

PA/1340/sf

7 November 2014

Sue Pilcher
Aylesbury Vale District Council
The Gateway
Gatehouse Road
Aylesbury
Bucks
HP19 8FF

Dear Mrs Pilcher

**Land at Haddenham Glebe, Stanbridge Road, Haddenham, Buckinghamshire
(planning application reference 14/02666/AOP)**

We refer to the above outline planning application with new vehicular access from Stanbridge Road and Aston Road to be considered and all other matters reserved for the construction of up to 350 dwellings, including 45 retirement dwellings, with associated garages, parking, estate roads, footways, pedestrian linkages, public open space, burial ground, community sports facility, strategic landscaping, drainage and other associated works.

We are writing to you on behalf of Haddenham Action Group representing a cross-section of local residents in Haddenham. Having studied the submitted planning application drawings and supporting documents, we write to confirm that our client strongly objects to the proposed development on the grounds that follow in this letter.

Unsustainable Site

1. Paragraph 7 of the NPPF provides a definition of sustainable development in relation to three dimensions – economic, social and environmental. In our opinion the proposed development does not represent economic, social or environmental sustainability as defined by paragraph 7.
2. According to paragraph 8 of the NPPF these economic, social and environmental gains should be sought jointly. It is our view that the proposal does not contribute to building a strong and responsive economy as the site is not located in the correct location and has not come forward at the most appropriate time.
3. In our view the proposal does not support the development of a strong and vibrant community within Haddenham. The site does not relate well to the village in terms of design or location and does not represent a high quality built environment. There are significant issues surrounding healthcare and education and the development will not support the village's social and cultural well-being. As a result the proposal is not socially sustainable.

4. In our view the proposal does not protect and enhance the natural, built or historic environment. The development will be built on high quality agricultural land and will have a detrimental impact on the historic core of Haddenham and the associated built environment. The proposal will also have a negative impact on biodiversity. The proposal is therefore, in our opinion, not environmentally sustainable.
5. In line with paragraph 14 of the NPPF, the significant negative impacts of the proposal significantly and demonstrably outweigh the benefits when assessed against the policies within the NPPF and the saved policies of the Aylesbury Vale Local Plan. The principle of development in this location is unacceptable because the proposals would, in our view, be completely out of scale and would overwhelm the existing village.
6. Please note that the site at was originally included within the Aylesbury Vale District Local Plan for 100 dwellings. When examining the draft deposit Local Plan the Inspector concluded that the site should be deleted from the Plan. In summary his objections were:
 - i. Haddenham is not the most sustainable location for development when compared to Buckingham, Winslow and Wendover.
 - ii. Development of the site would totally alter the approach to Church End and would have a suburbanising effect.
 - iii. Development of the site would cause the perception of the historic core of Haddenham and the Conservation Area in the landscape setting, as well as existing views, to be lost.
 - iv. Development of the proposed site would, particularly in relation to public rights of way, cause existing views and an open prospect to be lost.
 - v. A development on the proposed site would be totally unrelated to the existing village and would constitute a modern housing estate attached to an otherwise integrated settlement.
 - vi. Developing the proposed site would have an excessive visual impact resulting in the destruction of important views of the Haddenham Conservation Area.
 - vii. The development site is not in a sustainable location in terms of accessing local services and facilities. The site would be outside a reasonable walking distance from Haddenham Business Park and the train station.
7. The Inspector's comments relating to the site are found within chapter 9 of the report. Chapter 9 has been enclosed within this letter for reference. A location plan has also been enclosed. We consider that the issues raised by the Inspector are still valid and have not been adequately addressed by the applicants, who are now proposing 350 dwellings in this location. We would ask that the objections raised by the Inspector in 2002 are applied again to this planning application.

Increased Congestion

8. The proposed development of 350 dwelling would significantly increase traffic using local roads. The addition of 350 new houses could result in at least 600 additional vehicles using the roads in Haddenham as realistically most homes have two cars.
9. It is likely that the majority of new residents will travel out of the village to work. The level of traffic wishing to access the A418 (in particular with the intention of travelling towards Thame and the M40) will cause transport issues in one direction on Woodways and Thame Road, and in the other direction on Aston Road through to Church End and Station Road.

10. The proposed development is located on the opposite side of the village to Haddenham and Thame Parkway. From each of the two vehicular access points, as well as from the public right of way it will be at least a mile from the edge of the site to the station. In our view it is likely that residents of the new development will drive to the train station as it would be at least a 20 minute walk. This is supported by the Inspector within his 2002 report where he states in paragraph 9.1.36 that:

“Haddenham is also served by a parkway railway station, providing regular rail services to London and Birmingham. However, the site is some 1.8km from the station, and would thus be beyond reasonable walking distance for most residents intending to travel.”

11. The increased traffic and congestion that will result from the proposed development will also lead to an increase in traffic noise resulting in amenity issues for those living on the vehicular routes in and out of the village.

Highway Safety

12. Church End already has significant traffic problems as vehicles approach the junction from four different directions. Increasing the traffic flow in this area will increase the chances of accidents between both pedestrians and vehicles.
13. Of particular concern is that Church End serves as the only access to St Mary's School. Children currently have to cross an already busy junction and increased car volumes in this area will result in the area becoming more dangerous for school children going to and from school as there is no safe crossing point.
14. The proposed development is also likely to prejudice the safety of school children on Woodways. Haddenham County First School and Haddenham Community Junior School are located on this road where there are no safe crossing points. In our view, the increased traffic in these areas resulting from the proposed development will increase the risk of accidents which may include children at those key school areas.
15. In other areas of the village, the crossroads between Stanbridge Road and Woodways has a history of road accidents. It is estimated that there have been six accidents in the last three years. At least one of these accidents has required air ambulance support.
16. There would also be safety issues relating to the T junction between Stanbridge Road and Aston Road. This junction would become an accident hot spot as increased levels of traffic use it to access the new development.

