

Cuddington

Draft comments on the Draft VALP v3

1. Background

Para 1.13 Duty to cooperate

The Council is seeking to find space for an estimated unmet need of 12,000 from neighbouring districts. This is described as a 'worst case scenario'. However, there is great uncertainty about this number and AVDC officers are actively seeking to reduce the 'unmet need' figure by auditing the estimates of their neighbouring authorities. The numbers will also be tested at the Public Examinations.

It seems likely that there will not be any certainty about these numbers before the VALP goes to PE and the numbers will not be fixed until the Plan is adopted (date tbc).

It would help if the VALP could set out what would happen if the final housing numbers are different from those being incorporated in the Plan and include details of the relevant consultation process.

Para 1.62 Natural and Built Environment

This section should include a reference to the landscape of the district and the Areas of Attractive Landscape

2. Vision and Strategic Objectives

Spatial Vision

Comments on Haddenham are included at Section 4 dealing with the New Settlement

The VALP states that the spatial vision for the rural areas are to have proportionate growth and :-

Para 2.4 j

1 will remain predominantly rural in character, enjoying high-quality landscapes with heritage, cultural and biodiversity assets protected and where possible enhanced

4 growth will have been proportionate and reflect community aspirations in terms of scale, phasing, type and design of growth. Further details will come through neighbourhood plans in most cases

6 – growth will protect high-quality agricultural land (this is generally taken to mean the best and most versatile land is defined

The Strategic objectives also confirm the need to respond to environmental issues: -

Para 2.6 6. *The council will manage development in a way that ensures the protection and enhancement of the district's built, natural and historic environment, as well as its landscape and biodiversity. Planning positively for biodiversity and green infrastructure, minimise development on high-quality agricultural land, and require high-quality design and building at appropriate densities*

This is repeated in para 3.6 as part of the AVDC sustainability strategy:-

Environmental constraints – to avoid flood risk areas, protecting environmental assets, landscape quality, contaminated land and pollution, the historic environment and settlement character.

The Parish Council agrees with the proposed approach whereby allocations take account of environmental constraints (including landscape, heritage and agricultural land quality) and the aspirations of the local communities.

The environmental issues affecting Cuddington are set out in Section 3 dealing with the Settlement Hierarchy

With regard to community aspirations Cuddington does not yet have a Neighbourhood Plan but accepts that the villages should plan for a degree of growth over the Plan period. However, there is a concern that the VALP proposal for additional 50 dwellings (up to 200 additional people) in a village with a population of 569 would be an unacceptable and disproportionate increase in the size of the village.

The Council's aspiration is to help manage a lower level of growth commensurate with the environment quality and character of the village and the capacity of its community facilities. The exact number, mix and location of dwellings needs to be assessed in response to proposals yet to be submitted by AVDC (see Para 4.56) and any sites that come forward through landowners/ developers.

3 Strategic

Cuddington is defined in the VALP as a medium village.

Policy S2 states that

At medium villages, listed in Policy S3, there will be housing growth of 19% at a scale in keeping with the local character and setting. This growth will be encouraged to help meet local housing and employment needs and to support the provision of services to the wider area.

The Parish Council believes that a 19% rate of growth for Cuddington is NOT in keeping with its character and setting for reasons given in Section 2 and its comments on the settlement hierarchy set out below. Nor is a 19% level of growth needed to sustain the economic vitality of its existing services which operate successfully with the current population level.

5 year land supply

The latest AVDC interim position statement on housing supply is :-

https://www.aylesburyvaldc.gov.uk/sites/default/files/page_downloads/5%20Year%20Housing%20Land%20Supply%20interim%20position%20statement%20January%202016.pdf

The trajectory document describes a record of poor delivery of housing for AVDC leading to the addition of a 20% 'buffer' to future targets. The delivery rate for the last two recorded years has improved from 900 to 1400 pa. However, this is significantly below the required delivery rate of 1623 dwellings pa in first five years of the Plan.

Moreover, the current draft VALP has a major shortfall in identified sites and some will need to be found post-adoption.

There seems little prospect of the required 5-year supply being delivered. The consequence of this is that sites will continue to come forward outside the Plan process and will need to be assessed on their individual merits. This undermines the importance of the Neighbourhood Plans because the association with the (underperforming) VALP will give them little weight in planning terms. Parish Councils need more confidence in the ability of AVDC to deliver a 5 year housing supply if they are to invest resources in preparing Neighbourhood Plans

The VALP should include a section on how deliverability is being addressed to bring AVDC in line with Government guidance.

