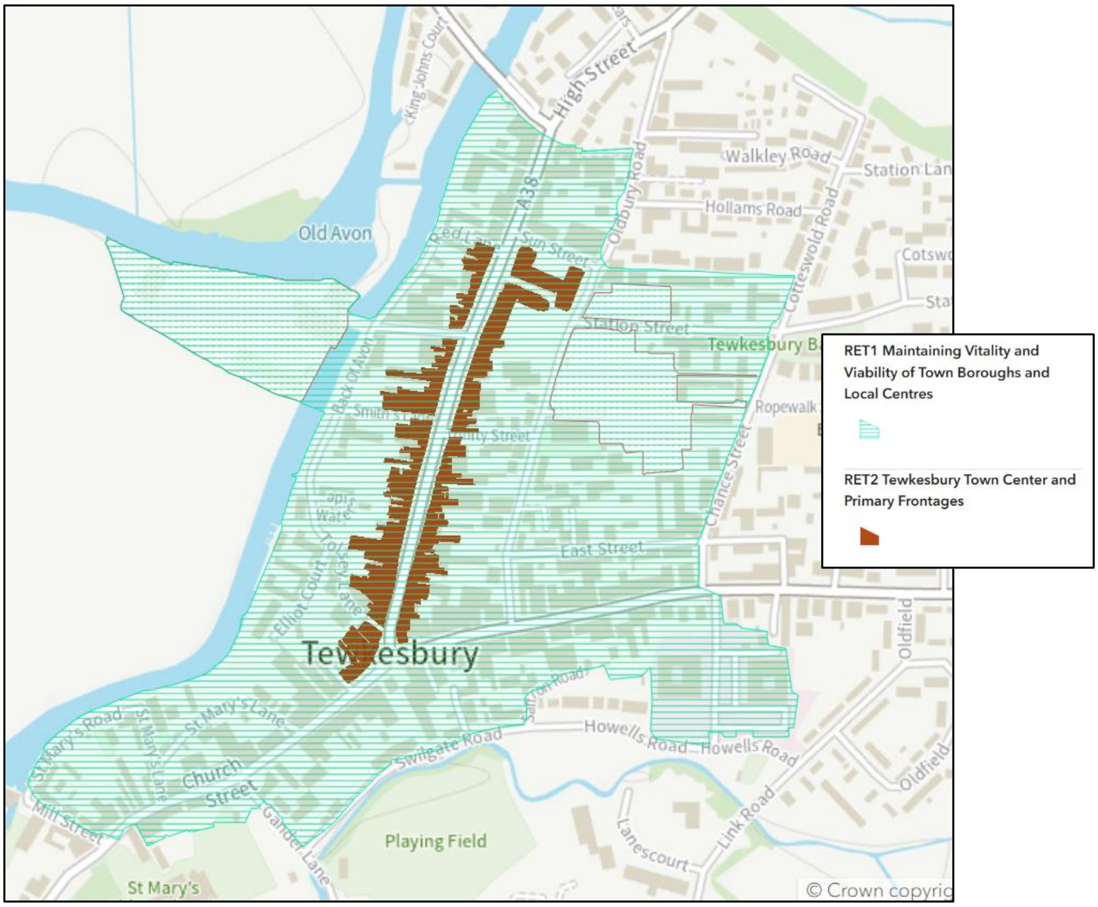
7.13 Additionally, a number of existing allocations in the adopted JCS already propose new local centres including North West Cheltenham, Innsworth/Twigworth, South Churchdown and North Brockworth. These allocations require 'the provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community'.

