25/02006/AOP Land At Station Road Haddenham Bucks HP17 8DD Outline planning application (with all matters reserved except for means of access for mixed use development comprising up to 192 residential units in total (of which up to 32 units would be provided in the Local Centre; with 25% of all homes to be affordable housing) and a Local Centre comprising up to 1400sqm of Class E (Commercial, Business and Service) floorspace (excluding convenience/comparison retail) with residential (up to 32 units), together with access and footways, highways and drainage works, car park/parking, amenity space, landscaping, play area(s) and associated infrastructure.

Overview

- 1. Speculative planning applications like this are the consequence of Buckinghamshire Council's failure to protect our community by (a) not meeting its legal deadline and undertakings given of adopting a Local Plan within 5 years of becoming a unitary authority and (b) not bringing forward sufficient development under the VALP.
- Our local authority has further failed this community by never undertaking any
 assessment of Haddenham's infrastructure and ability to absorb growth. Unlike other
 settlements identified for growth, we have never had a supplementary planning
 document, area action plan, transport, schools and health facilities reviews, or
 community impact assessment of any description.
- 3. The VALP's allocation of 1082 dwellings to Haddenham in the period 2013-33 has already been exceeded. 1134 homes have been started or completed, including all the major allocated development sites. A further 103 dwellings have been approved which are expected to start. This application will add 192 units; another speculative application for up to 800 units on the former airfield is imminent. Together these 2 sites would add nearly 1000 more dwellings. Doubtless yet other sites around Haddenham shown in the Local Plan's "Call for Sites" are being prepared to take advantage of the "tilted balance" open season for hostile development which has been created.
- 4. The concept of sustainability underpins both NPPF and VALP. It is clear to the Parish Council that this community has reached saturation point in its ability to absorb so much growth so quickly. Our public services (schools, doctors, dentist, sewage, roads, railway) are struggling to cope. The Parish Council is not against more housing, but objects to further development in the continued absence of a plan-led approach including a spatial plan and infrastructure impact assessment. We think there may be better options for future spatial growth than the Station Rd site. The PC is initiating action to help the local authority with this.
- The PC objects to this application and asks for a moratorium on new approvals pending a review of spatial growth options and a full sustainability impact appraisal.

The Development Plan

- 6. The Vale of Aylesbury Local Plan 2013-2033 (VALP) provides the main basis on which the application must be determined. Its key policies are shown below, with text we have highlighted in bold.
- 7. Policy S1(c) requires that "All development must comply with the principles of sustainable development ... in assessing development proposals, consideration will be given to delivering strategic infrastructure and other community needs to both new and existing communities."
- 8. This intent is elaborated on by Policy S2 which states that "Strategic growth and investment will be concentrated in sustainable locations as follows ... Haddenham will accommodate growth of 1,082 new homes. This will be supported by infrastructure.
- 9. Policy S5 requires that "All new development must provide appropriate on- and off-site infrastructure ... in order to avoid placing an additional burden on the existing community (and) avoid or mitigate adverse social, economic and environmental impacts ...". It goes on to state that "In planning for new development, appropriate regard will be given to existing deficiencies in services and infrastructure provision. Development proposals must demonstrate that these have been taken into account when determining the infrastructure requirements for the new development. The provision of infrastructure should be linked directly to the phasing of development to ensure that infrastructure is provided in a timely and comprehensive manner to support new development."
- 10. In respect of considering proposals on unallocated sites, Policy D3 states that "The proposal must contribute to the sustainability of that settlement ... and ... provide appropriate infrastructure."
- 11. Finally, Policy I3 on Infrastructure states that "In considering applications for residential development, the council will consider the need for new community facilities and community infrastructure arising from the proposal. Conditions will be imposed on permissions, or planning obligations sought in order to secure appropriate community facilities, or financial contributions towards community facilities, reasonably related to the scale and kind of development proposed." Its supporting text notes that "new development, depending on its scale, creates an additional need for community facilities and community infrastructure. This may be new provision or enhancement of existing provision. The type of facilities and infrastructure needed depends on existing infrastructure facilities in the locality, and the type of development proposed" (§11.28).
- 12. The position adopted by VALP is consistent with the National Planning Policy Framework (NPPF Feb 2025) as follows, again with key text highlighted:

- a. The purpose of the planning system is to contribute to the achievement of sustainable development, **including the provision of ... supporting infrastructure** in a sustainable manner (§7)
- b. Achieving sustainable development means ... identifying and coordinating the provision of infrastructure (§8)
- c. Strategic policies should look ahead ... from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure (§22)
- d. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as ... significant extensions to existing villages ... provided they are ... supported by the necessary infrastructure and facilities (§77)
- e. To provide the ... facilities and services the community needs, planning policies and decisions should ensure an integrated approach to considering the location of housing ... and community facilities and services (§98)
- f. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities ... should give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted (§100)
- g. To ensure faster delivery of other public service infrastructure ... local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted (§100)

