Employment Land Monitoring May 2014







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Gloucester City Employment Land Report

1.0 Executive summary

- 1.1 This report updates the 2012 Gloucester City Employment Land Monitoring Report and identifies that in the past 2 years 14.13ha of additional draft allocated employment land has been taken up within the City.
- 1.2 Recent trends since 2012 have shown that unallocated, derelict and vacant sites in the City continue to come forward and yield new 'windfall' employment development in the City.
- 1.3 The public sector continues to invest in the City with the delivery of new education facilities citywide and the completion of a new large health care and medical facility on Horton Road.
- 1.4 The City continues to experience the loss of old employment sites where these are no longer suitable for employment purposes and can more effectively be redeveloped for sustainable residential development.
- 1.5 In the Joint Core Strategy monitoring period of 2011 2014 a gross total of 16.32ha of both allocated and non allocated employment land has been delivered with a corresponding loss of 10.37ha resulting in 5.95ha net of new employment land in the City.
- 1.6 The future allocation of sites for employment purposes will be considered through the City Plan. The potential for allocating new employment land or new business parks in Gloucester is relatively limited due to the fixed City boundary. Any shortfall arising in Gloucester's strategic employment land provision is being met through the Joint Core Strategy with the neighbouring planning authorities of Tewkesbury and Cheltenham Boroughs.

2.0 Introduction

- 2.1 The National Planning Policy Framework (NPPF) (March 2012) places great emphasis on the role of the economy in pursuing sustainable development. Sustainable economic development is identified as one of the 12 core planning principles of the NPPF¹. Local authorities are encouraged to make every effort to objectively identify and then meet the business needs of an area and respond positively to wider opportunities for growth by taking account of the needs of the business community.
- 2.2 The NPPF clearly states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth, including the regular review of sites allocated for employment purposes².
- 2.3 The monitoring of employment land in the City has been undertaken since 1991 in order to provide an evidence base to inform policies and proposals relating to the provision and protection of employment land across the City. Monitoring work to understand the supply and take up of employment land across the City continues to be essential for the evidence base supporting the emerging Joint Core Strategy and City Plan, taken together these two documents will provide the Development Plan for the City.
- 2.4 This report considers the take up of employment sites allocated in the 2nd Deposit Gloucester City Local Plan.
- 2.5 In order to give a balanced view, the loss of employment land throughout the City is also reported on. Allocated gains and all losses provide the statistics for the employment land supply figures.

¹ Paragraph 17 NPPF (March 2012)

² Paragraph 22 NPPF (March 2012)

- 2.6 The report also captures information on new employment development on brownfield sites that were previously derelict and vacant but were not allocated employment sites in the 2nd Deposit Draft Local Plan in order to provide a picture of the recycling of existing brown field sites for new employment development.
- 2.7 Other gains to employment floor space include recent extensions at existing employment sites and investment in the public sector across the City.
- 2.8 Potential employment supply is considered separately in the 2013 Strategic Assessment of Land Availability report which can be found on the City Council website³.

3.0 Methodology

- 3.1 This employment land report has been produced by rolling forward the employment monitoring that has been undertaken by the City Council since 1991.
- 3.2 Employment monitoring was not undertaken in 2013, instead two years of monitoring has been undertaken in April 2014.
- 3.3 As the Gloucester City Second Deposit Draft Local Plan (2002) is the policy document which has been used for decision making in the City the employment allocation it contains have been used as a benchmark against which to assess the effectiveness of local planning policy in delivering employment land in the City over the past 12 years.
- 3.4 The monitoring of planning permission in order to ascertain consents for gains and losses was undertaken and site visits carried out in early April

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- 2014 in order to establish the take up of consents and implementation or completion of previous permissions.
- 3.5 A broad definition of 'employment' is used in order to identify potential consents to monitor over and above traditional 'B' class uses, therefore all retail, commercial, health and education related consents are considered in the study.
- 3.6 Comparing losses of employment land (allocated and non allocated) against the delivery of allocated new sites provides a figure for net gain of employment land in the City.
- 3.7 It is appreciated, however that the methodology in 3.5 fails to capture new employment land that may have come forward on recycled or non-allocated sites. This report therefore now captures this additional information in order to provide a fuller picture of the economic health of the City. Details of recently completed non-allocated sites providing more than 100 square meters of employment floor space are captured.
- 3.8 In addition, firms or companies who have space to expand on their existing sites may choose to extend their premises in order to expand production or grow their business rather than totally relocate to a new site. Details of recently completed extensions are capture in this report where more than 100 square metres of additional floor space has been provided.

