

Haddenham Neighbourhood Plan 2014-2033

Sustainability Appraisal/ Strategic Environmental Assessment

Published by Haddenham Parish Council for examination with the Haddenham Neighbourhood Plan in accordance with the Neighbourhood Planning (General) Regulation 2012, the EU Directive 2001/42 and the Environmental Assessment of Plans and Programmes Regulations 2004.

January 2015

NON TECHNICAL SUMMARY

1. The purpose of this Environmental (Sustainability Appraisal) Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission Neighbourhood Development Plan for Haddenham Parish.

2. The Neighbourhood Plan contains the vision, aims, objectives, planning policies, site allocations and proposals for improving the village for the period until 2033. Its focus is much broader than solely site allocation and encompasses a wide range of social, economic and environmental issues such as education, employment and transport. It will, once adopted, have statutory status and influence planning decisions.

3. The Neighbourhood Plan policies, together with the policies of the development plan – (that is the saved policies of the 2004 Local Plan and the National Planning Policy Framework), will be used by Aylesbury Vale District Council to determine planning applications once the Neighbourhood Plan is approved in due course. Aylesbury Vale District Council is currently in the early stages of bringing forward the Vale of Aylesbury Local Plan (VALP) and once this is adopted (currently scheduled for mid 2017) this will also form part of the development plan. The VALP is being prepared after the Vale of Aylesbury Plan (VAP) was withdrawn; however the VAP serves (in some regards) as the most up to date evidence base and has been considered in the production of the Haddenham Neighbourhood Plan (Neighbourhood Plan). As the Neighbourhood Plan must be in general conformity with local strategic policies, it does not therefore seek to repeat them. The Neighbourhood Plan must also have regard to national policies as set out in the National Planning Policy Framework but, again, it does not seek to repeat them.

4. Haddenham is a large village and civil parish around 5 miles southwest of Aylesbury and 2 miles northeast of Thame (which is in South Oxfordshire). The village is well located adjacent to the A418 strategic route which connects it to the M40 Motorway, the A40 and Aylesbury. The A418 has been upgraded over the years and sections now bypass settlements on the original route (such as Thame town centre). The village is served by regular rail services between London and Birmingham via the nearby Haddenham & Thame Parkway railway station.

5. The Neighbourhood Plan contains relatively modest policies and proposals for development that are broadly consistent in scale and location with the reasoning and evidence of the former Vale of Aylesbury Plan (VAP) and its proposed settlement hierarchy. Due to the size and scale of the existing settlement, employment, amenities and public services in the village and its proximity to strategic transport links, this evidence indicates that Haddenham is a 'strategic settlement'.

6. The Sustainability Appraisal Scoping Report for the Neighbourhood Plan identified (following consultation) a series of environmental designations within the parish, notably:

- the Haddenham Conservation Area
- 121 Listed Buildings including one Grade I and three Grade II* buildings in Church End
- One scheduled monument - Bowl barrow known as the Round Hill, 170m ENE of Roundhill Farm. The monument includes a Bronze Age bowl barrow situated on the north side of the A418 Aylesbury Road

7. Haddenham is not located in close proximity to any nature site of European importance, nor are there any national or local nature designations, though a study of biodiversity value around the village identified areas of high value and sensitivity to development on its southern and western edges. There are some parts of the village that are prone to surface water flooding and larger areas beyond the village to the south that are in Flood Zones 2 and 3.

8. The strategic objectives of the Neighbourhood Plan cover a range of economic, social and environmental issues in support of realising the community's vision for the parish. In all respects, the relationship between the Neighbourhood Plan objectives and the sustainability framework is complementary, with the prospect of a number of positive environmental impacts. At the very least, impacts will be neutral – there are no identified negative effects of any neighbourhood plan objective.

9. The conclusion of the assessment of the objectives and policies of the Neighbourhood Plan is that they will have no significant environmental effects and will promote sustainable development. There is a close correlation between the plan's objectives and those of the Sustainability Appraisal, as should be expected from a community-driven document. The policies have clearly been selected and drafted to ensure that any potential for negative impacts is avoided through site selection and effective policy wording.

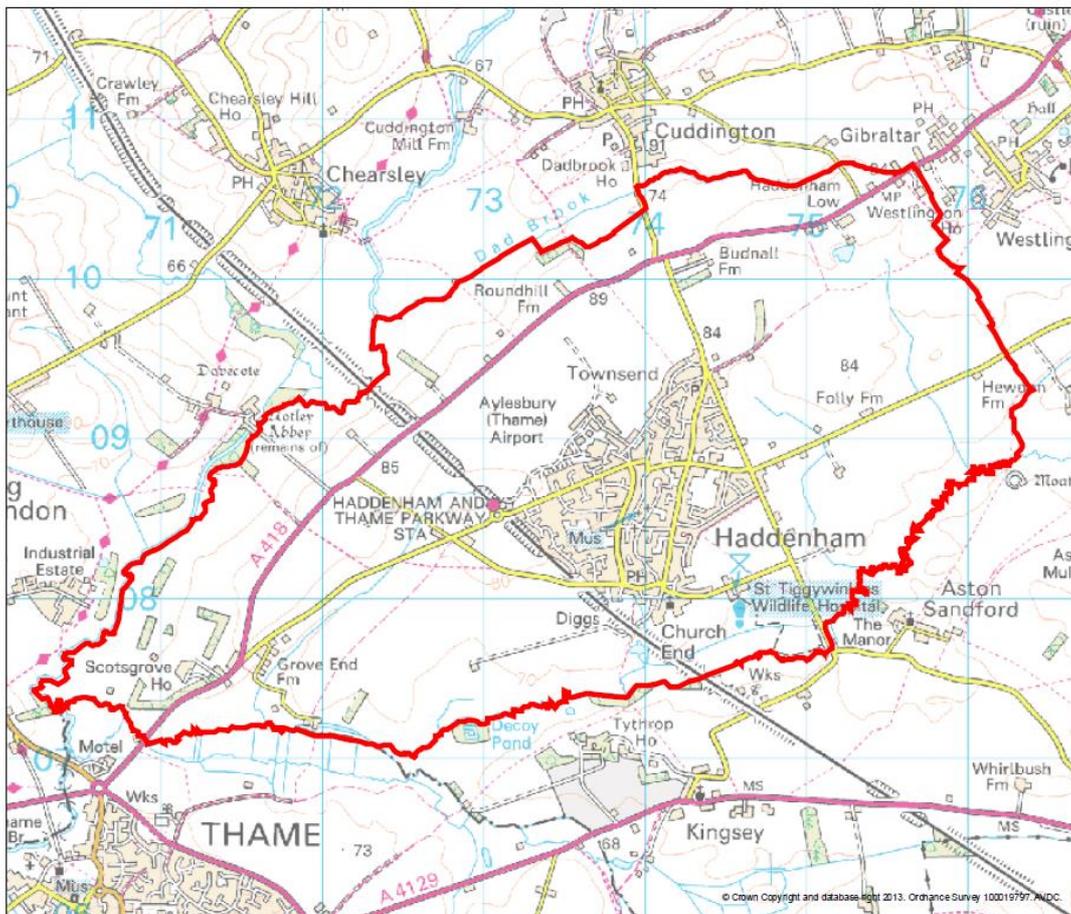
10. This is a crucial factor in assessing the sustainability attributes of neighbourhood plans and is distinctive from the same task in respect of other forms of development plan. The Parish Council has been required to use its planning judgement to strike the right balance between the technical suitability and political acceptability of the Neighbourhood Plan. In some cases, this can lead to policies that may not be the most sustainable of all the potential choices made but they are nonetheless sufficiently sustainable so that they will lead to no significant environmental effects. That is the most important test required by the EU Directive on SEA and the 2004 Regulations.

