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Planning Application 14/02666/AOP - Land at Haddenham Glebe

Haddenham Parish Council OPPOSES this planning application for the following reasons:

1. AVDC will be aware that Haddenham Parish Council started work on its Neighbourhood Plan (NP) in 2013 and originally proposed to undertake its own site allocations review; at that time the draft VAP included 100 homes for Haddenham. The subsequent rejection of the VAP has left Haddenham exposed to major planning applications by developers taking advantage of the absence of strategic direction. Initially AVDC advised against the NP undertaking its own housing allocation and sites review, but more recently it has become apparent that NPs are being given weight by planning inspectors and by the Secretary of State in advance of adoption of a Local Plan.
2. AVDC will be aware that the PC met AVDC in July to express the extensive public concern about the potential combined impact of about 750 homes across the 3 principal sites in the SHLAA (including Aston Road), let alone the cumulative 1000-plus homes potentially indicated by sites in the recently published HELAA exercise. The PC has therefore determined to press on with its NP and to include a sites assessment and housing allocation review. This is well underway with a view to submitting the draft NP to AVDC in January 2015. As part of this work the NP team has held meetings with the developers of all 3 principal sites in the SHLAA who are known to be preparing planning applications to establish their intentions and consider their proposals. Public consultation conducted so far in relation to the three SHLAA sites has shown a majority preference for a significant part of future development taking place on the airfield site near the station. At this stage we are clear that there is limited public support for a large development at Aston Road. Those who did support Aston Road were under the impression that doing so might persuade Arriva to reinstate the 280 bus service to the south end of the village, but this seems most unlikely to happen (see para. 14 below). The PC Planning Committee meeting which considered the current planning application was one of the best attended in years, and, along with the representations already made to AVDC, shows the extent of public concern about this proposal.
3. The PC believes that the present application has been submitted deliberately to undermine the NP. Significantly there is no mention of the NP in the applicant's "Planning" document, so clearly the NP is not seen as a relevant matter. By contrast both the other developers of the SHLAA sites expressed willingness to work in tandem with the NP process. Unlike the other two developers, the present applicant has not sought to present to the full Parish Council or its Planning Committee. The present developer did not take up our suggestion to hold a residents' workshop event to work up a master plan – in contrast to the airfield site developer which held a 3 day

“planning for real” event including a site inspection. However because of this application, both of the other developers have indicated to the PC that they now feel that they have little choice but to submit their own applications rather than await the NP. This potentially could fatally harm the NP process and all the work entailed.

4. **Accordingly the PC urges AVDC to reject or defer this application on grounds of prematurity. AVDC should insist that all 3 sets of proposals must be considered together so that a balanced view can be taken about growth in Haddenham taking account of the emerging Neighbourhood Plan.**
5. The PC accepts it will have an allocation in principle. It further accepts that this allocation will be more than the 100 homes proposed in the failed VAP. However there has to be a reasonable limit to Haddenham’s ability to absorb growth. Despite its population size, in both its built form and service functions, Haddenham is a village, not a town. It has very limited shopping, has no real central focus, and no secondary school. The large industrial/business park allocated in last adopted Aylesbury Vale District Plan has seen a limited take-up of plots. So all new development will necessarily generate significant daily out-migration in terms of journeys to work, for the majority of shopping, and for all school journeys by secondary school age children and young people. This is a major sustainability issue. It was why the Inspector in reviewing the evidence of the last adopted Aylesbury Vale District Plan wrote in 2002:

“I am not persuaded that Haddenham presently possesses the character or range of facilities to satisfactorily absorb a significant amount of additional residential development” (Cover letter to Report part 2 in rejecting 100 homes at Aston Rd).

Since then there has been no material change to Haddenham’s range of facilities which would alter this conclusion.

6. Turning to the site itself, Aston Road was originally included in the draft of the last adopted Aylesbury Vale District Plan as a development site for 100 homes (in an earlier version the figure was 300). The site was later excluded at public inquiry by the Planning Inspector in 2002 on several grounds, but particularly on heritage issues. The Inspector’s findings in Ch. 9 of his report amounted to a thorough and comprehensive rebuttal of this site. Although the national policy framework has changed, the material site assessment issues are just as valid today. Because of that rebuttal the site was deleted from the Plan; AVDC’s Forward Planning Officer at the time commented that this site would be most unlikely to be promoted again. Yet the current proposal is for 350 homes.
7. **Heritage: effect on CA and surrounding countryside.** The NPPF is strong on heritage and on the concept of harm to heritage, and essentially re-states pre-NPPF advice. Because of its special character, Haddenham’s Conservation Area (CA) was one of the first declared by AVDC in 1971, and the development site is close to the most recognised part of the CA at Church End. The CA was one of only two selected for recent comprehensive study and review: so it is very significant in heritage terms within Aylesbury Vale and indeed regularly features in AVDC’s own literature. AVDC’s attention is particularly drawn to paras 9.1.25 to 9.1.33 in the Inspector’s 2002 report which are reproduced in full in the comments by Mr & Mrs Nash of 20 Church End, Haddenham. In particular the Inspector concludes:

9.1.28 Approaching Church End on Aston Road the proposed development would make a significant impact...such that it would suburbanise, and thereby totally change, the approach to Church End

9.1.29 The perception of the historic core of the CA in its landscape setting would be concealed and the present views lost.

9.1.30 These views would suffer maximum visual impact from the development. ...Development would dominate the foreground and these views, which presently provide an impressive contextual setting for the historic heart of the settlement, would be eliminated.

9.1.33 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 of this site.

8. The applicant acknowledges that the site adjoins the CA at Church End in its "Heritage" document. No serious attempt has been made to address the substantive issues raised by the Inspector in 2002. The applicant suggests at Church End the CA has already been enveloped by development. This is not correct. In fact the CA to the south and predominantly to the east is bounded by agricultural land and open country with access via a country lane (Aston Rd). This development will entirely envelop the CA to the east, and will sub-urbanise the whole approach to it.
9. **The PC considers that the proposals amount to serious harm and should be dismissed accordingly.**
10. **Site Sustainability and Traffic Impact.** The site is poorly related to the main village services, particularly the two primary destinations of the railway station and the business parks on Thame Road and Pegasus Way. These are both more than one mile away. This is beyond the walking threshold for most people. The majority of these homes will be marketed at commuters. Inevitably most will drive to the station either via Church End or via Woodways: both have primary schools en route with congestion and danger to children and pedestrians at peak times. One of the PC's biggest current issues is all day commuter parking in residential roads near the station to avoid station car park fees. Because of its distance from the station, this development will exacerbate the problem with yet more roads experiencing unwanted all day parking. By contrast, both the other development sites in the SHLAA are within walking distance of both the station and the principal employment areas.
11. Other village amenities including the few central shops on Banks Road, the village hall, library, junior school and health centre are potentially within reasonable walking distance for most people. However the poor pedestrian linkages are likely to dissuade many, especially the elderly and those with children, from making the journey on foot. Moreover as explained in para. 5 above, the limited range of services available make accessibility and car use more of an issue than in other comparably-sized settlements. The Inspector in 2002 recognised these limitations of the Aston Road site at paras. 9.1.37 and 9.1.38 of his report.
12. Impact monitoring was carried out in the summer holiday and contrary to advice to carry out during period of normal activity

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13. Access Issues. Although an outline application, it does not reserve access issues. Yet a number of access issues are not addressed including:

- No access is shown to the proposed burial ground;
- No access is shown to the proposed sports area;
- A new footpath is shown along the northern edge of Aston Road. Aston Road would not appear wide enough to accommodate a footpath; this will entail the destruction of an attractive verge, which in part borders a listed wychert wall, and sub-urbanise and the whole approach to Church End. The footpath will end by the staff access to St Mary's School, with no safe means of continuing to the childrens' and parents' access which is via St Mary's churchyard (an access defined in the permissions for the building of St Mary's School);
- It is unclear what arrangements will be made in relation to an aviation supply pipeline underneath the site.

14. Bus. The applicant has stated that Arriva will route the 280 through the development. Arriva withdrew its 280 service from Church End a few years ago, and as recently as October 2014 informed a meeting in the village that it has no plans to re-instate the service to the south end of the village.

Recommendations to AVDC

- 1. The PC believes AVDC should reject or defer this application on grounds of prematurity given that work on the Neighbourhood Plan is well advanced**
- 2. AVDC should insist that all 3 sets of current proposals must be considered together so that a balanced view can be taken about growth in Haddenham taking account of the emerging Neighbourhood Plan**
- 3. The PC believes that there are other more sustainable, accessible and better integrated sites within the village likely to have higher priority in the emerging Neighbourhood Plan, and does not wish to see such a large number of houses on this particular site**
- 4. The PC believes that the proposals amount to serious harm in terms of their heritage impact and should be dismissed accordingly**

Yours sincerely



Mrs Sue Gilbert
Clerk to Haddenham Parish Council