Parking

17. The proposed development is likely to attract commuters who will be using the railway station. Given the distance of the development from the station, in our view, it is very likely that these commuters will drive to the station.
18. There is already a significant problem within Haddenham (in particular on Sheerstock) in relation to users of the station parking in residential streets. Commuters park in the streets near to the station rather than paying to use the car parking facility at the station itself. This existing problem will be made far worse with increased numbers of residents accessing the station by car.

19. There is no parking shown on the Masterplan in relation to the burial ground. This will cause increased parking on Aston Road, restricting access for emergency vehicles and increasing the likelihood of accidents and congestion.

Bus Route

20. The existing bus route does not accommodate the new development. Diverting the bus route would remove the service from existing residents. We understand that Arriva have no plans to re-instate their service to the Church End section of the village.

Overall Transport and Highways Impact

21. The proposed development of up to 350 houses (over 600 new vehicles) would result in:
- Increased congestion on roads within the village
 - An increased risk of accidents at key junctions and on village roads, particularly in areas adjacent to schools
 - Increased levels of parking in roads surrounding the station and on Aston Road in relation to the proposed burial ground
 - Increased traffic noise resulting in amenity issues for residents on busy streets.
22. These transport impacts resulting from the development would be contrary to guidance within the NPPF and in particular paragraph 32 which states that proposals for developments that result in severe cumulative transport impacts should be refused. This is of particular concern given other potential major residential developments within the village; Land at Pegasus Way, Haddenham Airfield (300 dwellings plus other uses); Land at Dollicot (60 dwellings); and Land associated with the Medical Centre.

Community Facilities

23. There are two primary schools located in Haddenham – St Mary's CofE School and Haddenham Community Infant School. These two primary schools are full. St Mary's have been forced to accommodate a bulge year in 2014/15 but this will not be possible in subsequent years.
24. The Community Infant School has no extra space to expand as it is on a small site. There is therefore insufficient space within local schools to accommodate the additional children that will require places as a result of the proposed development.
25. There is no secondary school facility within Haddenham and as a result children will be required to travel out of the village for secondary education, leading to further traffic congestion, again highlighting the unsustainable location of the site.
26. Within the Framework Travel Plan Lord William's School is referred to. It should be noted that Lord William's School is located within Thame in Oxfordshire and residents of Haddenham do not fall within the catchment area.

27. It has not been possible to locate an assessment of local educational need within the planning application submission. It is clear that there is no capacity within local primary schools and transporting small children out of the village is unsustainable.
28. There is therefore no local educational capacity, particularly at primary school level. The proposed development is therefore unsustainable.
29. In terms of healthcare services, the GP surgery already struggles to accommodate the number of patients that are currently registered. The applicants have not addressed the issue of healthcare within their submission. The Statement of Community Involvement states that healthcare provision relating to the new development is not a concern of the developer.
30. We do not consider that the proposed location of the retirement housing is the most convenient for older people who wish to access community facilities such as the GP surgery or the village hall. The main pedestrian access to these facilities is along the current right of way behind The Gables. Even if this pedestrian access is upgraded it would be secluded and unsuitable for pedestrian use. This is particularly the case after dark when it could be susceptible to criminal and anti-social behaviour. This would be contrary to saved policy GP45 of the Local Plan.
31. Full details of the proposed recreation facility are not known. However, the village already has two football pitches and we therefore feel that the applicant should consider what is included in this space.

Heritage

32. Conservation Areas are afforded statutory protection under Section 72(1) of the Planning (LBCA) Act 1990. It is required that special attention is paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area.
33. The proposed development would have a detrimental impact on the setting of the Haddenham Conservation Area. The site was specifically assessed by the Inspector in relation to the deposit draft Aylesbury Vale District Local Plan. The Inspector considered that the site at Aston Road should be deleted from the Local Plan particularly in relation to the impact on the Church End segment of the Haddenham Conservation Area.
34. In paragraphs 9.1.25 to 9.1.33 of his report, the Inspector considers the site at Aston Road in relation to the Conservation Area. He states that the proposed site is unsuitable for housing for the following reasons:
 - The site is totally unrelated to Haddenham and would be impossible to integrate with the rest of the village.
 - Any proposal for housing would have a detrimental impact on the historic, rural setting of Church End.
 - Any proposal would have a seriously detrimental effect on the character and setting of the Church End part of the Haddenham Conservation Area.
35. He states:

36. "Were the Aston Road site to be developed modern development would interpose itself between Church End and the open fields to the east. The perception of the historic core of the Conservation Area in its landscape setting would be concealed and the present views lost."
37. We consider that the points raised above by the Inspector in 2002 are still valid and the proposal would therefore not comply with saved policy 53 of the Aylesbury Local Plan.