11. However, the conclusion remains that in a number of cases, the Neighbourhood Plan should deliver positive effects for local residents and businesses as the village grows in a sustainable manner in the coming years. There are some theoretically reasonable alternative policy options, which have been assessed in this Report to compare and contrast the options chosen, but in no case does an alternative perform as well against the chosen policy and there is therefore no case for policy changes as a result.

12. The Neighbourhood Plan proposes that progress in its implementation will be assessed using the measures identified in the report. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data on an annual basis to report on the progress of the plan. Should any real or potential negative impacts be identified then the Parish and District Councils will seek to review the relevant policies and their implementation.

1. Introduction

1.1 The purpose of this Environmental (Sustainability Appraisal) Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission Neighbourhood Development Plan for Haddenham Parish ("the Neighbourhood Plan") in accordance with the Neighbourhood Planning (General) Regulations and the EU Directive 2001/42 on strategic environmental assessment (SEA). Plan A below shows the designated Neighbourhood Area.



Plan A: The Designated Haddenham Neighbourhood Area

1.2 The Submission version of the Neighbourhood Plan has been published by Haddenham Parish Council ("the Parish Council") for examination under Regulations 15 and 16 of the Neighbourhood Planning Regulations 2012. The local planning authority, Aylesbury Vale District Council (AVDC), has issued a screening opinion requiring an SEA and the Parish Council has chosen to meet this obligation by preparing a Sustainability Appraisal (SA) incorporating the SEA, under the Environmental Assessment of Plans & Programmes Regulations 2004.

1.3 In January 2013 a planning team was formed to consider the production of the Neighbourhood Plan and, in May 2013, Haddenham Parish Council formally agreed to the proposal. Since then, the planning team has

conducted a range of consultation activities, including at the village fete in 2013 and 2014, a Vision Workshop in August 2013, a consultation day in January 2014 and have also consulted with a wide range of village organisation. The resulting themes and principles, developed through this work, have formed the genesis of a draft plan but, as importantly, the process of generating the discussion has already started to generate benefits for the village. The Pre Submission Plan and the Draft Environmental (SA) Report were published for formal consultation over the period December 2014-January 2015 in accordance with Regulation 14 of the 2012 Regulations.

1.4 The Neighbourhood Plan contains the vision, aims, objectives, planning policies, site allocations and proposals for improving the village for the period until 2033. Its focus is much broader than solely site allocation and it encompasses a wide range of social, economic and environmental issues such as education, employment, heritage and transport. It will, once adopted, have statutory status and influence planning decisions.

1.5 This final report therefore provides an assessment of the Neighbourhood Plan objectives and policies and seeks to do in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. The social, economic and environmental baseline data is contained in the Haddenham Parish Neighbourhood Plan SA Scoping Report, which is available in the evidence base.

2. Background to Sustainability Appraisal & Strategic Environmental Assessment

2.1 A Sustainability Appraisal incorporating Strategic Environmental Assessment requires the evaluation of the social, economic and environmental effects of a qualifying plan. These requirements are set out in the European Directive 2001/42/EC as adopted into UK law by the Environmental Assessment of Plans or Programmes Regulations 2004.

2.2 The Regulations require that the Report should include:

- An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- The environmental characteristics of areas likely to be significantly affected
- Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC
- The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation
- The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water,

air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors

- The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan
- An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of competency encountered in compiling the required information)
- A description of measures envisaged concerning monitoring in accordance with Article 10

2.3 The method for the assessment of the Neighbourhood Plan is intended to be proportionate to the task of assessing the relatively modest development proposals compared to those covering a whole local planning authority area.

2.4 The report responds to the responses from the statutory bodies during the Regulation 14 consultation period on the Pre Submission Plan and the Draft Environmental (SA) Report. This final version of the report is therefore a modified version of the draft report that reflects the modifications made to the submission version of the Neighbourhood Plan. Hence, it responds to each of the SA requirements in turn, beginning with a short description of the Neighbourhood Plan, identifying the key environmental features of the area and then assessing the impact of the strategic objectives and policies of the Neighbourhood Plan on those features, using a framework of SA objectives and measures.

3. An outline of the contents, main objectives of the Neighbourhood Plan and relationship with other relevant plans or programmes

3.1 The Neighbourhood Plan contains a number of policies for the use and development of land in the Parish of Haddenham in the plan period up to 2033. These policies, together with the policies of the development plan - that is the saved policies of the 2004 Local Plan - and the National Planning Policy Framework (NPPF), will be used by Aylesbury Vale District Council ("the District Council") in determining planning applications once the Neighbourhood Plan is approved in due course. Aylesbury Vale District Council is currently in the early stages of bringing forward the Vale of Aylesbury Local Plan (VALP) and once this is adopted (currently scheduled for mid 2017) this will also form part of the development plan. The Neighbourhood Plan has also looked at the evidence base and the reasoning of the withdrawn Vale of Aylesbury Plan (VAP).

3.2 The Vision of the Neighbourhood Plan is:

"A well-designed, well-connected village that is a pleasant and vibrant place to live and work; a busy, active and dynamic community with a shared purpose and direction, a sense of history, and a strong community spirit that is valued by residents."

3.3 In pursuit of this Vision, the Neighbourhood Plan contains six strategic objectives and specific measures:

1. A village spirit
2. Retain a village focus
3. Sustainable development
4. A zero carbon village
5. Opportunities for all ages and abilities
6. Maximise the benefits of technology

3.4 The Neighbourhood Plan comprises 23 policies in pursuit of these objectives, covering a range of housing site allocations, design, transport/traffic, local business, connectivity, green infrastructure and community facility matters.

4. The relevant aspects of the current state of the social, environmental and economic and the likely evolution thereof without implementation of the Neighbourhood Plan

4.1 Haddenham is a large village and civil parish around 5 miles southwest of Aylesbury and 2 miles northeast of Thame (which is in South Oxfordshire). The village is well located adjacent to the A418 strategic route which connects it to the M40 Motorway, the A40 and Aylesbury. The A418 has been upgraded over the years and sections now bypass settlements on the original route (such as Thame town centre). The village is served by regular rail services between London and Birmingham via the nearby Haddenham & Thame Parkway railway station.

