



Wycombe District Local Plan Examination

Matter 4: Employment, Retail and Town Centres

June 2018

Introduction

0.1 The issue identified by the Inspector is:

Is the objectively-assessed need for employment soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?

Employment

1. Have the Housing and Economic Development Needs Assessments (HEDNA 2, HEDNA3, and HEDNA 5) been positively prepared and are their conclusions in respect of economic development soundly based and justified?

FEMA

- 1.1 The objectively assessed need for employment has been positively prepared involving joint strategic working across authorities and the local enterprise partnership, and has involved significant engagement with the property industry and wider stakeholders/interested parties.
- 1.2 As with the assessment of housing needs, prior to undertaking the initial work on employment needs a study was jointly commissioned, in late 2014, by the Bucks districts, following the methodology set out in the PPG, to identify the Functional Economic Market Area (FEMA).
- 1.3 The outcome of the work is set out in HMA3¹. HMA3 concluded that there is a single labour market that meets the tests of self-containment which includes Aylesbury town and its immediate hinterland, all of the Districts of Wycombe and Chiltern, as well as the northern parts of South Bucks. It identified two sub-FEMAs within the Central Buckinghamshire FEMA: Aylesbury Town sub-FEMA to the north, and Wycombe, Chiltern and Beaconsfield sub-FEMA to the south².

¹ Paragraphs 29 and 7.79 in HMA3 HMAs and FEMAs in Buckinghamshire and the surrounding areas - report of findings, p. 11 and 105.

² See paragraphs 30 -31 in HMA3 HMAs and FEMAs in Buckinghamshire pp.11-12 and Figure 3 in the same document, p. 13.

- 1.4 In November 2015, Chiltern and South Bucks District Councils made a decision to produce a joint Local Plan and this led to a revision, based on the conclusions of HMA2, to the best fit FEMA to include South Bucks district, on the basis of a best fit by plan area³.
- 1.5 A further update to the work was undertaken⁴ to take account of more detailed commuting data becoming available from the 2011 Census. This didn't alter the conclusions with regard to the area of best fit or the FEMA boundary⁵. Wycombe District falls 100% within the FEMA so there is no issue of best fit with Wycombe District.

Employment need methodology

- 1.6 Following the identification of the FEMA/ HMA areas, the Housing and Economic Development Needs Assessment (HEDNA) was undertaken, incorporating an assessment of the need for employment land/ floor space and associated jobs forecasts as well as calculating the housing OAN. The steering group for the work consisted of the four Buckinghamshire district authorities, the Buckinghamshire Thames Valley LEP and Buckinghamshire County Council.
- 1.7 In forecasting future economic development needs in the Buckinghamshire FEMA area, the HEDN2, 3 and 5, take account of the advice in PPG⁶ that plan makers should consider forecasts of quantitative and qualitative need, to estimate the scale of future needs. In carrying out this assessment, plan makers are advised that they should consider:
- Sectoral and employment forecasts and projections (labour demand);

³ Paragraph 49, HMA3 HMAs and FEMAs in Buckinghamshire, p. 10

⁴ HMA1 HMAs and FEMAs in Buckinghamshire Updating the Evidence

⁵ See paragraph 33 HMA1 HMAs and FEMAs in Buckinghamshire Updating the Evidence

⁶ Planning Practice Guidance (PPG) Housing and Economic Development Needs Assessment (HEDNA) Paragraph: 032 Reference ID: 2a-032-20140306 Revision date: 06 03 2014

- Demographically derived assessments of future employment needs (labour supply techniques);
- Analyses based on the past take-up of employment land and property and/or future property market requirements;
- Consultation with relevant organisations, studies of business trends, and monitoring of business, economic and employment statistics.

1.8 As part of HEDN3 and 5 three future employment land need scenarios were developed for the FEMA (2013-2033) including:

- A scenario based on sectoral employment growth forecasts developed by Oxford Economics (labour demand forecast);
- A scenario based on sectoral employment growth forecasts developed by Experian (labour demand forecast); and
- A scenario based on the extrapolation of the FEMA's historic employment growth trends.

1.9 Both Oxford Economics and Experian forecast future growth in employment by taking account of past growth in employment by sector and expected future performance of different B use class sectors of the economy. The consultants then apply densities and plot ratios to the job forecasts in order to convert the forecast jobs growth to land requirements. This is set out in more detail in HEDN3⁷.

1.10 In addition to the sectoral employment forecasts, set out in HEDN3 and 5, property market analysis is also included in the HEDNA. This has been informed by consultation with relevant business organisations. However, to be consistent with the requirements of PPG, the Bucks

⁷ HEDN3 Buckinghamshire Housing and Economic Development Needs Assessment Update 2016 - report of findings, pp. 128-129 and Appendix D in HEDN3.1 Buckinghamshire Housing and Economic Development Needs Assessment 2016 - study appendices

authorities and the LEP jointly commissioned HEDN2⁸ to ensure that plan making reflects the latest market conditions across the FEMA.