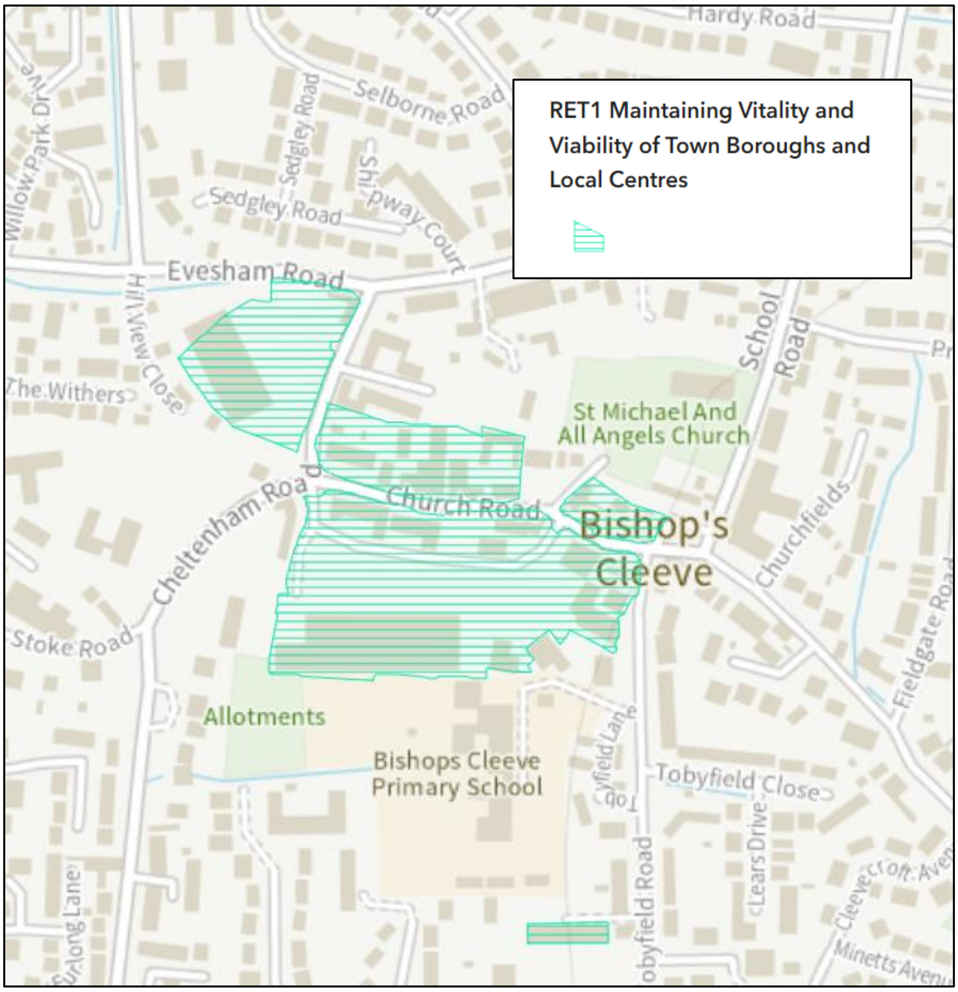
7.14 The **Tewkesbury Borough Plan**[30] 2011 – 2031 (adopted June 2022) acknowledges the JCS review in terms of retail in **Policy RET1 – Maintaining the vitality and viability of the town, borough and local centres** which stresses the importance of providing policy guidance on the issue in the interim. Policy RET1 therefore identifies a hierarchy of designated retail centres into market town, service centres and local centres.

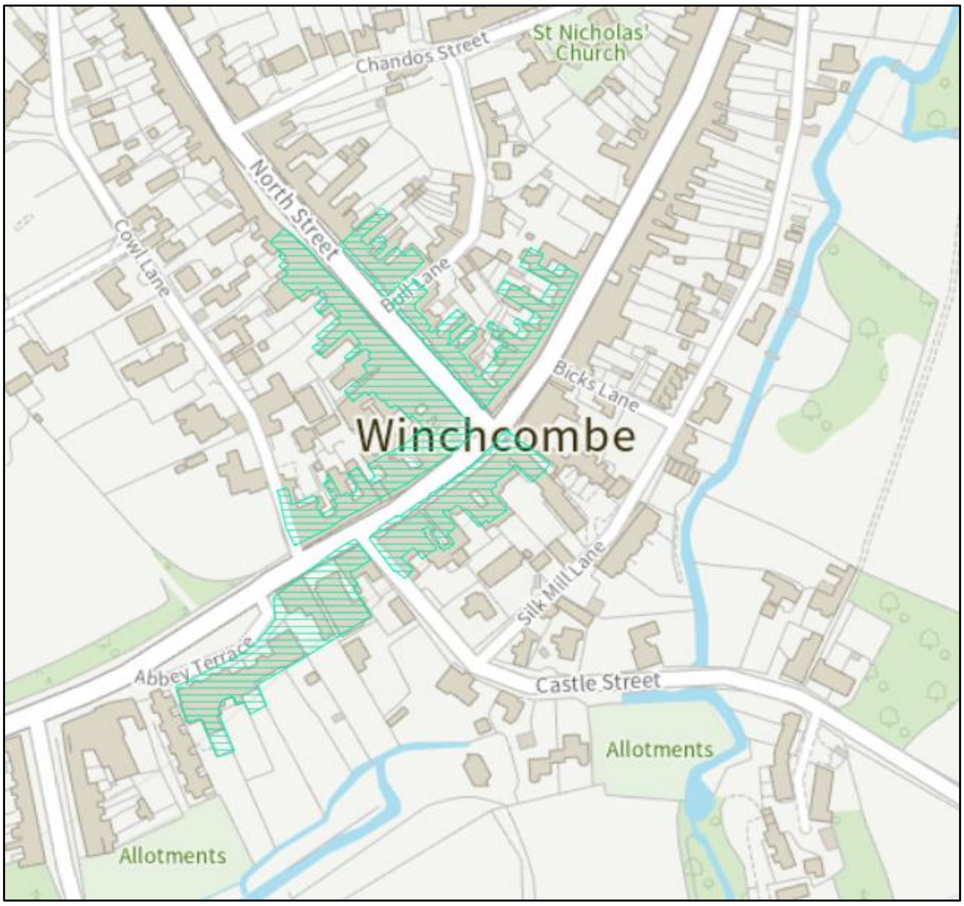
7.15 **Policy RET 2 - Tewkesbury Town Centre and Primary Frontages** sets out the flexible approach taken where other retail related uses may be permitted providing that the predominance of retail shops at ground floor level is maintained. It states that within the Primary Shopping Area the Borough Council will seek to retain at least 60% of the frontages within retail shop use at ground floor level. Outside of the Primary Shopping Area the approach taken in the remainder of the town centre is for a wide range of uses that contribute towards the vitality and viability of the town.