4.2 The River Thame lies approximately 1.5km to the north of Haddenham's built up area. The village has a modern business park to the north on the old airfield. The surrounding area other than Thame is rural, with several farms and dispersed hamlets. The village existed in the Anglo-Saxon period, with its character reflecting its origin as three ancient hamlets at Church End, Fort End and Towns End situated alongside a stream. Land between these original settlements has been gradually in-filled to create a historic linear core to the village, now a designated Conservation Area.

4.3 However, this evolution and the fact that the village was only briefly the site of a medieval market means that it lacks the central focus of the kind found at Buckingham, Wendover and Winslow, and the wider range of facilities found in those settlements. Instead, its main historic and architectural interest derives from the "Witchert" construction which was used, between the 15th and 19th centuries, for the majority of the houses and farms. Witchert walls and paths surrounding many of the houses with narrow winding lanes connecting a series of greens and ends give the village an attractive and distinctive appearance.

4.4 Haddenham Vale, wrapping around the village, is a relatively low lying area spreading out from the foothills of the Chiltern escarpment, the latter being a constant factor in many views with otherwise an absence of woodland and infrastructure.

4.5 The Neighbourhood Plan contains policies and proposals for development that are broadly consistent in scale and location with the reasoning and evidence of the former Vale of Aylesbury Plan (VAP) and its proposed settlement hierarchy. Due to the size and scale of the existing settlement, employment, amenities and public services in the village and its proximity to strategic transport links, this evidence indicates that Haddenham is a 'strategic settlement'. Hence the VAP proposed that development should take place mainly around Aylesbury and Buckingham and in the strategic settlements of Winslow, Wendover and Haddenham, with a proposed target of 100 extra homes for Haddenham. This would represent a 4.7% increase over the 1946 households shown in the 2011 Census and the 155 being built at the time. The 100 would include 37 currently being planned on the site at the north-west of the intersection of Thame Road and Pegasus Way.

4.6 However, in commenting on the withdrawn VAP, the independent inspector indicated that the proposed housing numbers for the District were unrealistic and did not cater for potential over-spill from neighbouring districts. At this point in time AVDC have not identified any strategic direction for the growth of Haddenham but it is likely that the demand will be significantly higher than the initial 100 figure.

4.7 In terms of housing supply, the Aylesbury Vale Strategic Housing Land Availability Assessment (SHLAA), produced by AVDC in 2013, identifies three general areas in Haddenham as having potential for development: The Airfield, The Glebe Lands and adjoining land and Dollicott. The SHLAA specifically excludes any land west of the railway or east of Stanbridge Road. To the north, the potential land is bounded by the area of the runway on the airfield. To the south, no sites are considered to have potential other than possible use of the field between St Mary's School and Tiggywinkles, which is owned by Bucks CC and tenanted for agricultural use. It might be suitable for a new burial ground, but Bucks CC have no current plans for it. Across the 3 sites, the SHLAA identified a potential capacity of 476 dwellings; however, it is likely that the actual capacity of the sites is much higher.

4.8 Without the Neighbourhood Plan, proposals for housing development in the parish would be left to individual planning applications. On the face of it, this would make little difference to controlling the environmental impact of those proposals as they must in any event demonstrate that they conform to development plan and NPPF policy. However, the Neighbourhood Plan provides an opportunity to plan positively for development by identifying the correct spatial strategy for growth and by co-ordinating that growth to best serve existing and future residents.

5. The environmental characteristics of areas likely to be significantly affected

5.1 The SA Scoping Report for the Neighbourhood Plan identifies a series of environmental designations within the parish, notably:

- the Haddenham Conservation Area

- 121 Listed Buildings including one Grade I and three Grade II* buildings in Church End
- One scheduled monument - Bowl barrow known as the Round Hill, 170m ENE of Roundhill Farm. The monument includes a Bronze Age bowl barrow situated on the north side of the A418 Aylesbury Road

5.2 Haddenham is not located in close proximity to any nature site of European importance, nor are there any national or local nature designations, though a study of biodiversity value around the village identified areas of high value and sensitivity to development on its southern and western edges.

5.3 There are some parts of the village that are prone to surface water flooding and larger areas beyond the village to the south that are in Flood Zones 2 and 3.

6. Any existing social, economic or environmental problems that are relevant to the Neighbourhood Plan

6.1 The following is considered by the Haddenham Parish Council to represent an up-to-date, relevant, accurate and comprehensive review of local issues for the purpose of informing the Haddenham Neighbourhood Plan and has come from extensive community engagement activities over the previous 18 months.

Community

6.2 The community values the range of facilities available and yet from the feedback from the consultation exercises there is a very strong feeling that much needs to be done to refurbish, renew and extend those facilities. Haddenham Health Centre provides the community and surrounding villages with an excellent service. However the increasingly older population and potential rise in numbers is a worry for residents. In respect of the provision of Youth Facilities, through extensive liaison with leisure and sports clubs in the village it has been shown that there is support for better provision of facilities for young people. There was also concern expressed about the lack of opportunities for young people to find work in Haddenham.

Local transport

6.3 The local bus service only travels through the centre of the village and back out onto the A418 which effectively means that the southern end of the village has no easy access to buses. The volume and speed of traffic through the village is a concern to many residents, in particular close to the schools and in the conservation area. Parking has become an issue for many residents near the station as commuters use the surrounding streets rather than pay the daily charge. There is strong support for improving walking and cycle routes through the village to get access to village amenities.

Local Environment

6.4 The village is characterised by the “Ends”, Fort End, Towns End and Church End and their associated greens and ponds. Villagers enjoy the green and blue spaces and development should recognise the need to incorporate these open spaces.

6.5 The increase in cycling over recent years has led to more requests for cycle routes linking surrounding villages and towns and to national cycle routes. The shops on Banks Parade are well used and a great asset to the village. But they are considered to be unattractive and in need of sprucing up and modernisation.

Housing, Conservation and Development

6.6 The threat of several extensive developments is of great concern to the majority of residents. There is widespread support for developing and growing the village but at a sustainable and environmentally sensitive rate.

6.7 Residents enjoy the character of being in a peaceful village and wish to protect and enhance the green spaces and open countryside. Comments received show there is a value attached to having a wide range of properties in the village, in particular affordable / starter homes, downsizing homes and housing suitable for the elderly.

6.8 The village does not have a secondary school, nor does it have a single centre or hub. However, there are some shops at Banks Parade, a large village green near the St Mary's Church, the Recreation Ground on Woodways, single shops at the top and bottom of Churchway and other additional green open spaces.

6.9 The conservation area stretches across the length of the village and is a highly prized asset for the district and the village and is to be protected for future generations.

Local Economy

6.10 Haddenham has a range of businesses from large multi-national manufacturing, centred in the Haddenham Business Park and Thame Road Industrial Park offering light industrial, professional and managerial and mixed employment, to a multiplicity of small and medium enterprises. Whilst some of the 173 identified businesses in the village operate from commercial premises, there are a significant number of home-based businesses.

6.11 The slow speed of broadband in the village is an inhibiting factor for some businesses to locate in Haddenham. There is a good provision of shops, services and facilities dispersed around the village, including a Post office, bakery, cafes, Indian restaurant and retail units, but pubs and restaurants have struggled in recent years, with closures of both in the last 18 months.