HEDNA findings

1.11 HEDN3 revised various elements of the work to take account of more recent data, including the updated economic forecasts produced by both Oxford Economics and Experian. HEDN3 indicated a need for Wycombe District, using the preferred Oxford Economics forecast, for an additional 8 hectares of employment land⁹ in total. This comprises 14 hectares needed for B1a/b and a further 7 hectares for B8, but offset by a projected surplus of 12 hectares of B1c/B2 land over the 2013-33 period.

Why we undertook the HEDNA Addendum (HEDN2)

1.12 It became apparent from HEDN3 and the sharing of information between the Buckinghamshire Districts that there appeared to be a potential significant loss of B1a office space and that this required more detailed analysis. As a result further work was commissioned to investigate this. The outcome was the preparation of HEDN2.

1.13 HEDN2 included:

- Additional forecasts based on the labour supply, past employment completions, property market analysis and local market characteristics built into the labour forecast;
- Review of employment densities;
- Considering further views of the commercial property market – this work was undertaken by the Buckinghamshire Thames Valley LEP¹⁰; and

⁸ HEDN2 Buckinghamshire Housing and Economic Development Needs Assessment Update 2016 - Addendum Report

⁹ Figure 110 HEDN3 HEDNA 2016 update report, p. 137. See also Table 8, WDLP1 Wycombe District Local Plan (Regulation 19) Publication version (including changes to the Policies Maps), p. 53

¹⁰ See Appendix A of HEDN2 HEDNA 2016 Addendum report

- A supply/ demand balance across the FEMA based on the work undertaken by the District Councils on potential employment land supply including employment land losses.

Main findings of HEDN2 – alternative economic forecasts

1.14 In addition to the scenarios, included within the HEDNA (HEDN3 and 5), HEDN2 included a number of alternative forecasts which are summarised in TP3¹¹ and HEDN2¹². In short these were:

- Labour supply forecast (taking account of some re-distribution of housing) – requiring 4ha net of employment land, also 4ha less than in the Oxford Economics forecast;
- Past Employment completions data – projecting a net decline in employment floorspace requirements, which the Council estimate using the plot ratios and densities used in the HEDN3¹³ to equate to approximately 39 hectares¹⁴;
- Property Market Analysis – highlighting structural changes in the office market in particular reducing the demand for office space;
- “Bottom up scenario” – better reflecting the local property market, projecting a net decline of 13ha of B use classes.

1.15 It is clear from the above scenarios that, as was also the case in the HEDN3, that the different scenarios used in the HEDN2 result in a wide range of different forecast needs for employment land for Wycombe District in the Local Plan period but none of which are as high as the employment land requirements of Oxford Economics, with the exception of the Experian forecast.

¹¹ TP3 Topic Paper 3 Economic Development, pp. 16-18

¹² HEDN2 HEDNA 2016 Addendum report, pp. 5-24 with Wycombe specific results on pp. 8-9, 11-12, and 16-17.

¹³ See Figure 93 in HEDN3 HEDNA 2016 update report, p. 129

¹⁴ See Table E4 of TP3 Topic Paper 3 Economic Development, p. 17

- 1.16 The reasons for adopting the Oxford Economics' forecasts are set out in the Economic Development Topic Paper¹⁵ and also in HEDN3¹⁶. HEDN3 explains that the Oxford Economics' forecast lie well above the trend based forecast but somewhat below the Experian forecast. It states that with regard to the B2 and B8 projections, in particular, there is good justification for adopting the Oxford Economics' projections¹⁷. HEDN3 recommends that "taking into consideration the market analysis, stakeholder consultation and review of past employment floor space gains and losses, the Oxford Economics' scenario is used as the preferred scenario for informing employment land policies across the FEMA"¹⁸. It was for this reason that use of the Oxford Economics forecasts were considered the most appropriate when considered against the alternatives.
- 1.17 The PPG advice is to consider a range of different factors in determining future employment land requirements results, in a Wycombe and Buckinghamshire FEMA context, a wide range of different requirements for B use classes, including some for overall negative growth. The NPPF however is seeking sustainable economic growth and for local planning authorities to plan proactively to meet the needs of business. As such the HEDN2 assessed needs, based on the Oxford Economics forecast, continues to take a positive view on growth but recognises that other evidence such as property market conditions should be considered¹⁹. It concludes that taking account of the additional work that has been undertaken, there is an argument for the Buckinghamshire authorities to take a cautious approach to defining and allocating employment land to meet B class employment needs and that perhaps a prudent approach would be to avoid allocating or releasing significant amounts of employment land with authorities

¹⁵ Paragraphs 3.20-3.25 in TP3 Topic Paper 3 Economic Development, pp. 12-14

¹⁶ Paragraphs 6.37 to 6.41 of HEDN3 HEDNA 2016 update report, pp. 130-131

¹⁷ Paragraphs 6.39 to 6.40 of HEDN3 HEDNA 2016 update report

¹⁸ Paragraphs 6.37 of HEDN3 HEDNA 2016 update report

¹⁹ HEDN2 HEDNA 2016 Addendum report paragraph 2.57

monitoring and managing employment floorspace, if necessary through an early plan review.²⁰

- 1.18 In summary, the Council considers that, the HEDN2, 3 and 5 has been positively prepared and that the conclusions in respect of economic development are soundly based and justified.

