

**From:** Nicole Penfold [REDACTED]  
**Sent:** 26 March 2019 09:08  
**To:** NewLocalPlan  
**Cc:** John Chorlton  
**Subject:** Wycombe Local Plan - Main Modifications - Gladman Representations  
**Attachments:** Wycombe Local Plan Main Mods - Gladman Final Rep.pdf



**Re: Wycombe District Local Plan – Proposed Main Modifications**

Dear Sir / Madam,

In response to the above consultation, please find attached representations submitted by Gladman. I would appreciate if you could confirm receipt of this submission by responding to this email.

Kind regards,

Nicole

Nicole Penfold - Policy Planner | [REDACTED]

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**Wycombe District Local Plan  
Proposed Main Modifications Consultation  
13<sup>th</sup> February 2019 – 27<sup>th</sup> March 2019**



**March 2019**

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# **1 INTRODUCTION**

## **1.1 Introduction**

- 1.1.1 These representations are submitted by Gladman in response to the Wycombe District Local Plan Proposed Main Modifications.
- 1.1.2 Gladman has considerable experience in the development industry across a number of sectors including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure that residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic development.
- 1.1.3 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure. Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in this representation.

## **1.2 Context**

- 1.2.1 In March 2018 Wycombe District Council submitted the Local Plan to the Secretary of State for Examination. Examination hearings were held between July and September 2018. The Council are now undertaking a public consultation on the Proposed Main Modifications to ensure the Plan is capable of being found sound. Gladman submitted written representations at the various stages of public consultation and actively participated in a number of the examination hearing sessions.
- 1.2.2 As outlined throughout the EiP hearings, Gladman remain unconvinced by the proposed spatial strategy when combined with the heavily constrained housing requirement. Given the circumstances in Wycombe District, specifically the significant areas of Green Belt and AONB, it is fundamental that all of the potential development options are robustly considered and that the Local Plan does not include blanket protection policies which arbitrarily restrict growth. Gladman maintain strong objections to the principle of the Strategic Buffer proposed around Princes Risborough. This limits the ability of this growth area to expand any further and there does not appear to be any clear evidential basis for this approach. This is particularly concerning given Wycombe District falls within the Cambridge to Oxford Growth Arc, which is of national significance.
- 1.2.3 The Council are not only having to direct growth to Aylesbury Vale but also release Green Belt land to meet housing needs and appear to be doing so without giving due consideration to available greenfield land. For these reasons Gladman do not consider the plan to be soundly based.

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### **1.3 Inspector's Follow up Questions and Council's Response**

1.3.1 Following the close of the hearing sessions in September 2018, the Inspector, instead of producing an 'interim report' posed a series of further questions to the Council. These follow up questions concerned the following matters:

- Sustainability Appraisal
- Strategic Context
- Household Projections
- Student Accommodation
- Delivering Land for Business

1.3.2 The Council provided responses to the Inspector's follow up questions and are now consulting on the schedule of main modifications.

## 2 PROPOSED MAIN MODIFICATIONS

### 2.1 PMM1 – Introduction and Context

- 2.1.1 PMM1 relates to the introduction and context chapter of the plan and is in direct response to the Inspectors follow up questions. The additional text provides greater clarity about the current and future context of the plan.
- 2.1.2 Whilst Gladman are supportive of this additional text we believe that further modifications are necessary in response to the Oxford-Cambridge growth arc. The national importance of this project and the scale of increased growth associated with this corridor heightens the need for the plan to be flexible and avoid overly restrictive policies.
- 2.1.3 Whilst Gladman agree that at this stage the particular implications cannot be meaningfully identified, what is clear is that the arc is of national importance and transformational growth will be necessary within this area alongside the planned key infrastructure projects.
- 2.1.4 With reference to the above, Gladman note that the Council’s response to the Inspectors follow up questions refers to how any implications can be addressed through a review of the Plan, however there does not appear to be a main modification introducing a new policy committing to an early review of the plan.
- 2.1.5 Gladman consider that there needs to be a firm commitment to an early/immediate review of the plan set out within a policy in the Local Plan and therefore an additional main modification is required. In this respect Gladman refer the Council and the Inspector to Plan: MK, this plan has now concluded its main modifications process and the Inspectors report has been issued. Through the Main Modifications (MM2 and MM3) Plan: MK is committed to an early review of the plan with specific timescale stipulated for when the plan should be submitted for examination.
- 2.1.6 The quotes below highlights the Inspectors conclusions on this matter and why he believed such a modification was necessary to ensure the plan was sound.

