
From: Roland Brass [REDACTED]
Sent: 27 March 2019 14:29
To: NewLocalPlan
Subject: Wycombe Main Mod - Reps from GLH
Attachments: 190327_Binder_Wycombe Mods Letter_FINAL.PDF

Dear Planning Policy Team

Please find attached our Reps on the Main Mods to the Wycombe Local Plan.

Would you please confirm receipt of this email and attachment?

If you have any questions or would like to discuss matters further please do not hesitate to contact me.

Kind regards

Roland
[Roland Brass](#)
Planning Associate Director



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Wycombe District Council
Planning Policy Team

BY EMAIL ONLY
newlocalplan@wycombe.gov.uk

27 March 2019

Dear Wycombe Planning Team

**Wycombe Local Plan
Representations to Main Modifications**

These Representations are submitted by GL Hearn, on behalf of W. G. Binder, who has a land interest at Binder Industrial Estate in Cryers Hill, Wycombe.

Overall we support the preparation of the new Local Plan however we have concerns with Policy DM42 which relates to managing development in the Green Belt. This is the fourth time that we have raised this matter as an issue as we referred to this matter in our Representations to the Reg 19 consultation, Written Statement to the EiP, and at the EiP hearing on 26 July 2018. Our main concern is that, as currently worded, Policy DM42 is unsound because it is not in accordance with the NPPF (2012) which is the national planning policy document which the Local Plan is being assessed against. In this respect it is also not in accordance with the NPPF (2019).

Policy DM42 restricts redevelopment of previously developed land in the Green Belt to land which is within built-up areas only and which is defined as limited infilled (e.g. at most one detached or one pair of semi-detached dwellings in an existing small gap between other buildings in the built-up area as referenced at Para 6.214).

The NPPF (2012) does not place such restrictions of the redevelopment of previously developed land in the Green Belt. This is demonstrated by NPPF (2012) Para. 89 which states that exceptions to inappropriate development in the Green Belt include "*complete redevelopment of previously developed sites*" if there is no greater impact on openness or purposes.

Therefore we suggest the Policy DM42 (Part vi) is amended as follows:

- vi. limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

We trust that our comments are helpful and it is our objective to ensure the Wycombe Local Plan is sound. If you have any questions or would like to discuss any matters further please do not hesitate to contact me.

Yours sincerely

[REDACTED]

Roland Brass
Planning Associate Director

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