Environment

38. The land is grade 3 agricultural land and is farmed productively every year. The proposed development would result in the loss of this important resource.
39. The public right of way to the rear of houses on Willis Road accessed from Stanbridge Road gets constant use at present by dog walkers and ramblers going all the way across the fields to Kingsey and Thame. The proposed re-routing of the footpath would mean that this rural dog walking route is lost, forcing dog walkers onto main roads and pavements. The proposal would be contrary to saved policy GP84 of the Local Plan.
40. The loss of green space will have a negative impact on the local wildlife and in particular the local Red Kite population. The proposal will also have a negative impact on the local landscape and will therefore not comply with saved policy GP38 of the Local Plan.

Layout and Design

41. The Concept Masterplan submitted as part of the planning application has not been well considered and does not reflect the existing character of the local area. The proposal does not relate well to the rest of the village and does not represent a natural extension to Haddenham or the historic character of Church End.

Haddenham Neighbourhood Plan

42. Paragraph 16 of the NPPF highlights the importance of neighbourhood planning and the engagement of local communities. The Haddenham Neighbourhood Plan is due to be published on 6th December 2014. The applicants make no reference to the emerging Neighbourhood Plan. It is clear that the applicants have timed their application to precede the adoption of the Neighbourhood Plan. We consider that the proposed development at Aston Road is premature and should not be determined until the Neighbourhood Plan is adopted.

In summary, the proposed development at Aston Road should be refused for the following reasons:

- The site is economically, socially and environmentally unsustainable as defined by paragraph 7 of the NPPF.
- The concerns raised by the Inspector in 2002 which resulted in the site being deleted from the draft Local Plan are still valid.
- The application is premature in relation to the adoption of the Haddenham Neighbourhood Plan and the new AVDC Local Plan.
- The proposal would result in increased congestion on local roads.



- The proposal would result in reduced levels of highway safety.
- The proposal would result in increased issues relating to parking.
- There is insufficient capacity within local schools and the GP practice.
- The application will have an adverse cumulative impact having regard to other major residential proposals within the village.
- The proposal would not preserve or enhance the Haddenham Conservation Area and in particular Church End.
- The proposal would have a significant impact on the local landscape.
- The proposal does not constitute good design, is unrelated to the rest of Haddenham and is out of character with Church End.
- The proposal is therefore contrary to the NPPF and to the saved policies of the Aylesbury Vale Local Plan.

Please ensure our client's objections and concerns are reported to your Development Control Committee when they meet to consider the application.

Yours sincerely

Paul Atton MRTPI
Senior Associate
paul.atton@jbplanning.com

Encs: Extract from Inspectors Report 2002
Street Map Location Plan



Haddenham, Aylesbury Vale

STREET MAP LOCATION PLAN



jb planning associates
town planning
and development
consultants

Chells Manor
Chells Lane
STEVENAGE
SG2 7AA

info@jbplanning.com
www.jbplanning.com
T 01438 312130
F 01438 312131

1340/001
Rev DRAFT VERSION 1
Not to Scale

November 2014

© JB Planning Associates 2013

DD5968	R Moore	DD6154	R Peacock
DD5975	M S Wellby	DD6156	Mrs M Chapman
DD6003	C Matthews	DD6160	Mrs Holmes
DD6006	Mrs Matthews	DD6196	N Nash
DD6011	J Spencer	DD6220	P Wright
DD6054	Skillion Ltd	DD6274	Oxford DBoF
DD6056	I Watt	DD6363	G & I Parsons
DD6059	J Watt	DD6366	D Gander
DD6062	P Lewis	DD6369	R Newton
DD6065	Mrs H Trafford	DD6378	B Hefford
DD6068	T & H Mozley	DD6675	Crest Strategic Projects Ltd
DD6071	A Butler	DD6884	J J Gallagher Ltd
DD6074	C & M Wellby	DD6914	Kemp & Kemp
DD6077	S Trafford	DD6933	Cala Homes Ltd & Westbury Homes
DD6081	S Smoot	DD7040	Station Road Trust
DD6083	Mrs M Watkins	DD7048	Estate of HC Stock
DD6087	Mrs M Scoltock	DD7058	Castle Cement Ltd
DD6089	P Beyer	DD7069	Old Road Securities Ltd
DD6093	Mrs A Farr	DD7207	English Heritage
DD6096	J & K O'Hare	DD7238	County Archaeol- ogical Service
DD6099	W & H Hunter	DD7339	Mrs M Paterson
DD6101	J Nicklen	DD7342	A Paterson
DD6104	Miss J Jeffries	DD7547	J Bercow MP
DD6107	R Jeffries	DD7569	N Walker
DD6133	Mrs R Butler	DD7579	Mrs C Jeffery
DD6138	Mrs J Nash	DD7602	Wycombe District Council
DD6141	G & M Collier		
DD6142	Mrs A Johnstone		
DD6150	Miss Oliver		
DD6151	Mrs K Meacham		
DD6152	B Meacham		
DD6153	J Diment		

* objection withdrawn

Objectors to Proposed Change (PC 8.1):

CO0132 The Oxford Diocean Board of Finance

Objectors to Proposed Change (PC 8.2):

CO0060 A B Nichols

CO0132 The Oxford Diocean Board of Finance

CO0152 M L J Evans

Principal Issues:

- 9.1.1 Whether brownfield land elsewhere in the District should be developed in preference to this greenfield site.
- 9.1.2 Whether Haddenham is a sustainable location for new development.
- 9.1.3 Whether the proposed development would have an adverse effect on the setting, character or appearance of the Haddenham Conservation Area, and/or the surrounding countryside.
- 9.1.4 Whether the site is in a sustainable location, having regard to accessibility by public transport, and the distance between the site and village centre shops and facilities, the railway station, and employment areas.
- 9.1.5 Whether the increase in traffic generated by the proposed development would have an adverse effect on the village by reason of noise, disturbance and road safety.