3.24 Settlement hierarchy

Following a review of the original settlement hierarchy a number of large villages have been re-graded as medium.

Cuddington is the only small village that has been changed to a medium village.

The Parish Council objects to the settlement hierarchy methodology and the identification of Cuddington as a medium village. It also objects to a flat rate of 19% growth for all villages in this category

Cuddington should be correctly identified as a 'small village' and, as such, would need to find locations for at least 12 new dwellings.

The Draft Plan has **not** identified the potential sites for the proposed 50 dwellings at Cuddington and AVDC officers aim to find 'suitable' sites through detailed site assessments for each settlement and consultation with parishes. However, it is understood that this exercise may not be completed until after adoption? (Ref paras 4.56 and Policy D6).

Cuddington Parish Council believes that the housing allocation in the Draft Plan is too high and should be based on **all** the criteria for sustainable development and should take account of the characteristics of each settlement and its capacity to accommodate change. Therefore it is intended to seek a reduction in the housing numbers for Cuddington by :-

- Asking for Cuddington to be defined as a 'Small Village'
- Objecting to the arbitrary flat % allocation for each village type and replacing it with a more qualitative approach. This should take account of a wide range of sustainable criteria (such as agricultural land quality) in assessing the ability of settlements to accommodate change without significant harm to environmental assets.
- Strengthening the policy for the protection of the Area of Attractive Landscapes (AAL) designation that covers the village – see comments in Section 9. Natural Environment

The details of the objections to the Draft VALP are as follows: -

The village does not satisfactorily meet the AVDC criteria for a medium village and should revert to its previous classification as a small village.

Cuddington does not meet 4 of the 5 criteria for a medium village: -

- Size – Population is 569. It would be the smallest of the medium villages and less than half the average of 1152 (in a range of 680-2115) for the proposed medium villages.
- Connectivity – Whilst only being 1.5 miles from Haddenham, there is no public transport to Haddenham, no footway and the necessity to cross the dangerous A 418 at an accident black spot. The public transport to Aylesbury is infrequent. This is not being 'well connected'.
- Employment – None. Insufficient weight has been given to the lack of employment – most of the settlements in the medium village group have some employment. This is an important issue that requires more weight to be given to it in any assessment of sustainability.
- Facilities –
Key services are -Food store, Pub, Post Office, General Practice, Village Hall, Recreation, Primary School
Non - Key Services are - Pharmacy, Library, Places of worship, Secondary schools

Cuddington is assessed to score 6 of the 7 on the list of key services. However, the system gives one point irrespective of how many shops/ pubs etc there are in the village. Various of the medium villages have greater numbers of each of these services but still the same score applies. Further, there is no weighting between any of the 'Facilities'. For example, for a population with a high proportion of older people, a GP surgery will be more important than recreational facilities.

Currently the nearest general practice and pharmacy is at Haddenham and this is only accessible by car.

The Cuddington school site is **not** a full Primary School, in that Cuddington and Dinton School is located on two sites, the junior school being in Dinton, with infants in Cuddington. The school is also heavily over-subscribed. It serves not only Cuddington but also Dinton, Chearsley and Lower Winchendon and these primary pupils are bused-in or driven to school.

- Qualitative assessment – recommends, throughout, a **small** village status. The description of being 'well connected to a service centre' is not accurate.

The capacity for each medium village to accommodate sustainable development should be sensitive to local conditions and a 'flat-rate' of 19 % growth is arbitrary and not appropriate in all cases.

Para 4.56 states that

By their very nature, some settlements are more constrained than others in terms of factors such as landscape, flooding and settlement form, and therefore it is to be expected that some settlements may not have sufficient suitable sites to meet their own housing requirements. The council, in consultation with the community, must decide on the most appropriate sites to allocate in the Local Plan for each village.

In the case of Cuddington:-

- Like many of the villages in Bucks, much of its area is in a Conservation Area.
- Cuddington is one of only two medium villages to be situated within an Area of Attractive Landscape (AAL). (the other is Brill)
- Most of the AVDC area is Grade 3 or 4 agricultural land. There are only small pockets of higher quality Grade 2 land and these lie between Aylesbury and Thame. The land between Cuddington and Haddenham is located within this belt of higher quality land and is identified as Grade 2 (very good) ie best and most versatile (see Policy NE3)
<http://publications.naturalengland.org.uk/publication/141047>
- It has a high proportion of green infrastructure (Policy I1) that will need to be protected – including village greens, allotments etc..