**“Given the emerging strategic context and plan period of Plan: MK there would be a need to review Plan: MK sooner than the five year requirement. The submitted Plan: MK does not include a review policy and I consider it would not be positively prepared was it to remain silent on this matter....” (paragraph 25)**

**“... The Government has set out its desire to see joint vision documents for the caMKox in 2019 and further evidence from the MK Futures growth strategy will also be available in 2019. With this in place, I see no reason why an expeditious review of Plan: MK cannot take place such that a new strategic plan could be submitted for examination by the end of 2022.” (paragraph 26)**

**“This would reflect that the Council itself recognises that Plan: MK is essentially an interim plan in the context of the emerging picture of strategic growth along**

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**the caMKox corridor. That is a realistic acknowledgement that Plan: MK serves as a critical bridge between the ongoing delivery of objectively assessed needs in the short to medium term and the need for the evidence base around transformational growth to be further developed...” (paragraph 27)**

2.1.7 Gladman consider that a similar policy approach specifically in relation to the delivery of an early review of the plan is necessary in order for the plan to adequately respond to the proposed transformational growth across the growth arc and in order for the plan to be capable of being found sound.

## **2.2 PMM26 and PMM30 – Settlement Boundary and Strategic Buffer**

2.2.1 Gladman note that through PMM30 the Council are adjusting the strategic buffer to respond to development permitted at Ivy Farm, Longwick. Gladman express significant disappointment that the strategic buffer is not proposed to have further more extensive modifications.

2.2.2 As outlined within written submissions and verbally at the Examination hearings Gladman reiterate that there is no tangible evidence that expansion beyond the settlement boundary into the strategic buffer would cause unacceptable material harm. As currently proposed the strategic buffer is overly restrictive and would prevent Princes Risborough from accommodating any further growth beyond the identified expansion area. This approach is highly illogical given the significant Green Belt and AONB constraints within the District. Gladman remain of the view that the buffer has the effect of reducing the ability of the Council to meet its full objectively assessed housing needs. This cannot be considered the most appropriate strategy, nor is it justified or positively prepared, and on this basis alone it is an unsound policy. Gladman recommend that the Council re-visit the policy approach to the settlement boundary and strategic buffer around Princes Risborough.

## **2.3 PMM57 – Policy DM22 ‘Housing Mix’**

2.3.1 Gladman are supportive of the inclusion of the new paragraph before 6.14 regarding what would happen if there was no take up of the self-build plots. This modification also outlines that the planning obligation will also set out the circumstances under which the requirement to deliver self-build plots will be relaxed or released.

2.3.2 Whilst Gladman are supportive of the above modification, we reiterate previous recommendations that further flexibility should be provided within this policy as there is no guarantee that these units will be delivered and there may be situations where it proves difficult to deliver, which would result in non-delivery of otherwise sustainable land for housing. It could also result in significant delay in the delivery of these units. This is of particular importance in Wycombe given the scale of constraints and the inability to deliver its full OAN. Consequently, Gladman recommend that this policy includes some form of mechanism whereby if the self-build plots are not taken up within a specific time period (for example 6 months) that they then revert back to market housing to be provided as part of the wider scheme. This will provide a degree of



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flexibility and help to ensure that the full amount of housing on schemes is delivered and would avoid significant delays in delivery.

## **2.4 PMM59 – Policy DM24 ‘Affordable Housing’**

2.4.1 Gladman note the change through PMM59 which alters the policy requirement of DM24 to be on the basis of total number of units rather than total gross internal area. Gladman support the change as it is standard practice for affordable housing policy requirements to be determined on the basis of the number of units. This will provide the development industry with greater certainty of the scale of affordable provision required.

2.4.2 Whilst Gladman are supportive of the modification in terms of assessing the requirement on the basis of the number of units being delivered, Gladman query the evidence and justification for the percentage requirements outlined through PMM59 (48% on greenfield land and 35% on other sites). The requirement for 48% affordable housing on greenfield sites seems particularly high and will need to be justified by robust evidence regarding viability. Gladman remind the Council of the need to be realistic in terms of the policy requirements set through Local Plans, the impacts overly onerous policies may have on the delivery of much needed housing and the need to consider the cumulative impact of all policy requirements.

2.4.3 Gladman also note and welcome the addition of part 4 to Policy DM24, which outlines that the required affordable housing mix and tenure shall be provided in accordance with current evidence. This provides the flexibility for schemes to respond to needs at a particular point in time to ensure the schemes delivered reflect this.

## **2.5 PMM64 – Policy DM31 ‘Development Affecting the Historic Environment’**

2.5.1 Gladman are supportive of PMM64 which provides clarity on the hierarchy of heritage assets, and ensures that the policy better aligns with the tests set out within the NPPF in relation to development affecting designated and non-designated heritage assets.