

Haversham-cum-Little Linford Neighbourhood Plan

Summary of responses received to Regulation 16 publicity period

Canal & River Trust	<p>Thank you for clarifying that the parish boundary runs adjacent to the Grand Union Canal for a short distance. Despite comments at an earlier stage of the plan there is little recognition of the canal in the document although it is now mentioned as a separate entity from the Ouse Valley Park. The plan now states 'The Grand union Canal, the longest canal, forms a small part of the parish boundary at Stanton Low Park.' Surely this should say that the Grand Union Canal, the longest canal in the country.' There is still no other recognition of the canal.</p>
National Highways	<p>Due to the rural nature of the parish and no specific allocation of land for large-scale residential and employment sites within the local area, we considered that the Haversham-cum-Little Linford Parish Neighbourhood Plan is not expected to have any significant impacts on the operation of the SRN in the area due to the limited level of growth proposed across the parish which is envisaged by the Neighbourhood Plan.</p> <p>Henceforth, we have no further comments to provide and trust the above is useful in the progression of the Haversham-cum-Little Linford Parish Neighbourhood Plan.</p>
Natural England	<p>Natural England does not have any specific comments on the Haversham-cum-Little Linford Neighbourhood Plan.</p>
Sport England	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below,

	<p>consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p>
Pauline Andrews	<p>The proposed Neighbourhood Plan site submitted to you for development by our Parish Council is, in our opinion, wholly inappropriate for the following reasons and we would request you take these into consideration when making your decision. Without your intervention, any referendum will be a foregone conclusion.....the resident numbers in Haversham Estate together with Little Linford, far outweigh the number of residents in the Old Village which is where this site is proposed. It is the only site proposed and is for the wrong types of houses in the wrong place.....we are in your hands..</p> <p>1) Our Parish Council has advised us that roads and traffic are outside the scope of preparing and proposing a suitable development site for a Neighbourhood Plan !!</p> <p>So, it would seem, are the lack of facilities.</p> <p>The site proposed to you in The Old Village has no mains sewage, gas, shops or routed bus service, poor lighting, and narrow pavementsthis was the main reason given by MKC to refuse planning for 2 houses in the grounds of the Greyhound Public Housenothing has changed..... and this is for a lot more houses and even further away from any facilities.</p> <p>2) Honestly.....the photograph submitted to you on the plan showing the clear view for traffic and access is totally misleading..... as many commuters, locals and residents will tell you.</p> <p>This is a busy narrow road with a volume of traffic particularly between 7am-9am and 4pm-6pm also frequently used by agricultural machinery. Traffic coming down the narrow hill, sometimes at speed, are forced onto the other side of the road into oncoming traffic to avoid the parked cars of residents, some of which have no alternative parking area. We are in the direct vicinity to hear the tooting of their horns, and together with our neighbours, have had cars damaged as a result. Getting in or out of a drive can on occasions be downright dangerous. The Chair of the Parish Council in the village magazine acknowledges that there is a need for a Speedwatch group for the village and that people are parking on pavements which we do not condone....but we would suggest it is to avoid the situation described.</p> <p>Despite a number of neighbours raising these concerns with our Parish Council, they have now shown us the professional illustrative housing layout for this proposed planned development site, and types of</p>

houses, presumably from a developer. The plan shows a row of terraced houses whose front doors are indicated to be directly opposite The Old Post Office, 34 and 36 High Street, all facing this affected part of the road. The parking on the plan proposed for these houses is some distance away and unlikely to be used for parking or deliveries to these houses, Our Parish Council advises that these illustrative plans have not been submitted to you, but shown to us. If parking occurs outside these houses, it will make a bad situation even worse.

3) The types of houses on the plan show family size homes The pavement is at best 1.4m wide with traffic brushing your shoulders....therefore we fail to see how this site is suitable for the considerable walk to a bus stop or to school or shops resulting in more car trips. A consensus of opinion from the village was that they would agree to a suitable site for properties for local people to either downsize or for local young people, yet the proposed housing does not reflect that. We see no restrictions in the form of covenants to ensure that these are for local people, nor any restrictions on Permitted Development, so these homes could become a whole lot bigger than portrayed, and not what the village agreed to.

Very recently our Parish Council objected to a planning application for a house to have black cladding, it was deemed unsuitable for the old village and within the proximity of Haversham Grange. In direct contradiction, they submit a proposed Neighbourhood Plan showing houses covered in black cladding in the same or similar proximity?

4) Site 11 or "Triangle" as it is known locally, is a wildlife habitat and home to badgers, muntjac deer, and where birds nest undisturbed. It is regularly covered in the Nature Notes of the Parish Magazine. It is a place where wildlife escape the harvesters of the surrounding fields.... and the only green space in the Old Village free to access for villagers to meet and enjoy. It is regularly used and would be sorely missed if it was to become just another road of houses.

When raising, some years ago, this site's wall crumbling onto the pavement and the duty of care, one Parish Councillor said that this site had already been earmarked for development, and the wall issue remains.

5) There is no doubt that many hours have been spent putting together this Neighbourhood Plan, and a number of other sites have been ruled out for various reasons by our Parish Council, leaving only this bad choice. Whilst it is understood that the motivation to put forward a Neighbourhood Plan is well intentioned to avoid bigger future developments, I would question the need for this site to be included at all in a Neighbourhood Plan by our Parish Council as it is not a requirement of MKC.

As residents who will be directly affected by this proposed development, a number of households including ourselves, have written on numerous occasions to our Parish Council over the last couple of years offering our views, concerns and constructive criticism. These have been both dismissed and discounted as NIMBYism by our Parish Council in their pursuit of ANY Neighbourhood Plan regardless of this site's suitability. We love and care about where we live and hope

	<p>that you agree we have demonstrated above that our objections are better founded than that.</p> <p>I wrote to David Blandamer on the 9th Nov 2021 raising these points at the pre submission stage. He kindly replied on the 18th Nov 2021 advising that it was up to our Parish Council as to what land was allocated in the plan, but despite a number of affected villagers' previous written views being sent to our Parish Council, as in the case of Respondent 14, our views have had little or no effect and been discounted, as evidenced by the plan submitted.</p> <p>We understand and are pleased that by writing to you these views will now be publicly available and would ask you to remove this proposed site from the Haversham Neighbourhood Plan.</p>
<p>Cllr T Rollason Wolverton and Greenleys Town Council</p>	<p>I support this statement and agree with the ambitions regarding embodied energy and Passivhaus, a point to note is that Passivhaus is a German energy standard and as German houses are larger than British ones with each resident expected to have 30m² and British residents have nearer 20m² which means the passivhaus standard is suitable for larger detached individual houses or row houses and this should be considered as it may exclude options especially for smaller social housing unless they are in a row.</p>
<p>Julia and Ian Cheetham</p>	<p>Thank you for the opportunity to comment on the latest version of the Neighbourhood Plan.</p> <p>Having read the documentation it appears to us that the current consultation exercise is limited to whether the current draft complies with National and Local Planning Law, Policy and Procedures. Clearly a difficult task for lay people to undertake.</p> <p>We have responded to all consultation requests and there is little point in repeating points made in earlier consultations, partly because the earlier points appear to be outside the scope of the current consultation but mainly because little attention appears to be taken of any of the points made by residents.</p> <p>Our points to the Regulation 14 Consultation are included in the documentation on the consultation process as respondent 9. Over twelve pages of residents' comments are included and these resulted in two changes to the draft Neighbourhood Plan. One of the two changes was also requested by Milton Keynes City Council. No feedback on the individual points we raised was provided. It appears that this consultation exercise consists of requests for comments, consideration of the comments, little change and no feedback. This may be because the Parish Council have been advised by O'Neill Homer to carry out the process in this way and this is how the exercise is carried out throughout the country. It is certainly not our experience of consultation in other walks of life.</p> <p>We were somewhat surprised to read that O'Neill Homer were acting on behalf of the landowners for site 11, the only site that has been included in the Neighbourhood Plan for development. This on the face of it could appear to be a "conflict of interest ". Somewhat cynically, we assume a comment like this is either outside the scope of the consultation or deemed not worthy of a response.</p> <p>Despite our disappointment with the consultation process and the proposed development, we would like to thank the Parish Council and</p>