7.16 The Tewkesbury Borough interactive map TBP Local Plan Adopted Policies Map defines the primary frontages and local centres of Tewkesbury, Bishops Cleeve and Winchcombe as referred to in policies RET 1 and RET 2 as shown on the mapping below:

[30] Adopted development plans - Tewkesbury Borough Council


RET1 Maintaining Vitality and Viability of Town Boroughs and Local Centres
RET2 Tewkesbury Town Center and Primary Frontages
Tewkesbury
Old Avon
High Street
Church Street
Playing Field
© Crown copyric


RET1 Maintaining Vitality and Viability of Town Boroughs and Local Centres
Bishop's Cleeve
Evesham Road
Church Road
Cheltenham Road
St Michael And All Angels Church
Allotments
Bishops Cleeve Primary School



7.17 The different approaches to retail and centres within each Local Plan demonstrates the individuality of each LPA area, however, the level of detail and consistency is lacking and there needs to be a more joined-up and holistic approach taken to ensure the future success of all centres within the SLP area and beyond throughout the county.

8 Identified Issues and future policy response

8.1 The previous and ongoing work undertaken by each LPA and other bodies in relation to the SLP areas centres has identified a number of issues, concerns and underlying conditions that have prompted a series of individual and collective actions, priorities and objectives in order to establish a foundation to enable the centres to thrive in the future.

8.2 The SLP policy approach needs to acknowledge these collective aims and respond to the issues in a pragmatic and robust manner. There will be general principles common to each LPA area that will need to be applied to maintain consistency and balanced centre relationships. However, it will also be imperative to address any specific requirements that may be needed to address issues unique to an individual LPA or area of concern.

8.3 There were common themes, concerns and suggestions received through the issues and options consultation that will help inform a policy response that will give residents and stakeholders confidence that the LPAs can adapt their current policy aspirations to meet the challenges ahead.

8.4 In response to the above, the following policy responses will be explored:

SLP Future Policies

8.5 The following principles must be taken into account when shaping future centres and retail policy criterion within the SLP:

- Ensure that the requirements of the NPPF are set out clearly within policies, including establishing the sequential approach and defining a clear hierarchy of centres. The hierarchy of 'town centres' should include all tiers of city, town, district and local centres across Gloucester, Tewkesbury and Cheltenham (including the rural areas);

- Clear recognition of the distinctive character and aspirations of each centre and how they are to evolve over the SLP plan period, reflecting the identity of each, including appreciation of the collective heritage value of Conservation Areas / Article 4 directions and of individually important buildings. Also recognising heritage as a level for regeneration;
- A focus on urban renewal with policy criterion that facilitates repurposing of the centres where they are failing through consideration of measures such as densification, whilst balancing heritage constraints;
- Ensure, through the policy direction, that prioritisation is given to walking and cycling to create legible, attractive and accessible centres and sustainable public transport solutions are factored in from the outset;
- Provide the policy basis, working with partners, to support, encourage and facilitate new employment, educational, health and leisure opportunities within the centres;
- Ensure that all opportunities for an increase in residential uses within the centres are explored and specific sites / areas allocated within SLP housing policies where the provision of residential would have a positive impact on centres. It is imperative that new residential units are provided for all needs and demographics;
- Outline a clear set of requirements to ensure that any new strategic developments provide their own focused, appropriately sized and flexible centres that are sustainable and accessible for residents. Policy criterion should ensure that developers provide robust evidence of the centres future implementation, ensuring that infrastructure is fully funded, with its future viability and maintenance in perpetuity clearly addressed;
- Encourage higher densities in centres, particularly on underused, brownfield, poor quality or vacant land – this might be better addressed on an individual LPA basis to reflect their differing identities;
- Inclusion of policies that continue to advocate for the

efficient residential use of upper floors where appropriate to increase town centre footfall;