7. The social, environmental and economic objectives that are relevant to the Neighbourhood Plan and the way those objectives and any considerations of its sustainability have been taken into account during its preparation

7.1 The Neighbourhood Plan has been prepared to address key social, economic and environmental issues in the Neighbourhood Plan area. As the Neighbourhood Plan must have regard for national policy and must be in general conformity with national and local strategic policies; it does not therefore seek to repeat them.

7.2 To assess the sustainability performance of the Neighbourhood Plan, the assessment framework set out below in Table A was developed. The proposed framework was initially consulted upon with the statutory consultees as part of the SA Scoping Report. The SA Scoping report was sent to the Environment Agency, Natural England and English Heritage by AVDC on behalf of the Haddenham Neighbourhood Plan group on 3 October. By 31 October responses had been received from all three consultees (these are appended to this report)

SEA objectives and the neighbourhood plan development including the site assessment criteria

7.3 The SA/SEA scoping work (specifically the understanding of the baseline environment and the initial assessment framework) was developed by a sub group of the Neighbourhood Plan team in September 2014. The initial SEA/SA scoping report drafts however were subject to attention and discussion of all members of the Neighbourhood Plan group. From this respect the SEA/SA process became an integral part of the plan making process. The interrelationship between the SEA/SA scoping stage and the plan drafting stage is documented in minutes of the Neighbourhood Plan Steering Group of meetings taking place on 27/08/2014, 15/10/2014 and 12/11/2014.

7.4 The SA/SEA scoping work took place in parallel to the identification of criteria to be used in the assessment of potential development sites. The site assessment criteria (or pro forma) used to assess the potential development sites was based on a pro forma drawn up for the purpose of site assessments for Neighbourhood Plans and Local Plans by URS engineering and planning consultants. It was tailored in order to be relevant to the Haddenham context following a community workshop held on 27 September 2014. The Neighbourhood Plan group were comfortable that both the initial site assessment pro forma as well as the final site assessment pro forma was compatible with the SEA/SA assessment framework.

7.5 The responses received on the SA/SEA Scoping report had been received from all three statutory consultees and these responses were fed into the plan development process including the site assessment work. The SEA/SA Scoping comments and resulting actions are appended to this report as Appendix 1:

7.6 In October 2014 a sub team of the Neighbourhood Plan team assessed the potential development sites against the site assessment criteria. This

process is reported in the Site Assessment Report and the results for each site are reported in individual site assessment reports.

<https://haddenhamneighbourhoodplan.wordpress.com/supporting-documents/>

7.7 Whilst the Neighbourhood Plan group had undertaken the SA/SEA scoping work themselves, Independent consultants rCOH were commissioned by the Neighbourhood Plan group in September 2015 to complete the SA/SEA process. By 21 November 2014, an initial SA/SEA assessment of the emerging plan including the site assessment work had been completed. This initial assessment provided an independent and professional view to the group on the performance of the emerging plan including the site assessment report. This initial view provided some useful input into the performance of the draft plan policies. It also however confirmed that the site assessment report was comprehensive and the site assessment criteria closely matched the SA framework.

7.8 The Neighbourhood Plan alongside its accompanying site assessment reports were then amended and published for its pre submission consultation from 6 December 2014 to 20 January 2015. The draft SA/SEA Environmental Report, also revised to reflect the changes to the draft Neighbourhood Plan, was published for consultation alongside this.

7.9 The SA/SEA assessment framework used to assess the sustainability of the plan's policies is set out below.

Neighbourhood Plan SA Objective	Neighbourhood Plan SA Measures
<p>1. Village Design</p> <p>Through development create a sustainable community by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Championing high quality design <input type="checkbox"/> Enhancing Haddenham's distinctive character and layout <input type="checkbox"/> Maintaining and adding to Village open spaces <input type="checkbox"/> Improve safety for vulnerable street user 	<p>1.1 Increase number of community spaces, (ha per resident)</p> <p>1.2 Include Wychert style walls and alleys in design layouts.</p> <p>1.3 Speed reduction measures for the safety of cyclists and pedestrians</p> <p>1.4 Reduced number of reported accidents</p>
<p>2. Transport and Travel</p> <p>Encourage a shift to more sustainable modes of travel and reduce car usage through:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Development and land use that positively promotes 	<p>2.1 Maintained and improved cycle and pedestrian pathways.</p> <p>2.2 Development to provide new pedestrian and cycle access to public transport, employment sites, village amenities and nearby settlements</p>

<p>pedestrian and cycle usage and reduces the negative effects of transport on the environment and communities</p>	<p>2.3 Community transport facilities 2.4 Encourage and enable walking and cycling commutes to employment areas. Measured by cars / employee</p>
<p>3. Access and Provision of Green and Blue Space infrastructure</p> <p>Haddenham's green and blue infrastructure and open space should be enhanced by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Protecting that infrastructure and rights of way from unnecessary development. <input type="checkbox"/> Increasing opportunities to access that green and blue infrastructure. <input type="checkbox"/> Encouraging the creation of new green & blue infrastructure and rights of way. 	<p>3.1 Ratio of green infrastructure to number of houses / people 3.2 Accessibility to green space 3.3 New walkways / cycle routes to green infrastructure 3.4 New green infrastructure in major developments</p>
<p>4. Landscape and Heritage</p> <p>Through development, maintain, conserve and enhance the landscape, heritage and built character of Haddenham by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Protecting and enhancing designated and undesignated heritage and landscape assets <input type="checkbox"/> Protecting the Haddenham Conservation Area minimising the adverse impacts of development, increased car throughput and on street parking, <input type="checkbox"/> Avoid development of greenfield sites, where possible, by re-use of suitable previously developed or unused land 	<p>4.1 Re-use of Brownfield land 4.2 Use of poor or non-agricultural land 4.3 Provision of vehicular access roads that avoid the need to drive through, or park, in the conservation area 4.4 the number and percentage of different heritage assets at risk; 4.5 the number of major development projects that enhance the significance of heritage assets or historic landscape character; 4.6 the number of major development projects that detract from the significance of heritage assets or historic landscape character; 4.7 the percentage of planning applications where archaeological investigations were required prior to approval; and 4.8 the percentage of planning applications where archaeological mitigation strategies were developed and implemented.</p>
<p>5. Housing, Development and Best use of Land</p>	