Overall planning context comments

- 13. The Parish Council considers there is a very clear thread running between policies S1, S2, S5, D3 and I3 that recognises the dependency on the timely provision of the right infrastructure in the right place if sustainable development is to be achieved. At Haddenham, this goes beyond the LPA simply collecting S106 contributions and crucially requires the infrastructure is delivered which is clearly recognised by the VALP policies and the NPPF references highlighted above.
- 14. This has not been the case. Although the Parish Council estimates that approx. £5m has been collected in S106 funds over the last decade to invest in social infrastructure from approved schemes in the village, it has not had any effect in addressing education or health provision. The Feb 2024 Buckinghamshire Infrastructure Funding Statement (IFS) shows that £340,000 has been spent on improving St. Mary's Infant School. Other funding has been allocated to improving a number of secondary schools that serve the village, none of which lie within walking, cycling or funded public transport distance of Haddenham.
- 15. The primary school place provision remains wholly insufficient and lagging behind demand. Evidence presented to the 23/00311/AOP appeal from the three primary (two infants and one junior) schools showed that all three schools are at capacity

- with classrooms at the maximum allowed numbers. The Junior School's roll has increased from 230 to 400, but with no money for additional classroom space beyond the existing school budget. The outcome is that contrary to the housebuilders' marketing brochures, some village children will have to find places in schools well outside the village for which car trips are inevitable.
- 16. The secondary school position is also stark. The IFS shows that S106 funds have been collected, and some spent, from Haddenham schemes at a selection of schools. However the way in which transport to schools are funded means that only transport to the closest secondary school is funded. The closest secondary school to Haddenham is Lord Williams's School in Thame and transport to this school from Haddenham is funded. However, Haddenham does not lie within the catchment area of Lord Williams's which is in the adjoining county of Oxfordshire with its own growth pressures at Thame. As a result, few students from Haddenham attend Lord Williams's and benefit from the public transport to it. Most Haddenham students attend secondary schools elsewhere including Aylesbury, Princes Risborough and Waddesdon. This has led to local parents having to self-finance a service with a private company or inevitably drive long distances for their children.
- 17. No funds have been collected to secure improvements to increase the capacity of the Haddenham Medical Centre until the local Integrated Care Board (ICB) requested a contribution of £85,000 (yet to be paid) towards relatively minor works at the Centre under 23/00311/AOP. Yet the Centre contains unused space dating back to its construction. The evidence provided by the ICB and presented as additional information to the Inspector at the 23/00311/AOP public inquiry by the Centre's Patient Participation Group describes the significant capacity problems. They result from a village population increase since 2012 of around 2,500, almost all of whom have registered with the Centre. If approved, the current proposal will generate an additional 480 patients, leading to an increase in demand for which no new capacity has been created. As appointments become increasingly difficult for patients to secure, so more will be forced to drive to alternative GP provision, counter to VALP policies.
- 18. Other services not coping include the dentist practice, which undertakes NHS work, but cannot serve its ever-growing waiting list without larger premises. The sewerage system is struggling to cope, as evidenced by recent spillage episodes in heavy rainfall incidents. LLFA colleagues have advised that Thames Water's principal waste pipe exiting the village is insufficient for the demands now made of it. There have been surface water flooding incidents (September 2024 and March 2025) damaging village properties. There is a significant parking problem, particularly by commuters on residential roads in the vicinity of the station, which the local authority undertook to review 5 years ago. Chiltern Railways is operating at or near capacity because of the cumulative growth of all settlements along on the Chiltern line; standing room only has become commonplace, and not only at peak times.
- 19. The Parish Council has addressed the failure in infrastructure delivery keeping pace with new development as far as it can. Notably we have worked with the Council's

Parks & Recreation to provide significant additional facilities for pitch-based sports, including building a £1.6m BC design-awarded pavilion. We have agreed to pay for an extension to the dentist practice located in a building belonging to a local charity of which the PC is sole trustee. We are becoming a burial authority following the closure of the local churchyard. The PC has undertaken its "Streetscape" project with consultants Phil Jones Associates which has recommended a number of improvements to address speeding, pedestrian crossings, junction design, and the local environment, but of course this needs BC Highways funding to implement.