- Consideration of repurposing out of town retail parks with high vacancy levels to enable flexibility in their use and reuse;
- Resist any new out of town retail parks unless robust evidence is submitted to ensure effective and sustainable active travel links to the host centre can be delivered in a timely manner and the retail sequential test can be satisfied;
- Inclusion of policies that encourage proposals that extend activities into the evenings in a way that is safe and enhances the character of the centres;
- Each LPA should produce a vacant unit strategy to tackle the issue on an individual basis and the position clarified on how "meanwhile" or "pop up" temporary uses for vacant units can be facilitated to prevent further decline;
- An updated retail study to be undertaken that will provide a descriptive retail strategy for each of the main centres. It should also determine whether allocations within the centres are required and what the most suitable uses are to address the needs of each LPA and any neighbouring LPAs involved in the county wide Infrastructure Needs Assessment work;
- Provision of robust assessment methods within the policy criteria to ensure any proposals that come forward over the plan period are effectively assessed. This will include ensuring that the SLP considers the need to introduce a locally-set threshold for assessing retail and leisure development proposals which are located outside of defined 'town centres';
- Ensure robust policies and strategies are formulated that ensure centres are accessible to all, particularly given that the government recognises that accessibility is of paramount importance. Accessibility criteria for new build, conversions and regeneration projects should be embedded into the policies;
- Provide support for the facilitation of community spaces in

centres to increase footfall, install pride and help to tackle isolation;

- Encouragement within policy criteria to create interest at street level with active frontages, ensuring public realm enhancements are facilitated and safer and more welcoming visible improvements to safety are made through support for al fresco dining and well placed street furniture. Equally provide support to high-quality retail and other complementary uses at ground floor level which encourages footfall to create active and vibrant centres;
- Ensure that green infrastructure and improved public space within the centres is an integral factor as it can help drive more footfall to high streets, improve air quality and increase opportunities for active travel. Encouragement should be given to more tree planting within streets, living walls / vertical gardens and open space opportunities;
- Ensure that thorough consideration is given to enact the council's Compulsory Purchase Order enabling powers to support the transformation of high streets and other regeneration projects so that they can acquire vacant and derelict buildings in order to attract new private investment;

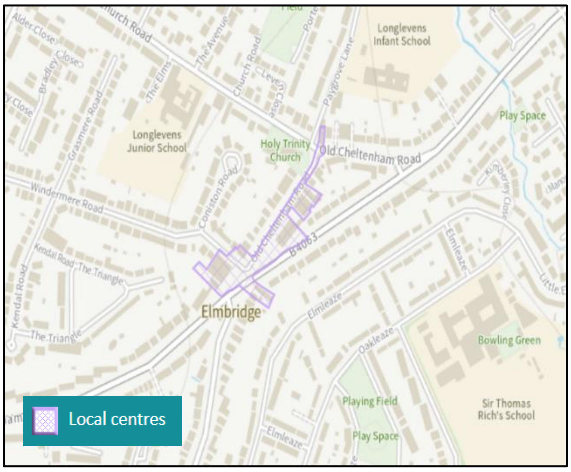
Wider considerations

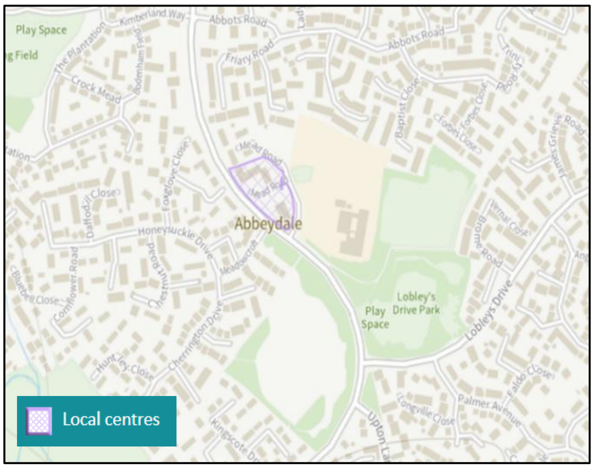
8.6 The baseline data and consultation responses form the foundation for also considering a broader, more holistic approach. Some of the identified issues fall outside the scope of the SLP; these are summarised in the bullet points below and, where appropriate, have been shared with relevant stakeholders for further consideration.

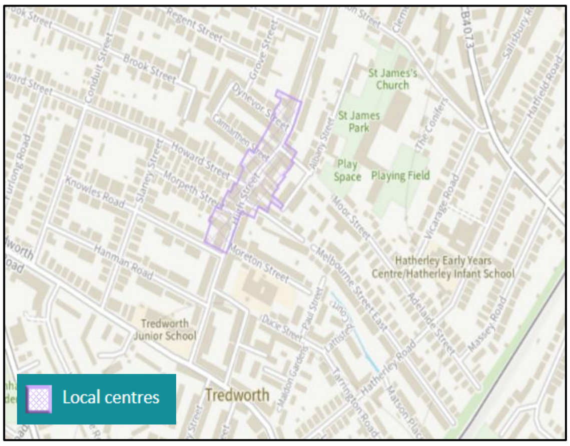
- Consideration of current car parking costs, both in central areas and out of town shopping destinations and a review of the accessibility of centre car parks with consideration to understanding the barriers to car parking in the centres;
- Ensuring sound and viable strategic climate change mitigation policies are embedded into the SLP which will provide the overarching principles for other policies / strategies to adhere to;