4.0 Take up of allocated sites

4.1 The 2002 Gloucester City Second Deposit Draft Local Plan identified 102.84ha of land for employment including existing commitments, mixed use allocations, new employment allocations and old employment land in the City⁴. As this plan is the policy document used for decision making in the City the employment allocations it contains have been

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- used as a benchmark against which to assess the effectiveness of local planning policy in delivering employment land in the City over the past 12 years.
- 4.2 The Local Development Framework for Gloucester progressed to Preferred Option stage in 2006 with two site allocation documents being published, the Central Area Action Plan and the Non Central Sites Allocation Document. Both documents included allocations for employment purposes.
- 4.3 In 2007 Gloucester City was instructed by the Secretary of State to prepare a Joint Core Strategy with Tewkesbury Borough and Cheltenham Borough Council's. The Joint Core Strategy (JCS) was submitted to the Secretary of State in November 2014. Within the City the JCS will be supported by the City Plan and taken together both documents will comprise the development plan for the City.
- 4.4 The 2006 Local Development Framework documents have now been superseded by the City Plan which will be allocating sites for housing and employment purpose for the plan period up to 2031.
- 4.5 Where sites were included in the City Plan Sites Consultation (May 2013) the relevant City Plan reference is provided in Table 1 below.
- 4.6 Table 1 below provides a summary of how the draft allocated 2002 sites have performed over the past 12 years.

<u>Table 1: 2002 Gloucester City Local Plan Second Deposit Draft</u> <u>Employment Commitments and Allocations</u>

2002 Policy Ref	Site Name	2013 City Plan Ref	Area(Ha) identified in plan	Use Class identified in plan	Built 2002 to date	Remaining with permission	Notes 2014
EC.1	Waterwells Business Park	-	12.09	B1	9.36	2.75	All but complete B1,B2 & B8
EC.2	Rear of 2-28 Hempsted Lane	-	8.7	B2 & B8	0.4	6.0	Two sites taken up since

							2012.
							Pressweld
							complete prior
							to 2002
EC.4	Telecom House	KW6	0.6	B1	0	0	Reserved for
	Great Western						relocation of
	Road						Court Buildings
EC.5	Metz Way	-	1.3	B1 & B8	1.3	0	Complete Build
							base A1 & B8
E1	Western	-	Unspecified	B1	0.66	0.2	Quays
MU.2	Waterfront						Employment
							Land
						2.37	Gloucester
							Quays Hotel &
							Bakers Quay –
							C1,A1
E1	Bus Station	WN4	1.81	B1 offices	0	0	Part of wider
MU.3							regeneration
							site
F4	DAT Overdeeless		20	D4 0 D0	2.00	47.04	Lacalacatus
E1 MU.5	RAF Quedgeley	-	20	B1 & B8	2.96	17.04	Local centre extension
1010.5							permitted plus
							Asda store
							built
E1	Jnctn Barnwood Rd	-	1.3	B1	1.3	0	C3 & B1 Hotel
MU.6	and Barnwood						and Coroners
	Bypass						Court -
							complete
E1	Land at Bristol	-	1	B1	0	0.75	B1 part of
MU.9	Road						outline
F2.4	1		0.40	D4		0	consent
E2.1	Long stay car park, railway station	-	0.48	B1	0	0	Required for operational
	Tallway Station						purposes
E2.2	RMC Site	_	7.8	B1	5.8	2.0	Includes new
	Waterwells		_			_	Glos. Custody
							Suite
E2.4	South West Bypass	WS11	0.5	B1	0	0	No movement
	Site						
E2.5	Land east of	QF1	15.1	B1	0	0	No movement
F2 C	Waterwells		6.4	DO	6.4	0	Cito in f
E2.6	IM Group Site	-	6.4	B8	6.4	0	Site in use for car storage
E2.7	South junction	-	0.7	B1	0	0	No movement
	Eastern Ave &						
	Barnwood Rd						

