

CNP – Regulation 14 responses to Bucks Council comments

GENERAL COMMENTS		
1	Update references to Bucks and AVDC Use proper titles and dates in references to documents Format document and plans in MS Word	
BIODIVERSITY		
	Bucks Comment	CNP response
2	Absence of a reference to biodiversity net gain	See point 10 below NPPF para 16 f) states that plans should avoid duplication of policies that apply to a particular area. The CNP para 5.4 explains that it relies on the Local Plan (VALP) policy NE1 for the protection of biodiversity for new developments. Net gain for biodiversity can be achieved through planning conditions for new development. No new development is identified in the CNP apart from the proposed VALP allocation at Dadbrook Farm. CNP para 6.6 refers to the Parish Councils proposed Green Initiative for additional tree planting and enhancing the ecological value of the local green spaces and highway verges.
3	No mention of protected species etc	Please refer to CNP Appendix A , Section 5 Biodiversity
RIGHTS OF WAY		
4	The CNP should assess the connectivity of existing routes and identify missing links and loops. It needs to consider current and likely future needs of users of public rights of way.	The village has published a new map of the local footpaths and bridleways – see link to village website. https://www.cuddingtonvillage.com/view-page.php?pid=9#a3113

	Community need to know more about how to access the PRoW network	The existing network is quite comprehensive. Missing links and areas for improvement are shown on the map at Appendix A. To date the Parish Council has had little support from Tf Bucks to implement these proposals.
5	Plans should encourage developments that contribute to new and improved pedestrian/cycle/ bridleway routes and safety.	The VALP allocation at Dadbrook Farm (CDN003) has the opportunity to create improved links between the village and the A418. The landowner of the site owns land alongside Dadbrook (east and west) from the farm to the A418. This corridor should be considered , together with the highway land, for a cycle/pedestrian link. Improvements to the access along Dadbrook should be sought by Bucks Planning at the pre-application stage for CN003.
6	CNP area plan needs a north pint	CNP to be modified
7	No need to refer to SPDs in the timescale of the CNP	CNP to be modified
8	Para 2.13 should identify location of historic car park	CNP to be modified
PLANNING		
9	Para 3.14 VALP will not now be adopted until mid / late 2021. The CNP should be reviewed in the context of AVDLP 2004 saved policies	CNP to be modified and AVDLP saved policies to be referenced in the basic Conditions Statement
10	Para 3.7 amend NE1 policy description to include 'and to enhance biodiversity value'	CNP to be modified
11	Para 3.7 amend policy NE2 description to read ' proposed developmnet should not have any adverse impacts to any watercourses and should enhance biodiversity'	CNP to be modified
12	Recent Planning Issues – there is a need to consider how the housing allocations provide safe and easy links to the wider ProW network	The Aylesbury Road allocation is now a 'commitment' in the VALP further Modifications. Pedestrian and cycle access to the site was resolved through the planning application stage. A note about the PRoW opportunities arising from the Dadbrook Farm site will be added to the CNP- see Point 5 above
13	Vision for Cuddington : residents need to know more about access to the countryside	See point 4 above

14	Opportunities for improvements to the PRoW network should be considered	See Point 4 above
15	Objectives: Green buffers of native planting should be provided between development and the countryside	Provision for green buffers is included in the VALP policy for the proposed allocation CDN003. No other development is proposed on the edge of the village at the junction with the countryside. The requirement for green buffers is included in CDN07 point 4. CNP to be amended to include a similar reference in CDN06
16	It would be helpful if the CNP could include a vision for sustainable drainage and water saving devices within properties	Drainage for new developments is dealt with by the drainage authority. Need to consider water saving policies as an option
POLICIES		
17	Look at Further modifications to VALP when published	The further mods show the Aylesbury Road site as a commitment and not an allocation . CNP to be amended accordingly.
18	P.18 Why is Holymans Farm to the north of Cuddington not included in the settlement boundary?	The settlement boundary in the CNP has been drawn using the definition of the existing development footprint in VALP . The Further mods FMM077 :- <i>*the existing developed footprint is defined as 'the continuous built form of the settlement, and generally excludes remote individual buildings and groups of dispersed buildings. The exclusion covers former agricultural barns that have been converted, agricultural buildings (but does not preclude permitted development for converting agricultural buildings to residential – Town and Country Planning (General Permitted Development) (England) Order 2015 as amended – Class Q) and associated land on the edge of the settlement and gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where the land relates more to the surrounding countryside than to the built-up area of the settlement.</i>
19	P.18 Why is Dadbrook Farm not part of the settlement ?	See Point 18 above
20	CDN01 /002 Housing needs a definition of larger , medium and smaller developments	CNP to be modified based on small/ medium being < or equal to 1Ha developable land and a larger site being > 1 Ha developable land .
21	There is no mention of Affordable housing and Local Plan policies would , by default, apply. For clarity the plan should indicate that the Bucks position should apply ie AVDLP Saved policy amplified by the 2019	CNP to be modified to include an affordable housing policy similar to Policy WAD3 but stipulating 15% affordable in line with VALP