	<p>their team of volunteers for all the work they have undertaken on what is clearly a complex process. There are some excellent documents in the Neighbourhood Plan and clearly a lot of people have voluntarily given considerable amounts of time over a number of years to produce this Plan.</p>
Harvey Gilbert	<p>My comments are as follows.....</p> <ol style="list-style-type: none"> 1. I would like to thank all participants in the Neighbourhood Plan process. This has been a long and arduous process made worse by the delays and difficulties of operating through the Covid pandemic. 2. The vast majority of the plan as submitted is great work and has my approval; it provides a good local framework for the near future of our neighbourhood. 3. Invariably the proposed Housing Development is seen as the headline issue, and I would like to comment on that proposal. <ol style="list-style-type: none"> a. The two surveys carried out arrived at an overall conclusion that there is a housing need in Haversham and that this can be expressed simply as, for a small housing development consisting of predominantly affordable housing. Yet the proposal outlined in this document is stated as conforming to Policy HLL2, which amongst other things states a minimum mix of 31% affordable housing. b. I understand how we have arrived at the proposal to go forward with the site to the North end of High St in the old village but to my mind, the process has let us down. We have arrived at the least-best opportunity on a site with no bus route which will have a disproportionate impact on its very local environment. c. In my opinion, the site that should have been explored much more intensely is the North end of the Recreation Ground. This site is already owned by the Parish Council, is on a bus route and would have a lower impact on its immediate environment in terms of additional traffic etc. 4. Overall, I propose to support this plan and to vote for it in its current format. I would not like to see Haversham without a Neighbourhood Plan. 5. However, if the developer of the site to the North end of High St proposes a plan with less than 50% affordable housing I will object to it. 6. One last thought. If this plan were to be rejected in the upcoming voting process, as part of the ongoing review process, I would like to see the site owned by the Parish Council at the North end of the Recreation Ground reviewed and reconsidered as part of the ongoing review process.
Milton Keynes City Council	<p>Policy HLL2</p> <p>Bii - For clarity, the policy should state that it is MKCC's First Homes Policy Position Statement.</p> <p>Biv – Typo, should refer to Policy HLL5.</p> <p>Bviii – amend to read “A foul water strategy that avoids unacceptable environmental harm is prepared and approved for approval by the local planning authority to address the absence of a connection to mains drainage to serve the site.”</p> <p>Bix – amend to read “A sustainable drainage strategy is prepared and approved for approval by the local planning authority to address the effects of surface water run-off within and adjoining the land”</p> <p>Bxi and xii – is not clear what is meant by “current standing advice”.</p>

	<p>Bxiv – the wording should also refer to relevant SPDs.</p> <p>Policy HLL3 Aii-iv - It is not clear how the maximum scheme size and site area has been arrived at. The key factors to consider are that development should be proportionate to the size of the settlement and should meet a demonstrable need.</p> <p>Aiii – gretaer clarity required as to what is meant by ‘main road frontage.’</p> <p>Policy HLL4 The policy should be amended to state that developments will be required to meet the policy criteria unless it is demonstrated that meeting the criteria would be unfeasible and/or unviable.</p> <p>Policy HLL5 The statement ‘reflect heritage assets’ in criterion Ai is too vague.</p> <p>Policy HLL11 The policy shouldn’t rely on criteria from policies in another Plan (i.e. Plan:MK). Clause B of the policy should set out relevant exceptions for when change of use of community facilities would be acceptable.</p> <p>Policy HLL12 A development proposal cannot be required to go beyond mitigating its own harm and impacts.</p>
Rachel Rothwell	<p>I am writing in reference to the requested planning permission for site 11.</p> <p>I live directly opposite the proposed site.</p> <p>Firstly I find it a shame to build on an area which is home to many wildlife and also to block our lovely view to the countryside which was one of the reasons we chose to live here.</p> <p>If the build proposal is agreed I strongly object to the five front facing houses which will impede on our privacy and give a direct line of sight into my home and mine and my sons bedroom, the plot is not far in distance from our house and so the intrusion will have a considerable impact to our privacy and view. I also strongly object to these houses because it will be inevitable that the owners will chose to park on the road as many of our neighbours already do, and even though parking is available it WILL happen as they are family homes and will be most likely to be more than one car families, this will cause a huge impact to our access and also the safety to enter a very busy and fast road. The turning circle to leave our drive already takes up the whole road so if another row of car’s are added we will not be able to leave or access our property easily.</p> <p>The road itself is not wide and the traffic is very busy and fast, at the moment crossing the road to walk the dog is dangerous and adding additional cars to the road will mean the view of oncoming traffic will be impeded and more dangerous.</p> <p>I also would like to know if it is decided to move forward with this build that the lorry’s, trucks and builders car’s will not cause us disruption and as mentioned above cars are not parked causing us problems to access to my property.</p> <p>The dark cladding which is proposed in the documents has already been rejected by the Parish itself when we requested this for our home, in their own words “The Parish Council objects to this application on the</p>

	<p>grounds that the proposed plans are out of character with that of neighbouring properties on the High Street. Specifically, we consider that the proposed cladding using dark stained timber and dark slate is visually out of keeping and will have an overbearing appear I hope these houses are seriously reconsidered as they will cause issues to our safety and living environment.</p>
Mrs H Reed	<p>I am a long time resident of Haversham and am writing to you as I believe the Neighbourhood Plan submitted to you presents a site that is inappropriate.</p> <p>I understand the amount of work and time that the Neighbourhood Plan steering group have carried out in uniquely difficult circumstances. The layout of Haversham creates particularly difficult problems regarding voting with the original old village High Street and Little Linford having approximately 60-70 houses in total, predominantly built pre 1900 and the Wolverton Road about 255 houses all built post 1920 and adjacent to open accessible farmland. I suggest that any vote by residents of Haversham for a development in the High Street or Little Linford will have a foregone conclusion such is democracy.</p> <p>Unfortunately I do feel that this plan has been drawn up to 'get the job done' as quickly as possible. I am sure one of the reasons is due to the recent large development of Hanslope which we are led to believe was caused by their lack of a Neighbourhood Plan but in spite of the particular difficulties I do not feel that sufficient consideration has been given to selecting both the size and location of the chosen site.</p> <p>I note below just some of the more relevant points that in my opinion need to be considered in respect of rejecting the site.</p> <p>I believe that the site recommended in the Haversham plan will unnecessarily sacrifice the historic detail of Haversham, destroy the only green space in the High Street and quality of life for residents. Lack of sustainability ... the development must be unsustainable due to the proximity to shops, schools, social facilities, jobs and how accessible these are for non car modes of transport. As the suggested site includes affordable housing this seems utterly illogical.</p> <p>I note that a previous small planning application in the High Street was rejected due to lack of sustainability and so do not understand how the proposed site can even be considered as it is further away with the one narrow pavement and a dangerous crossing.</p> <p>There is one narrow pavement along the High Street by the narrow village High Street road that requires a dangerous crossing near a right angled bend at the bottom of a hill to access schools and all other facilities.</p> <p>The High street has no mains drainage so the site presumably will require a large water treatment plant that will require servicing and so more cost to the residents plus more lorry movements.</p> <p>Access to the site is not straightforward and I am informed there are sufficient sightlines however although I am told traffic is not a factor when considering planning I assume the health, safety and well being of potential residents is. For the record I note in May 2019 Highways carried out a vehicle count check in the High Street that registered a 5 day flow average of 3,401 vehicle movements per day in a narrow country lane a further 20-30 vehicles accessing the suggested site will</p>