- 9.1.6 Whether the proposed development would result in an unacceptable loss of high quality agricultural land.
- 9.1.7 Whether the proposed development will result in an increase in the potential risk of flooding.
- 9.1.8 Whether existing community facilities and services are adequate to cope with the amount of development proposed. Or alternatively whether adequate provision can be made for these facilities.
- 9.1.9 Whether the proposed development will have an adverse effect on local wildlife and/or the functioning of St Tiggywinkle's Animal Hospital.
- 9.1.10 Whether an archaeological survey is required.
- 9.1.11 Whether the number of dwellings proposed should be increased in order to enhance the scheme's economic viability. Or alternatively, whether the number of dwellings should be reduced in order to allow the introduction of a 'third-tier' of village sites.
- 9.1.12 Whether the policy should be less specific with regards to the number of dwellings proposed.
- 9.1.13 Whether criterion c) requiring a contribution to bus service improvements, and f) requiring the provision of affordable housing, are excessive.
- 9.1.14 Whether criterion d) should require separate cycle and footpath links. And whether criterion e) is technically feasible.
- 9.1.15 Whether criterion g) is sufficiently clear to be capable of implementation, and whether the second part of criterion j) would prejudge negotiations with the EA.
- 9.1.16 Whether the proposed development would establish a precedent for further development on Aston Road.

Inspector's Considerations and Conclusions:

- 9.1.17 Policy HA.1, together with paras. 8.3 - 8.6, seek to establish the principle for development on a 4.8ha (or thereabouts) site at Aston Road, Haddenham for some 100 dwellings. The Council proposes PC 8.01 (to para. 8.4), PC 8.02 superseded by FPC 157.01, FPC 157.02, FPC 158.01, and ORC 157.03. I comment on these, where relevant, below.

Development of Brownfield Land Elsewhere as an Alternative

- 9.1.18 Several objectors have suggested that the allocation of the Aston Road site is unnecessary, and that new development should be directed to brownfield sites elsewhere.
- 9.1.19 I have in Part 1 of my report assessed the strategic objectives of the development strategy for the Rural Areas in the context of PPG and RPG advice. There is no reason for me to reiterate my detailed considerations and conclusions. Suffice to say that PPG3 advice concerning the development of brownfield sites is clear. The presumption throughout is that when allocating land for development, brownfield sites should take priority over greenfield land. The exception to this principle is where previously developed land performs so badly in relation to the selection criteria in para. 31 of the PPG so as to preclude its use for housing. These criteria include location and accessibility, infrastructure, and the ability to build communities. The Plan identifies two brownfield sites in the Rural Areas that

satisfy the selection criteria, and I have elsewhere expressed my support for their redevelopment. However, these criteria effectively preclude the allocation of remote rural brownfield sites on grounds of their relative isolation and absence of easy access to jobs and services by means other than the private car; the inadequacy of public utilities and social infrastructure; and the difficulty of establishing a viable community sufficient to support new physical and social facilities. Furthermore, the level of investment required to resolve these shortcomings, including the provision of a level of public transport to achieve a significant modal shift away from the use of the private car or the provision of adequate services and facilities, would be excessive for the amount of development proposed.

- 9.1.20 It must be recognised that there is a shortage of brownfield land throughout the Rural Areas that meets the aforementioned strict (yet entirely reasonable) criteria. And that in the absence of sufficient brownfield land to accommodate the requisite level of development envisaged during the Plan period it is necessary for greenfield sites to be allocated.

Haddenham as a Sustainable Location

- 9.1.21 Objection to HA.1 has been raised on grounds that Haddenham is not a sustainable location for new development. I do not agree. I have earlier, in Part 1 of my report, considered objections to the Rural Areas Development Strategy; again there is no need for me to re-iterate my conclusions. Suffice to say that I maintain my support for the principle of sequential site selection whereby development is concentrated at those settlements that have the greatest range of employment and services and are best served by public transport. Specifically, as noted above, the priority given to the development of brownfield sites (category 1 in the Council's search sequence) other than where they perform so poorly in relation to PPG3 selection criteria as to preclude their development. And, in the absence of sufficient suitable brownfield sites to meet the identified housing need, the objective of locating new development in rural service centres (category 2 settlements in the Council's search sequence), which act as focal points for housing, transport, and other services.
- 9.1.22 I recognise and agree that Buckingham, Haddenham, Wendover and Winslow have the greatest amount and range of employment and services in the Rural Areas, and that each is reasonably well served by public transport. As such they are the only settlements in the Rural Areas that meet the criteria in category 2. The identification of these settlements as potential locations for new development thus fully accords with advice in PPGs 3 and 13 and confirms their status as sustainable locations for new development. But, and it is a very big but, I have strong reservations about the appropriateness of directing a significant amount of new residential development to Haddenham, or otherwise affording it equal status in this respect with the other three category 2 settlements.
- 9.1.23 Buckingham is the second largest settlement in the District, having grown significantly in the past 20 years, with a strong employment base and a wide range of facilities serving the town and surrounding area. I am confident that it is capable of accommodating additional development. Wendover and Winslow are in my view alike, comprising small historic market towns with a wide range of shops, including a number of specialist shops serving a wider area, banks, building societies, estate agents, restaurants and other services, a range of social and some cultural facilities, a limited amount of employment, and, most noticeably, clearly

identifiable centres with a sense of purpose and place. I am likewise confident that both Wendover and Winslow are capable of absorbing additional development and that, while not without local problems and difficulties, such development would enhance both settlements and their centres.