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

- 2.1 One of the key requirements of Policy CP5 is to consider what floorspace/ land is needed in order to meet the employment land needs identified over the plan period²¹. HEDN2 includes within it the supply demand balance for the Buckinghamshire FEMA²².
- 2.2 The methodology for calculating the supply demand balance is set out in the Economic Topic paper²³. In summary the methodology brings together the various sources of employment land supply²⁴ and compares it to the need²⁵. Included within the overall supply of employment land is an assessment of potential gains from vacant floorspace and losses, particularly as a result of office to residential permitted development but also losses of other sites to residential and other uses²⁶.
- 2.3 Wycombe District Council worked with the other Buckinghamshire authorities to devise a common approach for assessing losses. The implications of the agreed approach for Wycombe District is set out in TP3²⁷.

²⁰ HEDN2 HEDNA 2016 Addendum report paragraph 2.59

²¹ See Council's response to Question 1 of this Matter.

²² Paragraphs 2.60-2.70 of HEDN2 HEDNA 2016 Addendum report, pp. 25 – 28 and paragraphs 2.73 – 2.78 in the same report, pp. 28 – 29.

²³ See Section 5 in TP3 Topic Paper 3 Economic Development, pp. 37-46

²⁴ See Section 4 of TP3 Topic Paper 3 Economic Development, pp. 19-36

²⁵ See paragraph 1.11 of Council's response to Question 1 of this Matter.

²⁶ Paragraph 2.62 HEDN2 HEDNA 2016 Addendum report, p. 26

²⁷ Paragraphs 4.40-4.47 of TP3 Topic Paper 3 Economic Development, pp. 33-34 and summarised in Table E7 of the same paper, p. 33.

- 2.4 The supply demand balance findings for both Wycombe District and the FEMA as a whole is set out in TP3 Table E10 on page 38. It is clear from Table E10 that (excluding allocations) there is a net requirement for 32 hectares of employment land overall in Wycombe District of which 14 hectares is for offices, 8 hectares is for industrial and 10 hectares is for warehousing²⁸.
- 2.5 Table E9 page 36 of TP3 sets out the contribution expected from new allocations in Wycombe District – the 21 hectares referred to in Policy CP5(3). Taking account of these allocations there is expected to be a shortfall in employment land in the District in 2033 of approximately 10 hectares overall²⁹. The majority of the shortfall is made up of 11 hectares/ 55,000 sq.m. in the office (B1a/b) sector with 4 ha/19,000 sq.m. in the warehousing (B8) sector. There is a projected surplus of 4 hectares/ 17,000 square metres in the B1c/ B2 sector.
- 2.6 It is considered that to meet the needs identified in the Oxford Economics forecast would be likely to breach the constraints referred to in paragraph 14 footnote 9 of the NPPF. Given the market uncertainties at present, and the historic picture in Buckinghamshire we want to avoid allocating or releasing significant amounts of employment land for growth that may not materialise, allowing development where the NPPF indicates that development should be restricted or where the adverse impact significantly and demonstrably outweighs the benefit.
- 2.7 Consequently, despite the best efforts of the District Council to find further employment land in the District, due to the constraints of the District, combined with the locational requirements of modern business and taking account of potential losses of employment it is likely that the demand, set out in the labour demand forecast in the HEDN3, will not be met in full in the plan period.

²⁸ This is set out in Table 9 in WDLP1 Wycombe District Local Plan, p. 56

²⁹ See Table E10 in TP3 Topic Paper 3 Economic Development, p. 38

2.8 Table E10³⁰ demonstrates that at the FEMA level, there is sufficient employment land available to meet demand³¹ as there are significant employment allocations and existing commitments in Aylesbury Vale District, including three new Enterprise Zones. However, these allocations are currently not in the sectors where there is predicted to be a shortfall in supply i.e. office and warehousing and consequently a flexible approach needs to be taken to allocating land for employment across the FEMA. If sectoral demand changes there is sufficient land available to meet the labour demand forecast from the HEDNA.

2.9 So CP5 is fundamentally justified because it is seeking to:

- Support economic growth rather than allow it to decline;
- Meet as much of the assessed needs as possible by:
 - i Protecting the most important employment sites;
 - ii Supporting High Wycombe as a location for high quality offices;
 - iii Allocating new strategic and local employment sites; and
 - iv Facilitating rural enterprise and diversification.