	<p>just create further problems causing pollution, noise and thus dangerous to the health of the potential residents. Even at the height of Covid the new Speed indicators showed 1600+ movements per day including several 40 tonne commercial vehicles on the narrow High Street that are so large they straddle any white lines and emit significant fumes.</p> <p>I note that a high proportion of properties adjacent to the High Street are less than 2 metres from this narrow High Street.</p> <p>The proposed site is very close to listed properties (mentioned I believe in Domesday book) and so will further destroy the traditional linear style common to several of the historic villages around Milton Keynes. Much of the High Street is traditional, I do not think that the design requirements are sufficiently stringent and are not sufficiently in keeping with most of the neighbouring properties.</p> <p>The site stands below a very significant south facing hill that slopes towards the centre of the High Street the amount of hard surfaces essential in any development will create dangerous run off which is already a significant problem with the current drainage system. There are significant agricultural drainage structures on the site supporting this drainage problem.</p> <p>The site has a frequently used footpath/bridleway and contains a significant level of wild life developing this site will destroy their habitat, as well as substantially increase risk of severe flooding and destroy the only green space in the High street.</p> <p>The number of properties suggested must surely be excessive. I am not against new housing but I do not believe the site suggested in the Neighbourhood Plan is the most suitable or sustainable in Haversham. Finally I am told that the expert professional advisers advising the Neighbourhood Plan steering group are able to also advise the owners of the site. I can only express doubts as to how there can be no conflict of interest which in itself is a controversial phrase currently under much public scrutiny. I am disappointed that this is not actually prohibited by planning authorities.</p> <p>Probity must be obvious so there is no doubt in matters such as this. I would ask you to reject this site.</p>
<p>O'Neill Homer on behalf of landowner of land south of 27 High Street, Old Haversham</p>	<p>The landowner has worked with the Parish Council to revise the information provided in support of the allocation to reflect the comments received during the Regulation 14 consultation and confirms that the land is still available and the proposals put forward in the supporting information are viable and deliverable under the conditions set out in Policy HLL2: Housing Development of the Haversham-cum-Little Linford Neighbourhood Plan.</p> <p>The landowner will continue to work with the Parish Council following the allocation of the site during the development of a planning application to ensure the scheme meets the ambitions of the neighbourhood plan.</p>
<p>Rob Coles</p>	<p>INITIAL COMMENTS/THOUGHTS</p> <p>I have commented before and these are identified as Respondent 14. I have no intention of re iterating those points here, but still feel they are essentially still valid.</p>

With the benefit of time passed I think I would still say that the plan seems to lack a strong vision of how the community of Haversham could be enhanced into the future, the aims and suggestions still seem quite downplayed. There is no analysis included into the character of the villages, so very little guidance emerges as to what could be permitted. I'm afraid that what is written about design parameters is so shallow as to be almost meaningless. In developing the plan over the years, it is unfortunate that it has focused on small areas of potential development, and not pursued the widely known opportunities for far more significant development, and in far more sustainable locations. I have to say upfront that I do live opposite the chosen development site, and I'm sure these comments will be therefore seen as a case of NIMBY ism. However, it isn't. I've been in the development and design industry for 40 years, it's been my career, so I am not opposing development now. Most of us around site 11 I believe accept that development is very likely here, but my concern is the policies being put in place to guide it, and any other areas.

COMMENTS ON THE CURRENT PLAN.

Introduction and background section, para 1.1 ff

In para 1.3 the question is asked, does the plan provide principles for sustainable development, and does it comply with European law? In para 1.4 it asks has it engaged with the local community?

In response to the first of these questions the overall policy seems to promote sustainable design in terms of zero carbon emissions, policy HLL 4, 8, 12 etc, but in relation to specific site 11, the principles do not appear to apply. There is at this location no drainage, no bus stop, no easy access to school ,and community facilities, no easy access to open space and play, whereas these facilities are all available in the main village, where in addition it is only a 10-15 minute walk to the railway station. This is not a theoretical point, but one which has been raised by the planning authority in response to various applications on properties on the High Street.

With reference to the law, I cannot comment and am not qualified to speak. However, it had been noted at this stage by several people locally that O'Neill Homer, whilst employed by the Parish Council to assess the various sites' potential earlier in this process are also acting for one of the site owners themselves, which turns out to be site 11, chosen for development. I am aware of the practice of building 'Chinese walls' to cope with this type of situation within a company, and it may well be that sturdy protocols have been put in place, but it does seem to represent a potential conflict of interest, and certainly has raised eyebrows locally.

Finally, in response to the question of engagement, I think the parish council has done all it can in the difficult period of Covid restrictions. However, in relation to the chosen development site, there has been no specific contact with those affected as a group of villagers. I think this would have been good practice, and good manners given that the plan suggests all proposed development in this one location.

COMMENTS ON SPECIFIC POLICIES.

Policy HLL2.

16 units seems unrealistically high, given the requirement for flood protection, sewage treatment, maintaining the existing tree and landscape, footpaths, horse paths and existing wildlife on the site! The plan also encourages a linear street frontage with views through to the country. All of which seems to make 16 units unworkable. The paras iii, v, vii, viii, ix, x, xi, xiii, and xvi refer to the requirements to fit onto site 11.

Para 5.9, I am not convinced that an 'on demand' bus is really the answer on a regular basis, given that we intend this site for those in affordable homes, who may be elderly or with young families. (I have used the on demand service, but I'm able bodied, with no particular time deadline to meet and reasonably IT savvy!)

There is no design guidance given to guide suitable development. It would be normal to include atleast suggested heights, materials, layout priorities, key frontages, privacy for existing dwellings, garden sizes, open space/play etc etc. In this case the impact of the adjacent listed buildings and their outbuildings would be very important, as was considered recently in comments from the planning authority on the proposed redevelopment of Steadgate', opposite site 11.

Policy HLL4. A good policy for sustainable low energy homes. Good to reference to HLL2

Policy HLL5. Regrettably it is possible to imagine almost any development meeting this policy. It needs substantially strengthening in order to impact what could be built here.