- 9.1.24 This is not to say that Haddenham is without merit. It is clearly an attractive place to live. The Haddenham Aerodrome Industrial Estate (now identified as the Haddenham Business Park) provides a strong employment base. The village is reasonably well served by public transport, including regular bus services to Aylesbury and beyond, and a parkway station providing rail service links to London and Birmingham. It also contains some shops scattered throughout the settlement and some social facilities. But it lacks the central focus of the kind found at Buckingham, Wendover, and Winslow, and the wider range of facilities found in those settlements. Rather, Haddenham's character reflects its origin as three ancient hamlets, Church End, Fort End and Towns End, situated alongside the stream that passes thorough the village. Land between these original settlements has been gradually infilled to create the historic linear core, now a designated Conservation Area. Extensive areas of more recent residential development east and west of the linear core create the sprawling settlement that is Haddenham today. I acknowledge that Haddenham, with a population of some 4800, is marginally larger than Winslow (pop. 4400). However, it seems to me that Haddenham retains the ambience of a dormitory village, whereas Wendover and Winslow do not. Thus, while fully recognising Haddenham's sustainability credentials and category 2 status, I am strongly of the view that as a matter of principle sites suitable for residential development in Buckingham, Wendover or Winslow should be afforded priority over comparable or otherwise suitable sites in Haddenham.

Effect on the Haddenham Conservation Area and Surrounding Countryside

- 9.1.25 The most vociferous opposition to development on the Aston Road site is that directed towards its effect on the setting, character and appearance of the Haddenham Conservation Area, and its impact on the surrounding countryside. The CA extends from Church End in the south to Towns End and beyond in the north, and embraces the whole of the linear historic core of the village, including most (and possibly all) of the listed buildings in Haddenham. In connection with these objections it should be noted that para. 4.14 of PPG15 affirms that *section 72 of the Act requires that special attention shall be paid in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area and that the desirability of preserving or enhancing the area should also ... be a material consideration in the ... handling of development proposals which are outside the conservation areas but would affect its setting or views into or out of the area.*
- 9.1.26 The Aston Road site lies to the east of Church End, with an 80m frontage to Aston Road that is distanced from the CA boundary by a 140m ribbon of 7 detached properties. The western boundary of the site runs for some 150m along the rear boundaries of 4 large detached dwellings, including the Grade II listed nos. 20, 21 and 22 Church End. This boundary is common with that of the CA, and is defined by a length of wychert (or wichert) wall. This is a nationally uncommon form of walling, formed by a hardened mix of mud, stone and straw on a stone base, that is found throughout the CA. The site boundary continues north-eastwards for 190m

along the rear boundaries of modern housing fronting The Gables, before turning south-eastwards alongside a public footpath and then southwards along a field boundary to Aston Road, excluding the farm buildings on the frontage. The public footpath alongside the north-eastern boundary continues outside of the site south-eastwards to Aston Road, north-eastwards along the rear boundaries of modern properties fronting Willis Road, and westwards to Churchway.

- 9.1.27 Church End is recognised as the most important element of the Haddenham CA, containing the greatest concentration of the village's highest quality buildings. It is dominated by the Grade I listed St Mary's Church and tower, contains a traditional village green and pond, and is surrounded by an irregular grouping of historic buildings, many of them listed. The buildings around the green close off views into the open countryside beyond, although the proposed development site can be glimpsed between nos. 20 and 22 from the small subsidiary green to the north-east of Church End. However, the influence of the CA extends beyond its boundaries into its overall setting. And in accordance with PPG advice, the approach to the CA and the perception of its relationship to open countryside are important factors to be considered.
- 9.1.28 The 140m ribbon of development along the northern side of Aston Road leads in to the CA. This frontage development conceals the Aston Road site from view from within the CA. However, approaching Church End on Aston Road the proposed development would make a significant impact along the frontage of the site such that it would suburbanise, and thereby totally change, the approach to Church End.
- 9.1.29 From further east along Aston Road and along Stanbridge Road, south of Willis Road, the open fields created, I understand, in 1834 pursuant to the Inclosure Award, provide an attractive setting to the village, both to the historic focal point of Church End and to the more distant modern development fronting The Gables and Willis Road. The existing line of development is precisely defined, and when viewed from Aston Road or Stanbridge Road there is a clear distinction between the modern pattern of small houses and gardens and the listed buildings in Church End, with their generous treed gardens and varied rooflines rising above the wychert wall, crowned by views of the tower of St Mary's Church. Were the Aston Road site to be developed modern development would interpose itself between Church End and the open fields to the east. The perception of the historic core of the Conservation Area in its landscape setting would be concealed and the present views lost.
- 9.1.30 In addition, views from the footpath network in the vicinity of the site would be prejudiced. From the point at which the footpath from Churchway emerges into open land at the northern tip of the proposed site, and along its entire length as it continues south-eastwards to Aston Road, there are uninterrupted views south-westwards towards Church End. These views would suffer maximum visual impact from the development. The present open prospect would be replaced by rear property boundaries, together with views of any houses close by. The sense of Church End in its historic rural setting, clearly defined by the wychert wall, and the perception of the Church tower proclaiming the heart of this part of Haddenham, would be destroyed. Likewise, views south-westwards from the footpath that runs along the backs of the Willis Road properties towards Church End, with a glimpse of the tower of the Grade I listed church forming a focal point, would also be lost. Development on the Aston Road site would dominate the foreground and these

views, which presently provide an impressive contextual setting for the historic heart of the settlement, would be eliminated.