2.10 The points relating to paragraph 2.9 (i-iv) are set out in more detail below:

i. Protecting the most important employment sites

2.11 The majority of the employment sites in the District were identified in the Wycombe District Economy Study and Employment Land³². This was further supplemented by an internal officer review in 2015, culminating in a report to the Council's Cabinet in September 2015³³.

³⁰ Table E10 in TP3 Topic Paper 3 Economic Development, p. 38

³¹ See also paragraph 6.8 in TP3 Topic Paper 3 Economic Development, p. 47

³² HELS12 Wycombe Commercial Assessment and HELS14 Short-term Employment Land Review

³³ CAB12 Cabinet - Short-term review of Employment Sites 21 September 2015

Both reviews considered the suitability of the sites for employment use in the longer term.

- 2.12 Fundamentally the reviews indicated the importance of retaining most employment sites for employment purposes. Although the HEDNA work is more recent, given the demand/supply position and shortfall of employment land against forecasts only limited amounts of employment land should and are proposed to be released to housing in the Local Plan.
- 2.13 This means it is critical that employment sites are protected through development plan policies, to avoid further unplanned losses. Sites are therefore identified as being suitable for employment use were designated as either Strategic or Local Employment Areas (under Policy DM28 – Employment Areas) and subject to protection policies.
- 2.14 Strategic Employment areas are identified in the Local Plan³⁴ as the most important employment areas in the District and as such, any new development taking place in these areas should only be for B uses or uses which support them and that complement the quality of accommodation and the types of activity already taking place. Local employment areas are important concentrations of businesses, but generally have lower quality accommodation and types of activity taking place. On the whole these areas often have a higher concentration of B2 and B8 uses. The types of uses allowed in these areas will be mainly restricted to B uses but certain other specified uses will also be allowed in these areas.
- 2.15 Policy CP5(1) also seeks, as set out in the Economic Topic Paper³⁵, to regenerate existing key business sites and areas including sites identified in the Plan such as Globe Park (Policy MR7) and Cressex Business Park (Policy HW18) through improved access, addressing on

³⁴ Paragraph 6.79 WDL P1 Wycombe District Local Plan, p. 340

³⁵ Paragraph 5.24 of TP3 Topic Paper 3 Economic Development, pp. 44-45

site issues such as car parking and improving their environmental quality and attractiveness.

ii. Supporting High Wycombe as a location for high quality offices

- 2.16 The Delivery and Site Allocations (DSA) Plan³⁶ which will remain in force and sit alongside the Local Plan once adopted, focuses on delivering regeneration and improvements to High Wycombe Town Centre and allocates a number of employment sites in the town.
- 2.17 TP3³⁷ sets out the employment allocations for High Wycombe Town Centre in the Delivery and Site Allocations (DSA) Plan. These sites could result in a total of 17,000 sq.m. of new employment floor space in the town. Consequently, the vast majority of sites in the High Wycombe town centre that are suitable for new employment purposes have already been identified and allocated within the adopted DSA Plan³⁸.
- 2.18 An analysis of the town centre office market, undertaken for the Council by local agents Chandler Garvey in March 2017³⁹, helped to provide an indication of the sites most likely to deliver offices, and this helped inform assumptions about the likely scale of office development in the town centre, as well as identifying an additional site opportunity, the Office Outlet site (formerly Staples) (Policy HW19).
- 2.19 The Council owns the Handy Cross Hub site, adjacent to the M40, and has obtained planning permission for the largest office development in the District, which it is now seeking to deliver. The office development proposals at Handy Cross Hub (HXB) have the potential to elevate the way in which the market views the town, and this improved perception may well have a benefit for the town centre.

³⁶ DPD1 Adopted Delivery and Site Allocations (DSA) Plan for Town Centres and Managing Development

³⁷ Table E8, TP3 Topic Paper 3 Economic Development, p. 34

³⁸ DPD1 Adopted Delivery and Site Allocations (DSA) Plan

³⁹ HELS10 An Assessment of the Office Market in High Wycombe Town Centre

iii. Allocating new strategic and local employment sites

- 2.20 The scope for identifying new sites for employment land in Wycombe is limited⁴⁰ by a number of factors including the significant planning constraints that exist in the District such as the Green Belt and the Chiltern AONB designations (defined in the NPPF as areas where development should be restricted⁴¹) as well as other environmental constraints and topographical constraints in terms of the availability of flat sites.
- 2.21 In addition to these, there are also commercial market constraints, whereby there are a limited number of locations that are attractive to the commercial property market. The Commercial Site Assessment Study⁴² was undertaken to ensure that allocations were soundly based from a commercial perspective.
- 2.22 The Local Plan allocates a further 21 hectares employment land capable of accommodating just under 100,000 square metres of B class employment floorspace. These sites are considered to be in good locations offering access to the motorway and trunk road network or otherwise accessible⁴³. The 21 hectares form part of the overall demand/supply balance outlined above, and due to the combination of commercial and site specific constraints assessment as considered to be realistic, justified and deliverable.

iv. Facilitating rural enterprise and diversification

- 2.23 The NPPF sets out in paragraph 28 that planning policies should support economic growth in rural areas. A number of policies in both the Local Plan (WDLP1) and the DSA (DPD1) support this requirement by encouraging the protection of scattered employment sites, farm diversification and the establishment of rural business centres including policies DM5, DM27, DM42, DM44 and DM45.