Policies HHL 8,10, 12, Are all good and could be referenced from HHL 2 to make the points more strongly.

SUGGESTED ACTIONS.

Priorities

Omit reference to a specific number of units on site 11

Produce a diagrammatic design plan for all development sites seriously under consideration indicating key constraints and opportunities.

Suggested

Add some work on village character and use it to establish stronger guidance for any site within HLL. Add to this guidance some thoughts how the wider requirements of the plan like views to the countryside and links to paths should be accommodated onto development sites

Make design quality guidance more Haversham specific and more robust. HHL 5.

Checkout the robustness of the site selection process to avoid future problems.

Ideally

	<p>At least approach again significant landowners within New Haversham to discuss the likelihood of major developments and advise that design guidance be applied to these areas as well.</p> <p>Review wider vision for HLL. For example, measures which could encourage local businesses and employment opportunities, ways to make better use of open space, ways to connect better to the City of Milton Keynes in terms of pedestrian and cycle links and the green spaces, parks and ecological corridors. Ways to connect better the old and new villages of Haversham, and increase pedestrian safety and wellbeing.</p>
<p>Stantec on behalf of L&Q Estates</p>	<p>As background, L&Q Estates have land interests within the Parish which were promoted to Milton Keynes Council as part of the preparation of Plan:MK at North Milton Keynes and are being promoted through the Plan:MK review process.</p> <p>Representations were submitted on behalf of L&Q Estates in response to Haversham-cum-Little Linford Parish Council’s consultation of the Pre-Submission Plan in April 2022 (a copy is enclosed at Appendix 1). The following representations do not seek to rehearse previously made points (which are taken as read) and instead build up our earlier representations, with specific focus on the new ‘Supporting evidence for Policy HLL10 Important Views’ document published alongside the Plan.</p> <p>Policy HLL10 Important Views</p> <p>Within our earlier representations we commented on the lack of evidence base to justify some of the identified views. In this regard, we welcome the preparation of the further evidence relating to ‘Important Views’.</p> <p>However, we do not support all of the content of the document. Firstly, the evidence base for Policy HLL10 should be revised to refer to the updated 2022 Milton Keynes Landscape Character Assessment (within which all of the view locations lie within Landscape Character Type (LCT) 2 Undulating Valley Slopes; Landscape Character Area (LCA) 2a. Ouse Northern Undulating Valley Slopes).</p> <p>Moreover, the evidence base should be revised to remove views which include detracting features identified in the published character assessment; or where reliance is placed on the degraded condition of features which actually require maintenance and restoration, as also set out in the published character assessment.</p> <p>On a related point, the published character assessment identifies ‘unclipped hedges’ as a ‘key characteristic’. This is relevant as at various points the supporting evidence includes views (including views 3, 8, 9 and 10) which are obtained across a landscape rendered more open by lack of the locally distinctive unclipped hedges, replaced by fencing or clipped hedges. Management guidance for LCT 2 states: ‘Conserve and strengthen the traditional landscape pattern and structure, as well as increasing biodiversity interest through the maintenance or restoration of hedgerows with native species. Consider the addition of hedgerow trees to provide additional structure in the landscape.’ The supporting evidence should be reviewed in this respect.</p>

The document should also specify what constitutes a 'significant adverse impact' as without any robust criteria the requirement to avoid such impacts is unsubstantiated.

We recommend that the constituent elements of each view should be broken down to identify which are the key focal features and which are the subsidiary focal features. For example, in various views, there are features which are not representative of high-quality aspects of the landscape (as set out in the published character assessment) and which are clearly not as important for maintaining in the view as other elements. These features should be recognised as of lesser or no importance on the basis that any change in views of such features would be very unlikely to have a significant adverse impact.

In respect of specific views, we have the following comments:

View 2

As set out in our earlier representations, the view shown only exists as a result of a large gap in a locally distinctive unclipped hedgerow which has not been subject to positive management to maintain the structure and integrity of the hedgerow.

Guidance for LCT 2 states: 'Conserve and strengthen the traditional landscape pattern and structure, as well as increasing biodiversity interest through the maintenance or restoration of hedgerows with native species. Consider the addition of hedgerow trees to provide additional structure in the landscape.' The description of LCA 2a states that 'hedgerows are in variable condition'. By way of contrast, the hedgerow flanking the southern side of High Street, to the north of this viewpoint, is intact and coherent, albeit has been partly clipped. Given this evidence in the published character assessment, it is not considered appropriate that the Plan should contain a policy that refers to an Important View which is clearly representative of a degraded condition of hedgerow; and where the character assessment states hedgerows should be 'maintained' or 'restored'.

Furthermore, the left-hand side of View 2, as shown in the supporting evidence, includes an example of what the published commentary for LCT 2 describes as 'out of character conifer shelter belts and hedgerows.' It is not considered appropriate that the Plan should contain a policy that refers to an Important View which includes a notably prominent example of an identified detracting feature of the published character assessment.

To the right-hand side of this view (not shown in the photograph), the urban edge of New Haversham is clearly evident. The published guidance for LCT 2 states that a development management objective is to '...improve the suburban edges of settlements such as Olney through the use of native hedgerows and woodlands...' Again, it is not considered appropriate that the Plan should contain a policy that refers to an Important View which includes a notably prominent example of an identified detracting feature of the published character assessment. Taking account of the above, View 2 should be removed from the policy.

View 5

Page 9 of the supporting evidence incorrectly sets out that 'this point has uninterrupted views in all directions' when in reality the view is

	<p>from the junction of four hedgerows which form substantial interruptions in the views obtained.</p> <p>In addition, it is incorrect to describe ‘...views in all directions of agricultural fields edged by mature mixed hedges...’ as the view to the south-east is of the exposed edge of New Haversham, at a distance of only approximately 200m (not ‘in the distance’ as the document suggests).</p> <p>The published guidance for LCT 2 states that a development management objective is to ‘...improve the suburban edges of settlements such as Olney through the use of native hedgerows and woodlands...’ It is not considered appropriate that the Plan should contain a policy that refers to an Important View which includes a notably prominent example of an identified detracting feature of the published character assessment.</p> <p>View 5 should be removed from the policy, or at least that part of it which is directed at the urban edge of New Haversham.</p> <p>View 6</p> <p>The supporting evidence incorrectly suggests on page 10 that View 6 ‘illustrates how the urban development of New Haversham in the 1930s was achieved with limited impact on the rural character of the wider locality.’ In fact, as is seen in View 5, the urban development of New Haversham has a notable visual influence on the wider landscape to the west. As such, the comment provided within the supporting evidence, which is not substantiated, should be removed from the description of View 6.</p>
Ed Neal	As a resident of Haversham, I would like to submit my support for the Haversham cum Little Linford neighbourhood plan.
Derek Jones	<p>I strongly support the concept of a Neighbourhood Plan and associated community consultations as an enabler of development & evolution of the local built-environment. However, I am equally keen that such consultations are approached in a way that maximises the opportunity for consensus to arise, rather than as has more usually happened in the case of HcLL where naturally arising good-will has been repeatedly & comprehensively damaged, often by what appeared to be clumsiness and/or ineptitude.</p> <p>From an early stage, I would have like much stronger, crisper “policy intents” relating to important topics within the consultation – such as eg floodwater drainage/ drainage maintenance, biodiversity, active traffic-calming, maintaining agricultural viability, litter removal, POSITIVE amenity development, preferential considerations (for resulting homes) and other important aspects that are dear to villagers’ hearts. By being so “out-of-tune” with what is important to many parishioners (esp. in the old village), as indicated through such glaring omissions, my overall impression was that the 2020 process was a missed opportunity that undermines the validity of this & future consultations.</p> <p>1. Concerns about development in the lower village: Affordable homes are strongly supported by Haversham residents AND most needed. Affordable homes seem more achievable from development in the upper village, rather than in the lower village. Threats to affordability by development within the lower village include (not in order of</p>

importance):

