

Haddenham Village Society

Comments on Haddenham Neighbourhood Plan (Pre-Submission Draft)

Overall

The Draft Neighbourhood Plan (NP) is an impressive document, well presented, with good illustrations, and clearly represents a great deal of work by the NP team with inputs from many organisations and individuals.

We are keen to ensure that the Plan is to be seen as credible by AVDC and potential developers, and that it should achieve the required level of acceptance within the village. There are some areas, as noted below, where we believe that the Plan needs to be strengthened if this is to be achieved.

Key Areas:

Total of New Homes Proposed

It is understood that the overall maximum number needs to be capable of support at the referendum, whilst providing a sufficient contribution to the District obligations to have an adequate five year housing supply within the national requirements and framework.

The NP has used as its basis a calculated 'fair share' of the District projection equivalent to about a thousand a year over the twenty years 2013 to 2033, which gives a figure of 529 houses. Deducting those built/accepted since April 2013, gives 430 from the present time. The historic projection from 11 per year, giving 220 over the period, has not been used, despite Haddenham not reducing the level of development during the recession. This could be a reasonable expectation of the development level which the village could absorb.

Our village status has helped us to have acceptance of a level below a mathematical District share in the past (e.g. in 2001), and arguably a lower number than 529 would be reasonable now, depending upon possibilities elsewhere in the District.

Having reached a more reasonable yet acceptable level, the section 'Suitable, available and achievable' on page 34 of the Pre-submission Draft needs to be clarified to explain, justify and express clearly the total number of new houses proposed in the plan, clarifying the houses built since April 2013 (including infill) to make clear the overall contribution that Haddenham is intending to make in fulfilling the need for housing in the local area.

Site Assessments

The detailed site assessments will undoubtedly come under intense scrutiny from developers who will be keen to challenge any inconsistencies; it is therefore essential that the results are as robust as possible. Due to the short time available to make the final revisions before the Pre-Submission Draft was published, there are apparent inconsistencies in particular in the marking of the Glebe Lands and Airfield sites, and it is suggested that these should be revalidated. Examples of apparent inconsistencies are at Appendix 2.

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Dollicott Site (HNP002/003)

Prior to publication of the Pre-Submission Draft of the NP on 6th December, a statement had been made by Cala Homes at the Parish Council Planning Committee meeting on 20th October, that they had been told by BCC Highways Department that their proposed development with access via Dollicott would not be refused on the grounds of highway safety. Since 6th December, it has transpired that BCC have no record of any such statement having been made, and the Ellis report on *Proposed Development by Cala Homes in Dollicott - Report on Roads and Traffic* (at www.haddenham.net/doc/D89044.pdf), which clearly shows that any significant increase in traffic along Dollicott would be inherently unsafe and detrimental to the local Conservation Area, has been widely accepted and supported.

If the Dollicott site is included in the discussion of possible sites at Chapter Six, it should be clearly stated that any development on this site would be feasible only if the developer can provide vehicular access via the airfield site, with access onto Dollicott for pedestrians and cyclists only.

The airfield developer has, however, pointed out that the private road through the business area, and that area itself, are not within their control. The Dollicott developer, therefore, would have to involve the current owners, who would see no advantage to themselves. Unless such vehicular access can be provided, the site should be removed from the list of allocated sites in Chapter Six of the Plan.

Glebe Lands Site (HNP/009)

The NP proposes a maximum of 50 dwellings for the Glebe Lands (Aston Road) site. Given the size of the site, we would guess that a developer would need to build far more for the site to be financially viable, particularly if some of the land is to be given over to a burial ground; it would therefore seem likely that developers would seek to challenge the figure of 50 set for this site, and this should be reviewed.

Any increase in the number of houses on the Glebe Lands site should not, however, be taken to imply that the overall number of houses permitted under the plan should be increased. Instead, it should open up for consideration the possibility of redistributing the numbers of new houses allocated in the NP across the proposed new sites, such as reducing the numbers of houses allowed on other sites, and possibly dispensing with the use of one or more of those sites.

Other Proposed Amendments

Other proposed amendments to the Plan are at Appendix 1 attached.