	position statement , but post adoption of VALP, the VALP policies would apply.	
22	CDN002 (and CDN001) .The CNP policy can't defer to another Plan . The CNP needs to be include the criteria it would use to assess proposals for development outside the settlement boundary – see made Waddesdon plan policy WAD1.	Plan policies CDN01 and 002 to be omitted and replaced by a Policy similar to WAD1. The settlement boundary will continue to exclude the CDN003 proposed VALP allocation for the reasons given in para 5.14.
23	CND003 – might wish to say how such spaces are to be managed and anything on detailed design and impact on adjacent uses to cover for a planning application coming which might retain the use of land as local green space but nevertheless be physical development	CNP to be modified
24	CDN04 the views need to be clearly on the policies map if they aren't already rather than just being in an appendix	CNP to be modified
25	CDN05 Non designate heritage assets – welcome the identification of these in appendix 4, however slightly concerned these are not measured/defined by HE criteria (or those in the emerging VALP policy). The policy relating to these needs to be reworded, so that it is clear that the proposal should bring public benefits, not the asset. There is also no mention of listed buildings, understand that these are protected by separate legislation but should this be mentioned – perhaps with archaeology as designated heritage assets (other than CA, already covered)	CNP to be modified
26	It is for the local community to decide on the scope and content of a neighbourhood plan; however, there could be benefits in setting out a specific historic environment section drawing on the evidence from Historic England and the Buckinghamshire Historic Environment Record. Investigations could include: • An analysis of the historic character of the area highlighting its contribution to the development and appearance of the place • The identification of any listed buildings, scheduled monuments, registered parks and gardens, battlefields, archaeological sites or local heritage assets. • The environmental issues the plan seeks to address.	See also comments from Historic England Not sure a separate chapter is needed as all the listed buildings are within the Conservation Area and most of the points raised are addressed in the CNP – albeit not in one place ie an historic environment section

	• Opportunities to repair, conserve or bring heritage assets back into use, especially those at risk • Policies to protect, conserve and/or mitigate impacts on the historic environment • Policies to manage the settings of heritage assets or important views • Policies to promote locally distinctive development in terms of scale and materials • Particular historic environment considerations to be taken into account when seeking to develop specific sites • Opportunities for investment into the historic environment alongside delivery of new development • As part of the process of preparing a neighbourhood plan opportunities could be identified to protect buildings and spaces.	
26	Guidance on taking the historic environment into consideration in neighbourhood plans has been published by Historic England and includes: • Neighbourhood Planning and the Historic Environment August 2014 • The Historic Environment in Local Plans There is also the NPPF especially Section 16.	Documents to be checked and considered
27	CDN005 - it would be more effective to list in the policy the sites/names of the assets like you have done for the Local Green Spaces and show them on the policies map if they aren't already	CNP to be modified
28	CDN06 Item 10 (and CDN07 Item 9) refers to external lighting. Please cross refer to NE5 in VALP	Plan to be modified and stipulate no external street lighting on new developments
29	CDN 06 Item 11 . Note that traditional orchards are classified as Section 41 priority habitats.	Noted
30	CDN006 – there definitely isn't any housing in Cuddington more than 2 storeys? i.e. 2 storeys plus dormers in a roof is 3 storey or 2 ½. If there are just say 'existing building heights'	CNP to be modified
31	There is no need to repeat policies that already exist nationally but encouraging the use of green and blue infrastructure in Policy CDN 06 and 07 to slow down runoff and to conserve and limit water	Plan to be modified to reference these points