Cuddington is unique in the quality and extent of its environmental constraints and this reinforces the case for a more qualitative approach to housing designations in the village and the exclusion of Cuddington from a settlement hierarchy (medium village) that requires a fixed rate of growth of 19% regardless of the environmental sustainability issues.

Coalescence

The Council supports the VALP position on coalescence with particular reference to the potential growth of Haddenham and the possible reduction in the actual and perceived gap between the two settlements

Para 3.27

The council will seek to preserve the character and identities of neighbouring settlements or communities. The council will resist development that would compromise the open

character of the countryside between settlements, especially where the gaps between them are already small.

Community Infrastructure Levy (CIL)

Ref para 3.53

In assessing future proposals for CIL contributions consideration should be given to the cumulative effects of building small numbers of dwellings. In small villages, developments come forward in relatively modest numbers and these often fall below thresholds for affordable housing – see Section 5 Housing. They may also potentially fall below CIL thresholds.

It is important that even small developments help to create a mixed housing stock and contribute financially to the provision and enhancement of community facilities such as play areas, schools etc

Delivering through neighbourhood planning

Ref para 3.87 etc

Policy S9 Securing development through neighbourhood plans

Cuddington has not started a neighbourhood plan yet. The Parish Council supports the concept in principle, not least because it enables the community to debate and set out a vision for the future of the village. However, the recent history of neighbourhood plans in AVDC shows that they have little weight in planning terms unless there is an adopted Plan and a 5 year housing supply. Whilst the VALP seems to be on programme for adoption, uncertainty about overall housing numbers and a poor record on deliverability highlight the difficulties in seeking to use the neighbourhood plan to guide development.

4.Strategic Delivery

4.27 Delivering a new settlement

The Parish Council has concerns about the scale of the potential location of a New Settlement at Haddenham and the direct and indirect effects this would have on the area between Thame and Aylesbury (including the smaller villages such as Cuddington and Chearsley).

Context

The Spatial Strategy, Para 2.4 j refers to proportionate growth for Winslow and Haddenham with a separate reference (Para 2.4 l) to a New settlement. Policy S2 confirms the VALP proposal for 50% growth for Haddenham (and Winslow). The importance of the existing (Haddenham) and proposed (Winslow) stations is highlighted.

Policy S2 Para f refers to a New Settlement of 4500 homes (within the Plan period) although it is understood that a total of 6,000 homes is the longer term aspiration

Haddenham's housing requirement is 1043 (with 1063 for Winslow)

Both settlements have populations of c 4000 and the proposed 50% growth in homes would increase their populations to around 6000 to 7000 by the end of the Plan period.

This compares with Thame with a population of c12,000 and draft proposals for an additional 1375 homes (775 in the made neighbourhood plan and an additional 600 in the draft local plan process for South Oxon . This would see Thame grow to a population of about 16,000.

In the local area South Oxon has proposals for a major development of 3,500 homes at Chalgrove and the draft High Wycombe local plan has proposals for an additional 2,500 homes at Princes Risborough.

In addition to these urban extensions Para 4.32 of the draft VALP refers to two shortlisted options for a New Settlement at Haddenham and Winslow with 6000 dwellings at each (4500 in the Plan period).

Rail capacity

The assumption in all the proposals for M40 corridor (Thame, Haddenham, Princes Risborough and Chalgrove) is that the Haddenham and Thame Parkway station (on the Chiltern Line) is a major locational factor by providing public transport access to employment. The proposed level of new homes would create significant additional demand for rail capacity over and above the existing pressure from major growth at Bicester and the new rail link to Oxford.

The Chiltern Line already experiences over-crowding at peak periods and there are proposals to mitigate the existing situation through the introduction of a longer trains, However Chiltern Railways have made it clear in their evidence on HS2 that there are limited opportunities to increase capacity on the line further –

<http://www.appghsr.co.uk/upload/Chiltern%20Railways%20submission.pdf>

"Current Capacity on Britain's railways

2. Britain's railways are now handling more traffic than at any time since the 1920s, and both passenger and freight traffic are continuing to grow despite the poor state of the national economy. A particular feature is the growth of rail traffic to/from south midlands (e.g. existing towns such as Banbury and Bicester, or new cities such as Milton Keynes), due to these being favoured locations for new housing development. There is a limit to how much of this growth can be absorbed on the existing rail network."

"4. It is clear that the key routes between London, the Midlands and the North will be running out of capacity within the next decade".