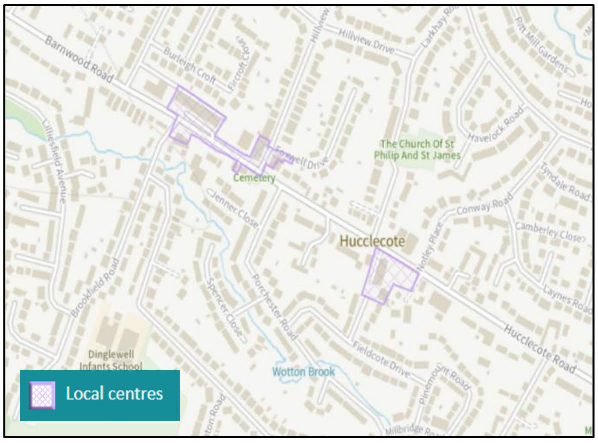
- Ensuring a joined-up approach to sustainable travel, improved transport links and public transport investment is taken and that the relevant policies within the SLP link effectively to the centres policies;
- Provide clear guidance to businesses / developers on the changes to the Use Classes Order and permitted development rights to increase understanding;
- Consideration of whether it is feasible to offer incentives for existing and new small businesses in the centres that could include a reduction in business rates, 'green' incentives, facilitation of grants and the provision of business consultation and advice services;
- Ensure that there is a sound policy basis embedded in council plans and strategies to facilitate and encourage new tourist attractions / events to the centres;
- Initiating the new 'High Street Rental Auctions' power to help regenerate high streets and fill empty shops as a measure to tackle vacant units in the centres.

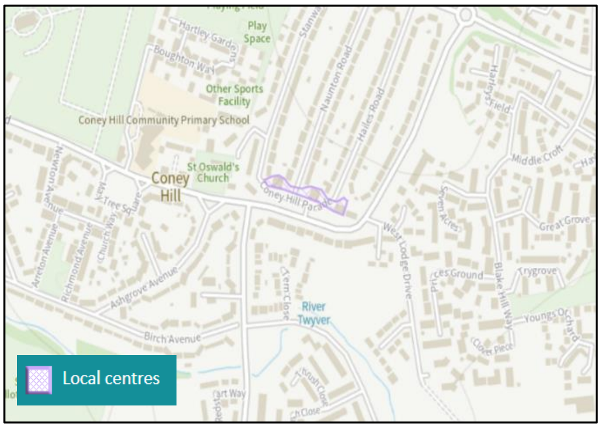
Appendix 1: Gloucester City Councils Local / District Centres

