

**HAVERSHAM-CUM-LITTLE LINFORD PARISH COUNCIL
NEIGHBOURHOOD PLAN**

RESPONSE TO THE EXAMINERS QUESTIONS

Project: The Haversham-cum-Little Linford Neighbourhood Plan (HcLLNP)
Date: March 2023

The Parish Council is grateful for a further opportunity to respond to the examiner's clarification points.

Examiner's question:

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.

Response:

The suggested boundary continues to capture the important value of this area identified in the evidence base. The Parish Council therefore agrees with the examiner's proposition on amending the proposed area.

Examiner's question:

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

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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.

Response:

Clause B of Policy HLL4: Zero Carbon Buildings clarifies how the acceptability of a 'trade-off' should be interpreted. Although meeting these standards ought not to compromise a scheme fitting in with the character of a local area, on occasions this may be the case. It therefore allows for some degree of flexibility where a scheme will not have a significant harmful effect on the character area. It is agreed that the last revision of the NPPF enhanced expectations of good design, but it is not considered that it does so at the expense of mitigating and adapting to climate change noting specifically the provisions of paragraph 126 which seeks not only high quality and beautiful buildings and places but sustainable buildings and places. Seeking to meet the objective for new homes to achieve high energy efficiency standards and avoiding financial liability for future retrofit is considered sustainable and ought not lead to any significant harmful effect on the character area given the requirements of Clause B of Policy HLL4. The 'trade-off' in Policy HLL4 will apply to the allocated site and any scheme which comes forward will have to strike the right balance between creating high quality, beautiful and sustainable buildings and place. It is considered that all clauses in Policy HLL4 are policy, both Clauses B and C are necessary to retain as part of the policy as providing an incentive for higher energy efficient buildings.

Examiner's question:

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.

Response:

The Parish Council has sought further clarification from the landowners on this matter and a response is attached along with a sketch map. The Parish Council continues to be satisfied that a viable scheme in accordance with Policy HLL2 provisions can be delivered on this site.

Like many of the dwellings in Haversham, the site is not within reach of utilities drainage and provision will need to be made on site. The proposals are based using Packaged Wastewater Sewage Treatment Plants

A sewage treatment plant provides a more comprehensive treatment process than septic tanks and the waste water from a sewage treatment plant is far cleaner than from a septic tank, the liquid waste being clean enough to be discharged into a pond, or a constructed drainage field/infiltration system. The level of treatment of the wastewater will determine the drainage field system size. If a packaged system is installed, the drainage field can be reduced up to 20% compared to one for a septic tank

The installations will be specified and installed to BS 6297:2007 & A1:2008 Code of Practice for the Design and Installation of Drainage Fields for use in Wastewater Treatment and in accordance with Building Regulations 2010 H - Drainage and Waste Disposal.

The site is located in an area of loamy clay soils with slightly impeded drainage and a drainage field will work with these ground conditions and the site topography. The proposals have been discussed with contractors who do not consider this to be a development abnormal given the site location.



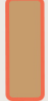
The attached plan Drainage Strategy_v3 shows the principles for a layout based on the Illustrative Layout prepared for the neighbourhood plan with a perimeter drainage field and individual packaged plants type A for the housing. A shared packaged plant type B which might be considered for the affordable dwellings fronting onto the High Street as it would have advantages in terms of management. This will be discussed with the Registered Provider as the scheme is developed.

There is sufficient area across the site to accommodate the packaged treatment plants for 16 dwellings and the layout has the flexibility to be adjusted to meet the detailed design requirements if needed, such as in the alignment of the Lane to balance out the areas of drainage field on either side of the site.

Surface water management will be an integrated part of the drainage design and it may be that attenuation incorporated the Lane and entrance square is preferable, in which case the SUDS pond indicated on the illustrative plan would become available as part of the open space/drainage field.

Land south of 27 High Street, Old Haversham: Drainage Strategy_v3

KEY

-  DRAINAGE FIELD
-  PACKAGE TREATMENT PLANT type A
-  PACKAGE TREATMENT PLANT type B

