
From: Tom Rider [REDACTED]
Sent: 22 March 2019 17:31
To: NewLocalPlan
Subject: Wycombe District Local Plan Proposed Main Modifications (February - March 2019)
Consultation - Reps on PMM59
Attachments: Deanfield Homes - Reps - 22.03.2019 - PMM59.pdf

Dear sirs,

Please find attached Deanfield Homes' comments in response to the current consultation on the Proposed Main Modifications to the Wycombe District Local Plan.

These comments are solely in relation to **PMM59**.

We have no other comments on the Local Plan.

Kind regards,

Tom Rider
Land Director
Deanfield Homes Limited
W: [REDACTED]
M: [REDACTED]



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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	Mr	
First Name	Tom	
Last Name	Rider	
Job Title (where relevant)	Land Director	
Organisation (where relevant)	Deanfield Homes Ltd	
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	n/a
Client's Name	n/a

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:

Deanfield Homes Ltd

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

Proposed Main Modification number

PMM59

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.

We are supportive of the Proposed Main Modification number PMM59 but we believe that Policy DM24 Affordable Housing requires further modification because as currently drafted it does not accord with national policy.

Paragraph 63 of the NPPF (2019) states that

“Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount”.

The definition of “major development” in Annex 2 of the NPPF (2019) is:

“For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015”.

It therefore follows that affordable housing should only be sought for residential developments where 10 or more dwellings will be provided, or where the site has an area of 0.5 hectares or more.

Policy DM24 does not accord with this because it sets a threshold of 1000 sqm, which is not supported by national policy. At the same time, it fails to set a site size threshold of 0.5 hectares or more, which is required by national policy.

Part 1 of Policy DM24 should therefore be amended as follows to bring the trigger point for on-site provision of affordable housing into line with the definition of major development in the NPPF (2019):

“The Council will require all housing developments where 10 or more dwellings are to be provided, or where the site has an area of 0.5 hectares or more to provide on-site affordable housing of at least:

a) 48% of the total number of units on sites that are greenfield land or were last used for Class B business use or a similar sui generis employment-generating use, or;

b) 35% of the total number of units on all other sites.”