<p>Minimise the loss of bioproductive land and biodiversity by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Re-using existing buildings <input type="checkbox"/> Developing on previously developed land and minimising development on quality agricultural land. <p>Through development, provide:</p> <ul style="list-style-type: none"> - Appropriate range and types of homes - In appropriate locations - sustainability <p>A scale and rate of development that is positive to the incorporation of newcomers into the village community</p>	<p>5.1 No loss of productive good quality farm land</p> <p>5.2 No disturbing protected species of flora and fauna</p> <p>5.3 A village rate of growth that is in line with district growth rates, is sustainable and enables the merging of those new communities into the village.</p> <p>5.4 Increase the supply of serviced, sheltered and supported accommodation.</p> <p>5.5 Incorporate housing designed for an aging population</p> <p>5.6 Promotes renewable energy and low carbon designs</p> <p>5.7 Maximise recycling</p> <p>5.8 Meet VALP requirements</p>
<p>6. Retail, Business and Employment</p> <p>Support and enhance retail, employment, business and service provision in Haddenham by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Safeguarding retail premises and enhancing existing businesses <input type="checkbox"/> Enabling a range and mix of facilities and services ensuring visitor and residents needs are met. <input type="checkbox"/> Through development, promote economic growth, employment and the provision of new retail and business opportunities <input type="checkbox"/> Provide a range of sizes and types of employment premises to suit SME's. <input type="checkbox"/> Develop primary business space that is commutable. <input type="checkbox"/> Encourage the introduction of high-speed broadband throughout the village 	<p>6.1 No loss of retail, cafes, public houses or restaurants.</p> <p>6.2 Increase in businesses in Haddenham</p> <p>6.3 Increase in employment opportunities within the village. Villagers employed in the village</p> <p>6.4 Identify and introduce specific visitor / tourist amenities</p> <p>6.5 Identify and measure the sizes and types of employment premises to suit needs of SME's.</p> <p>6.6 Improved broadband speed.</p>

<p>7. Biodiversity</p> <p>Conserve, protect and enhance biodiversity, natural habitats, wild fauna and flora including protected species and habitats through support for:</p> <ul style="list-style-type: none"> □ The appropriate management of natural habitats and wildlife □ Protection and the integrity of European sites and other designated sites for nature conservation. □ Increasing access to, enjoyment and understanding of, these assets 	<p>7.1 Protection and development of Snakemoor</p> <p>7.2 No impact on protected flora and fauna</p> <p>7.3 Provision of benches / picnic sites for the enjoyment of these assets</p>
<p>8. Flooding</p> <p>Minimise the risk of flooding to people and property through the location and design of new development that has regard to the potential risk to new and existing properties and communities.</p>	<p>8.1 No risk of potential flooding created in the village through development</p>
<p>9. Water, Soil and Air Quality</p> <p>Avoid development on contaminated land where remediation is not possible. Through development encourage reduction of water consumption and air polluting emissions.</p>	<p>9.1 Low emission development</p> <p>9.2 Reduced car emissions</p> <p>9.3 Collection and re- use of rain water</p>

Table A: Neighbourhood Plan SEA Objectives & Measures

Assessing the impact of the Neighbourhood Plan Strategic Objectives

7.10 The strategic objectives of the Neighbourhood Plan are outlined in para 3.3 above. They cover a range of economic, social and environmental issues in support of realising the community's vision for the parish. Each of these objectives is assessed against the SA objectives below.

7.11 In all respects, the relationship between the Neighbourhood Plan objectives and the sustainability framework is complementary, with the prospect of a number of positive environmental impacts. At the very least, impacts will be neutral – there are no identified negative effects of any

neighbourhood plan objective.

7.12 There is an especially strong correlation between the 'Village Spirit' and 'Sustainable Development' plan objectives and the SA objectives, as would be expected. The SA objective aimed at supporting and enhancing retail, employment, business and service provision in the village is pursued by all the plan objectives as success in this respect will go a long way to defining the future success of the village as a whole.

	Village Design	Transport & Travel	Access etc	Landscape and Heritage	Housing etc	Retail etc	Biodiversity	Flooding	Water, Soil & Air Quality
SA Objective	1	2	3	4	5	6	7	8	9
Neighbourhood Plan Objectives:									
Village spirit	Positive	Positive	No impact	No impact	No impact	Positive	Positive	Positive	Positive
Village focus	No impact	No impact	Positive	Positive	Positive	Positive	No impact	No impact	No impact
Sustainable development	Positive	No impact	No impact	No impact	No impact	Positive	Positive	Positive	Positive
Zero carbon village	Positive	Positive	No impact	No impact	No impact	Positive	No impact	No impact	No impact
Opportunities etc	No impact	No impact	No impact	No impact	No impact	Positive	No impact	No impact	No impact
Technology etc	No impact	No impact	No impact	No impact	No impact	Positive	No impact	No impact	No impact

Positive	Positive impact
No impact	No impact or some impact but mitigated
Negative	Negative impact

Table B: Summary Assessment of Objectives

Assessing the impact of the Neighbourhood Plan policies

7.13 The Neighbourhood Plan contains policies, which may have social, environmental and/or economic impacts. Using the sustainability framework of Table A, the assessment of each policy is summarised below in Tables C to H below. Tables E and F below summarise the chosen allocation policy and its alternative option respectively. Further analysis of this summary is provided in the following paragraphs.

7.14 Firstly, the assessment considers the Spatial Strategy of Policy 1 and its two reasonable spatial alternatives (in Tables C and D). Then, the site allocation policies are assessed by comparing each policy with the

alternative of retaining the allocation but comprising no mitigation measures (in Tables E and F) and/or of increasing the land available for development in that location (in Tables E and F). Two proposed sites (HD3 and HD5) are part of larger sites promoted for development and have been assessed. No other sites were put forward for consideration during that process, as they were not considered suitable in policy terms (i.e. they would not conform with saved development plan policy or the National Planning Policy Framework) and/or were not considered acceptable (i.e. their planning history and the community engagement activities indicated clear local objections that would likely risk a successful referendum vote). For these reasons, such sites were not considered as genuinely reasonable alternatives as defined by the 2004 Regulations.

7.15 Finally, the remaining policies are assessed and compared to the reasonable alternative of choosing to have no policy on that matter (in Tables G and H). This alternative assumes that the local community would be content to allow planning applications to be considered in the light of current and future district-level and national planning policies.

Spatial Strategy (Policy HD1)

7.16 The spatial strategy of Policy 1 seeks to confine development in the plan period to those sites allocated or supported by its other policies, unless there is a full justification otherwise. The policy in effect provides for approximately 430 dwellings to be provided over the plan period, which together with existing committed housing schemes will lead to an increase in the dwelling stock of over one quarter by 2033. It is therefore very positive in respect of meeting the SA housing objective of planning for 'a scale and rate of development that is positive to the incorporation of newcomers into the village community'. In addition, housing schemes will contribute to the village spirit by creating new open spaces and will support local retailers and businesses through greater footfall in the village.

7.17 It could be argued that the result of this scale of development will be negative effects on traffic, biodiversity and air quality. In absolute terms, any net additional development on the edge of the village will have such consequences. However, the policy makes specific provision for the sites allocated or reserved in policies HD2 to HD6, that have been assessed (below) as sustainable places for housing growth and they each allow for either net positive effects or net neutral effects to be achieved through their respective mitigation measures. In overall terms, therefore this assessment concludes that the chosen strategy has no negative effects.

