

Tewkesbury Borough Plan Examination

Matter 5 – Employment land and policies, including Gloucestershire Airport

Participant Statement by Savills on behalf of Vinci St. Modwen and Defence Infrastructure Organisation

5.16 Are the general employment policies EMP3 – EMP6 in the plan positively prepared, justified, effective, consistent with national policy and the JCS?

Policy EMP6

Policy EMP6 contains a stringent requirement to safeguard all employment land within the authority area. We object to this policy on the basis that it is unduly restrictive and not based upon a sound interpretation of the evidence.

The basis for the formulation of employment policies in any Local Plan should be an analysis of the economic growth predicted to take place during the plan period. The analysis then converts the job growth forecasts into employment land requirements which can then be implemented through the allocation of land for employment through the plan-making process. This approach is confirmed in paragraph 81 of the Framework, which states that: *“planning policies should ... (b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”*.

This approach was adopted in the production of the JCS where the assessments undertaken by economic forecasting houses provided a breakdown of job creation by sector. It is the role of the emerging Tewkesbury Local Plan to make provision for the arising needs within the authority area based upon this analysis.

This is important when considering the nature and role of an employment protection policy such as EMP6. Since it is the role of the Local Plan to allocate employment land to meet future arising needs, existing employment locations need only to accommodate the number of jobs present on the site at the point in time at which the assessment was undertaken. In other words, it is the protection of the existing number of jobs which is important and not the land upon which those jobs are situated.

We do not object to the general safeguarding of the number of jobs on employment land where the evidence demonstrates that there is a clear rationale for doing so, however, since the policy approach in EMP6 focuses on the land as opposed to the jobs, it is unduly restrictive, unrefined and inconsistent with the principle established in paragraph 120 criteria (b) of the Framework.

Furthermore, the policy does not adequately balance the actual harm resulting from the loss of employment against other planning objectives. As it is currently drafted, proposals for the redevelopment of employment land which resulted in only a very minor loss of employment land but which offered substantial public or community benefits would conflict with this policy unless one of the three tightly defined criteria was also triggered. A more nuanced policy approach is therefore required which balances the number of jobs to be lost as part of a development proposal (as opposed to simply protecting the land upon which those jobs are located) with the planning benefits achieved through redevelopment.

In order to enable the decision maker for a planning application to reach a balanced judgement based upon the evidence, the objective of retaining jobs on a site should be characterised as having moderate or substantial weight in the planning balance and not in such binary terms as it is currently presented in the policy and reasoned justification.

Take for example a hypothetical 5ha employment site in a sustainable location which currently employs 50 people. Through consolidation and redevelopment the existing business can retain the number of employees yet reduce the land area needed for employment to 3ha. Since there is no net loss of employment, there is no planning reason not to adopt a unweighted, balanced judgement on proposals for the redevelopment of the residual 2ha. There is no justification to protect the land for employment purposes as the number of jobs would remain unchanged.

Alternatively, if the proposals involved the redevelopment of 4ha of employment land and resulted in half of the 50 jobs on site being lost, but through that redevelopment there would be a significant public benefit arising from the provision of affordable housing and local community facilities, the alternative policy wording proposed above would ensure that appropriate weight is attached to the loss of jobs on the site but that this is balanced against the public benefits of the development proposals. It would be for the decision making to determine whether the latter outweighed the former.



The policy approach in EMP6 as it is currently drafted is unduly restrictive and could result in the unnecessary protection of existing employment land at the expense of achieving other planning benefits. Furthermore, provided the number of jobs remains unchanged, there is no planning justification to prevent redevelopment. This policy should therefore be modified in order to rectify these objections and ensure it is sound.

Savills

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