

From: Andy Meader [REDACTED]
Sent: 21 March 2019 15:39
To: NewLocalPlan
Cc: Caroline Green; Henny Handley
Subject: LP Proposed Mods - Reps obo Bovis
Attachments: WDLP-Main-Mods-Response-Form- Bovis Submission .pdf

Sir / Madam,

On behalf of my client, Bovis Homes, I attach representations in response to the Council's Proposed Main Modifications.

Please confirm receipt, and if you require anything further at this stage please say.

Kind regards,

Andy Meader

Senior Director

(Working days: Monday to Thursday. For enquiries on a Friday please contact the office on 01344 207777)

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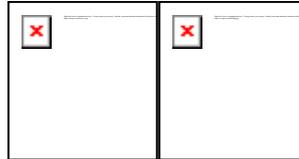
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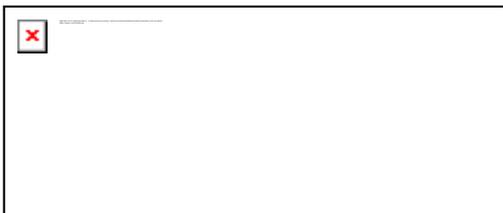
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Wycombe District Local Plan Proposed Main Modifications (February - March 2019) Representation Form

The Wycombe District Local Plan was submitted for examination in public in March 2018. Hearings were held over the summer of 2018.

The independent Local Plan inspector has identified various changes that she considers may need to be made to the Plan (known as “Proposed Main Modifications”) to make the Wycombe District Local Plan a “sound” plan.

We invite your comments, also known as representations, on these Proposed Main Modifications.

- Please quote the Proposed Main Modification you are commenting on (question 1 in part B).
- Please give your comments on the Proposed Main Modification and indicate any further changes to the Proposed Main Modifications that you feel are necessary (question 2 in part B).
- **Comments will only be accepted for the Proposed Main Modifications. General comments about the content of the Local Plan not related to a Proposed Main Modification will not be accepted.**

The deadline for responses to be received by the Council is **11:59 pm on Wednesday 27 March 2019**.

Responses can be submitted:

- online at www.wycombe.gov.uk/local-plan-modifications
- by email to newlocalplan@wycombe.gov.uk (an automatic email response will confirm receipt)
- or sent by post to:
Planning Policy Team,
Wycombe District Council,
Queen Victoria Road,
High Wycombe,
Bucks,
HP11 1BB

You can submit as many comments as you would like. Please complete a separate part B for each part of the plan on which you want to comment.

This form has two parts:

- Part A – Your Details
- Part B – Your comment(s). Please expand the comments table as appropriate

All comments received will be passed to the independent Local Plan Inspector for consideration.

PART A

1. Personal Details

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	Ms	Mr
First Name	Caroline	Andy
Last Name	Green	Meader
Job Title (where relevant)	Planning & Design Manager	Senior Director
Organisation (where relevant)	Bovis Homes	Pegasus Group
Address		
Postcode		
Telephone		
Email Address		

3. Client Details

If you are an agent representing a specific site interest, please fill in the details below.

Site Interest	Land at Clay Lane, Booker (HW 11)
Client's Name	Bovis Homes

4. Please tick this box if you wish to be notified of future stages of the Wycombe District Local Plan

/

5. Please tick this box if you wish to receive our electronic Weekly Planning Bulletin which gives you updates on local and national Planning matters (you will need to supply an email address to receive this)

PART B – Comments on the Proposed Main Modifications– Please copy and use a separate sheet for each representation

Name or Organisation:

Bovis Homes

1. Which of the inspector's Proposed Main Modifications does this response relate to?

Proposed Main Modification number

PMM 11

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the Proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

PMM 11 sets out the revised details for the sites identified for housing in Table 11.

Objection is made to PMM11 because it does not correctly update the figures to be applied to allocation HW 11 (Clay Lane, Booker).

Elsewhere in the proposed modifications (PMM 18) it is confirmed that the indicative capacity of allocation HW 11 should be increased from 30 to 40 dwellings. However, this is not reflected in Table 11 which is the focus of PMM 11.

As a result, in order to ensure consistency with the rest of the proposed Plan, and to enable the efficient development of the site at Clay Lane, Booker, it is recommended that PMM 11 be amended to update Table 11 to ensure the indicative capacity shown against allocation HW 11 is 40 dwellings, rather than the 30 currently included.

As explained in response to PMM 18, further detailed layout work has indicated that more than 40 dwellings could be appropriately introduced to the site at HW 11, and as a result it is important that the figure referred to in Table 11 is an 'indicative' capacity to allow for more than 40 dwellings if considered appropriate after detailed consideration through the application process.

In connection with the above recommended amendment it will also be necessary to update Appendix 1 of the Local Plan, in order to reflect the increase in indicative capacity of the site at HW 11 from 30 to 40 dwellings.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

Bovis Homes

1. Which of the inspector's Proposed Main Modifications does this response relate to?

Proposed Main Modification number

PMM 18

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the Proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

PMM 18 proposes an increase in the indicative capacity at site HW 11 (Clay Lane, Booker) from 30 to 40 dwellings. This is in response to evidence provided through the Local Plan Hearing sessions, and associated pre-application enquiries and feedback from the Council.

