

David Blandamer

From: Andrew Matheson
Sent: 21 March 2023 19:17
To: Pam Williams; David Blandamer
Subject: [EXT]Re: Examination of the Haversham-cum-Little Linford Neighbourhood Plan
Attachments: Character Area_20230321_0001.pdf

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Dear Pam and David

I have now made my visit to the area to see the various sites and locations. I can confirm that I will now proceed to write up my Report on the basis of the written representations/responses that I have received. However, there are a few issues arising either from my visit or the responses on which I am inviting further input.

1 Non-designated Heritage Assets/ Local Areas of Special Character

Neither on the ground nor within your responses am I provided with evidence to support the very widely drawn boundaries for these two Assets. I fear that some confusion may have arisen between heritage assets and their setting. The Historic England publication "The Setting of Heritage Assets" includes the explanation (paragraph 9): "Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated [in its own right] ... Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance". The details for Haversham Mill say "the site of the demolished old mill at Haversham (bottom of Mill Road). Including the mill race; wharf and mill house"; whilst it is difficult to appreciate the extent of these from the map because of the overlays, it is apparent substantial areas of open ground are encompassed, the boundary to which is not evident or 'readable' on the ground. The heritage assets are the interrelated features listed; their setting is not. The Old Haversham Asset is, at its core, a collection of already listed buildings (excluding the Manor Farm) but it has not been explained to me why the linking spaces have any particular merit, other than as setting (the northern boundary at one point appears to separate the garden from a related house). The only building of individual merit that is not already listed would appear to be the old School. To justify the proposed Area of Special Character a specific appraisal would be required, otherwise the boundary must be tightly drawn - a suggestion is attached for comment.

2. Zero Carbon Buildings

I have followed up the references provided in support of this Policy but would note that the content needs to be justified in the context of this Plan, not borrowing from other Plans. I have noted that the Milton Keynes "Our New City Plan - Ambition and Objectives Consultation 2023" includes a commitment to "Shape the built environment and transport systems to help achieve net zero carbon emissions by 2030 and be carbon negative by 2050". Evidently new construction will need to make a contribution here and the response acknowledges that the direction of national policy, and the Building Regulations in particular, recognises this. The response advises me that "Policy HLL4 simply provides an incentive at Clause C for developments to choose a higher energy efficient standard. Where it does choose that higher standard, the policy acknowledges that there may sometimes be a trade-off between its objectives and local design policy and guidance." It is not evident whether "sometimes" will be applicable for the site allocated in the Plan, nor is it evident how the acceptability of a "trade-off" should be assessed. At its last revision, the NPPF enhanced its expectations of good design, in particular its expectations of locally sensitive design. It does not seem to acknowledge the need for a trade-off to achieve carbon neutral buildings. A 'trade-off' policy might therefore be seen as regressive? Further, I assess the Policy content as straying into guidance that should, appropriately worded, be in the supporting text.

3. Allocation of Land off High Street, Old Haversham

From my visit to the area it is evident that the selected site is well-related to the existing settlement and its linear pattern. Widening the range of housing is also an evident potential benefit. With regard to my enquiry, and

representations from others, about site foul drainage I am directed to the content of Appendix C; whilst that addresses SUDs drainage it does not specifically address the feasibility of foul drainage capacity for 16 dwellings. Further input is invited.

Whilst further queries may yet arise as I write up my Report, I believe the above are the major issues on which both the Qualifying Body and the local authority may wish to comment.

Kind regards

Andrew

Andrew Matheson MRTPI
Independent Examiner

Haversham-cum-Little Linford
Neighbourhood Plan
Policies Map Inset 2 Old Haversham
July 2022

Key

-  Parish Boundary
-  HLL1 - Settlement Boundary
-  HLL2 - Land south of 27 High Street
-  HLL6 - Non-designated heritage assets
i. Land at Old Haversham
-  HLL8 - Existing footpaths and
bridleways (also part of HLL9)
-  HLL9 - Existing green and
blue infrastructure network
-  HLL10 - Important views
-  HLL11 - Community Facility
f. The Greyhound Pub
g. St Mary's Church
h. Sailing Club