⁴⁰ See paragraph 4.2 of TP3 Topic Paper 3 Economic Development, p. 19

⁴¹ NPPF paragraph 14 footnote 9 constraints

⁴² HELS12 Wycombe Commercial Assessment

⁴³ Paragraphs 5.22-5.23 of TP3 Topic Paper 3 Economic Development, p. 44

- 2.24 Overall the Plan's proposals are the most appropriate strategy when considered against the reasonable alternatives. Allocating more land for development would involve development of land where development should be restricted and whose adverse impacts would significantly and demonstrably outweigh the benefits. It could also result in allocations that are not taken up. Allocating less land would not provide sufficient support for economic growth.

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

- 3.1 As set out in response to Matter 3 question 6, the HELAA draws together the evidence on suitability and development constraints. As for housing sites, the site selection methodology used in the HELAA for assessing employment sites followed the joint approach⁴⁴ set out in the Central Buckinghamshire Housing and Economic Land Availability Assessment Methodology (HELS3) and all sources of supply were considered⁴⁵. This approach is in accordance with the NPPF and closely follows the wording of the PPG⁴⁶.

Site Assessment

- 3.2 The scope for identifying new sites for employment land in Wycombe is, as set out in response to question 2 above, limited by a number of factors including the significant planning constraints that exist in the District⁴⁷; environmental and topographical constraints and also commercial market constraints, whereby there are a limited number of locations that are attractive to the commercial property market.

⁴⁴ Paragraph 1c of MOU1 Proposed Central Bucks SHMA FEMA DtC MoU between AVDC, CDC and WDC August 2015

⁴⁵ See Table 1 in HELS3 Central Buckinghamshire Housing and Economic Land Availability Assessment Methodology, pp. 11-13.

⁴⁶ Paragraph 6 of, HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version, p. 12

⁴⁷ Paragraph 4.2 of TP3 Topic Paper 3 Economic Development, p. 19

- 3.3 In addition, an analysis of the town centre office market undertaken for the Council by Chandler Garvey (March 2017) helped to provide an indication of the sites in High Wycombe town that were the most likely to deliver offices, and this helped inform assumptions about likely scale of office development in the town centre.
- 3.4 As referred to above in response to question 1, the HEDNA Addendum also included as Appendix A the Buckinghamshire Office and Floorspace Market Review.

Development Constraints – Plan Allocations

- 3.5 The commercial site assessment⁴⁸ identified that Wycombe Air Park has the potential to provide a significant amount of additional employment floorspace⁴⁹. It is recognised that this site has a number of constraints (as set out in the HELAA⁵⁰ and also the Statement of Consultation⁵¹), in that it is an operational airfield and that in order to allow development to occur the north south runway will need to be relocated⁵² and access arrangements to the site improved. It is considered that these constraints can be overcome as set out in HW16 Wycombe Air Park and the supporting evidence documents⁵³.
- 3.6 In terms of the other employment sites allocated in the Local Plan none are considered to have significant constraints and a number, such as for example the proposed expansion of the Princes Estate in Princes Risborough (PR9) and the Stokenchurch Business Park (RUR10) are supported by the Boyer Report⁵⁴.

⁴⁸ HELS12 Wycombe Commercial Assessment, pp. 86 - 106

⁴⁹ See paragraphs 3.4-3.5 of WDLP10.20 Statement of Consultation (SoC) Appendix 20 - Deliverability of the Air Park

⁵⁰ See HELS1 HELAA Publication Version, pp. 61-62 and also HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use), pp. 65-66

⁵¹ See WDLP10.20 SoC Appendix 20 - Deliverability of the Air Park

⁵² See Section 3 of WDLP10.20 SoC Appendix 20 - Deliverability of the Air Park

⁵³ See HELS1.4 HELAA Publication Version - Appendix 4 - Site Assessment Proformas pp. 65-66 and also WDLP10.20 SoC Appendix 20 - Deliverability of the Air Park

⁵⁴ Paragraphs 1.6 and 1.7 of HELS12 Wycombe Commercial Assessment

- 3.7 Further site specific detail will be provided in the Council's responses to Matters 7-10.
- 3.8 In cases where a constraint cannot be realistically overcome the site has been rejected through a two stage process, depending upon the type of constraint⁵⁵.

Viability

- 3.9 The Commercial Site Assessment Study (HELS12) was undertaken to ensure that employment allocations were soundly based from a commercial perspective. All of the out-of-centre sites allocated for new employment generating development are supported by this assessment⁵⁶ (HW16 Wycombe Air Park, PR9 Princes Estate Expansion, RUR10 Land to the Rear of Stokenchurch Business Park).