- 9.1.31 It has been suggested that the development could be laid out so as to retain the view of the Church tower through the site. However, the presentation of a single point view through modern development would be an wholly unacceptable substitute for the present open view of the traditional village grouping of Church End from the many points along both footpaths.
- 9.1.32 I am also concerned that the proposed development would be totally unrelated to the rest of the village, and as such would display all of the unfortunate characteristics of an estate of modern housing tacked - unthinkingly and unsympathetically – onto the edge of an otherwise integrated settlement. Vehicular access would, of necessity, have to be taken off Aston Road, and the site laid out in the form of a series of linked culs-de-sac. No opportunity exists to create a suitable vehicular access into the site from the north or west. The narrow unmade and unlit footpath to Churchway provides the only link through to the established part of the village. For the most part this footpath runs between the rear/flank garden boundaries of dwellings, and despite possible improvements would still be a singularly unattractive route for most people walking alone or after dark. In my view it would be unrealistic to expect this footpath to provide anything other than a secondary (if that) means of access to the site, with the possibility that its infrequent use would exacerbate its inherent dangers. The inadequacy of pedestrian access to the site is likewise exacerbated by the absence of a footpath along either side of Aston Road, between the site and Church End. Persons walking to the shops or bus stop at Church End would thus be at risk from passing vehicles. Furthermore, it seems to me that at the point where it enters Church End, Aston Road is of insufficient width to enable a footpath to be provided without compromising other aspects of highway safety.
- 9.1.33 It is inevitable that development of a greenfield site on the edge of a settlement will result in some encroachment into and loss of open countryside, and will in all probability have an impact on local and distant views. However, in my opinion the visual impact in this location would be excessive, resulting in the destruction of some of the most characterful views of the most important part of the Haddenham CA. For these reasons alone development on the Aston Road site should be resisted. The fact that it would be impossible to integrate the proposed development with the rest of the village, creating a text-book example of the worst kind of village expansion, strengthens my resolve to resist development on this site.

Site Sustainability

- 9.1.34 Concern has been expressed that the Aston Road site is in an unsustainable location relative to services and facilities throughout the village. To some extent I recognise the validity of that concern.
- 9.1.35 Haddenham is served by several bus routes providing regular services to Aylesbury, Thame, Oxford and elsewhere. Two of these services pass through Church End; one providing a half-hourly service Monday – Sunday, the other providing 4-8 journeys per day Monday – Saturday; both operate between Aylesbury and Oxford. A third peak hour service links the northern part of the village with Aylesbury, Brill and Long Crendon Monday – Friday, and a peak-hour schools service passes the site on Aston Road. The proposed site is thus better

served than many in this respect although, as noted above, pedestrian access to the nearest bus stops is hindered by the absence of a footway alongside Aston Road and the constricted nature of the footpath link between the site and Churchway.

- 9.1.36 Haddenham is also served by a parkway railway station, providing regular rail services to London and Birmingham. However, the site is some 1.8km from the station, and would thus be beyond reasonable walking distance for most residents intending to travel. Likewise Haddenham Business Park, the main employment destination in the village, is some 1.5km from the site, and thus at the limit of distance most people would be prepared to walk to work. Both destinations, in common with others throughout the village, are within easy cycling distance.
- 9.1.37 The few central shops on Banks Road, together with the village hall, library, health centre, primary and middle schools are some 900m - 1.1km from the proposed site, and thus within reasonable walking distance for most people. However, I suspect that the poor pedestrian linkages between the site, Church End and Churchway may dissuade many, especially the elderly and those with children, from making the journey on foot.
- 9.1.38 Haddenham is not a large settlement, and thus it is unsurprising that the majority of facilities are within reasonable walking distance of the site, and all are within easy cycling distance. However, two of the primary destinations in the village, the railway station and business park, are beyond the walking distance threshold for most people. And while the central shops and facilities are within walking distance, they do not provide the range available - and for the most part equally accessible - in other category 2 settlements.

Traffic Impact

- 9.1.39 Concern has been expressed that development on the Aston Road site would result in a significant increase in vehicular traffic, and that this would have an unacceptable adverse effect on the village by reason of noise, disturbance and road safety.
- 9.1.40 It is inevitable that the erection of some 100 houses would result in an increase in traffic on nearby roads and throughout the village. However, while it may be argued that any increase in traffic on rural roads is undesirable, I am not persuaded that the level of increase would be excessive or otherwise unduly detrimental to local amenities or road safety. Neither, I note, have BCC as HA objected to the proposed development.
- 9.1.41 Vehicles leaving the site and travelling towards Aylesbury, the parkway railway station or Thame would be unlikely to pass through the built-up heart of the village, choosing instead to travel via Aston Road and Stanbridge Road to Aylesbury, or Station Road to the station or Thame. Only those vehicles travelling to the Business Park or to the shops and facilities in the Banks Road area would need, or be likely, to use the more restricted roads in the central parts of the village. And though while not insignificant, the number of vehicles involved and their distribution throughout the day would, in my view, be unlikely to cause an unacceptable increase in disturbance or congestion, or be so detrimental to road safety as to justify resisting development of the scale or in the location proposed.