- 20. The planned growth of Haddenham by VALP has not been delivered as expected but has been exceeded, as detailed in para 3. This population growth should have been accompanied by timely social infrastructure improvements addressing the lived experience of the community but hasn't (with the exception of recreation). We now have the prospect of speculative applications, including this one, for nearly 1000 more homes being approved, which will only exacerbate the problem of the failure of the plan-led system to meet the needs of the local community. Continuing to bat away the matter into the long grass via \$106 agreements in the absence of approved plans to invest is not a sustainable strategy. The school, health and other contributions for 192 homes will be very different if this really turns out to be 1000 (or more) homes.
- 21. The proposal is in clear breach of VALP Policy D3 which acts as a pressure valve in circumstances where allocated sites are not being delivered at the anticipated rate. It only allows larger scale proposals on non-allocated sites, like this one, in carefully worded exceptional circumstances. Such proposals are only to be approved "exceptionally", i.e. wholly outside the norm and commensurately benefitting from an unusually robust justification. But a proposal must still contribute to the sustainability of that settlement and provide appropriate infrastructure provision. That is not the case here. There has been no delay in the delivery of homes at Haddenham, quite the reverse. Knowing the VALP-led growth would require improvements to infrastructure, it is not rational for Haddenham to be used to release pressure from under-delivery elsewhere in the VALP territory, or indeed to counter the historic absence of any local plan in the south of the County.

Site-specific Comments

- 22. Spatial growth. Haddenham has already been substantially extended on its northern boundary. The permission for Pegasus Way opened up the airfield, to be followed by the airfield business park and Cala developments, while the adjoining HAD007 (Redrow) site also moved the boundary northwards. This could suggest a pattern for future development rather than extending the boundary in an entirely new direction westwards, hindering the longer-term proper planning of the village and causing avoidable harm to the surrounding area's rural character. What's missing is the plan for spatial growth.
- 23. <u>Open countryside</u>. In past decisions, the railway has been established as the westernmost edge of the village for housing. This land is firmly in the countryside,

indeed open countryside. It is separated from the development in Haddenham by a physically robust and historically respected boundary – a busy railway, itself in a deep cutting. On one side of the boundary is the development of built-up Haddenham; on the other side of the boundary is entirely undeveloped greenfield land. It is not connected to the utilities networks. It is the definition of open countryside. There is a strong steer in the VALP through policy S3 against new development in the countryside. It says: "new development in the countryside should be avoided".

- 24. <u>Landscape setting.</u> In failing to respect the natural boundary of the railway by seeking to grow the village westwards, the proposal will diminish the visual setting and rural character. The local authority certainly agreed when the VALP's HELAA review (2017) rejected this site (referenced as HAD014) as "Unsuitable. The site is beyond the existing village edge defined by the railway line without other built-up sites west of the line. The site has limited screening and is open to views from public vantage points with panoramic long-distance views to the south".
- 25. <u>BMV.</u> The site is moreover "Best & Most Versatile" agricultural land. It is not peripheral ex-orchard or ex-equestrian style uses often found on the edge of settlements. It has been in active food production for cereal crops for very many years. Both VALP and NPPF say that loss of BMV land should be resisted. It seems to have become accepted to give low priority to this matter in planning decisions (see for example 23/00311/AOP). But this disregards the cumulative impact of repeatedly down-playing BMV and food production, which is surely rash and irrational.
- 26. Connectivity. Although close to the railway station, the site is actually some distance from the village centre, schools, doctors' and dentist's surgery. These are towards the eastern part of the village, so car use for local trips will be encouraged. Historic separation from the village by the railway cutting, means that the site is not well connected to the utilities network for water supply, electricity, sewerage and cable networks. We note the comments of both Network Rail and Thames Water. There would seem to be practical issues not addressed in the application, for example how exactly will this site connect to the sewerage network on the far side of the railway cutting? Even if connection is possible, the PC has been advised that the sewerage network can no longer cope see para 18 above, in which case surely an appropriate S106 contribution should be levied. Can the water and electricity supply networks cope and how will they connect? Where exactly will surface water discharge to once collected?

27. Access issues.

a. Station Road is a rural C class road with a weight restriction, albeit frequently ignored, and an awkward bend part way down with restricted distance from the proposed southern facing exit. The PC would want a 20pmh zone to include Station Road all the way from Thame Road into Church End.