- Local infrastructure & services: Town gas & mains drainage are key requirements of affordable homes. There is currently no town gas or mains drainage in the lower village. Introducing these services has been overwhelmingly opposed in previous consultations and, in any case, also ruled-out by technical impracticalities. The alternatives of oil tanks & septic tanks respectively represent sources of significantly increased building costs (elaboration can be provided), as well as above-average running costs that are also at-odds with maximising affordability.
- Local amenities: Ease of access to local amenities should be maximised. The sites in the lower village are situated in least proximity to important amenities (Shops, Buses, School & Social Centre) and, as such, are self-evidently less in tune with needs of people that would seek the social/ affordable housing approved of by residents in previous consultations. Any development in the lower village would result in residents – especially children – who need to walk to amenities having to go further and climb the poorly lit, very steep (and dangerous) connecting road between the two parts of the village.
- Character of lower village: Maintaining an “in keeping” requirement in the lower village. Most existing properties in the lower village are constructed from stone. To be in keeping with the existing character of the lower village, developments involving more than 1 or 2 properties would need to be similarly & sympathetically constructed, so costlier to build (elaboration can be provided) and consequently less affordable. Also, the lower village has been a linear settlement for many centuries. Development on the sites that are situated behind existing properties (sites 5, 10 & 11) would represent a radical & negative departure from the existing character of the village. Such would also have an adverse effect on the outlook - and the market value - of the existing properties and access connections raise safety concerns from the ensuing additional traffic.
- Risk of drainage floodwater: Requirements for countermeasures and need to be robustly stipulated. Unless substantial countermeasures are adopted, development at eg site 10 (especially – but possibly at other sites, as well) could exacerbate the already high risk of drainage floodwater running off from the higher elevations to the North-West of this site. (see Learn more about this area's flood risk - GOV.UK (flood-warning-information.service.gov.uk) Countermeasures relevant to this hazard aren't stipulated in “Policy Intent 1” so, to the extent these may be adopted, they would instead be decided by the developers and risk being scrimped upon. To be effective, the countermeasures required would significantly increase building costs (elaboration can be provided) and further detract from affordability. Irrespective of any focus on development, it seems to me that the lack of focus & matching policy intent by the parish & municipal authorities on the general topic of flood risks in Haversham is an astonishing and potentially calamitous omission. I would strongly urge that the village plan is significantly and urgently revised to address this far more tangible issue that is currently threatening Haversham's residents & community assets.

2. Concerns about the process: Because of the Covid pandemic, the consultation process has of necessity been truncated and, despite the best efforts by the villagers involved in the steering group, the process so far has resulted in a lack of sufficient

	<p>transparency, objectivity & fairness which creates a likelihood of a flawed, potentially unrepresentative outcome: • Current constraints: A village meeting could not be convened so representative opinions / acceptance of what is fair & reasonable to residents appear to have only had a very limited influence on how the process has been conducted (so far). In consequence, many people say they find the information & explanations provided (about the process) are unclear & confusing. Others will provide detailed submissions that elaborate on these concerns. • Prospective development sites: According to the consultation booklet, 11 sites were originally considered for prospective development but, the specific reasons for eliminating each of the 6 excluded sites are undisclosed so the justifications for the outcome aren't clear. This lack of transparency has undermined trust and the prospect of developing a ready consensus. • Location of sites: Upper Haversham has (approx.) 300 households but only 1 nominated site has been carried forward. Lower Haversham has (approx..) 50 households and 4 nominated sites have been carried forward. Development on one (or more) of the 4 nominated sites the lower village will have a disproportionate impact on its population. This approach seems to be a very skewed and unfair way of proceeding. • Survey: The voting method of 1-5 being used is flawed because it doesn't anticipate / cater for showing the strong disapproval many have for individual site. Sieve 2 needs to be a lot more open & transparent, especially about why individual sites are being accepted / rejected. The absence of an opportunity for dialog – even accepting the pandemic restrictions – is a huge flaw that risks leaving the consultation process wide open to subsequently being challenged and/ or disregarded, especially by developers. Instead, an opportunity for dialog could be provided (to a reasonable degree) through - say - a 10-session program of online meetings involving up to 40 people/ session over 2 weeks. These and/ or other measures could feed into an online FAQ library for those unable/ disinclined to participate.</p>
<p>Lavinia and David Cowin</p>	<p>Having read the documentation it appears to us that the current consultation exercise is limited to whether the current draft complies with National and Local Planning Law, Policy and Procedures. Clearly a difficult task for lay people to undertake.</p> <p>We have responded to all consultation requests and there is little point in repeating points made in earlier consultations, partly because the earlier points are deemed to be outside the scope of the current consultation but mainly because little attention appears to be taken of any of the points made by residents.</p> <p>Our points on the Regulation 14 Consultation are included in the documentation on the consultation process by respondent 9. Over twelve pages of residents' comments are included and these resulted in two changes to the draft Neighbourhood Plan. One of the two changes was also requested by Milton Keynes City Council. No feedback has been offered on the individual points we raised and overall. It seems that the consultation exercise consists of requests for comments, consideration of the comments, with little resulting change and,</p>

	<p>importantly, no feedback. This may be because the Parish Council have been advised by O'Neill Homer to carry out the process in this way and this is how the exercise is carried out throughout the country.</p> <p>Like any residents of the parish we were surprised to learn that O'Neill Homer were acting on behalf of the landowners for site 11, the only potential development site included in the Neighbourhood Plan. This appears to be a conflict of interest ".</p> <p>Despite our disappointment with the consultation process and the proposed potential development, we would like to thank the Parish Council and their team of volunteers for the work they have undertaken.</p>
<p>Bidwells on behalf of Vistry</p>	<p>We have promoted parts of this land to the Parish Council throughout the earlier stages of preparing the Plan and during this process met with representatives of the Parish Council to discuss the merits of allocating part of the land within Vistry's control for residential development. As was expressed to the Parish Council through the Regulation 14 consultation in March 2022, Vistry are disappointed that the Parish Council have not seen the benefit of the opportunity offered by allocating an area of their site in the Neighbourhood Plan, which could deliver in the order of 50 homes. As is set out further below, whilst we understand the desire of the Parish Council to focus on 'small' sites, Vistry are disappointed that residents have not had a chance to comment on the merits of a slightly larger site and the benefits it would bring. They also do not believe that the approach to allocating sites leads to a Plan which satisfies the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 that neighbourhood plans are required to satisfy.</p> <p>Alongside the concern with the allocations process, we have addressed additional concerns with the Plan below, making it clear where we think either the approach of the Parish Council or the policies of the Plan do not satisfy the basic conditions.</p> <p>The allocation of land for housing</p> <p>Through our engagement on the Neighbourhood Plan, we have made it clear to the Parish Council that we do not believe the approach taken is robust and will satisfy the basic conditions. Whilst it is positive that the plan is seeking to allocate housing, the approach to limiting sites to 1 hectare is not justified by the evidence, nor do we believe that the site selected for development will contribute to delivering sustainable development, therefore failing two of the basic conditions.</p> <p>As we set out in our Regulation 14 response to the Parish Council, the Planning Practice Guidance for Neighbourhood Plans (paragraph: 040 Reference ID: 41-040-20160211) sets out:</p> <p><i>Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.</i></p> <p>It goes on to state (Paragraph: 072 Reference ID: 41-072-20190509):</p> <p><i>In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, sufficient and proportionate</i></p>

evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions.