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

4a. Are the site allocations available and deliverable within the anticipated timescales?

- 4.1 The Plan will be an effective mechanism for delivering the employment land requirements in CP5 by providing the right development plan policy to guide where new employment development should go, and to safeguard existing employment areas. The Council, however, also has a role as landowner in helping to deliver some sites (e.g. Handy Cross Hub, an existing commitment and Wycombe Air Park), and the Council has a track record of delivering commercial regeneration projects. The Council has also demonstrated its willingness to intervene to prevent the loss of employment land, for instance in relation to the acquisition, if necessary by compulsory means, of Glory Park⁵⁷.

⁵⁵ See HELS1.13 HELAA Publication Version - Appendix 13 - Rejected Employment and Retail Sites

⁵⁶ A summary of the key conclusions appears on page 4 of HELS12 Wycombe commercial assessment

⁵⁷ For further information see paragraphs 5.25-5.28 in TP3 Topic Paper 3 Economic Development, pp. 45-46

- 4.2 In relation to the site allocations, the HELAA (HELS1) sets out the suitability, availability and deliverability of the proposed employment allocations on pages 61-71 together with the supporting site proformas (HELS1.4) which indicate the anticipated timescales for delivery of the allocations. This has been informed by information from developers and landowners wherever possible. The assessment has also been informed by the aforementioned Commercial Sites Assessment (HELS12) to ensure that the proposed allocations are deliverable from a commercial perspective. Further detail on the individual sites will be supplied in response to questions in Matters 7-10.
- 4.3 It is clear, from the response to question 3 above, the selection of sites for inclusion in the Local Plan was a direct output of the assessment of constraints and that the Plan includes all sites that were developable having regard to their constraints.

5. Will Policy DM28 (Employment areas) provide an effective mechanism for managing new development in strategic and local employment area?

- 5.1 Overall, policy DM28 is considered to be a pragmatic expression of the strategy to retain key employment sites in primarily employment use, whilst allowing flexibility for changes in the nature of individual premises and uses, and appropriate supplementary uses, such as local sandwich shops.
- 5.2 Policy CP5 and TP3 Topic Paper 3: Economic Development set the context for Policy DM28 and explain the evidentiary background to the identification of the sites subject to DM28. The purpose of DM28 is thereafter to provide a framework for assessing the essential appropriateness of proposed uses within planning applications for development within these areas, and in particular to protect employment land from other uses. Other policies will be relevant to other issues such as flood risk, transport, and design, for example.

- 5.3 “Strategic” and “Local” employment areas are described in paragraphs 6.79 and 6.80 of the Plan, and Parts 1 and 2 have been drafted specifically to reflect their different quality and function. A wider range of uses is considered appropriate in local employment areas including both sui generis employment generating uses (often vehicle related) and certain D1 uses. In both types of employment area part 3 allows for small scale uses which support the overall function of the area. Examples listed in paragraph 6.81 of the Plan include catering outlets, crèches, or banking facilities (although the availability of existing facilities nearby will also be a consideration).

Community Facilities

6. Is Policy DM29 (Community Facilities) soundly based and will it provide an effective mechanism for retaining existing and securing future community facilities?

- 6.1 The WDLP policy is contributing to the goals of the Council’s wider Sustainable Communities Strategy which sets out the Council’s ambitions in terms of thriving economy (securing the necessary infrastructure improvements and safeguarding all that is best about our local environment), health and wellbeing (providing and promoting positive activities for young people) and community involvement (enabling provision of community buildings)⁵⁸ .
- 6.2 Policy DM29 in line with the NPPF aims to guard against the unnecessary loss of valued services and facilities⁵⁹ and to promote the retention and development of local services and community facilities in villages⁶⁰.

⁵⁸ CORP2 Sustainable community strategy for Wycombe District 2013-2031

⁵⁹ NPPF paragraphs 69-70

⁶⁰ NPPF paragraph 28

- 6.3 Where it is proposed to replace or lose land or buildings currently or last occupied for community use, the onus will be on the developer to demonstrate the lack of need.
- 6.4 In relation to indoor and outdoor sports facilities, existing sports facilities are protected by this policy (part 1) however the requirement in part two for new facilities to support growth does not extend to outdoor sport and play, which is covered by DM16 of the adopted DSA⁶¹.
- 6.5 As such the policy provides an effective mechanism for retaining and securing future facilities.
- 6.6 Site specific policies in the Plan also set out a number of requirements intended to retain or deliver local facilities either on or off site: HW4, HW5, HW6, HW7, HW14, PR3, PR4, PR7, PR11, PR15, PR16, PR17, BE1, BE2, BE3, RUR4.

Town Centres

7. Is Policy CP6 (Securing vibrant and high quality town centres) soundly based and will it provide an effective mechanism for new development in town centres?