"7. Conversely, we believe that the potential for adding extra capacity to existing routes is limited:

- Many of the possible projects have already been carried out (e.g. Chiltern Railways' successive "Evergreen" projects that between 1999 and 2011 have transformed the Marylebone line from a low capacity suburban route into an intensively-used main line; or the West Coast Main line's Trent Valley quadrupling). The scope for further upgrades is thus limited*
- Such work causes massive disruption over many years for both rail users and for lineside residents.*
- Engineering work on an existing railway is inevitably more expensive than on a "greenfield" site, where construction is unimpeded by the need to continue running trains.*
- Due to the amount of lineside housing, upgrading and additional tracks is least practical where it is most needed - again, the first 30 miles out of London".*

The significance of this for the draft VALP is that there is no evidence that the Chiltern Line has the capacity to accept further passenger growth particularly in the context of proposals for growth of 8,400 homes in the Thame/Princes Risborough area (with the potential for an additional 6000 from a New Settlement at Haddenham).

East/West Transport Links

In contrast, growth at Winslow would encourage investment in the proposed new transport infrastructure for the Oxford/ Cambridge expressway and the East West Rail link described in Bucks Transport Plan

<http://www.buckscc.gov.uk/transport/more/local-transport-plan-4/>

<http://www.eastwestrail.org.uk/2016/08/16/east-west-rail-key-to-economic-development-say-local-enterprise-partnerships/>

A strategic approach

Given the proposed transport-led approach to housing growth it would seem logical to prioritise development in the northern part of AVDC (in order to support investment in the Oxford / Milton Keynes/ Cambridge growth corridor) rather than create further pressure on the 'over-heated' M40 corridor.

At a strategic level consideration also needs to be given to the potential effect on the hierarchy of settlements in the M40 area. At present Aylesbury, Oxford and High Wycombe provide the main centres for employment, services, transport links and facilitates. The market towns of Thame (Pop 11,500 :2011) and Princes Risborough (Pop 8000 :2011) provide intermediate services between the main centres. Unfortunately, the contribution of these settlements is not considered adequately in the VALP because they lie in adjacent districts. As a consequence of this approach, the smaller settlement of Haddenham (approx. pop 4000) is elevated to the role of a 'strategic' settlement within the VALP even though it is significantly smaller than its near neighbours.

The VALP proposals for proportionate (50%) growth at Haddenham maintains the current hierarchy and balance between the various settlements. A new settlement at Haddenham of 4500 to 6000 additional homes would create another town the size of Thame with only a small gap between the two settlements. Both Haddenham and Thame would lose their individual identities and the overall hierarchy in the area would be distorted beyond recognition.

The consequential effects on local roads, education etc would destroy what is currently an attractive and well-balanced area of small towns and villages, for the most part linked by local bus services.

In assessing options for New Settlements AVDC have produced supporting evidence in the form of a report entitled New Settlement Scoping Study :June 2016

In para 2.6 and 2.7 a New Settlement is defined as

"A free standing settlement, promoted by private and/or public sector interest, where the completed new development – of whatever size – constitutes 50 per cent more of the total size of a settlement, measured in terms of population/dwellings".

2.7 We have taken forward this definition in this Study, which therefore considers the potential for a new freestanding settlement or one which would enlarge an existing settlement by more than 50% of the population/dwellings.

The Scoping Study debates the pros- and cons of a free-standing settlement v an urban extension: -

2.31 The form of any new settlement – i.e. whether it is a free standing settlement or urban extension, also poses different challenges. The benefits of urban extensions include linking into existing infrastructure networks such as transport, jobs and social infrastructure, and they can also be perceived as having fewer environmental impacts. Equally new standalone settlements provide the opportunity and the economies of scale to truly fulfill the ambitions of sustainable development by delivering multiple benefits including zero carbon design, sustainable transport and local food sourcing. They also avoid the impact of sequential development around existing communities

In short-listing Winslow and Haddenham as sites for a new settlement the consultants have placed great weight on their existing and proposed rail links without (in the case of Haddenham) any evidence to show that there is sufficient capacity to accommodate further passenger growth (see above). The consultants have also underestimated the potential for stand-alone settlements to generate investment in new public transport that would enhance their sustainability credentials

It is recommended that further work is undertaken, in particular with public transport operators (rail and bus), before the long-list of options is reduced in number.