The rationale for focusing on sites of under 1 hectare is not justified by the evidence base. Whilst there has been engagement, which is used to justify the decision, no question was asked in the 2018 questionnaire about the size of site preferred, with residents only asked about what type of housing was important to them and there are only a couple of individual comments noted in the Appendix B of the questionnaire results which make reference to any development being 'small scale'. The evidence base for the Neighbourhood Plan does include the results of a Housing Need survey, prepared to specifically identify the likely level of housing need in the Parish over the next five years (although we note this does not appear to have been submitted to Milton Keynes Council alongside the Neighbourhood Plan). This indicated that 33 households expressed as housing need and a further 27 identified people with a local connection to the village who want to set up home in Haversham. The Parish Council's own evidence therefore indicates a housing need far greater than the 16 homes that land has been identified for in the Plan.

We therefore do not believe that the general approach to limiting the size of sites to 1 hectare is justified as it is not based on evidence, as required by the Planning Practice Guidance. This means the Plan fails to satisfy the basic condition for neighbourhood plans to have regard to national policy and guidance.

Additionally, the consultation undertaken by the Parish Council and the site assessment work both indicate that site 6 (Vistry's site) is a) residents preferred location for development and b) the most sustainable location for development. The site selection process is therefore also not justified by the evidence as required by national guidance, as required to satisfy the basic conditions.

The Basic Conditions Statement appears to indicate that the decision to limit the size of the site to 1ha is in part due to the desire to ensure sustainable travel. This is the first time we are aware of this reasoning being set out. The justification fails to recognise that although 'New' Haversham is a village, it is in close proximity to Wolverton railway station (under 1.5km) which is accessible both on foot and bicycle, with the village also benefiting from a regular bus service which connects into Wolverton and Central Milton Keynes. 'New' Haversham is therefore a sustainable location for development and the justification set out in the Basic Conditions Statement for limiting development to 1ha, particularly in light of the evidence on need, is not justified.

The selected site for residential development is located away from what services and facilities are in the village particularly the school and bus stops. It has potential for ecological value (as it is not a managed arable field), and is referred to as falling within an Area of Attractive Landscape (noting, although this designation no longer exists in the Local Plan, it is an indication of enhanced landscape value in this area). The size of the site also indicates that it will only deliver limited affordable housing compared to a larger site.

Therefore, in addition to not according with national planning policy guidance, Vistry's view is that both in terms of the overall justification for limiting the size of the site to 1ha and the selection of the site, the Neighbourhood Plan does not satisfy the basic condition of contributing to sustainable development.

Policy HLL4 – Zero Carbon Buildings

Policy HLL4 seeks to deliver 'zero carbon ready' development. As we set out to the Parish Council in our Regulation 14 representation, we do not feel this policy is properly justified nor is it in general conformity with the strategic policies of Plan:MK, which includes policy SC1 - Sustainable Construction (clarified in Appendix J of Plan:MK).

Whilst the overall thrust of the policy is consistent with policy SC1, references to Passivhaus standard or equivalent step away from adopted policy. This means the policy has the potential to cause confusion by applying a different set of standards to the rest of Milton Keynes, which have not been properly tested by evidence, particularly as to whether their implementation is viable.

The lack of conformity with strategic policy is recognised at paragraph 5.12 of the Neighbourhood Plan where it states that it won't be until a review of Plan:MK that a policy including such standards will be introduced, and also in the basic conditions statement where it is stated that the policy is '*inspired by innovative plan making work in other parts of the country*'. This may be the case, but this policy work would have been in accordance with the relevant guidance and properly tested.

The National Planning Practice Guidance (Paragraph: 002 Reference ID: 56-002-20160519) sets out that:

Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.

It goes on to state (paragraph 003 Reference ID: 56-003-20150327): *Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment.*

Whilst this guidance refers to Local Planning Authorities, it equally applies to Parish Council's and the preparation of neighbourhood plans. Therefore, we consider that with the inclusion of policy HLL4 in the Neighbourhood Plan, the plan cannot be considered to satisfy the basic conditions as it is neither in conformity with the strategic policies of Plan:MK or been prepared with regards to national policy and guidance, failing two of the basic conditions.

Policy HLL10 – Important Views

We raised in Vistry's Regulation 14 representation whether proportionate, robust evidence to support the choices made and the approach taken in the Plan to identifying important views has been prepared to justify the selected Important Views. We also note that Milton Keynes Council raised similar concerns ahead of submission of the Plan.

Despite evidence now accompanying the submitted plan, these concerns still exist. The Basic Conditions Statement sets out that:

'there are some demonstrable physical attributes within the surrounding landscape that are special in framing views between, from and to the settlements that are above the norm in defining its rural character'.

	<p>Within the Supporting Evidence for HLL10, there is no comparative assessment of views around the village and no criteria to assess each against to understand whether they 'are above the norm'. We would expect such criteria to cover matters including heritage, landscape sensitivity, landscape quality and consideration of other natural and built features of importance.</p> <p>Whilst a number of the views do pick out particular features that are likely to justify protection of a view, such as to the viaduct or the church, a number are simply of fields where there is no rational assessment of how the views compare to any other around the village to justify their protection.</p> <p>Without such an assessment to provide the proportionate evidence required by national policy guidance, the policy cannot be justified, and it does not meet the basic condition of having regard to national policy and guidance.</p>
<p>Smith Jenkins on behalf of Mr Charles Glasse</p>	<p>The representations are made in the context of our client's interest in land east of the High Street, Old Haversham. The site has previously been promoted for allocation residential development in the HcLLNP for approximately 10no. zero or near zero carbon units with 40% being affordable and access via an existing gate or a new access off the High Street.</p> <p>Our client is disappointed to learn that the site has not progressed as an allocation in the submission HcLLNP. The response below sets out why there continues to be concern regarding the suitability and deliverability of the site proposed to be allocated at Land south of 27 High Street, Old Haversham for up to 16 dwellings (Policy HLL2) and why the HcLLNP should positively seek to allocate land east of High Street, Old Haversham for a small scale residential development as a suitable and deliverable alternative.</p> <p>Policy HLL1: Settlement Boundaries The draft HcLLNP seeks to limit development proposals to within the settlement boundaries at New Haversham and Old Haversham. A new settlement boundary has been drawn for Old Haversham for the purposes of the HcLLNP which excludes our client's site. We maintain that establishing a new settlement boundary for Old Haversham is not an appropriate strategy given it provides no flexibility for situations of undersupply of market housing in the Borough and brings with it the risk of limiting the ability of sustainable development opportunities on the edge of settlements from coming forward. This fails to accord with the positive approach to growth required by the National Planning Policy Framework (NPPF) and is contrary to Basic Condition (b).</p> <p>Accordingly, Policy HLL1 should be modified so that it allows for a degree of flexibility consistent with the requirements of the presumption in favour of sustainable development and allows for the consideration of sustainable development opportunities on sites adjoining the settlement where the benefits of the scheme significantly and demonstrably outweighed any harm, if these could assist with delivering the overall objectives of the HcLLNP. Policy HLL2 Land south of 27 High Street, Old Haversham Housing Number The draft HcLLNP allocates Land south of 27 High Street, Old Haversham for a residential development scheme of up to 16 dwellings. It however remains unclear</p>