Agricultural Land

- 9.1.42 I have elsewhere in my report relied upon MAFF ALC surveys (where available) in order to maintain a commonality of approach to the issue of agricultural land quality, and to enable me to make comparisons (if necessary) between competing sites. I have thus had particular regard to the MAFF survey of 22ha of land on the south-eastern side of Haddenham, including the Aston Road site, carried out in February 1996.
- 9.1.43 This survey revealed that the Aston Road site comprises Grade 3b agricultural land. As such it does not constitute b&mv agricultural land. And is thus not accorded the protection given in principle by PPG7 to Grades 3a and above; rather it is recognised as land to be preferred for development in advance of better quality land.
- 9.1.44 I appreciate that, as a result of good husbandry, the site forms part of a productive farm unit. Nonetheless I cannot, in light of PPG advice, raise objection to the development of the site on grounds of its quality as agricultural land.

Potential Flood Risk

- 9.1.45 Neither the Environment Agency nor Thames Water, those agencies responsible for ensuring that proposed development neither exacerbates the risk of flooding nor is itself liable to flood, have objected to the proposed development of the Aston Road site. And neither, despite local expressions of concern, is there any definitive evidence before me that the increased rate of run-off precipitated by the proposed development or site drainage would in any way result in an unacceptable increase in the risk of flooding, either on the site or elsewhere.
- 9.1.46 I can thus find no reason to give any credence to objections concerning this issue.

Social and Community Facilities

- 9.1.47 A number of objectors have expressed concern that overloaded social and community facilities would be unable to cope with the additional demand arising from the scale of development proposed. However, no service provider has objected to the proposed development, and I must therefore conclude that either existing facilities would be able to cope with the projected increase in demand, or that facilities could be increased or improved as necessary.

Potential Impact on Local Wildlife and St Tiggywinkles Animal Hospital

- 9.1.48 The proposed development site is in predominantly arable use, and as such is recognised as being of low ecological and wildlife value. There is no evidence before me to suggest otherwise. Neither is there any evidence to suggest that the occupation of some 100 dwellings would cause an unacceptable increase in disturbance to, or otherwise affect the operation of, the St Tiggywinkles Animal Hospital.

Archaeology

- 9.1.49 The Council suggests that an additional criterion be introduced requiring an archaeological evaluation of the site to be undertaken as part of the preparation of the planning brief, FPC 157.02.
- 9.1.50 I am satisfied that this FPC resolves objections concerning this issue.

Number of Dwellings Proposed (Part 1)

- 9.1.51 Potential developers have suggested that the number of dwellings proposed within the site should be increased in order to enhance the economic viability of the scheme. It is self evident that any increase would enhance viability. However, I have earlier concluded that the development of the site for some 100 dwellings would have a seriously detrimental effect upon the character and setting of the Church End part of the Haddenham CA, - sufficient to cause me to recommend that the site be deleted. It thus follows that I cannot support any suggested increase in the number of dwellings proposed.
- 9.1.52 In contrast, other objectors suggest that the number of dwellings should be reduced in order to allow for an increase in development in category 3 settlements. However, neither can I agree that approach.
- 9.1.53 I have earlier (and consistently) expressed my support for the Rural Areas Strategy whereby new development is directed, in principle, to the four category 2 settlements, Buckingham, Haddenham, Wendover and Winslow, given that they are capable of providing the widest range of services and facilities. I am entirely satisfied that this approach accords with PPG advice. Thus, notwithstanding my recommendation below that policy HA.1 be deleted, there can be no justification for suggesting that the number of dwellings on the Aston Road site be reduced in order to facilitate allocations in category 3 settlements. Finally, objectors should not lose sight of the fact that policies RA.18 and RA.20 provide for limited development in category 3 settlements, and it is anticipated that these will make a significant contribution to rural housing provision.

Number of Dwellings Proposed (Part 2)

- 9.1.54 It has been suggested that the policy should be less specific with regards to the number of dwellings proposed.
- 9.1.55 Para. 8.4 of the Plan states that *a site for approximately 100 dwellings off Aston Road is proposed*, whereas policy HA.1 specifically states that the site shall *be developed for 100 dwellings*. Policies elsewhere throughout the Plan are less specific with regards to housing numbers, eg BU.1 and WE1, or omit reference altogether, eg AY.15 – AY.17, relying on supporting text to indicate the number of dwellings proposed.
- 9.1.56 It is generally recognised that the number of dwellings specified in development plan policies is not intended (unless stated otherwise) to be a definitive statement of the number of dwellings that will be permitted on that site. The final number being determined by a range of cogent issues that cannot possibly be dealt with at the local plan stage. I am thus surprised to note that the Council suggest that para. 8.4 should be altered by the deletion of *approximately*, PC 8.01, thereby requiring in both policy and text that the site be developed for 100 dwellings, no more or no less.
- 9.1.57 Given that I recommend below that policy HA.1 be deleted, this issue is purely academic. However, it highlights the need for consistency throughout the Plan and, where necessary, a more flexible – and realistic – approach to policy formulation.

Criteria Issues

- 9.1.58 Again, in light of my recommendation that policy HA.1 be deleted, my observations concerning the wording of suggested criteria are academic. However,

for completeness I comment briefly on objections concerning various criteria as follows.