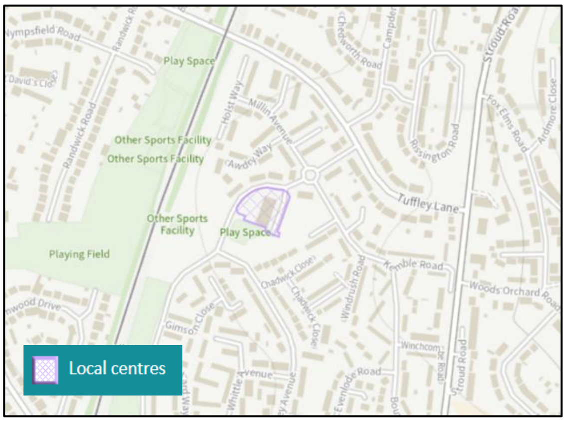


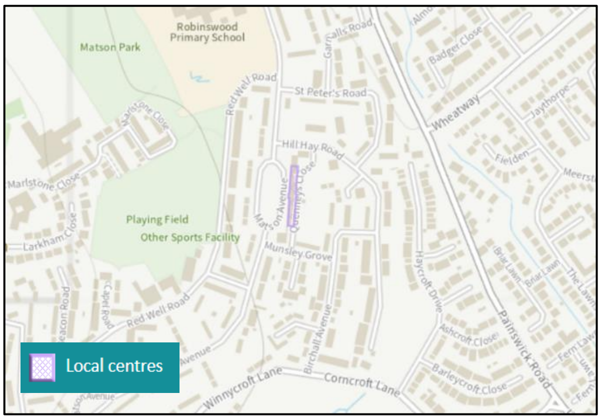




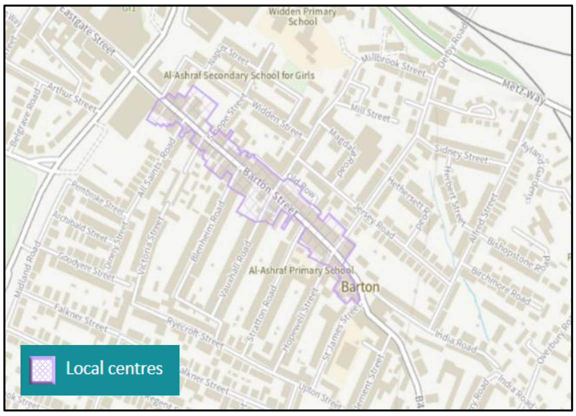


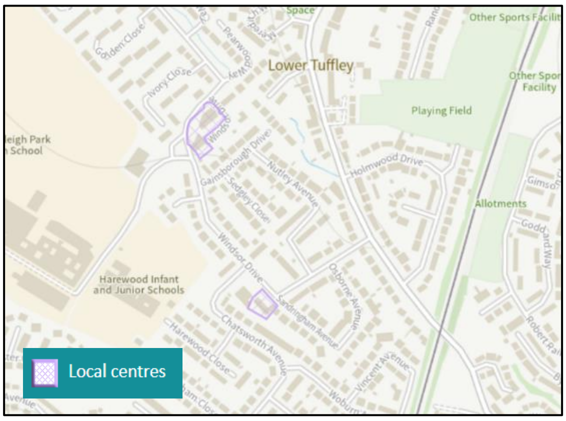


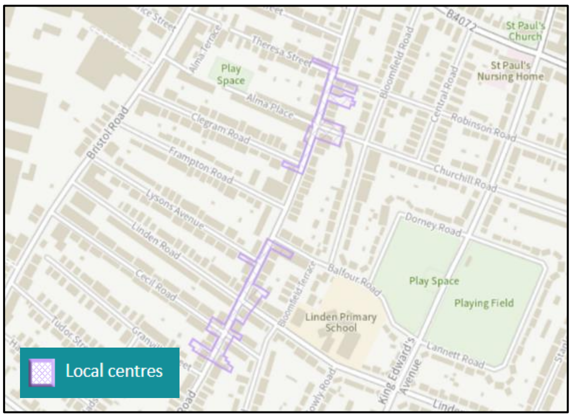


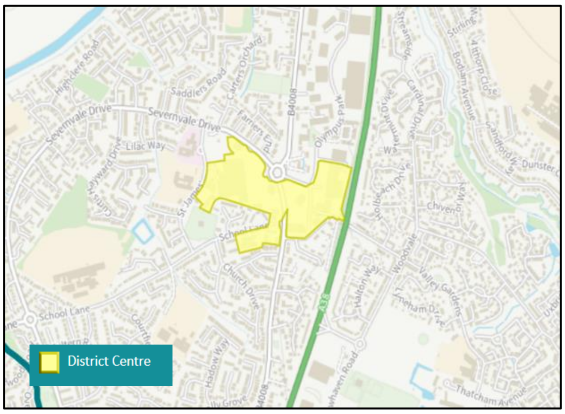


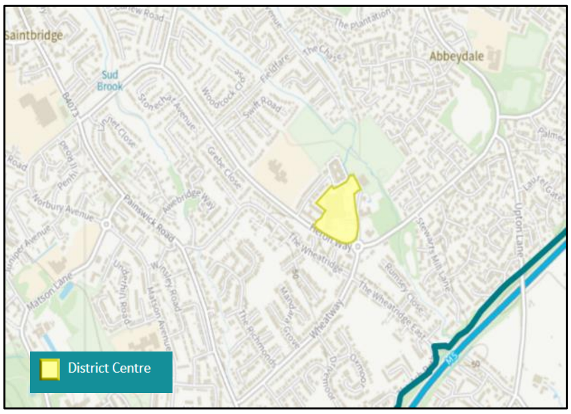

Sapperton Road
A38
Finlay Road
Selwyn Road
Southfield Road
Beaufort Road
Darwin Road
Reservoir Road
Ashmore Road
Local centres


Widden Primary School
Al-Ashraf Secondary School for Girls
Barton Street
Al-Ashraf Primary School
Barton
Local centres


Lower Tuffley
Playing Field
Allotments
Harewood Infant and Junior Schools
Local centres

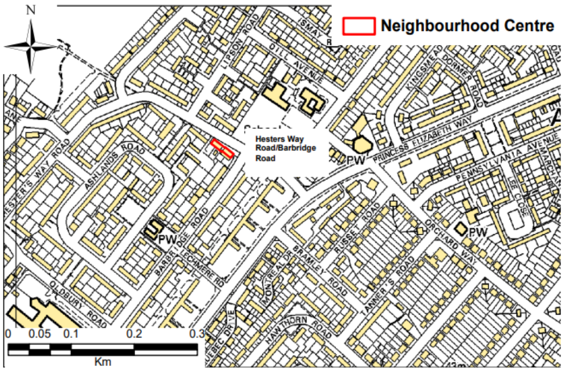

Play Space
Bristol Road
St Paul's Church
St Paul's Nursing Home
Robinson Road
Churchill Road
Play Space
Playing Field
Linden Primary School
Local centres