E3.1	British Gas Site Bristol Rd	-	7.0	B1 & B2	8.18	0	Permitted for B8 open storage
E3.2	Railway Triangle	-	10.9	B1,B2 & B8	3.89	7.01	Whole site has outline consent for mixed use redevelopment
E3.3	Great Western Road Railway Sidings	KW8	4.3	B1	0	0	Resi & B1 in development brief
E3.4	Horton Road Railway Sidings	-	3.46	B1	3.46	0	Site has temporary permission from County for open air storage, crushing and screening
			102.84		43.71	38.12	

- 4.7 Table 1 demonstrates that of the 102.84ha identified as commitments or allocations in the 2002 Plan, by May 2014 43.71ha had been delivered with a further 38.12ha available as extant permissions.
- 4.8 This represents delivery/take up of 14.13ha of land over the past two years since the 2012 Employment Monitoring Report.
- 4.9 Further written commentary is provided on each of the sites below.

4.10 Major Employment Land Commitments

EC.1 Waterwells Business Park

This business park comprises predominantly B1 office and light industrial uses with B8 storage and distribution also being present. A green field site with excellent access to Junction 12 of the M5, the site has proved popular with both speculative developers and businesses relocating from within the City and elsewhere. 9.36ha have now been developed at the site with a further 2.75ha benefiting from planning permission that is yet to be implemented.

EC.2 Rear of 2-28 Hempsted Road

Since the completion of the South West bypass this site has become more attractive to the market with 2 plots receiving planning permission and in use since the last monitoring report in 2012. One is occupied by a company specialising in recycling, the other as a new depot for Hobbs Brothers Oil distribution.

EC.4 Telecom House, Great Western Road

This central site remains vacant and was allocated in the Preferred Option Central Area Action Plan for the relocation of a magistrates court. The site was used for a temporary period as a car park for the hospital but is no longer used for this purpose.

EC.5 Metz Way

This site is totally built out by Build Base, a wholesale building company.

4.11 Policy E.1 Mixed Use Allocations

MU.3 Bus Station and Market Parade

This site lies within the wider regeneration area known as Kings Quarter which is the City Council's top priority area for regeneration in the City. The Council's preferred development partner is Stanhope. A Concept Statement was produced for the area and published in January 2013⁵. Submission of a planning application for a retail led regeneration scheme, to include a new bus station is anticipated in the near future.

MU.2 Western Waterfront

St. Oswalds Park

This area, the former cattle market, has undergone major regeneration with new retail warehouses, restaurants and dwellings being delivered at the site. A large extra care village has been delivered alongside open market and affordable housing. Since the 2012 Employment Monitoring Report an additional new restaurant has been delivered at the site.

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Gloucester Quays

In June 2006 outline planning permission for this site was granted by the Secretary of State. To date the scheme has delivered a factory outlet centre (May 2009), a new F.E. college, a supermarket and an hotel (May 2009). These elements of the scheme predated PPS4 and have not been included in employment land figures – however, any new employment uses generated within this area post 2009 are captured by the employment monitoring.

Since the 2012 study a new 10 screen cinema and nine restaurant's have been delivered within the Quays complex comprising some 0.52ha of development.

The outline permission for this site also granted residential, leisure and additional employment development across the wider area identified in the outline permission.

Gloucester Docks

Regeneration of this part of the city has been ongoing with the reuse and conversion of listed warehouse buildings for office and residential purposes. New build and conversions have delivered flats and apartments with commercial units on ground floors. In the monitoring period the conversion of Lock Warehouse with a retail unit on the ground floor has been completed.

MU.5 RAF Quedgeley

The mixed use redevelopment of this site will yield approximately 20ha for employment. The local centre at Kingsway will yield 0.82ha of employment land comprising a mix of uses.

The main employment area at the site is Framework 5 which is in the process of being delivered. Within the monitoring period a new Asda supermarket has been delivered, while a speculative application for 10,000 sq metres of B1 office space remains extant, both within Framework 5.

A new primary school and nursery have been provided in the residential Framework 4 within the monitoring period.

MU.6 Junction Barnwood Road and Barnwood By-pass

This site is built out and complete, it has delivered an hotel, a coroner's court with mortuary and residential development. A total of 1.3ha of employment land has come forward at this site.

MU.9 Land at Bristol Road

Comprised of three former employment sites, Contract Chemicals, St. Gobain and Wellman Grahame, this site benefits from a planning permission for wholesale mixed use redevelopment including 0.75ha of employment land.

