
From: Meghan Rossiter [REDACTED]
Sent: 22 March 2019 10:17
To: NewLocalPlan
Subject: Modifications Consultation
Attachments: 0715-259.M15 Wycombe.pdf

Good morning,

Please find attached our comments on the proposed modifications on behalf of **Rentplus UK Ltd**. I would be happy to discuss these further should you have any questions.

Kind regards,
Meghan

Meghan Rossiter BSc (Hons) MSc MRTPI
Associate Director
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Wycombe District Council
Council Offices
Queen Victoria Road
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Date: 22 March 2019

Our Ref: M15/0715-259

By email only:
newlocalplan@wycombe.gov.uk

RE: WYCOMBE NEW LOCAL PLAN PROPOSED MAIN MODIFICATIONS CONSULTATION

We represent **Rentplus UK Ltd**, an innovative company providing **affordable rent to buy housing** for hard-working people aspiring to home ownership with an accessible route to achieve their dream through the rent - save - own model, renting at an affordable rent (the lower of 80% market rate (affordable rent) or LHA, including any service charge), and a gifted 10% deposit upon purchase.

We previously responded to the Draft and Publication Version consultations, and welcome the amendments at **PMM55**. As a matter of clarity, those references to the NPPF at **PMM55** and elsewhere in the Plan, should be updated to refer to the 2019 version as this was revised in February. The Council's approach in the housing policies is considered a sensible response to the transitional arrangements, pragmatically reflecting the policies of the revised NPPF in relation to affordable housing.

We welcome **PMM59** in seeking to amend **Policy DM24** to use unit numbers instead of floorspace requirements. This will significantly improve the clarity for applicants and certainty when negotiating development proposals, and is considered significantly more effective and therefore sound.

The proposal to include **Table XX** at **pages 328-329** do however introduce too rigid an approach to the requirements for affordable housing mix over the lifetime of the Plan, and will fail in some cases to respond to locally identified need and site specific circumstances. Such house size mix policies in our experience often result in overlong negotiations between applicants and Councils; mix aspirations are better expressed in relation to expectations for 'around' the established percentages.

The requirement for an 80/20 affordable rented to affordable home ownership tenure split also fails to reflect the NPPF paragraph 64 expectation for 10% of major development schemes to be delivered as affordable home ownership with the proposed new percentage thresholds of 48% and 35%. This should be reconsidered in light of the clear need for affordable home ownership, which remains to be updated following the publication of the revised NPPF in 2018 (and 2019). The HEDNA provided analysis against the Housing White Paper, considering that:

The costs associated with AHO products can be notably higher than private sector rents, and therefore they are unlikely to be affordable to those households that the HEDNA Update identified as being unable to afford market housing. (HEDNA Update 2016, Paragraph 3.20)

As the proposed changes in the Housing White Paper were amended and updated to produce the revised NPPF, it is sensible for the Council to schedule an update to its housing needs evidence, to ensure that future updates to the Plan are based on a sound understanding of this wider definition of affordable housing and how these tenures can better respond to local housing needs.

As noted above, affordable rent to buy provided by Rentplus is aligned with affordable rent or LHA (whichever is lower), providing by definition an affordable level of rent to assist those who cannot access housing on the open market, or indeed other affordable home ownership tenures where these require upfront deposits – including shared ownership. The proposed modifications at PMM59 should allow for delivery of this tenure by amending the references to 'intermediate' affordable housing which is no

longer a term recognised in the NPPF. We ask that this term be replaced with either 'affordable housing for sale', or 'other affordable routes to home ownership' as these terms are more consistent with the NPPF (2019).

The below proposed wording would also be more effective in responding to evolving evidence, and the NPPF's requirement that plans be updated at least every five years, where necessary to respond to change:

We will update the evidence periodically, and reflect this in updates to the Plan ~~through a supplementary planning document~~ if necessary based on the new evidence, and to provide flexibility in its application.

We would like to be notified of updates on the examination; please notify **Tetlow King Planning** as agents of **Rentplus** by email only to [REDACTED].

Yours faithfully



MEGHAN ROSSITER BSc (Hons.) MSc MRTPI
ASSOCIATE DIRECTOR
For and On Behalf Of
TETLOW KING PLANNING

[REDACTED]