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Appendix 1 – Other Proposed Amendments

Chapter Five – Vision and Objectives

A notable omission from Chapter Five (Vision and Objectives) is any mention of flora and fauna. Propose that the following be added:

Preservation of Flora and Fauna:

One frequently sees, in the skies above Haddenham, pairs of Red Kites circling effortlessly, and in Summer, Swifts chasing insects and then swooping down to feed their young in the nests to which they return every year in the eaves of houses. Mallards and Moorhens breed in the three village ponds at Church End, Banks Lane and Rudds Lane, and on the Church End pond, one can see examples of the white, long-breasted Aylesbury Ducks, bred in Haddenham for many years and sold in Aylesbury market. The airfield hosts a number of important bird species, including Lapwings, Yellowhammer and Skylarks, all of which are species listed by the RSPB as being of Red Status, needing the highest conservation priority. Additionally Bats can be seen feeding in the airfield areas, and surrounding woodland, which has already been diminished by building work. Snakeshead Fritillaries and other flowers are found on Snakemoor and on the meadows on the outskirts of the village. This biodiversity is a valued and important part of village life and should not be eroded.

Chapter Six – Housing and Development

Characteristics against which individual Sites are assessed

The characteristics ('A village spirit', 'Retain a village focus', 'Sustainable development', 'A zero carbon village', 'Opportunities for all ages and abilities', 'Maximise the benefits of technology') shown against each site appear to have been derived from Chapter Five (Vision and Objectives), where they are discussed in general terms. There is no clear definition of each, and there appears to be considerable overlap between 'A village spirit' and 'Retain a village focus', and between 'Sustainable development' and 'A zero carbon village'. Because of the ambiguity, the characteristics seem to have been interpreted differently for different sites – e.g. under 'The Airfield' it is not clear how the comments about lapwings' habitat relate to 'zero carbon'.

It is suggested that some characteristics be combined and that, for the purposes of this chapter the following definitions could be used:

Retain a Village Spirit and Focus:

Enable ready access to, and where possible enhance, existing community assets (Local shops, Village Hall, Library, Village Greens, Churches, Public Houses, Sports pitches, and other leisure and sports facilities).

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Sustainable Developments and Progress towards a Zero Carbon Village:

Dwellings should be energy efficient and positioned such that the need to use cars within the village is minimised.

Opportunities for all Ages and Abilities:

Successful integration of different types of dwellings suitable for all (young, old, those with special needs).

Maximise the Benefits of Technology:

Provision of high speed broadband to all premises and of wifi in public areas.

Following the proposed addition to Chapter Five, the following should also be added:

Biodiversity:

The range of existing flora and fauna should not be eroded and should ideally be enhanced.

The general principles of these characteristics apply to all sites, and it seems unnecessarily repetitive to state each of them under each site. It would be more logical to state the general principles, and then for each site, state:

- a. Description of the site
- b. Any particular way in which the site could exceed, or fail to meet, any of the general principles, plus any other relevant points
- c. The Policy statement for the site.

Under Airfield site, add.:

Comment on Lapwing habitat etc as previously against 'A zero Carbon Village' [fits more logically under 'Biodiversity' than under 'zero carbon!']

Under Dollicott site, add:

Any significant increase in traffic levels along Rudds Lane is likely to increase the deaths of ducks and ducklings which often cross the road in search of food.

Under Glebe Lands site, add:

Any significant increase in traffic levels past Church End pond is likely to increase the deaths of ducks and ducklings which often cross the road to the other side of the Green.

Policy Statements:

Policy statements need to be comprehensive, as they may be quoted in isolation from the Plan as a whole. For example, all policy statements should include a requirement for a managed transport system (however defined...) to take account of the site reports summarised in the Plan.

General wording such as 'minimises any adverse impact to the approach to the Conservation Area' (Policies HD3, HD4), 'a managed transport system' (Policies HD3, HD5), 'a transport management plan' (Policy HD6) provide little in the way of guidance and need to be more specific.

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Policy HD9 refers to ‘avoiding buildings of more than two and a half storeys (and not exceeding 3 storeys)’; the section in brackets is redundant and should be deleted.

List of Tables (Page v of Pre-Submission Draft NP)

Page numbers need to be inserted after all other amendments have been incorporated – page numbers for Tables 2, 3 and 4 are incorrect in the pre-submission draft.