4.12 Policy E.2 Employment Allocations

E.2.1 Long stay car park railway station

This site is owned by network rail and used as a long stay surface level car park for rail commuters. There are no current proposals to bring the site forward for employment purposes, the future allocation of the site for employment purposes will be considered through the City Plan.

E.2.2 RMC Site Waterwells Business Park

This site lies immediately to the north west of the original Waterwells site and is partly built out. The whole site has extant planning permission for employment development. Since the last monitoring report the new Gloucestershire Constabulary Custody suite has been permitted and is in the process of being constructed on the southern part of the site.

E.2.4 South West By-Pass Site

This small site adjacent to the south west by-pass has not come forward for employment purposes to date.

E.2.5 Land East of Waterwells Business Park

This site was the subject of a Development Brief adopted in September

2009⁶. There are currently no extant employment permissions at this site. New highway infrastructure is required in order to be able to deliver the site effectively for employment purposes, the future allocation of the site will be considered through the City Plan.

E.2.6 IM Group Site

The whole site is currently in use for car and van storage/valeting purposes and has therefore been taken up during the monitoring period.

E.2.7 Land south of junction of Barnwood Road and Eastern Avenue
There are no current proposals to bring this site forward for
employment purposes, access to the site is severely constrained. The
site has recently been sold and its future allocation will be considered
through the City Plan.

4.13 Policy E.3 Allocations on Old Employment Sites

E.3.1 British Gas Site Bristol Road

This site was granted permission in 2011 for open storage and sale/display/storage of new or used motor vehicles. The clearance of the site and implementation of the permission was completed in the 2011/12 monitoring period. In the monitoring period two new reserved matters consents have been granted at the site.

E.3.2 Railway Triangle

This site has begun to be built out during the monitoring period with the delivery and opening of a Morrisons food store and petrol filing station on 3.89ha. Reserved matters consents have been permitted for a further 1.95ha and outline consent is in place for the remaining 5.06ha of the site for B1,B2,B8 & car showroom.

The City has long awaited the bringing forward of this previously derelict and vacant railway related site for employment purposes. This

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redevelopment is testament to the fact that long retained 'old' employment sites can come forward in challenging economic circumstances to yield jobs for local residents and attract inward investment into the City.

E.3.3 Railway Sidings Great Western Road

This site was considered through the City Plan Sites consultation as a possible location for employment led mixed use development with a view to the establishment of a Health Innovation Centre given its proximity to Gloucestershire Royal Hospital. The future allocation of this site will be considered through the City Plan. A constraint to development at the site is its current operational requirement as sidings for Network Rail, however, the opening up of site E.3.2 provides the opportunity for Network Rail to rationalise siding activities to the south of Metz Way.

E.3.4 Railway Sidings Horton Road

This site is being used for the crushing and screening of inert waste materials to produce secondary aggregates.

4.14 <u>Commentary on plan led employment sites</u>

Between 2000 and 2010 the main area being developed in the City for employment uses was Waterwells Business Park. This was a green field site and provided both bespoke and speculative B1, B2 and B8 development. With good access to the motorway network the business park continues to provide an ideal location for those companies wishing to expand or invest in the City. The public sector also invested in the park with a new flagship building for the police and emergency services. The construction of a new police custody suite to the north west of the site has commenced during the monitoring period.

4.15 The site to the north of Waterwells has also delivered for B1, B2 and B8 employment purposes and has come forward as a natural extension to the Business Park over the period 2007 to date. The whole of this area is consented for employment purposes.

- 4.16 The development of land to the east of Waterwells is constrained by highway infrastructure. The future allocation of this site will be considered through the City Plan process.
- 4.17 The mixed use allocations continue to yield employment development including the Western Waterfront which includes; Gloucester Quays, which has delivered a new cinema and restaurants in the monitoring period; the Docks which has seen the establishment of a new brewery and occupation of 4 ground floor commercial units during the monitoring period and St. Oswalds Park which has seen the delivery of additional floor space and commencement on the delivery of a new restaurant facility.
- 4.18 Of particular note for the monitoring period 2012- 2014 is the continued delivery of 'old employment sites' allocated in the 2002 plan, most specifically the northern Railway Triangle that had lain derelict for 30 years. This 10.9ha site, close to the City Centre, has seen the delivery of a retail superstore and petrol station totalling 3.89ha, with an additional 0.66 ha benefiting from reserved matters consent for seven A1 units and 1.29ha benefiting from reserved matters consent for a building providing large vehicle servicing.
- 4.19 The ongoing delivery of old brown field employment sites and other easier to develop green field allocated sites reflects investor confidence in the City and demonstrates that there is a market for a range and mix of employment types in the City. It is important therefore that the City Plan continues to provide a range and mix of sites through plan preparation to absorb and maintain investor confidence and contribute to economic recovery both within the City and beyond through job and wealth creation.
- 4.20 It should be noted that the potential for allocating new employment land or new business parks in the City is relatively limited owing to the fixed City boundary. The need to provide additional strategic employment land outside the City boundary but in close proximity to the

