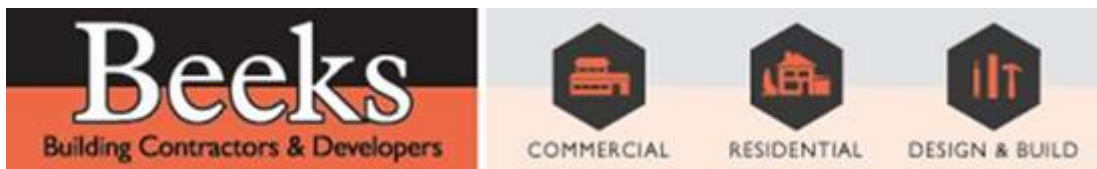

From: Maggie Spooner [REDACTED]
Sent: 25 March 2019 11:55
To: NewLocalPlan
Cc: [REDACTED]
Subject: Wycombe District Local Plan - Proposed Main Modifications (Feb-Mar 19) Comments and Objections
Attachments: Full Comments Obj - PMM Feb March 19.pdf
Importance: High

Dear Sir/Madam,

Please find document attached as per subject - Wycombe District Local Plan - Proposed Main Modifications (Feb-Mar 19) Comments and Objections.

Regards,

Philip Mason, Director



[REDACTED]
[REDACTED]
Website: <http://www.beeks.co.uk>



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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	PHILIP	
Last Name	MASON	
Job Title (where relevant)	PLANNING ADVISOR.	
Organisation (where relevant)	P. M. DESIGNS	
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	
Client's Name	

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)

Comments and Objections
to
Wycombe District Local Plan

Proposed Main Modifications
February – March 2019

From
Philip Mason
PM Design

Index of representations

PMM 55
PMM 56
PMM 57
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PMM 74
PMM 76

During the hearing the 2018 NPPF was published, it was agreed by the Inspector with the Council's Officers, Barrister and those attending the hearing that no account would be taken of the new 2018 NPPF as all works and consultation were based on the 2012 version.

It would not be legal to now change the plan based on the 2018 NPPF.

The last note should be deleted.

"Note as this plan has been adopted after the 2018 NPPF, its policies are not expressly subject to the advice on 'weight' in paragraph 213 of the 2018 NPPF"

I have objections to the referencing to the 2018 NPPF for amendments when it was clearly stated by the Inspector that no account would be taken of this document.

PMM 56

Paragraph 6.5

Objection to amendment referring to

The current NPPF is the second edition published in June 2018.

Objection as PMM 55.

PMM 57

Paragraph 6.14

The self-build requirement needs to ensure the land is offered at a reasonable price for all parties concerned. The land to be sold should be valued at a rate per square metre equal to the developers purchase price of the land plus 10%.

The overall purchase price of the major site should be divided by the overall site area in metres and then multiplied by the plot site area for sale plus 10%.

PMM 62 **Paragraph 6.88**

I support the removal of the last sentence regarding viability is not of great relevance.

A note should be added to acknowledge that viability may be a factor in the release of community facilities for other uses.

It should also be noted that it is illegal to advertise premises for sale or lease that have an EPC rating of F or G.

PMM 67 **Paragraph 6.163**

I object to the proposed modification stating or surface level car parks.

To include structure above surface level car parking is not practical in the majority of cases and does not accord with the Councils Residential Design Guidance 2017 SPD.

To require robust justification and appropriate only in limited circumstances it being acceptable is not justified as Policy DM35 refers to all development.

PMM 69

Policy DM37

I have concerns that the proposed change to this policy wording doesn't resolve the problem raised at the hearing.

The objection was not against shop fronts having internal and visually permeable shutters. The issue of concern related to more remote locations of windows serving other uses which could have expensive goods and equipment on show or in storage. Open internal shutters would invite criminal actions knowing there is a reward that is visible.

The current wording still requires all buildings in local or town centres and remote accesses having visually permeable shutters even if serving store or other rooms.

Laminated glass only slows entry and would not prevent criminal actions.

The policy could be amended to read and to replace or.

Security shutters to protect the windows of shops or other buildings within local or town centres and fronting a public highway are required to be internal and visually permeable using open lattices or laminated glass.

PMM 74 Policy DM43

I have continued objection to Policy DM43 which creates much greater complexity than the NPPF and prevents any extension to a residential dwelling of over 1080 cubic metres.

Outbuildings are also restricted in volume and 4 metres in height. This could prevent the use of pitched roofs with clay plain tiles which may be more appropriate in some locations.

The whole policy should be deleted and be in accordance with the NPPF.

PMM 76 Policy DM45

1a The policy should allow for replacement of Asbestos based materials or materials that would improve the appearance of the building.