Chapter 14 - Bibliography

Add:

Ellis, Trevor: *Proposed Development by Cala Homes in Dollicott - Report on Roads and Traffic* at www.haddenham.net/doc/D89044.pdf

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Appendix 2 – Examples of Apparent Inconsistencies in Assessment Sheets

The comments below focus on aspects of the rating assessments for the Airfield and Glebe Lands sites, and on the reports in Chapter 6 of the NP that are drawn from those assessments.

We feel these are particularly open to challenge, and thus run the risk of undermining the scores quoted in the Site Allocation Table on page 92 of the NP and the proposals for these sites.

1. Airfield Site Assessment (HNP/001)

Transport Rating

As it stands, all items are rated green. However each of the following could be re-rated as amber for the following reasons:

- General/overall likely traffic impact on village: rated as minimal, with the comment ‘internal village movement only’. Even the NP report on the site acknowledges that additional traffic on Thame Road would be ‘undesirable’, and that something would need to be done to ‘prevent an overly detrimental impact’ (p.36).
- Impact on known traffic bottlenecks/blackspots. Rated minimal, yet currently the traffic problems at the junctions between Thame Road and Pegasus Way, and Thame Road and Sheerstock are the focus of action by the Parish Council, because of dangers caused by parking and volume of traffic.
- Cycling access difficulty of the site: rated minimal, with the comment ‘Access by cycle via Thame Road’. Yet the report in the NP states: ‘Thame Road, as the main thoroughfare through the village, is not conducive to walking or cycling [...]’ (p.36)
- Pedestrian access difficulty of site: rated as minimal, with the comment ‘Existing paths on Thame Road’, yet as noted above the report in the NP states: ‘Thame Road, as the main thoroughfare through the village, is not conducive to walking or cycling [...]’ (p.36)

Amber on four of the eight features assessed – and not negligible features - raises the possibility that the Airfield site should be assessed overall as amber on this parameter. This would reduce the rating of the airfield site to 34 points.

Distances to Transport, Community and Leisure Facilities

Assuming distances quoted are walking distances measured from the field next to Skyhawk Technologies, some of the distances quoted are incorrect:

- Distance to Station and Bus Stop is 950 metres (quoted as <500m)
- Distance to Banks Parade is 1450 metres (quoted as 500-1000m).

Distances to other facilities not mentioned in the Assessment are:

- King’s Head pub: 1450 metres
- Rose & Thistle Pub, Parminers Butchers, St Mary’s Church: 1750 metres.

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Policy HD2: Airfield Allocation (NP pages 36-37)

Given the account of the site presented in the NP (especially p.36 'Sustainable development'), Policy HD2 should include a requirement for the developer to contribute materially to the 'comprehensive traffic management scheme' called for earlier in the summary comments about the site (p.36) to offset the negative impact on traffic that the report anticipates – similar to that stipulated in the policy statement for a potential Glebe Lands development (bullet five, p.42).

2. Glebe Lands (Stanbridge Rd) Site Assessment (HNP 009)

Community Amenities and Facilities

The overall score for community amenities for this site is shown as red. This assessment looks vulnerable to challenge on the grounds that, assuming distances are walking distances quoted from the field behind 37-41 Willis Road, using the footpath onto Stanbridge Road and Churchway, the distance to Banks Parade shops is quoted as >1000m (red), when it is actually 800 metres (amber).

If this were to be reassessed, of the six distances measured, two would be red, three would be amber, and one would be green. Hence we would submit that the overall assessment should read 'amber' – leaving 4 points for this factor. This adjustment would raise the overall rating for the site to 36.

There is a minor inconsistency in that a note in the assessment states that the Business Park is over 2 kms from the site, whereas under 'Retain a village focus' on page 41 of the NP, the distance is quoted as 1.5 kms.

In addition to the amenities and facilities noted in the Assessment sheet, we feel that it is worth noting in the NP that:

- Within 650 metres of the site are the Green Dragon pub, White Hart Studio, Haddenham Carpets, Ivor Miles garage and the RC Church
- Within 800 metres of the site are St Mary's Church and Community Centre, the Methodist and Baptist Chapels, the Rose and Thistle and King's Head pubs, Parminers butchers, the Museum and Haddenham Garden Centre.
- Only the smallest of the other four sites offers comparable ease of access to this range of amenities and facilities. Hence this site has particular merit in enabling and encouraging integration into the community (one of the recognised key criteria in assessing potential developments).