Severnvale Drive
District Centre

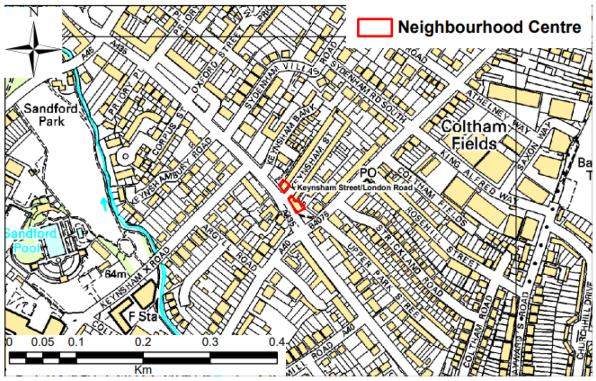

Saintbridge
Abbeydale
District Centre

Appendix 2: Cheltenham Borough Councils Neighbourhood Centres

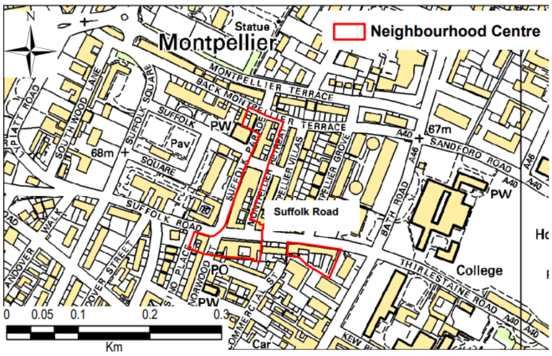
APPENDIX 6: NEIGHBOURHOOD CENTRES (HESTERS WAY)



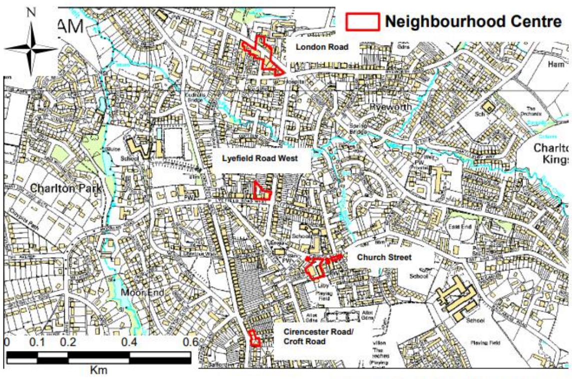
APPENDIX 6: NEIGHBOURHOOD CENTRES (ALL SAINTS)



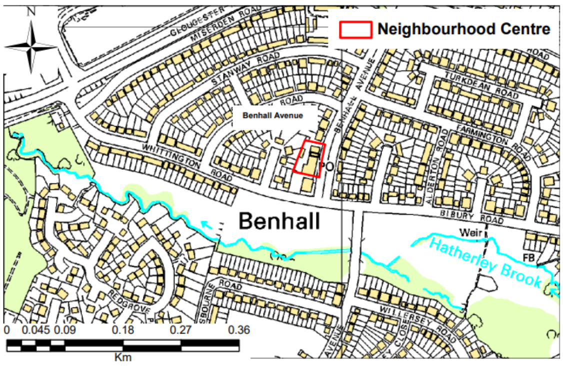
APPENDIX 6: NEIGHBOURHOOD CENTRES (COLLEGE)



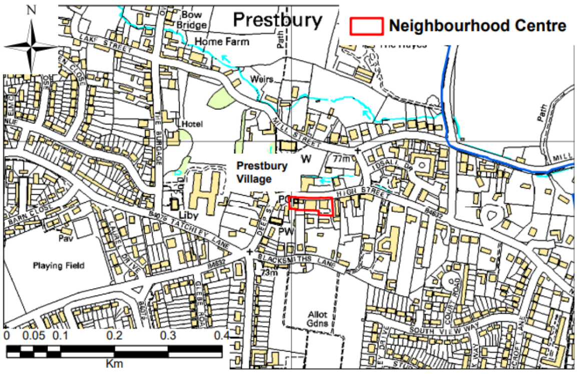
APPENDIX 6: NEIGHBOURHOOD CENTRES (CHARLTON KINGS)



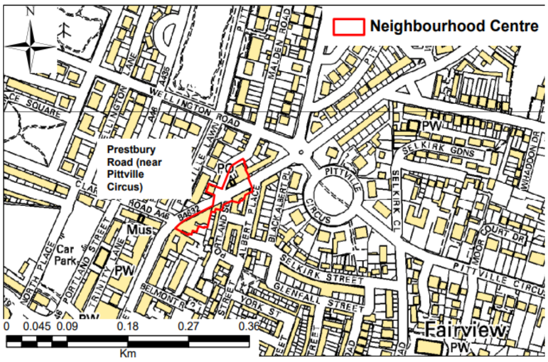
APPENDIX 6: NEIGHBOURHOOD CENTRES (BENHALL AND THE REDDINGS)