	PROPOSED POLICIES	Village Design	Transport & Travel	Access etc	Landscape & Heritage	Housing etc	Retail etc	Biodiversity	Flooding	Water, Soil & Air Quality
	SA Objective	1	2	3	4	5	6	7	8	9
HD1	Spatial Strategy									

Table C: Summary Assessment of Proposed Policies

7.18 The alternative options – essentially leading to significantly greater housing growth of 960 dwellings (Option A) or of growth of only 100 dwellings (Option B) – score poorly by comparison, irrespective of how and where such growth would happen. Option A would represent an increase in the size of the village of over half, which would threaten its very character and role in order to provide more housing, with the consequences for landscape and heritage character and transport infrastructure. Whilst that option would undoubtedly have positive effects on supply of a mix of local housing types and tenures and of boosting local shops and businesses, it is not considered possible for such benefits to outweigh the considerable negative effects across a range of measures. It is very likely that the local road infrastructure could not accommodate the traffic generated by new development and the scale of incursion into the surrounding countryside would significantly change the character of the village.

7.19 In the case of too little development (Option B), there will not be enough new homes built to meet local demand. This may also have negative consequences for local shops and services. The option does however have a number of positive effects in respect of protecting the character of the village and its surrounding landscape.

7.20 In both options it is arguable that they are unreasonable in any event. Both options would risk the Neighbourhood Plan being out of conformity with the NPPF and development plan in respect of the village role in the settlement hierarchy and of the need to plan positively for housing growth. Even if positively examined, Option A would also be very unlikely to be supported at the referendum. However, in order for this report to compare and contrast these different approaches to plan making, both options are assessed.

	ALTERNATIVE POLICY OPTIONS	Village Design	Transport & Travel	Access etc	Landscape & Heritage	Housing etc	Retail etc	Biodiversity	Flooding	Water, Soil & Air Quality
HD1	Spatial Strategy Option A*									
HD1	Spatial Strategy Option B*									

* Alternative options for HD1 are: A 960 dwellings and B 100 dwellings

Table D: Summary Assessment of Proposed Policies

Site Allocation Policies (HD2 – HD6)

7.21 The Neighbourhood Plan makes four housing site allocations (HD2 – HD5) and one housing reservation (HD6) and has been modified in terms of the designation of the sites and their housing capacities in some cases. However, the sites remain the same as those proposed in the Pre Submission Plan.

7.22 In the case of The Airfield of Policy HD2, the site is large enough and well enough located to deliver important positive impacts, for example in respect of providing a wide range of housing and significant new green infrastructure. Its edge location will result in a lower traffic impact on the Conservation Area but the policy requires improvements to walking and cycling access to ensure it connects well to the village. It is, however, close to the railway station and bus routes and there is the opportunity to improve the biodiversity value of land that has been degraded in the past. The provision of new community facilities and the provision of recreational facilities will have a significant positive effect on the functioning of the village.

7.23 The Dollicot allocation (HD3) provides for either 50 extra care dwellings or 25 conventional dwellings. The policy recognises the potential negative effects of a larger scheme on this site (perhaps up to 100 dwellings) and of a scheme not addressing traffic and heritage asset issues, to ensure that its overall effect will be neutral in those respects. Those mitigation measures are therefore important in ensuring that the proposal will be sustainable development. The alternative larger scheme would have negative effects on traffic generation through the Conservation Area and on narrow lanes, a matter which even the proposed smaller allocation scheme will have to address.

7.24 The Station Road allocation (HD4) has been reduced from 15 to 10 dwellings in the Submission Plan. This site is also part of a much larger potential development site, which was considered unsuitable on heritage and access grounds. A smaller scheme, however, could be accommodated and the policy makes specific requirements in respect of assessing heritage asset impacts, retaining important trees on the site and connecting the site with the

village. Again, therefore, these mitigation measures have resulted in a policy that avoids any negative effects.

7.25 The Glebe allocation (HD5, formerly HD6 in the Pre Submission Plan) has increased from 50 to 85 dwellings in the Submission Plan. It is another site that is part of a larger site that is considered by the Parish Council to be unsuitable and unacceptable if developed as a whole. Such a proposal appears to be capable of delivering between 224 and 400 homes, which is of a scale that would be one means of delivering Option A to the Spatial Strategy of Policy 1. This scale of development in this location would have negative effects on the Conservation Area and on traffic and access that would not be capable of being mitigated with measures in a policy that could overcome these disadvantages.

7.26 However, in dividing the larger site into three and increasing the chosen site to 85 dwellings, the policy will have positive effects on housing without undermining the character of the village or the Conservation Area or creating traffic problems that cannot be effectively accommodated. This appears to be a reasonable compromise that will enable a viable, sustainable development scheme to come forward that will win the support of the local community at the referendum.

7.27 The South Lower Road policy (HD6, formerly HD5 in the Pre Submission Plan) is now a policy that only reserves rather than allocates land for housing development in the Submission Plan. In doing so, the policy maintains the reserved site capacity at 43 dwellings and removes the previous allocation of an additional 30 dwellings. The site location has a number of positive effects in terms of creating an opportunity to improve water quality and biodiversity at Folly Farm Ditch and in encouraging trips to local services. Its mitigation measures identify the importance of protecting open views, of providing a landscape buffer and of managing traffic in to the core of the village. Without such measures, it is likely that the policy would have some negative effects on these matters.

	PROPOSED POLICIES	Village Design	Transport & Travel	Access etc	Landscape & Heritage	Housing etc	Retail etc	Biodiversity	Flooding	Water, Soil & Air Quality
	SA Objective	1	2	3	4	5	6	7	8	9
HD2	Airfield Allocation									
HD3	Dollicott Housing Allocation									
HD4	Station Road Allocation									
HD5	Glebe Housing Allocation									
HD6	South Lower Road Reservation									

Table E: Summary Assessment of Proposed Policies HD2 – HD6

	ALTERNATIVE POLICY OPTIONS	Village Design	Transport & Travel	Access etc	Landscape & Heritage	Housing etc	Retail etc	Biodiversity	Flooding	Water, Soil & Air Quality
	SA Objective	1	2	3	4	5	6	7	8	9
HD2	Airfield Allocation									
HD3	Dollicott Housing Allocation									
HD4	Station Road Allocation									
HD5	Glebe Housing Allocation									
HD6	South Lower Road Reservation									

Table F: Summary Assessment of Alternative Policy Options HD2 – HD6

Other Policies (HD7 – RBJ2)

7.28 The housing policy HD7 will deliver some positive benefits in ensuring infilling will contribute to providing a good mix of housing types and tenures in addition to the site allocations over the plan period. In doing so, it contains measures to ensure that infilling is managed to avoid negative effects on local character and amenity. On some sites in the village it is possible that this policy will lead to the positive enhancement of the local area by perhaps replacing buildings and uses that do not contribute to its character. The alternative of having no policy should have a neutral effect as other development plan policies may be applied for the same purpose.

7.29 The affordable housing policy (HD8) has been modified to reflect a recent change to the Planning Practice Guidance to remove the requirement for schemes of 10 or fewer dwellings to deliver affordable homes in places like Haddenham. It has a positive impact on delivering a mix of housing types and tenures and the alternative, of relying on the saved development plan policy (GP2) that has a 25 dwelling threshold for this purpose, will arguably have a negative effect on that objective.