- b. The Parish Council would object to a standard Buckinghamshire Council wide bell-mouth junction on the site's southern boundary in this rural setting. A more modest pedestrian friendly width would be appropriate.
- c. Proximity to the station makes it inevitable that commuter parking on residential streets will be an issue here which must be addressed from the outset alongside proposals east of the railway.
- d. The northern road exit would seem more sensibly incorporated with the existing roundabout outside the station. The pedestrian crossing arrangements towards the station should be conditioned by provision of a raised parallel pedestrian and cycle crossing, ideally signal controlled. This would provide a safe crossing for new and existing residents accessing the station and other village amenities, as well as slowing traffic entering the village and encouraging through traffic to take the A418. This work needs to complement current proposals for Thame Road east of the railway bridge.
- e. The overall carriageway width on the Station Road railway bridge is limited, with a poorly defined narrow footpath on its northern side which is single file only, and easily mounted by passing vehicles. This requires review as planning permission would significantly increase both pedestrian and vehicle numbers.
- f. We are pleased to note the retention of the line of the current permissive path, but see para. 28 on Greenway to Thame for more detail.
- g. Creating a footpath access across Station Road to the well-used permissive path on the field opposite is supported, but a safe pedestrian crossing should be secured as part of any planning permission.
- 28. Greenway to Thame. It has been a 30-year ambition to connect Haddenham to Thame, our principal service centre, by a dedicated safe cycle and walking route. Despite a feasibility in 2016, inclusion in BC's LCWIP, active Thame Town Council support, inclusion in Oxfordshire CC's Strategic Active Travel Network, and a top 15 cross-boundary active travel links for modal shift potential identified by England's Economic Heartland, yet again no plan has come forward. Although we cannot be certain of the route, this site is likely to be involved. An obvious option is to reserve a route inside the northern boundary of this land which should be secured as a condition of approval. On leaving the site westwards, the route would then continue onwards besides Thame Road to Scotsgrove, or possibly via the Miller's Way bridleway. Another possibility is that the Greenway follows a route via Tythrop, in which case, the Rights of Way Officer's suggestion of upgrading the permissive path beside the railway to cycleway standard makes a lot of sense. Indeed, given the likelihood of significant cycle traffic between Thame and the station once the greenway is in place, separation of cycles and pedestrians, at least in any section passing through a housing development, would be appropriate to avoid conflict (see the LTN 1/20).
- 29. <u>Noise</u>. Although not picked up by the noise survey sampling, the Parish Council is concerned that the K2 agricultural machinery factory is known to be noisy at times, with machinery stored on open land, raising a question about its suitability as a neighbour to residential properties. The success of Chiltern Railways does mean that noise from passing trains has become very frequent and will be a fact of life for

- people living here, as will continuing emissions, particularly when accelerating away from the station towards London, in the absence of any plan to electrify the line.
- 30. <u>Heritage</u>. The Parish Council is very concerned about heritage damage to the Conservation Area at Church End and its approach from Station Road caused by the growth of both through traffic, particularly since completion of the Aston Road and Stanbridge Road developments, and school-related parking chaos. This proposal is likely to add to both those problems. A radical approach is needed and should be considered and funded alongside the Parish Council's Streetscape proposals, including a 20mph village zone, the current Conservation Area review and its proposed CA management plan.
- 31. Local centre. The proposal includes a "Local Centre comprising up to 1400sqm of Class E (Commercial, Business and Service) floorspace". The research and evidence base for this inclusion is unclear. We understand the intention is to open up another "centre" in addition to those recently built at Tibbs Road and Stanbridge Road (both the Garden Centre and Bradmoor Farm), and potentially in competition with the longestablished parade at Banks Road. These proposals could be beneficial and worthy of discussion, but suggest the need for a retail needs assessment. We are aware of an unmet demand for child care places in Haddenham. We also have an ambition for an indoor multi-use sports centre (eg badminton, basket/net ball, pickleball etc), although not necessarily located here: we can advise further. Once again, this should be informed by an assessment and overall plan.
- 32. <u>Consultation.</u> Ultimately, the open countryside on which this development is proposed to be built, is very important to the people of Haddenham as is evident from the public responses received. The Parish Council is proud of the area's rural character; it makes an essential contribution to the pleasures of living in the village. We understand the importance of development but seek to emphasise that it should not come at any cost. The point of the planning system is to develop in a sustainable way without needlessly compromising vital amenities. We do not feel well-served by the planning system, and do not support development on this site.

Considerations in the event of approval

- 33. In the event of planning permission being granted, the Parish Council:
 - a. Will shortly provide Parks & Recreation with projects for S106 funding;
 - b. Requests that Highways consult the PC about incorporating proposals from the "Streetscape" project;
 - c. Requests that the S106 agreement gives clear priority to the Parish Council over and above a resident management company to take transfer public facilities including open spaces, playgrounds, planted areas, streetlights etc.
 - d. Stands ready to discuss the issues in paras 26 to 31 above.