- 7.1 The NPPF⁶² and PPG⁶³ make it clear that the main focus for town centre uses, including retailing, should firstly be within town centres. It is only when these needs cannot be met in town centres that Councils should undertake an assessment of the need to expand town centres.
- 7.2 In keeping with national policy's 'town centre first' approach, Policy CP6 of the Local Plan is based on a town centre hierarchy approach⁶⁴ and is referred to in Policy CP6(1).

⁶¹ Policy DM16 – Open Space in New Development in DPD1 Adopted Delivery and Site Allocations Plan (DSA), pp. 76-78

⁶² NPPF paragraph 23

⁶³ PPG Ensuring the Vitality of Town Centres - Paragraph: 001 Reference ID: 2b-001-20140306

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⁶⁴ See Table 10 in WDLP Wycombe District Local Plan, p. 63

- 7.3 The Local Plan is intended to sit alongside the adopted Delivery and Site Allocations (DSA) Plan (DPD1). The focus of the DSA is on Town centre proposals. The DSA:
- Allocates a number of mixed use sites, in particular, across the three main town centres of High Wycombe, Marlow and Princes Risborough, a number of which are considered to have potential for retail development;
 - Defines the District Centres⁶⁵ of Bourne End, Flackwell Heath and Hazlemere and the extent of these local district shopping centres and seeks to ensure their ongoing vitality and viability by allowing appropriate development within them;
 - Includes measures for improving the quality of the town centres. The High Wycombe Town Centre Masterplan⁶⁶ sets out the timings of key elements of the town centre masterplan. Implementation of this Plan is already underway and will continue during the lifetime of this Plan.
- 7.4 Given the focus of the DSA, most site opportunities will have already been considered in the DSA and consequently the deliverability of this strategic policy and the supporting evidence base lies primarily with the DSA.
- 7.5 Policies PR12-14 of the Local Plan support the delivery of the strategic requirements for Princes Risborough in CP6.
- 7.6 The Retail Study⁶⁷ indicates that High Wycombe Town Centre has a relatively high proportion of vacant retail units and consequently the Council wants to encourage the take up of these units. The Council is, where possible, taking direct action to bring vacant shop units into use and bring forward land within its control.

⁶⁵ Policy DM9 of DPD1 Adopted Delivery and Site Allocations (DSA) Plan, p. 65

⁶⁶ See Box 2 of DPD1 Adopted Delivery and Site Allocations (DSA) Plan, p. 11

⁶⁷ Paragraph 5.8 of RET1 Wycombe Town Centres and Retail Study - 2017 Addendum, p. 8

8. How has the retail hierarchy been defined?

- 8.1 Policy CS10 of the Wycombe Core Strategy 2008⁶⁸ sets out the retail hierarchy in the current development plan. The 2014 Retail Study (RET2) considered whether changes needed to be made to the retail hierarchy in terms of the three town centres – High Wycombe, Marlow and Princes Risborough and concluded that the retail hierarchy, as set out in the DSA, was correct⁶⁹.
- 8.2 The retail hierarchy is based on the Javelin Group's VENUESCORE which evaluates shopping destinations in terms of the provision of multiple retailers including anchor stores, operators fashion multiples and non-fashion multiples.
- 8.3 The Retail Study also looked at the mix of uses and representation in the centres, retailer representation, service users, vacant units, environmental quality, accessibility, shoppers' views and the strengths and weaknesses of the centres.
- 8.4 One of the strategic recommendations of the Retail Study (RET2) was that the Local Plan should identify the town centre hierarchy in Wycombe District and set out the proposed hierarchy and justification⁷⁰. In line with this recommendation, Table 10 on page 63 identifies a town centre hierarchy, as opposed to a pure retail hierarchy, which directs proposals for town centre uses to town and district centres according to the scale and function of the use based on the evidence set out in section 7 of the Retail Study.

9. What are the requirements for future comparison and convenience goods both in qualitative and quantitative terms, how have they been defined and how will these requirements be met?

⁶⁸ DPD4 Wycombe Development Framework Adopted Core Strategy Development Plan Document

⁶⁹ RET2 Wycombe Town Centres and Retail Study - 2014 Update, p. 10

⁷⁰ Paragraphs 7.1-7.9 of RET2 Wycombe Town Centres and Retail Study - 2014 Update, p. 45

- 9.1 TP3 sets out how comparison and convenience retailing have been defined⁷¹ and section 2 sets out the national policy requirements with regard to retailing.
- 9.2 Section 7 of TP3 sets out the requirements for future comparison and convenience retailing⁷². TP3 begins by providing a quantitative update to the retail need requirement for the District⁷³, taken from the Retail Study (RET1)⁷⁴.
- 9.3 Table R1 of TP3 breaks the demand forecasts down into time periods; main town centres, district centres and other categories. The requirement figures are net of completions and outstanding commitments and consequently have a starting point of 2016⁷⁵.
- 9.4 The methodology for deriving the quantitative needs are set out in the Retail Study (RET1)⁷⁶. The analysis is based on a study area defined for the three main shopping centres within the District – High Wycombe, Marlow and Princes Risborough⁷⁷. It takes account of a number of factors such as consumer expenditure⁷⁸, population⁷⁹ and available spending⁸⁰.
- 9.5 Paragraph 5.4 of the Retail Study (RET1) refers to the unreliability of long term retail forecasts beyond 2023. This view is also reflected in the Draft NPPF (March 2018) which sets out in paragraph 86d that “In allocating sites to meet the need for town centre uses it is proposed that policies should look at least 10 years ahead but not necessarily