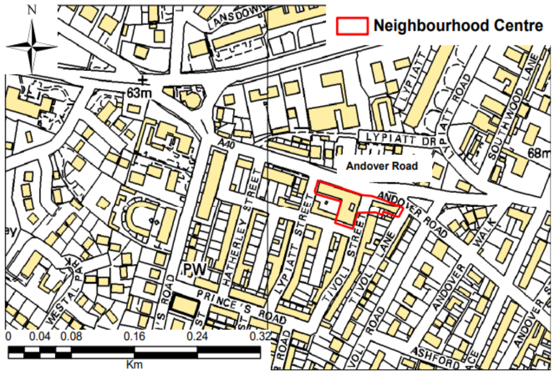
APPENDIX 6: NEIGHBOURHOOD CENTRES (PRESTBURY)



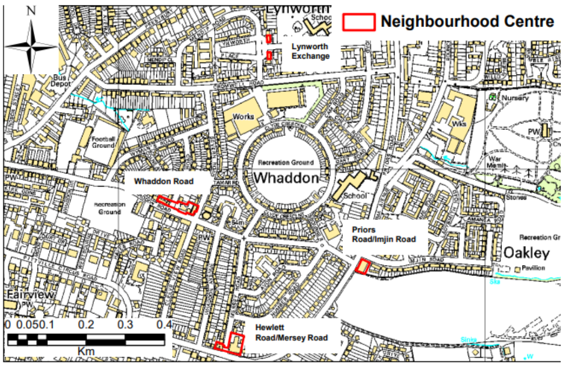
APPENDIX 6: NEIGHBOURHOOD CENTRES (PITTVILLE)



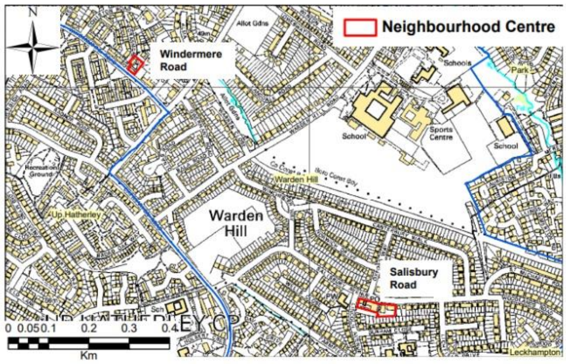
APPENDIX 6: NEIGHBOURHOOD CENTRES (PARK)



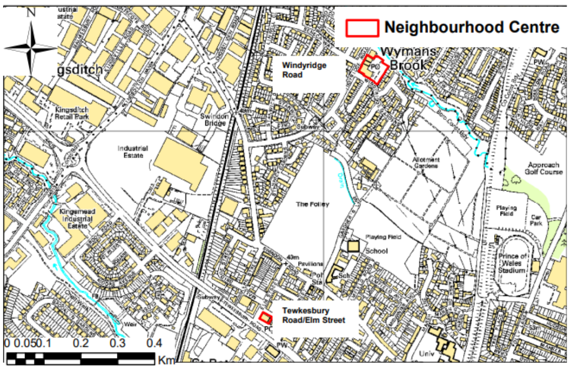
APPENDIX 6: NEIGHBOURHOOD CENTRES (OAKLEY)



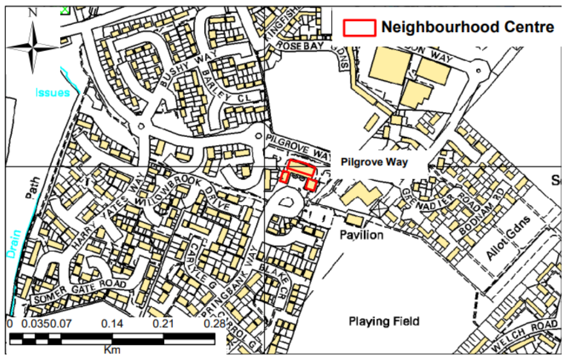
APPENDIX 6: NEIGHBOURHOOD CENTRES (WARDEN HILL)



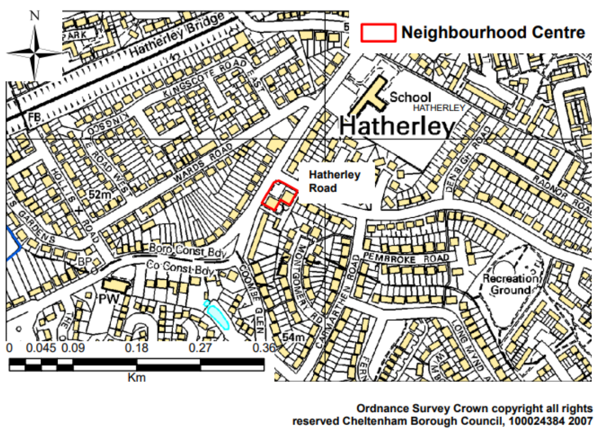
APPENDIX 6: NEIGHBOURHOOD CENTRES (SWINDON VILLAGE)



APPENDIX 6: NEIGHBOURHOOD CENTRES (SPRINGBANK)



APPENDIX 6: NEIGHBOURHOOD CENTRES (UP HATHERLEY)



APPENDIX 6: NEIGHBOURHOOD CENTRES (ST. PETERS/ST. MARKS)