- 9.1.59 I do not regard criterion c) as excessive, and am satisfied that it accords in principle with the requirements of C.1/97 and is consistent with similar criteria elsewhere throughout the Plan.
- 9.1.60 The Council suggests ORC 157.03 to criterion d), requiring the provision where possible of segregated cycle and footpath links. I am satisfied that this resolves objections concerning this issue. However, I share objectors' concerns that criterion e) is not technically feasible, given the constricted nature of existing footpath links and the absence of sufficient space alongside for meaningful improvements.
- 9.1.61 The Council suggest amendments to criterion f), FPC 158.01, requiring the provision of a mix of house types, comprising a minimum of 20% and up to 30% of proposed dwellings as affordable housing, and at least 10% as low cost market housing. This FPC accords with my recommended modifications concerning policy GP.2 and supporting text, contained in Part 1 of my report.
- 9.1.62 Notwithstanding my earlier conclusion regarding the unacceptable impact of proposed development on the Church End part of the Haddenham CA, I agree objectors' view that the wording of criterion g) is insufficiently clear to be capable of implementation. Likewise, although not the subject of objection, criterion h) is bland, imprecise and serves no useful purpose.
- 9.1.63 Finally, I see no reason why criterion j) would prejudice or otherwise prejudice negotiations with the EA.

Precedent for Further Development

- 9.1.64 The Pre Deposit Issues Paper, published by the Council in June 1996, identified the 22ha of undeveloped area north of Aston Road and west of Stanbridge Road as a potential site for development. The Paper suggested that the total site could accommodate some 300-400 dwellings.
- 9.1.65 The DDLP does not envisage development beyond the approx. 4.8ha site presently proposed. However, it seems to me that if, contrary to my recommendation, the Aston Road site were to be developed, there would be a clear impression of encroachment beyond the established limit of the village into an area defined not by the field boundary along the eastern edge of the proposed site but by Aston Road and Stanbridge Road. And it seems to me that once made this breach would be difficult to hold, with the longer-term eventuality of development up to Aston Road and Stanbridge Road. This must be is a genuine cause for concern.

Conclusions

- 9.1.66 The expansion of any settlement in a manner that will come to be regarded as acceptable by future generations requires those of us involved today to maintain a fine balance between the 'art' and 'science' of good planning. The Council's clinical assessment of local employment opportunities, public transport links and other sustainability criteria has demonstrated Haddenham's potential as a sustainable settlement that is seemingly capable of accommodation additional development. But this scientific analysis alone is not sufficient to guarantee that such development will make a positive contribution to Haddenham as a settlement. Rather the art of good planning requires that Haddenham itself be socially,

physically and environmentally capable of receiving and assimilating new development; that any identified site be physically and environmentally suitable for development; and that the proposed development itself be capable of making a positive contribution to the character of the settlement as a whole; a neutral contribution is simply not good enough. In my view Haddenham presently lacks the focus and character of a settlement that is capable of absorbing a significant amount of new residential development, and certainly not on the site or in the 'tacked-on' manner proposed at Aston Road.

- 9.1.67 Thus, while recognising Haddenham's category 2 credentials, and expressing my support for the allocation of additional employment land at the Hadenham Business Park (see policies HA2 and HA.3 and CP070 below), I am of the opinion that sites suitable for residential development in Buckingham, Wendover or Winslow should be afforded priority over comparable or otherwise suitable sites in Haddenham. I have elsewhere in this Part of my report identified sufficient suitable sites in other category 2 settlements to meet the Rural Areas housing requirement, thereby obviating the need to identify a site (or sites) in Haddenham. In site specific terms, the visual impact of proposed development on the Aston Road site would result in the destruction of some of the most characterful views of the most important part of the Haddenham CA. And finally, the fact that it would be difficult to integrate the proposed development with the rest of the village reinforces my opinion that development on this site should be resisted.

Recommendation:

- 9.1.68 I recommend that the Plan be modified by the deletion of policy HA.1, and the deletion and modification where necessary of relevant supporting text.

EMPLOYMENT

9.2 Policies HA.2 and HA.3

Supporters:

DD1084	Vale of Aylesbury CPRE	DD5652	Mr Cairns
		DD5840	Mr Warburton
DD1122-23	Vale of Aylesbury CPRE	DD6052	Skillion Ltd
		DD6935	Cala Homes Ltd & Westbury Homes
DD1942	Taywood Homes		
DD2038	Mrs Newman	DD7782-83	Rural Develop-ment Commission
DD2046	Mr/s Knight		
DD5650	Ms Court		

Objectors:

DD0001	Mrs J Bernard	DD0496	Prof J Corina
DD0006	Mr/s L Palmer	DD0499	Mrs R Corina
DD0127	Mr/s D Luckie	DD0723	C Mitchell
DD0155	P Barron	DD0747	R Roach
DD0161	Sir Denis Wright	DD0755	MAFF
DD0166	Mr/s J Fearnley	DD1054	Ramblers Ass
DD0170	E Calver	DD1057	Ramblers Ass
DD0336	B & Z Bowman	DD1476	M Wallen
DD0374	J & E Landon	DD1655	M Walker
DD0410	P Ashcroft	DD1747	D Ferguson
DD0415	L Nichol	DD1782	J Capstick
DD0416	P Richardson	DD1841	H Skipsey
DD0493	P Young	DD1888	Mr /s L Palmer