⁷¹ Paragraph 1.4 TP3 Topic Paper 3 Economic Development, p. 1

⁷² Section 7 of TP3 Topic Paper 3 Economic Development, pp. 48-63

⁷³ Table R1 in TP3 Topic Paper 3 Economic Development, p. 49

⁷⁴ See Tables 5.1 ‘Convenience’ and Table 5.2 ‘Comparison’ in RET1 Wycombe Town Centres and Retail Study - 2017 Addendum, pp. 7-8

⁷⁵ See Table R1 TP3 Topic Paper 3 Economic Development, p. 49

⁷⁶ RET1 Wycombe Town Centres and Retail Study - 2017 Addendum, pp. 2-3

⁷⁷ See Appendix 1 of RET2 Wycombe Town Centres and Retail Study - 2014 Update

⁷⁸ See Appendix 2, Table 2 of RET1 Wycombe Town Centres and Retail Study - 2017 Addendum for ‘Convenience’ and Appendix 3 for ‘Comparison’.

⁷⁹ See paragraphs 2.4-2.9 in RET1 Wycombe Town Centres and Retail Study - 2017 Addendum, p. 2, and Appendix 2 Table 1 in the same study.

⁸⁰ See paragraphs 2.10-2.15 in RET1 Wycombe Town Centres and Retail Study - 2017 Addendum, pp. 2-3

over the entire plan period, in view of the difficulties of longer term forecasting.”

- 9.6 The HELAA Publication Version (HELS1) considered the supply of sites for meeting the forecast retail needs⁸¹. The majority of the sites included in the supply had already been identified in the DSA Plan as town centre mixed use sites.
- 9.7 Tables R2 (comparison) and R3 (convenience) in the Economic Topic Paper (TP3) set out the latest position with regard to retail supply by sites.
- 9.8 The majority of the sites included in the supply, which weren't already identified in the DSA (DPD1), have been identified through the planning application process i.e. through pre-applications and permissions⁸².
- 9.9 Some mixed use sites in the DSA Plan such as Octagon Parade and Easton Street in High Wycombe, for example, have not been counted in the retail supply because of the uncertainty surrounding their delivery but have the potential to include an element of retailing.
- 9.10 One further source of supply is vacant floor space (as set out in response to question 7 at paragraph 7.6 above). No account was taken of vacant floorspace in the need projections⁸³. The Retail Study indicates that there is a high shop vacancy rate in High Wycombe town centre⁸⁴. If this vacancy rate could be reduced to a pre-recession level for a relatively successful centre⁸⁵ this would mean that around 7,000 sq.m. gross would be reoccupied. The Council believes that should be a focus for the strategy, as set out in Policy CP2(a)(ii).

⁸¹ HELS1 HELAA - Publication Version, pp. 72-77

⁸² See paragraph 194 of HELS1 HELAA - Publication Version, p. 73; and HELS1.12 HELAA Publication Version - Appendix 12 - Deliverable and Developable Employment & Retail Sites

⁸³ As set out in Table R1 of TP3 Topic Paper 3 Economic Development, p. 49

⁸⁴ Paragraph 5.8 in RET1 Wycombe Town Centres and Retail Study - 2017 Addendum, p. 8

⁸⁵ Paragraph 5.8 in RET1 Wycombe Town Centres and Retail Study - 2017 Addendum, p. 8

- 9.11 The Economic Topic Paper (TP3) sets out that demand/ supply balance for High Wycombe, Princes Risborough, Marlow and the rest of the District on pages 55-58 in Tables R4-5.
- 9.12 Some shortfalls are identified in provision against forecasts, mainly towards the end of the plan period⁸⁶. In an attempt to meet this shortfall the Council considered⁸⁷ the scope for expanding its town centres, in line with the advice in paragraph 23 of the NPPF. However, it concluded that there is nowhere else for them to expand and there are no other opportunities to meet retail demand elsewhere in the town due to its impact on meeting other needs (employment land and housing) or other constraints. Meeting those needs either elsewhere within the town or on the edge of the town is likely to have an adverse impact that significantly and demonstrably outweighs the benefits, or results in development where the NPPF indicates development should be restricted.

⁸⁶ See Tables 4-6 and the supporting text in TP3 Topic Paper 3 Economic Development, pp. 60-62.

⁸⁷ Paragraphs 7.32-7.37 of TP3 Topic Paper 3 Economic Development, pp. 60- 62