how the figure of 16 dwellings has been derived. The review of Plan:MK (the New City Plan) will include strategic policies to set a housing requirement for designated neighbourhood areas. The Review of Plan:MK will also establish a new overall housing number and allocate new sites for development. Given the still early stage of the New City Plan and the current uncertainty regarding the wider planning strategy and the lack of evidence of local housing need, it is queried whether a major development of 16 dwellings represents an appropriately sized housing allocation for Old Haversham consistent with its current status in the Local Plan settlement hierarchy as a 'village and rural settlement.' The Consultation Statement identifies that our Regulation 14 comments queried the quantum of development included in the HcLLNP but does not appear to provide any justification in response. It is considered that a more modest allocation of up to 10 dwellings, which can provide a greater proportion of affordable housing in line with the community's aspirations, would be more appropriate. This could be suitably delivered by our client's site at Land east of High Street, Old Haversham. Paragraph 3.8 of the Consultation Statement states that the Site Assessment Report provides 'proportionate, robust evidence that has been used to support the choices made and the approach taken' to the site selection but does not justify this any further. There remains significant concerns about the lack of evidence for a number of claims in the Site Assessment Report and the same situation applying to each site for a number of criteria as identified above. In our view, the identification of Site 11 as the preferred allocation has not been based upon an appropriately evidenced assessment of the sites or an accurate application of the criteria. Correcting this has the result of demonstrating Site 5 to clearly perform more favourably. In accordance with the community's aspirations and the policy objectives, Site 5 would deliver a small housing development of up to 10 dwellings on a site under 1 hectares in size with a higher proportion of affordable housing (40%) compared to Site 11 which is proposing a larger site and a major development of 16 dwellings with a lower proportion of affordable housing. Development on Site 5 would also preserve the character of the village in the surrounding landscape, maintaining the linear nature of the High Street at Old Haversham and can preserve local biodiversity. Given the small scale development envisaged, it would not significantly worsen existing traffic congestion and/or safety issues. It will also deliver low energy use, low water use and zero carbon footprint housing which should be afforded significant weight. The Basic Conditions Statement confirms that the majority of the effects of the development have been 'satisfactorily mitigated through policy provisions which will be assessed in detail at the planning application stage.' For the remaining residual effects, the Parish Council attributes moderate adverse weight to the net additional traffic effects of development in this rural area and minor adverse weight to the residual effects of development on the wider landscape character. In response, such minor adverse impacts would not be applicable to Site 5. It is maintained that Site 5 clearly represents a suitable, sustainable and deliverable option for housing development devoid of any insurmountable constraints which should be allocated in the HcLLNP, as

an alternative to Site 11, to assist in meeting housing needs and sustainability objectives. Policy HLL3: First Homes Exception Sites The HcLLNP's inclusion of a policy in relation to First Homes Exception Sites is welcomed given that the affordability of housing was identified as being important by the community. However, there remains concerns that the wording of the policy is overly restrictive and will frustrate the delivery of such exception sites contrary to the Government's key objectives. The Consultation Statement identifies that the HcLLNP has taken the opportunity to use the provisions of 026 Ref ID: 70-026-20210524 in Planning Practice Guidance which states that 'For plan making, local authorities and neighbourhood planning qualifying bodies are encouraged to set policies which specify their approach to determining the proportionality of First Homes exception site proposals, and the sorts of evidence that they might need in order to properly assess this.' In this regard, there is no evidence provided on the local circumstances which have informed the policy requirements that such sites must be adjacent to the defined settlement boundary of New Haversham and not Old Haversham, that a site must be no more than 0.4 ha in size and 12 dwellings and that no other proposals for a First Homes Exception Site have been approved or implemented in the plan period. It is therefore maintained that as drafted, the policy will serve to constrain the delivery of such exception sites and therefore the achievement of sustainable development. Accordingly the policy as drafted is contrary to Basic Conditions (a) and (b) and should be amended. Policy HLL4: Zero Carbon Buildings Overall our client supports the policy requirements to deliver a step change in the energy performance of all new developments in the Parish. As set out above, our client has promoted Land east of High Street, Old Haversham for zero or near zero carbon dwellings and is committed to assisting supporting the transition to a low carbon future as required by the NPPF (Paragraph 152). Given the strong policy commitment in the draft, it is considered that the HcLLNP should include reference in the Objectives to climate change resilience. The HcLLNP should however recognise the cost of such requirements which may have adverse implications on development viability. It should include a caveat whereby if it is not feasible or viable to meet the requirements, developments would need to meet alternative requirements so that proposals are not rendered unviable and undeliverable.

Conclusion On behalf of our client, Mr Charles Glasse, we would like to confirm support overall of the Vision and Objectives of the draft Haversham-cum-Little Linford Neighbourhood Plan (HcLLNP), however are concerned that the Plan in its current form does not fully comply with all of the Basic Conditions and should be amended to enable it to be robust enough to serve its purpose for the local community. Is clear that the HcLLNP must be consistent with national planning policy and there is a need to take account of up-to-date housing needs evidence and the policy direction provided in the strategic plan. It is not considered appropriate for the HcLLNP to determine its own housing requirement to the extent proposed. It is also considered that the HcLLNP should not seek to restrict sustainable development to an unreasonable level through the establishment of a new settlement