7.30 A new policy on water and waste (HD9) has been added to endure that future developments have regard to the local availability and capacity of water and waste supplies. The policy has only neutral effects, as would the alternative of having no policy, as it restates what is required in any event from development schemes in terms of securing utility services.

7.31 The design policy (HD10) champions high quality design that will enhance Haddenham's distinctive character and layout. Its provisions should not undermine the ability to deliver viable housing or other development schemes and it acknowledges the importance of green infrastructure and heritage assets. No policy on this matter will rely on generic development

management policies being applied which may mean that these matters get less attention but not to the extent that a negative effect will arise.

7.32 The four 'Transport & Getting Around' policies - TGA1 to TGA 4 – have generally neutral and some positive impacts as they seek to ensure development proposals are acceptable in terms of addressing traffic impacts and of improving connectivity in the village.

7.33 However, Policy TGA2 on Parking Standards has one inevitable negative effect in shifting the emphasis of parking policy from the maximum standards of the last couple of decades back to minimum standards. This may encourage greater car ownership and use than may otherwise have been the case but, arguably, the impact is only marginal, given the scale of the existing village and its car ownership levels. The policy responds to community concerns about the failure of recent development schemes to properly provide for the realities of car ownership and to bring about behavioural change through restricting on site car parking places. This will lead to schemes that should provide for the better integration of car parking so the negative effects of on street parking on the appearance and functioning of the village do not continue, which may be the case if there is no policy.

7.34 The community facilities and amenities policies - CES1 to HWS2 – all score well on a number of measures. Play facilities and local green spaces make important contributions to village life and character and so there are no negative effects of these policies. The alternative of having no policies on these matters will have no negative effect but the lack of encouragement offered by the plan may lead to proposals not coming forward.

7.35 Similarly, policies SRL 1 to SRL3 promote positive changes to existing sites to secure improved community facilities through redevelopment. The sites – the Recreation Ground Pavilion and Banks Park – are well-suited for these purposes. Policy SRL2 is not entirely permissive as it requires attention is paid to protecting local amenity and the success of the existing facility, thereby ensuring it will have no negative effects.

7.36 The retail and employment policies RBJ1 and RBJ2 both score well against a number of measures. The encouragement for redeveloping Banks Parade for a continued partial retail use should attract greater footfall into the 'village hub' and so will have a number of positive village design, access and retail benefits. The focus of Policy RBJ2 on retaining and growing businesses at the existing employment locations in the village, and the mitigation measures relating to amenity and landscape, should result in any negative impacts of such development being avoided and in success in local job creation. Again, the alternative of having no policies for these sites will have neutral effects, as other development plan policies serve a similar purpose. However, the loss of the encouragement offered by RBJ1 for the redevelopment of the Retail Arcade may lead to harmful commercial consequences that could be argued to be a negative effect.

	PROPOSED POLICIES	Village Design	Transport & Travel	Access etc	Landscape & Heritage	Housing etc	Retail etc	Biodiversity	Flooding	Water, Soil & Air Quality
HD7	Infill Development	Green	Orange	Orange	Orange	Green	Orange	Orange	Orange	Orange
HD8	Affordable Homes	Orange	Orange	Orange	Orange	Green	Orange	Orange	Orange	Orange
HD9	Water and Waste	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange
HD10	Design Principles	Green	Orange	Orange	Green	Green	Orange	Green	Orange	Orange
TGA1	Commuter Parking	Orange	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange
TGA2	Parking Standards	Green	Red	Orange	Green	Green	Orange	Orange	Orange	Orange
TGA3	Walking & Cycling	Orange	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange
TGA4	Cycle & Pedestrian Networks	Orange	Green	Green	Orange	Orange	Orange	Orange	Orange	Orange
TGA5	Urbanisation	Green	Orange	Orange	Green	Orange	Orange	Orange	Orange	Orange
CES1	Play Facilities	Orange	Orange	Green	Orange	Orange	Orange	Orange	Orange	Orange
HWS1	Local Green Spaces	Green	Orange	Green	Green	Orange	Orange	Green	Orange	Orange
HWS2	Community Amenities	Orange	Orange	Orange	Green	Orange	Green	Orange	Orange	Orange
SRL1	Recreation Ground Pavilion	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange
SRL2	Banks Park	Orange	Green	Orange	Green	Orange	Green	Orange	Orange	Orange
SRL3	Natural Environment	Green	Orange	Green	Orange	Orange	Orange	Green	Orange	Orange
RBJ1	Retail Arcade	Orange	Green	Orange	Green	Orange	Green	Orange	Orange	Green
RBJ2	Employment	Orange	Green	Orange	Orange	Orange	Green	Orange	Orange	Orange

Table G: Summary Assessment of Proposed Policies HD7 – RBJ2

7.37 In general, therefore, the alternative option of not having a policy has no impact, or at the most results in the opportunity to secure a positive impact being lost. However, there are some cases where the loss of a policy may have a negative impact, as shown in Table D. For example, policies SRL1 to SRL3 all benefit from having site-specific, positive proposals. The loss of these policies may result in no development proposals coming forward that may result in long term problems. Conversely, the one policy (TGA2) that had one negative impact (by not discouraging car ownership/use) receives an improved score if there is no policy, as applications will revert to the county standards.

	ALTERNATIVE POLICY OPTIONS	Village Design	Transport & Travel	Access etc	Landscape & Heritage	Housing etc	Retail etc	Biodiversity	Flooding	Water, Soil & Air Quality
HD7	Infilling									
HD8	Affordable Homes									
HD9	Water and Waste									
HD10	Design Principles									
TGA1	Commuter Parking									
TGA2	Parking Standards									
TGA3	Walking & Cycling									
TGA4	Cycle & Pedestrian Networks									
TGA5	Urbanisation									
CES1	Play Facilities									
HWS1	Local Green Spaces									
HWS2	Community Amenities									
SRL1	Recreation Ground Pavilion									
SRL2	Banks Park									
SRL3	Natural Environment									
RBJ1	Retail Arcade									
RBJ2	Employment									

Table H: Summary Assessment of Alternative 'No-Policy' Option (HD7-RBJ2)

7.38 The conclusion of the assessment of the objectives and policies of the Neighbourhood Plan is that they will have no significant environmental effects and will promote sustainable development. There is a close correlation between the plan's objectives and those of the Sustainability Appraisal, perhaps as should be expected from a community-driven document. The policies have clearly been selected and drafted to ensure that any potential for negative impacts is avoided through site selection and effective policy wording.

7.39 This is a crucial factor in assessing the sustainability attributes of neighbourhood plans and is distinctive from the same task in respect of other forms of development plan. The Parish Council has been required to use its planning judgement to strike the right balance between the technical suitability and political acceptability of the Neighbourhood Plan. In some cases, this can lead to policies that may not be the most sustainable of all the potential choices made but they are nonetheless sufficiently sustainable so that they will lead to no significant environmental effects. That is the most important test required by the EU Directive on SEA and the 2004 Regulations.