In the event that Haddenham and Winslow remain the two preferred options at the draft stage of the VALP the Parish Council recommends that Haddenham is not selected as a new settlement for the following reasons: -

- It would create a second town the size of Thame - duplicating the role of Thame in the local area
- It would be difficult to avoid the actual or perceived coalescence of Haddenham with Thame and the local villages
- It would destroy the character of Haddenham and the whole of the local area between Stone and Thame
- It would exacerbate queuing around Thame in the evening and morning peaks. Mitigating measures are likely to be costly and intrusive, further degrading the rural character of the area
- It would create additional and unacceptable pressure on rail capacity
- It would contribute to a significant and unsustainable increase in passenger numbers as a result of other development proposals for the M40 corridor
- It would reduce the potential to create a successful East /West corridor of growth by diverting investment to the southern part of AVDC
- It would substantially increase the already unacceptably heavy amount of north/south commuting traffic to and from Milton Keynes that uses minor roads through villages in preference to heavy congestion through Aylesbury because of the lack of any adequate ring road system

Delivering the allocated sites

The Council supports the qualitative approach set out in para 4.56 but this seems to contradict the rigid methodology of the spatial strategy and settlement hierarchy. It suggests that housing numbers will need to be reviewed for each settlement based on capacity / constraints and deliverability. A fixed % growth is not a sensitive enough tool and there will need to be exceptions/ adjustments

Para 4.56

By their very nature, some settlements are more constrained than others in terms of factors such as landscape, flooding and settlement form, and therefore it is to be expected that some settlements may not have sufficient suitable sites to meet their own housing requirements. The council, in consultation with the community, must decide on the most appropriate sites to allocate in the Local Plan for each village.

However, it is not clear when this qualitative assessment is happening.

Policy D6 suggests that this process will be completed within 12 months following the adoption of the Plan. Whilst this may sound sensible as there should, at least, be some certainty on housing numbers on adoption it does make it difficult for Parish Councils to contribute/comment. As stated above the VALP should include a clear process and programme for the refinement of housing allocations including a well-defined public consultation process.

Policy D6 includes tests for proposals that come forward before all the sites have been identified (items a to f). It is recommended that item g is added to minimise the effect on best and most versatile agricultural land in accordance with Policy NE3.

5 Housing

Para 5.5

Policy H1 sets a threshold of 11 dwellings, or more, for affordable housing target of 31%.

There should be a requirement where 10 or less trigger a requirement for affordable housing when considered cumulatively with other small scale developments in the same settlement. This could take the form of a negotiation with AVDC and local social landlords to contribute to affordable housing, maybe through the CIL process?

6 Economy

No comment

7. Transport

No comment

8. Built Environment

No comment

9. Natural Environment

Landscape

9.11 *Therefore all the landscape in the district is considered to have innate value as referred to in the National Policy Planning Framework (NPPF)²⁸ That said, of the locally significant landscape, the Areas of Attractive Landscapes (AALs) are of the greatest significance followed by the Local Landscape Areas (LLAs).*

Policy NE3 Landscape character and locally important landscape addresses effects on landscape character and quality. NPPF distinguishes between guidance on landscape character and the hierarchy of designated landscapes including locally designated areas such as AALs.

For this reason, it is customary for policies that define landscape designations (such as Areas of Attractive Landscapes) to have separate policies to those that deal with landscape features and qualities so that these elements are adequately protected. This approach is recommended for VALP.

10. Countryside

No comment

11 Detailed Infrastructure

The Parish Council welcomes the protection offered in housing policies D4, 5, 6 and 7 to existing open space and green infrastructure.

It is noted that the definition of Green infrastructure at Para 11.1 includes allotments :-

11.1 Green infrastructure is a strategically planned network of high quality multi-functional green spaces in both urban and rural areas. It is designed, developed and managed to meet the environmental, social and economic needs of communities. The term includes open green spaces such as parks and gardens, country parks, allotments, cemeteries, green corridors (potentially including cycleways and rights of way), allotments and trees. It can also include informal amenity green spaces and accessible countryside such as river and canal corridors, woodland, natural grassland, wetlands, lakes and nature reserves.

The Parish Council supports Policy I1 Green infrastructure and its emphasis on the protection, enhancement and maintenance of green infrastructure (including allotments):-

As part of this development proposals must demonstrate that the green infrastructure network would be maintained and, where appropriate, enhanced within the site as follows :-

- g. protect, create, and improve recreation, play, and local food cultivation opportunities for communities
- h. secure on-going management and maintenance of green infrastructure assets;