urban area has been addressed through the strategic allocations identified in the submitted JCS (Nov 2014).

5.0 Delivery of additional employment land on non allocated sites

5.1 Non allocated site delivery

In carrying out employment monitoring in 2012 it became apparent that sites had been delivering across the City for employment purposes since 2006 which had not been allocated in the 2002 Second Deposit Draft Local Plan. The delivery of these sites was therefore not contributing to identified employment land supply in the City.

5.2 Since 2012 a further 0.47ha of employment land has come forward from this source in the City and is detailed in Table 2 below.

Table 2: Windfall Employment Completions 2012 - 2014

Site	Ha Complete	Use Class	Former Use
India House	0.07	A1	Derelict pub
Inn on the Docks	0.14	D1	Derelict pub
Former Fire	0.2	A1	Derelict store
Station Barnwood			
Road			
Vets at Walls	0.06	D2	Vacant Site
roundabout			
Total	0.47ha		

- 5.3 Table 2 demonstrates that recent windfall employment completions have included redevelopment for local convenience stores, a children's nursery and a vets. These are smaller derelict sites scattered across the City, one of which is a mixed use redevelopment (Barnwood Road). This take up demonstrates the demand within the City for small sites for employment purposes.
- 5.4 There have been no significant extensions greater than 100sqm to existing employment sites completed in the monitoring period 2012-2014.

5.5 Public sector investment remains strong in the City with over 16,000 sqm of new floor space being delivered in the City in the monitoring period including a new centrally located health centre and on going investment at both primary and secondary schools across the City, completions are listed in Table 3 below.

Table 3: Public Sector Completions 2012-14

Site	Floor space completed (sqm)	Use Class	Completed
Gloucester Academy Cotteswold Road	9400	D1	12/13
Dingelwell Infants School, Former Caretakers Bungalow	160	D1	13/14
Waterwells Primary Academy	2210	D1	13/14
PreSchool Nursery Waterwells Primary Academy	160	D1	13/14
Severnvale School Former Caretakers Bungalow	160	D1	13/14
Ermin House Horton Rd – Medical centre and Pharmacy	4058	D1	13/14
Totals	16,148 sqm		

5.6 Development at school sites contribute to the local economy and result in job creation both during construction and once in use for educational purposes. As the population of the City continues to grow the delivery of new educational facilities will continue to provide new employment in order to order to provide for lifelong learning for the City and its residents.

6.0 Loss of employment land

6.1 In order to have a balanced view of employment land trends across the City it is necessary to understand losses of land as well as gains.

- 6.2 Historically the City has been a centre for manufacturing, railway related industry and export trade related to the Docks. As a result, over the years a succession of relatively large central sites, no longer suited to the needs of modern business, have come to the market or been promoted as suitable and sustainable residential development sites. The use of such sites for residential purposes has been the main loss of employment land in the City over recent years. Some sites have been promoted through the Strategic Assessment of Land Availability (SALA) including annual consideration by the JCS SALA panel.
- 6.3 When sites come forward for development and have not been pursued through the SALA they are considered in the light of Policy E.4 of the 2nd Deposit Local Plan and national planning practice guidance which considers how long the site may have been marketed unsuccessfully for employment purposes and the possibility of greater community benefit that may result from bringing the site forward for alternative use.
- 6.4 In some instances it may well be beneficial to the local area to remove heavy goods vehicles from the local highway network; or 24 hour operations from a residential area; or secure more open space and play provision for the local community, than to insist that the site be retained for employment purposes in perpetuity.
- Other small losses occur in the central area where offices or other employment uses are converted to dwellings. Table 4 below records the losses for the monitoring period 2012-2014.

