

**From:** James Yeoman [REDACTED]  
**Sent:** 27 March 2019 11:25  
**To:** NewLocalPlan  
**Cc:** Rosie Brake  
**Subject:** Response to WDLP Main Modifications  
**Attachments:** L 190327 JY - Response to Main Mods FINAL.pdf

Dear Sir / Madam

On behalf of Bloor Homes, please find attached a consultation response to the WDLP Main Modifications. I would be grateful if you can confirm safe receipt.

Regards

James

James Yeoman  
Associate Director  
Planning  
Savills, [REDACTED]



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27 March 2019  
L 190327 JY - Response to Main Mods FINAL



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James Yeoman

Correspondence sent by email to:  
newlocalplan@wycombe.gov.uk

Dear Sir / Madam

### **Wycombe District Local Plan – Proposed Main Modifications Consultation**

Savills is instructed by Bloor Homes to submit the following representations on the Proposed Main Modifications to the Wycombe Draft Local Plan (WDLP). Bloor Homes controls an area of land to the north-west of Princes Risborough, situated within the proposed Princes Risborough Expansion Area.

In general, Bloor Homes has limited comment to make on the WDLP Main Modifications, as set out below:

#### **PMM28: PR3 - Princes Risborough Area of Comprehensive Development**

Bloor Homes supports the amendment at Paragraph 5.3.16, in that applications for individual parcels will come forward within the PREA.

#### **PMM29: PR4 – The Main Expansion Area Development Framework**

PMM29 seeks to clarify the locational requirements of key elements of the Concept Plan. In line with discussion held at the Examination, Bloor Homes supports that elements within the Concept Plan are 'required' and, therefore, deletion of the term 'fixed'.

Bullet 2 refers specifically to the location of the two primary school sites within the PREA. Whilst the Concept Plan is not seeking to 'fix' elements required, Bullet 2b) is ambiguous and lacks definition. The term 'near' is open to interpretation.

#### **PMM57: DM22 – Housing Mix**

Bloor Homes maintains its position reported at the Regulation 19 and Examination stages in respect of self-build plot provision. Notwithstanding this, Bloor Homes acknowledges the insertion of a review mechanism concerning self-build plot provision (in line with new paragraphs proposed at 6.14) and supports this addition.

#### **PMM59: DM24 – Affordable Housing**

Bloor Homes supports, in principle, the amendment to require affordable housing as a proportion of total dwelling unit numbers (rather than gross internal area). This provides a clearer approach to understanding delivery requirements through the development control process, particularly in respect of outline planning applications.

There is the potential for an onerous requirement which could delay the delivery of much needed housing in the District. In line with comments to the Regulation 19 and Examination stages of the Local Plan, Bloor Homes maintains that it is important that this policy incorporates flexibility to allow for viability assessments to be





undertaken, particularly in circumstances where the full cost of infrastructure unknown. This is particularly important considering that the affordable housing quantum sought is high. A suitable policy edit should be made to allow for appropriate viability testing:

Amend Policy DM24 to read:

1. *The Council will require, where viable, all development for 10 or more dwellings....*

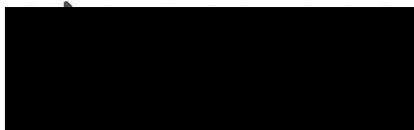
**PM77: Appendix D – List of Housing Allocations**

The PREA is reported, in Appendix D as having a net developable area (NDA) of 68.7 hectares. A net density (ND) of 32 dph is reported by the final column of the table. However the indicative dwelling number, presumably based on the multiplication of NDA x ND, is reported as 2,298 units. Applying WDC's proposed ND to the NDA results in a quantum of 2,198 units (not the 2,298 reported). An average net density of 34dph is required to meet the development quantum reported, against the development area Identified.

Paragraph 5.3.43 of the WDLP identifies a range of densities that will be applied to the PREA. Accordingly, Appendix D should not be viewed as prescriptive. It does however provide an anomaly in calculations presented and should be updated accordingly.

We trust that the above comments will be taken on board in a constructive manner in order to provide a Local Plan that meets the requirements of the NPPF, including being flexible, deliverable and sound. If you have any questions in relation to these representations, please contact James Yeoman at the above address.

Yours sincerely



**James Yeoman** BA(Hons) DipTP MRTPI  
Associate Director

cc. Bloor Homes Southern