The modification is supported by Bovis Homes as it will allow for the effective and efficient use of the site. This is consistent with national guidance, and in particular paragraph 123 of the NPPF which encourages developments to make the optimal use of the potential of each site.

It should be noted that more recent detailed layout work undertaken by Bovis Homes has indicated that more than 40 dwellings can be introduced to the site in an appropriate manner. As a result, it is important that it is an 'indicative' capacity that is being referred to within the policy rather than an absolute figure, to allow more than 40 dwellings to be introduced if considered appropriate through the planning application process. It is on this basis and understanding that the modification and subsequent wording of HW 11 is supported.

In connection with the above amendment it will also be necessary to update Appendix 1 of the Local Plan, in order to reflect the increase in indicative capacity of the site from 30 to 40 dwellings.

(Please continue on a separate sheet/expand box if necessary)

Name or Organisation:

Bovis Homes

1. Which of the inspector's Proposed Main Modifications does this response relate to?

Proposed Main Modification number PMM 59

2. Please use this box to set out your comments on the Proposed Main Modification, setting out clearly if you support or object to the proposed Main Modification and the reasons supporting your position.

If appropriate, please set out what further change(s) to the Proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

PMM 59 proposes an amendment to affordable housing provision. This consists of two elements. Firstly, a move from defining the requirements based upon gross internal area of development, to the number of units. No objection is made to this aspect of the amendment, as it is likely to be clearer to apply and understand and is consistent with national guidance on the issue.

Objection is however made in response to the second aspect of the amendment, which proposes that 48% of the total number of units on greenfield sites should be affordable. This increases from the 40% previously applied to internal area.

Detailed justification for the proposed increase in percentage is not apparent in the Council's evidence base. In preparing this submission, Officers have been asked to provide such information, but have not done so. The viability reports undertaken and referred to in the Housing Topic Paper (TP2) related to an assessment allowing for internal floor areas, and as a result the Council have not prepared evidence demonstrating that the requirement for 48% of units to be affordable will be viable.

It is understood that the Council's position is primarily that market housing will typically be larger than affordable housing, and as a result in order to maximise the amount of affordable housing being introduced, the resulting number of units required should represent a greater percentage figure than that of the internal floor area of a site. So, the Council are suggesting that the provision of 48% of units on a site being affordable, will provide the same amount of affordable housing as 40% of the internal floor area of a site being affordable.

It is questioned whether this really is the case, especially given that the additional text proposed by the Council for inclusion at paragraph 6.39 refers to the importance of economics not skewing the provision of affordable units towards small flats, and the introduction of Table XX which sets out the required tenure and size of affordable units based upon current need.

It is also noted that the percentage figure applied of 48% is higher than that of adjoining authorities, who would have undertaken their viability assessments based upon unit provision, rather than internal area. As an example, AVDC have an emerging Submission Plan from November 2017, expected for adoption in late 2019, which includes a requirement for 25% affordable homes on sites of more than 10 dwellings. Almost half that now currently proposed by Wycombe.

The Adams Integra May 2017 Viability Assessment, which the Council relies upon, confirms at paragraph 15 on page 6, and at paragraph 3.6 on p.17, that the Assessment was carried out on the basis of floor areas. No reference is made within the Assessment to the equivalent impact of assessing the number of affordable units being delivered on sites, rather than floor area. There is therefore no evidence to demonstrate that the 48% of units now proposed by the Council will be viable, as required by the NPPF.

It is therefore recommended that the proposed modification is amended to propose an affordable requirement of 40% of dwellings on greenfield sites of 10 or more dwellings.

(Please continue on a separate sheet/expand box if necessary)

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Wycombe District Council Planning Policy Service collects, uses and is responsible for certain personal information about you.

This response form collects the following personal information from you:

- your name
- your phone numbers
- your email address
- your home address

This information is being collected to allow us to fulfil our statutory function of producing a Local Plan covering the Wycombe District.

Your submissions, including personal data, may be shared with the Local Plan Programme Officer and the Local Plan Inspector. We may also share your submissions with other government partners and agencies such as Buckinghamshire County Council, the Environment Agency, Historic England and Natural England, or other service departments within Wycombe District Council.

Your submissions will be published on our website. These will be redacted (“blacked out”) to remove personal information including:

- personal contact details - Telephone numbers, email addresses, postal addresses
- signatures
- information about health conditions or ethnic origin
- information agreed to be confidential

If you are submitting information which you would like to be treated confidentially or wish to be specifically withheld from the public register, please let us know as soon as you can.

Your submissions and personal information will be kept until the Local Plan is superseded.

If you have questions about data or privacy, please see our full privacy policy on our website: <https://www.wycombe.gov.uk/pages/About-the-council/Privacy/Our-privacy-policy.aspx>

Alternatively you may contact our Data Protection Officer at **Wycombe District Council, Queen Victoria Road, High Wycombe, HP11 1BB** or at access2information@wycombe.gov.uk.