7.40 However, the conclusion remains that in a number of cases, the Neighbourhood Plan should deliver positive effects for local residents and businesses as the village grows in a sustainable manner in the coming years. There are some theoretically reasonable alternative policy options, which have been assessed in this Report to compare and contrast the options chosen, but in no case does an alternative perform as well against the chosen policy and there is therefore no case for policy changes as a result.

8. A description of measures envisaged concerning monitoring

8.1 The Neighbourhood Plan proposes that the progress in its implementation will be assessed using the measures identified in Table A. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data on an annual basis to report on the progress of the plan. Should any real or potential negative impacts be identified then the Parish and District Councils will seek to review the relevant policies and their implementation.

Appendix 1 – Comments received from Natural England, English Heritage and The Environment Agency on the SA/SEA Scoping Report

SEA Stat Consultee	SEA Stat comment on the SEA Scoping Report	Neighbourhood Plan group comment
Natural England	The process and methodology that has been adopted in drawing up this document is in line what would be expected and the various topic areas that are going to be considered cover the right kind of subject areas for a plan of this kind.	Noted
Natural England	One of the main sites chosen for development – The Airfield, is in an area of identified high quality soils and as such too much development here would be going against paragraph 112 of the NPPF which states that “Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”. Further development here would, as the quote above states, need to provide robust evidence as to why other sites aren't as viable an option and why high grade agricultural soils would have to be lost.	The Airfield site had in the Scoping report simply been identified as a potential development site. The quality of agricultural land is incorporated as part of the site assessment criteria.
English Heritage	The baseline information for the historic environment of Haddenham is	This information has been fed into the Neighbourhood plan drafting.

	<p>fragmented within the Report and incomplete - we suggest that a new section be drafted specifically on the historic environment. This should include information on the Conservation Area (why was it designated – what is its special architectural or historic interest ? when was it designated ? has the designation been reviewed ? when was the Character Appraisal undertaken ? is there a Management Plan ?).</p>	
English Heritage	<p>Reference is made to 110 nationally listed buildings in the village, but the National Heritage List for England has 121 listed buildings within the parish. It also has a Scheduled Monument. Could these be shown on a map to demonstrate their spatial distribution ?</p>	<p>Neighbourhood Plan and Sustainability Appraisal now refers to the correct heritage assets. The neighbourhood plan maps the Conservation area.</p>
English Heritage	<p>Is there a list of locally important buildings and features - non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity ? There should be a reference to any non-scheduled archaeological remains, information on which is available from the Buckinghamshire Historic Environment Record</p>	<p>There are no locally listed buildings. All heritage assets are itemised as a consideration in the site assessment criteria.</p>
English Heritage	<p>We welcome the indication that the Conservation Area is a “highly prized asset” and is to be protected for future generations.</p>	<p>Community concerns over the threat to the village’s heritage assets were expressed strongly at the site assessment criteria community workshop which</p>

	<p>However, we would welcome greater consideration of the current and potential future condition of the heritage assets within the parish – are there are particular threats to their significance e.g. from development, lack of maintenance etc ? Has there been any change in their condition in recent years, particularly for the worse ?</p>	<p>took place on 27 September 2014. As an outcome of this workshop heritage was identified as the most important from a list of 5 topic areas; subsequently heritage considerations were given a weighting of 5 in the site assessment criteria</p>
English Heritage	<p>Has there been any ongoing loss of character, particularly within the Conservation Areas, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc ? Perhaps the Parish Council could undertake a survey of Grade II buildings to ascertain whether any are at risk from neglect, decay or other threats.</p>	<p>“Garden grabbing”, “plot subdivision” and “Garden infilling” were all highlighted in community consultation process as key concerns of the community.</p> <p>Comment with regards to survey of Grade II buildings forwarded to consideration by the Parish Council. The condition of the buildings is currently (2015) being surveyed by AVDC.</p>
English Heritage	<p>Although the history of the landscape around the village appears to have been a consideration in the 2006 Landscape Character Assessment, reference could also be made to the Buckinghamshire Historic Landscape Character Assessment.</p>	<p>Noted</p>
English Heritage	<p>We note the historic growth of Haddenham as shown in the Conservation Area document, but has</p>	<p>Noted.</p> <p>Final draft of Neighbourhood Plan</p>

	<p>there been a characterisation of the village as a whole? English Heritage considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. We therefore suggest a characterisation study as a precursor to neighbourhood plans as such a study can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.</p>	<p>includes supporting paragraph to policy HD10 which signposts applications to the following reports.</p> <ul style="list-style-type: none"> • <i>Aylesbury Vale Environmental Character Assessment – Historic Environment Assessment Haddenham June 2006</i> • <i>Haddenham Conservation Area Appraisal</i> • <i>Buckinghamshire Historic Town report for Haddenham for its coverage on the origins, history, development and townscape character of Haddenham</i> • <i>Buckinghamshire's historic landscape character assessment</i>
English Heritage	<p>We promote the use of characterisation toolkits such as "Placecheck", "Understanding Place" or the Oxford Toolkit, links to which can be found in the appendix to this letter.</p>	<p>Is referenced against the criteria under "what is the character of the immediate vicinity" in the site assessment criteria.</p>
English Heritage	<p>We welcome heritage being a Sustainability Appraisal heading but feel that it would be clearer if separated from landscape: both are important considerations and deserve separate consideration (as for biodiversity). We also welcome the Objectives</p>	<p>Noted. NP are comfortable to keep the headings as they are.</p>

	<p>for this heading (and “Enhancing Haddenham’s distinctive character and layout” – assuming that there is a clear understanding of what makes that character distinctive – under Heading 1 Village Design).</p>	
English Heritage	<p>As regards the draft indicators, 4.4 is an action rather than an indicator. Appendix 4 of the English Heritage guidance on Strategic Environmental Assessments and the historic environment contains a range of possible indicators for assessing and monitoring the performance of the policies and proposals of the Plan against a historic environment objective. Not all of these will be relevant, but we suggest that the following be considered:</p> <ul style="list-style-type: none"> • the number and percentage of different heritage assets at risk; • the number of major development projects that enhance the significance of heritage assets or historic landscape character; • the number of major development projects that detract from the significance of heritage assets or historic landscape character; • the percentage of 	<p>Indicator for 4.4 has been amended to incorporate the suggested indicators.</p>

	<p>planning applications where archaeological investigations were required prior to approval; and</p> <ul style="list-style-type: none"> the percentage of planning applications where archaeological mitigation strategies were developed and implemented. 	
English Heritage	The evidence base should include the National Heritage List for England and the Buckinghamshire Historic Environment Record and Historic Landscape Character Assessment.	Noted. These documents are referenced in the Neighbourhood plan text and included in the bibliography.
Environment Agency	We wish to add the Water Framework Directive to the evidence base for the neighbourhood plan. Both the River Thame (Aylesbury to Scotsgrove Brook) and the Scotsgrove Brook provide boundaries to the plan area. Both of these watercourses are of poor ecological status according to the River Basin Management Plan of the Water Framework Directive and both are looking to achieve an improvement to Good Ecological Status by 2027. Consideration of this should be included in this document.	Has been included