

WYCOMBE DISTRICT LOCAL PLAN EXAMINATION

MATTER 4 - EMPLOYMENT, RETAIL AND TOWN CENTRES

HIGHSHORE COMMERCIAL LTD - ID REF. 0978

Additional statement responding to the Inspector's Schedule of Matters, Issues and Questions. These representations do not repeat matters set out in previous representations on behalf of Highshore Commercial Ltd and do not seek to respond to every question raised in the Inspector's Schedule. The matters set out below focus on particular issues which the representor considers to be important in relation to assessing the soundness of the Plan.

Q2. Are the requirements of Policy CP5 (Delivering Land for Business) realistic, justified and deliverable?

1. CP5 point 2 gives support for High Wycombe as a location for "...high quality offices..." but only seeks to achieve this by "ensuring the delivery" of existing key employment commitments. There is, however, no strategic policy support or requirement for the allocation of new office sites in High Wycombe town centre.
2. The existing employment commitments in High Wycombe town centre are from the adopted Delivery and Site Allocations Plan (July 2013). Policy HWTC4 lists five sites where opportunities for new or enhanced quality office accommodation will be created.
3. The Council says in the Plan at para. 4.56 (Page 53) that the approach is to "deliver" sites in High Wycombe town centre but do not include any further justification or detail on how this might be achieved. The five sites in the Delivery and Site Allocations Plan have been allocated since July 2013 and would have been identified as development locations for some time before that through the draft stages of that plan.

Q3. Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?

and

Q4. Will the Plan be an effective mechanism for delivering the employment land requirements contained in Policy CP5?

a) Are the site allocations available and deliverable within the anticipated timescales?

4. The evidence base for the proposed allocations is not considered to be robust since (for at least some of the sites) it lacks detail to demonstrate that sites are economically viable and/or make a number of assumptions which have not been tested.

5. Early evidence produced to support the Plan (HELS16, 16.1 and 16.2) contained detailed viability testing of some employment sites to determine if they were suitable for continued employment use.

6. The later HELLA evidence identifies new site opportunities including, for example, the proposed allocation Policy HW19 - Office Outlet Site, Queen Alexandra Road, High Wycombe. HELS1.2 contains a schedule of sites which are cross referenced to the site proformas in HELS1.4. The proforma for the HW19 site (HELS1.4 page 23) relates to site "suitability" and "deliverability" which are very high level comments much of which the site owner does not recognise.

7. There is, however, no viability assessments and HW19 was not one of the sites previously examined in the HELSA16 documents (para. 5 above).

8. The Council also relies on HELS10 as part of its evidence base. This does examine a number site specific opportunities (including HW19) but at a very high level with effectively no detailed content on the deliverability and viability of individual sites.

9. The evidence base, therefore, lacks sufficient detail (at least for some sites) to demonstrate that the proposed allocations are sound, viable or deliverable within anticipated timescales.

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Planning Works Ltd 29th June 2018.