Table 4: Loss of Employment Land 2012- 2014

Site	На	Use Lost	New Use	Completed
Gardener Denver	1.83	B2 -	C3	2013
		Manufacturing		
Wellman	8.44	B2 & Sui	C3	Site cleared 2014
Graham/Contract		Generis		
Chemicals		Manufacturing		
		& former		
		chemical works		

Central area losses	0.1		
Totals	10.37		

7.0 Results of monitoring of employment land delivery

7.1 Historic Delivery Measurements

Historically the delivery of employment land in the City has been measured by assessing the delivery of adopted Local Plan employment land allocations against Structure Plan requirements, the Structure Plan time period being 1991 -2011.

- 7.2 The 2012 Employment Land Report drew attention to the fact that such a methodology missed those new employment sites being delivered that were not previously allocated, including the re-cycling of existing brown field sites or the provision of additional floor space at existing employment sites.
- 7.3 Given that the Structure Plan is no longer used for monitoring purposes this report continues to consider the total amount of employment land provided on previously allocated sites, but no longer compares it to Structure Plan requirements. Increasingly requirements for employment land have become 'qualitative' rather than 'quantitative' and the type and nature of land considered to constitute 'employment' for planning purposes has changed to include a broader range of uses. Moreover solely quantitative monitoring does not capture the nature or density of jobs that have been provided.
- 7.4 Since 2011 Gloucester, Cheltenham and Tewkesbury Council's have been work on a joint strategic planning document called the Joint Core Strategy (JCS). The delivery and loss of employment land in the City will now be monitored in accordance with the time scale of the JCS.
- 7.5 Table 5 below lists delivery of new employment land in the City since 2011.

Source	На	Floor space sqm
Allocated Sites	14.35	
Non allocated sites	1.97	
School/health care		19,294
Losses of employment land	10.37	
Net Gains	5.95ha	19,294sqm

Table 5: Delivery of new Employment Land in City since 2011-2014

- 7.6 The City Council is producing a City Plan, which taken together with the JCS will comprise the Development Plan for the City. The City Plan will identify new areas for employment development in the City as employment allocations and will seek to safeguard areas of prime employment land in the City from redevelopment for alternative uses.
- 7.7 The City Plan will also carry forward policy in order to help retain employment land within the City to allow for its re-cycling and redevelopment for employment uses where it is well located to existing transport networks and its reuse will not have an adverse impact on neighbouring residential areas.

8.0 Conclusions

- 8.1 The following conclusions can be drawn from this report
- Of the 102.85ha of land identified as commitments or allocations in the 2002 2nd Deposit Gloucester City Local Plan only 17.91ha have not benefited from a planning permission over the past 12 years.
- Over the past 3.5 years between April 2011 and October 2014 an additional 16.32ha of employment development has been delivered in the City, demonstrating the market's willingness to bring forward sites even in challenging economic circumstances, including the northern

railway triangle. Simultaneously 10.37ha of land formerly used for employment purposes has been lost owing to the build out of sustainable residential schemes on old employment sites. This has resulted in a net delivery of 5.95ha of new employment land over the 3.5 year period.

- An additional 19,294sqm of public sector investment in primary and secondary schools and health care facilities has been completed in the period April 2011- October 2014.
- The above statistics demonstrates the significant interest in bringing forward sites for employment purposes in the City and the fact that the City is seen as a location suitable for investment with an attendant suitable trained labour market.
- Windfall sites continue to yield employment development by bringing forward vacant and derelict unallocated sites.
- It is clear from the above that with so much recent development interest in the City in terms of completions on both allocated and non allocated sites over the past three years since 2011 that the City Plan needs to ensure that a range and mix of employment sites are identified across the City in sustainable locations in order to sustain inward investment and build on the increased confidence in Gloucester as a location for business growth.
- To achieve this the City Plan will need to allocate new sites, both brown field and green field to provide a mix of supply as well as provide a policy framework to ensure that the best and most suitable employment land within the City is retained for recycling, reuse and redevelopment.
- Where there is insufficient land within the City to allocate effectively for strategic employment growth purposes, collaborative working across local authority boundaries will be required under the duty to co-operate in order to help deliver Gloucester's strategic employment land growth requirements.

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