	consumption would be in line with other environmentally sustainable aspirations.	
32	CDN007 - might wish to say the design must be 'high quality and sympathetic architecture and detailed and urban design' not just innovative because you can get innovative architecture completely out of place standing out not of high quality in itself	CNP to be modified
33	Trees The CNP highlights within 4.2 that maintaining and enhancing existing trees is a key objective, along with ensuring all new developments include planting of trees and hedgerows. The CNP goes on to state that it avoids duplication of existing national or local policies, and states at 5.4 that it relies on NPPF and VALP for the protection of trees. The only Policy specific reference to trees comes within policy CDN 07 (6) which, aside from specific reference to tree types that characterise "these parts of the village" does not significantly advance on the generic policy within NPPF or VALP. It is therefore assumed, that there are no specific tree concerns that the CNP wants to address within policy,	No specific tree policy is proposed. The Parish Council maintain trees on their land and liaise with TfB about trees within the highway. Trees within the Conservation Area are protected by policy.
	APPENDICES	
34	Appendix B: Cuddington Neighbourhood Plan: Local Green Spaces Expecting to see more sites that have been assessed than just the designated ones, so sites that have not considered to be worthy of designation are sieved out– what alternatives where there? It doesn't look a very thorough exercise if there were no alternatives and every one they wanted to designate just happened to meet the criteria The matrix used is too simplistic –yes- or no it doesn't explain in each instance how the NPPF criteria are being met. Some kind of scoring system would have been good like what Quainton did in their original plan (see attached document). I think you need to beef up the evaluation of each LGS site so it's really clear for the examiner that the sites haven't just been chosen on a bit of a whim	Alternative sites that were discarded will be reviewed Review Appendix and look at Quainton example https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/QNDP%20Local%20Green%20Spaces%20Report-1.pdf

	You could include some more photographs in this background report and details of when the site visits were done Needs to be crystal clear how and when the landowners of potential LGS sites have been notified and what their response was assuming the parish council have had a response so far	Add photos Add section on consultation with landowners
35	Appendix C: Cuddington Neighbourhood Plan: Landscape A map showing where the photos were taken from and where they are too would be very useful. The photos any commentary of what is existing should be dated as the time of year is very important when thinking of how landscape grows and shrinks throughout the year P.7 – The former AVDC re-affirmed the locally designated landscapes following review by LUC yes just need to be clear here not all the locally designated landscapes (AALs and LLAs) from the 2004 local plan have been retained it was only those recommended for retention following the evaluation of LUC P.11 the VALP policy numbers aren't right e.g. NE8 is now Trees. and NE4 is Landscape. NE1 is Biodiversity.	Add map of photo locations Noted CNP to be modified
36	Appendix E: Cuddington Neighbourhood Plan: Built Environment The maps need to show where the photos at the back of the doc are taken from How does the discussion on character and the character areas consider the adopted Cuddington Conservation Area document – has it taken account of this already for areas that are in the Conservation Area?	Photo locations to be shown on a plan Cross refer to the Conservation Area document
37	Appendix G: Cuddington Neighbourhood Plan: Traffic Has this and any of the documents so far been shared by the parish with the highway authority (Buckinghamshire Council highways) if they have been consulted it should be explained in the appendix as it can add to its validity.	Explain consultation with the highway authority

	P.9 has reference to HGV surveys in Sept 2020 – were these carried out?	Complete this ref to HGV surveys
38	List of Figures Fig 7. Cuddington CNP Policy map There needs to be a single composite policies map maybe produced at A3 scale showing all the things mentioned in the policies like the views, green spaces, built heritage assets, settlement boundary...	CNP policy Map to be amended

Appendix A

Map of proposed PRow improvements