	<p>boundary for Old Haversham. We also maintain significant concerns as to how the selected site allocation has been assessed. Whilst the Policy on First Homes is welcomed, it is considered that, as drafted, it is overly restrictive and will serve to restrict the delivery of such exception sites contrary to the Government's key objectives. We therefore consider that in order to pass examination, proceed to referendum and be 'made', the HcLLNP should re-assess the level of housing required and look more flexibly at settlement boundaries. The First Homes policy should also be amended as suggested. We also request that land east of High Street, Old Haversham is re-considered as an alternative option for allocation as it provides a suitable, deliverable and sustainable location for small scale future growth in line with the community's aspirations. In light of the above, this representation should be read as an objection to HcLLNP at this time albeit we are hopeful that amendments can be made in order to allow it to meet the Basic Conditions and proceed to referendum.</p>
<p>Aitchison Rafferty on behalf of Mr & Mrs Cross</p>	<p>We object to the Submission Neighbourhood Plan which potentially restricts future changes at Haversham Manor and farm complex under Policy HLL6 which is not considered reflective of the NPPF or PPG and based upon an unsound assessment.</p> <p>This objection seeks to remove the proposed identified non-designated heritage asset from the Neighbourhood Plan as currently shown on the Proposals Map Inset 2 and referred to in Policy HLL6. There are a number of features in the proposed area which are already protected through existing national and local planning policies. These relate to the controls over Listed Buildings and their setting and to the Scheduled Ancient Monument. It is not necessary to identify such a wide area of land and existing farm in order to protect the landmarks and views identified in the assessment which has been used to create this policy. More importantly, the assessment which has formed the basis for the policy has not assessed the area in full and not made any meaningful reference to the existing farm and buildings. The proposed removal of a small area of buildings and land from the designated Area has been arbitrarily made.</p> <p>The bulk of the buildings and lane surrounding the church relate to the farm complex and yet these are included within the defined area. It is accepted that Listed Buildings and the Ancient Monument should be protected and will be under existing development plan policies, the NPPF and other relevant Acts. As recognised in this section of the Neighbourhood Plan, the protection to the various listed properties is already in place. The proposed inclusion as a non-designated heritage asset of the area described as Old Haversham is not sound or based on an accurate assessment of the setting and character of this area. There is no firm basis for the area as defined and the current farm complex and buildings have not been understood correctly in respect of the assessment of the character of the area.</p> <p>Therefore, the objection seeks the removal of the designation as currently set out in Policy HLL6. If part of this area is to remain then it is only relevant to include the area east of the Church in light of the views from the footpath and land around the Scheduled Ancient Monument.</p>

	<p>We oppose the Submission Neighbourhood Plan for reasons set out within this statement, and request changes are made as set out in this objection.</p>
<p>Webb Paton on behalf of TM Paton & Son</p>	<p>1. We would like to make sure that following wording within Planning Policy DS5 Open Countryside the current Plan:MK 2016 – 2031 is included within the Haversham Neighbourhood Plan:</p> <p>“Policy DS5 OPEN COUNTRYSIDE</p> <p>A. The Council defines Open Countryside as all land outside the development boundaries defined on the Policies Map. Planning permission within the open countryside will only be granted for development which is essential for agriculture, forestry, countryside recreation, highway infrastructure or other development, which is wholly appropriate to a rural area and cannot be located within a settlement, or where other policies within this plan indicate development would be appropriate.</p> <p>B. Limited extensions or ancillary structures to existing buildings situated in the open countryside are acceptable in principle, provided that their scale and visual impact do not have a detrimental impact on the open character of the countryside.</p> <p>C. Replacement dwellings might be acceptable provided that the impact on the character of the open countryside is equal to or less than the dwelling it replaces. Replacement dwellings should meet the following criteria:</p> <ol style="list-style-type: none"> 1. Be compact and well-designed, in turn, retaining sufficient space around the dwelling to provide an attractive setting and to protect the character of the countryside. 2. To not create a visual intrusion on the skyline or in the open character of the surrounding countryside. 3. To be within similar scale of the existing dwelling it intends to replace. <p>D. New dwellings which are of exceptional quality or innovative in the nature of their design might be accepted where they conform with paragraph 55 of the NPPF.”</p> <p>2. We would like to make sure that Planning Policy ER8 Employment and the Rural Economy of the current Plan:MK 2016 – 2031 is included within the Haversham Neighbourhood Plan. This policy states the following:</p> <p>“Policy ER8 EMPLOYMENT USES AND THE RURAL ECONOMY</p> <p>A. Proposals which sustain and enhance the rural economy by creating or safeguarding jobs and businesses will be supported where they are of an appropriate scale for their location and respect the environmental quality and character of the open countryside. B. The following types of development are considered to be acceptable:</p> <ol style="list-style-type: none"> 1. The re-use of farm buildings.

2. Schemes for farm diversification involving small-scale business and commercial development.
3. Small-scale tourism proposals including visitor accommodation.
4. Proposals that recognise the economic benefits of the natural and historic environment as an asset to be valued, conserved and enhanced.
5. The expansion of small-scale businesses in their existing locations depending on the nature of the activities involved, the character of the site and its accessibility.
6. The use of land for agriculture, forestry, fisheries and equestrian activity.
7. Small scale employment development to meet local needs.”

3. We would like to make sure that Planning Policy SC3 Low Carbon and Renewable Generation of the current Plan:MK 2016 – 2031 is included within the Havesham Neighbourhood Plan. This policy states the following:

“Policy SC3 LOW CARBON AND RENEWABLE ENERGY GENERATION

A. The Council will encourage proposals for low carbon and renewable energy generation developments that are led by, or meet the needs of local communities.

B. Planning permission will be granted for proposals to develop low carbon and renewable energy sources (including community energy networks) unless there would be:

1. Significant harm to the amenity of residential area, due to noise, traffic, pollution or odour;
2. Significant harm to wildlife species or habitat;
3. Unacceptable landscape and visual impact on the landscape, including cumulative impacts;
4. Unacceptable harm to the significance of heritage assets; and
5. Unacceptable impact on air safety.

C. In addition to the above criteria, wind turbines should avoid unacceptable shadow flicker and electro-magnetic interference and be sited an appropriate distance away from occupied properties, consistent with the size and type of the turbine. Proposals to develop solar PV farms should avoid unacceptable visual impact from the effect of glint and glare on the landscape, on neighbouring uses and aircraft safety. Proposals for large scale renewable energy in the open countryside should be informed by a satisfactory landscape and visual impact assessment. D. In the case of energy generation through wind power, permission will only be granted for proposals where:

1. The proposed site is identified in a Neighbourhood Development Plan or other Development Plan Document as a suitable site for wind energy generation; and
2. Following consultation with local residents, it can be demonstrated that the planning impacts identified can be fully addressed, and therefore the proposal has the backing of the local community; and

3. The proposal complies with national and local guidance, including the Council's Wind Turbines SPD and Landscape Sensitivity to Wind Turbine and Solar PV Development document.”

4. We need to make sure the Haversham Neighbourhood Plan does not prevent the ability to build a dwelling for the essential need for a rural worker to live permanently at or near their place of work in the countryside, as per the exceptions allowed for under paragraph 80 of the National Planning Policy Framework (NPPF). As such the Haversham Neighbourhood Plan should be amended to make sure farmers and farm workers within Haversham can use the exemption within paragraph 80 a) as written with the NPPF. In addition the Haversham Neighbourhood Plan should not prevent the exempted developments covered by paragraph 80 c) and e) of the NPPF which states:

“Paragraph 80 of the NPPF

Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
- c) the development would re-use redundant or disused buildings and enhance its immediate setting;
- e) the design is of exceptional quality, in that it: - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.”

5. We need to make sure the Haversham Neighbourhood Plan does not prevent the ability for farmer / agricultural business to diversify their businesses outside of agriculture as allowed for with paragraph 84 a), b) and c) of the NPPF which states:

“Paragraph 84 of the NPPF Supporting a Prosperous Rural Economy

Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;
- c) sustainable rural tourism and leisure developments which respect the character of the countryside”

The National Planning Policy Framework clearly promotes the development and diversification of agricultural and other land-based rural businesses, and as such these policies written with Plan:MK 2016-2031 should be available for my clients. I trust that the above policies

	<p>will be clearly not blocked and the amendments to the Haversham Neighbourhood Plan we requested above and in our previous consultation response are included by the Neighbourhood Plan Independent Inspector within their amended version of the Haversham Neighbourhood Plan.</p>
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